**EXHIBIT** 

1

STUDENTS FOR FAIR ADMISSIONS, INC.

Plaintiff,

V.

Civil Action No. 1:14-cv-954-LCB-JLW

THE UNIVERSITY OF NORTH CAROLINA AT CHAPEL HILL, et al.,

Defendants.

### EXHIBITS IN SUPPORT OF PROPOSED DEFENDANT-INTERVENOR'S MOTION TO INTERVENE

- Exhibit 1.1: Declaration of C.J. High School Student Under 18
- Exhibit 1.2: Declaration of Q.M. High School Student Under 18
- Exhibit 1.3: Declaration of R.J. High School Student Under 18
- Exhibit 1.4: Declaration of A.J. High School Student Under 18
- Exhibit 1.5: Declaration of I.N. High School Student Under 18
- Exhibit 1.6: Declaration of Cecilia Polanco College Student Over 18
- Exhibit 1.7: Declaration of Luis Acosta College Student Over 18
- Exhibit 1.8: Declaration of Star Wingate-Bey College Student Over 18
- Exhibit 1.9: Declaration of Laura Ornelas College Student Over 18

STUDENTS FOR FAIR ADMISSIONS, INC,

Plaintiff,

 $\mathbf{v}_{\boldsymbol{\cdot}}$ 

THE UNIVERSITY OF NORTH CAROLINA AT CHAPEL HILL, et al.,

Defendants.

Civil Action No. 1:14-cv-954-LCB-JLW

#### **DECLARATION OF C.J.**

C.J., pursuant to 28 U.S.C. § 1746, declares the following:

- 1. My name is C.J., I am under 18 years of age, and I am fully competent to make this declaration.
- 2. I was born in Forsyth County, in the State of North Carolina, and I have lived in North Carolina for 17 years.
  - 3. My father, Christopher Jackson, is representing me in this litigation.
- 4. I attended public elementary school in Forsyth County and public middle school in Wake County, North Carolina. I currently attend a public high school in Wake County, North Carolina, and am a rising senior.
  - 5. I am African American.

- 6. My school is racially mixed. About half of the students are white, while the other half are minorities, most of whom are Black.
- 7. I attend an International Baccalaureate World School. My school coursework has included the following Honors, Advanced Placement, and/or International Baccalaureate courses: Geometry, Algebra II, Pre-Calculus, Physics, AP World History, English I-III, Environmental Science, US History, and Statistics. My future coursework includes: AP Physics, AP Human Geography, AP Calculus, AP English Literature, Honors JROTC IV, and Honors Latin III. My cumulative GPA is 4.03. I anticipate graduating in the top 25% of my class.
- 8. I have been an honor roll student every year at my high school. I have taken the SAT college admission exam and scored 1730.
- 9. My extracurricular activities have included: Latin Honor Society, Senior Class Council, Softball, Cheerleading, JROTC, and Distinct Youth, a community service organization.
- 10. I volunteer for the Alzheimer's Association, the Museum of Natural Science, Stop Hunger Now, and S.T.E.P.S. Camp, an academic camp for children. I assist teachers with lessons during the camp, and supervise elementary and middle school students throughout the day. I often participate in JROTC extracurricular activities. I enjoy taking tumbling classes, attending volleyball camp, and babysitting during the summer.

- 11. I am a cancer survivor. I was diagnosed with ovarian cancer when I was in the fourth grade, and received treatment at UNC hospitals.
- 12. I embrace my racial background, even when I feel underrepresented as a minority in my classes at school. I am often the only or one of the only minorities in my advanced courses. When I am on my own in these courses, I often feel like I have to be a "representative" for my race, and I feel out of place briefly. I sometimes wonder why there aren't more minorities in my classes. Students at my school treat me fairly, but I have noticed that when I am the only black person in a class, people are often uncomfortable talking about racial issues. I think it might help everyone be more comfortable if my advanced courses were more diverse.
- 13. My racial background will contribute to UNC-Chapel Hill by helping to silence stereotypes which assume that only white students are smart enough to get into a school like UNC-Chapel Hill. I also believe it is good to add many different types of diversity to the campus. A university should include diversity in race and ethnicity, diversity of experience, of beliefs, hobbies, and interests, of family history, and of economic background. In particular, my experience with a serious illness as a child is uncommon among my peers and gives me a different perspective on life. As a unique individual, I bring a unique experience to UNC-Chapel Hill.
- 14. I want to attend a university that has a significant representation of students from a variety of racial and/or ethnic backgrounds. It will benefit my individual growth for me to be around more people from a variety of different backgrounds and cultures.

UNC-Chapel Hill is my first choice for college and I intend to apply to UNC-Chapel Hill as soon as I am able to. Their in-state tuition is an important factor in my decision to apply to UNC, because it will help my parents be better able to pay for college, though I will still need to apply for financial aid and scholarships. Additionally, I am interested in pursuing accounting or finance as a career, and UNC's Kenan-Flagler undergraduate business program is very renowned and appealing to me. I am also emotionally tied to UNC, as I received chemotherapy at UNC hospitals from 2008-2009. I have wanted to go to UNC-Chapel Hill for a long time.

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

this  $\underline{24}$  day of  $\underline{JUNe}$ , 2015.

STUDENTS FOR FAIR ADMISSIONS, INC,

Plaintiff,

v.

Civil Action No. 1:14-cv-954-LCB-JLW

THE UNIVERSITY OF NORTH CAROLINA AT CHAPEL HILL, et al.,

Defendants.

#### **DECLARATION OF Q.M.**

Q.M., pursuant to 28 U.S.C. § 1746, declares the following:

- 1. My name is Q.M., I am under 18 years of age, and I am fully competent to make this declaration.
- 2. I was born in New York County, in the State of New York, and I have lived in North Carolina for five years.
  - 3. My parents, Angie and Kevin Mills, are representing me in this litigation.
- 4. I attended public elementary school in New York and public middle school in New York and North Carolina. I currently attend a public high school in Wake County, North Carolina, and am a rising senior.
  - 5. I describe my race and/or ethnicity as Black.

- 6. My school coursework includes the following Honors and Advanced Placement courses: AP Human Geography, AP Chemistry, AP US History, Honors Anatomy & Physiology, Chemistry I-II, Earth and Environmental Science, English I-III, Pre-Calculus, Algebra II, Drafting II, Architecture, Spanish III, Biology, Geometry, and World History. I hold a cumulative GPA of 4.40 and anticipate graduating in the top 10% of my class.
- 7. I have made my school's honor roll multiple years, and have had perfect attendance multiple years. I also received my school's Academic Improvement in Motion Award and its Lamp of Knowledge Award.
- 8. My extracurricular activities include participating in Robotics Club, the Science Honors Society, Science Olympiad, Beta Club, and the National Achiever's Honors Society. I enjoy volunteering with many of these organizations.
- 9. This summer I will be participating in Project Uplift, a UNC-Chapel Hill program that will allow me to visit classes, meet faculty, staff, and UNC-Chapel Hill students, and participate in cultural and social activities on campus. This program is designed for high-achieving rising seniors from underrepresented populations. I was nominated by my guidance counselor for this program and accepted for participation by UNC-Chapel Hill. During a previous summer, I participated in the MSEN Pre-College Program, which is held on the campus of North Carolina State University. As part of this program, I took classes in math, science, robotics, communications, and career awareness.

- 10. As a black male, I have had people question my racial identity because of my intelligence, assuming that intelligent black people are not really black. Those experiences have given me the determination to show people how wrong those stereotypes are. There are plenty of intelligent black people like me.
- 11. If I am admitted to UNC-Chapel Hill, I would bring to the campus a sense of independence and diligence. I would stand out as a student not because of my race, but because of my accomplishments.
- 12. I want to attend a university that has a significant representation of students from a variety of racial and ethnic backgrounds. At my school there is a good mix of students and I like that aspect of my education. It is also important to me that I have a core group of peers with a background similar to mine.
- 13. I intend to apply to UNC-Chapel Hill for undergraduate school as soon as I am able to. Attending UNC-Chapel Hill to major in Biology would be an important first step in my goal of becoming a doctor. If I attend UNC-Chapel Hill for undergraduate school, I would want to stay in the UNC system for medical school.

	I declare under penalty of perjury that the foregoing is true and correct. Ex	kecuted
this	29 day of June, 2015.	

Q.M. Q.M.

STUDENTS FOR FAIR ADMISSIONS, INC.,

Plaintiff,

v.

Civil Action No. 1:14-cv-954-LCB-JLW

THE UNIVERSITY OF NORTH CAROLINA AT CHAPEL HILL, et al.,

Defendants.

#### **DECLARATION OF R.J.**

R.J, pursuant to 28 U.S.C. § 1746, declares the following:

- 1. My name is R.J., I am under 18 years of age, and I am fully competent to make this declaration.
- 2. I was born in Durham County, in the State of North Carolina, and I have lived in Washington, DC since October 2013.
  - 3. My mother, Ramonia Jones, is representing me in this litigation.
- 4. I attended public elementary, middle, and high school in Durham County,
  North Carolina. I currently attend Woodrow Wilson High School, a public high school in
  the District of Columbia, where I am a rising senior.
  - 5. I am African American.

- 6. I attend a high school that is fairly diverse, but most of my classmates in my AP and Honors classes are white. I often feel underrepresented in my courses, and am conscious of how it feels to be one of the few people of color in a community.
- 7. My school coursework includes the following Honors and AP courses:
  Honors Biology, Honors Algebra I-II, Honors Chemistry, Honors Geometry, Honors
  English II, AP Human Geography, AP World History, AP US History. Next year, my
  coursework will include: AP English Language and Literature, AP Calculus,
  Environmental Science, District of Columbia History, and United States Government. I
  also speak some Spanish. I have a 3.95 cumulative GPA.
- 8. I have been on my school's honor roll every year I have been enrolled, and I belong to the National Junior Honors Society. I anticipate graduating in the top 20% of my class.
- 9. My extracurricular activities include cheerleading and performing with the Fly by Light Performance Troupe and the Triple A Music Group. I have performed with my choir for National Congress of Black Women's Award Ceremony, where Washington D.C. Mayor Muriel Bowser received an award. I am also part of a conflict resolution group that writes poetry, skits, and presentations about real-life problems. These activities include a diverse group of students.
- 10. I have done volunteer work and community service at the Oxford Children's House, the Ronald McDonald House, and I have worked at yard sales to help the homeless.

- 11. I work as a hostess at Jake's Grill in Washington, DC.
- 12. My racial background has contributed to my personal development. My awareness of the history of African-American oppression in the United States and my family's emphasis on achievement and higher education have influenced how I see the world around me. Society does not expect me to be great and Black. At work, my coworkers assumed that I drink and smoke because I am Black. Other students in my school are surprised to learn how high my class rank is, and I am one of the only Black students in my AP classes. Tenants in my family's apartment complex have asked my family members if they work in the building, assuming we are not tenants because we are African American. I have learned to counter these attitudes by being Black, smart, educated, and intellectual. I feel a responsibility to speak out in my classes about the discrimination that African Americans have faced and continue to face.
- 13. My background would contribute to the community at UNC-Chapel Hill by adding another hard-working, devoted student to the campus. I want to do well in college, and I want to help others to do the same. I consider it my duty to motivate my African-American peers to do well in school, and I believe in uplifting Black voices and Black achievement in academics in order to break down the stereotype that African-American students do not do well in school.
- 14. I want to attend a college or university that has a significant representation of students from a variety of racial and/or ethnic backgrounds, and that will be an important factor in deciding where I go to college or university. I would not want to

attend a predominately African American university, because it would not prepare me for the real world and the work place, where I will interact with people from many different races and ethnic backgrounds.

15. UNC-Chapel Hill is my first-choice college. I intend to apply to UNC-Chapel Hill as an undergraduate as soon as I am able. I want to major in biology and enroll in UNC-Chapel Hill's Pre-Med program, with the ultimate goal of becoming an OBGYN. A high quality education for a low price is important to me, and UNC-Chapel Hill is even more appealing because it is close to Durham, where I still have close family members.

I declare under penalty of p	erjury that the foregoing is true and correct. Executed
this 26 day of June, 2015.	
O	R4
	(R.J.

STUDENTS FOR FAIR ADMISSIONS, INC,

Plaintiff,

v.

Civil Action No. 1:14-cv-954-LCB-JLW

THE UNIVERSITY OF NORTH CAROLINA AT CHAPEL HILL, et al.,

Defendants.

#### **DECLARATION OF A.J.**

A.J., pursuant to 28 U.S.C. § 1746, declares the following:

- 1. My name is A.J., I am under 18 years of age, and I am fully competent to make this declaration.
- 2. I was born in Wake County, North Carolina, and I have lived in North Carolina for 16 years.
  - 3. My mother, Tamika Williams, is representing me in this litigation.
- 4. I attended public elementary and middle school in Wake County, North Carolina. I currently attend a public high school in Wake County, North Carolina, where I am a rising junior.
  - 5. I am African American and American Indian.

- 6. My high school is majority white, with a wide variety of other ethnicities and races. The student population was even less diverse until the school started to bring minority students from other schools to add diversity.
- 7. My school coursework includes the following Honors and AP courses:
  Honors American History, Honors Math, Pre-AP English, Honors Chemistry, and Honors
  Biology. My future coursework includes: AP English, Honors History, Honors
  Environmental Science, AFM Math, Visual Arts III, Honors Digital Medias, and Forensic
  Science. I have a 3.8 cumulative GPA.
- 8. I made my school's honor roll this year and last year, and received my school's awards for Most Improved Student, Computer Programming, and Art. I have a passion for art. My work has been displayed in the Duke Energy Center for Performing Arts and was published in the Spring 2011 edition of "Celebrating Art."
- 9. Through my high school I participate in a number of programs focused on leadership development and community service, including the YMCA's Y-Achievers Program, Beta Club, the National Honor Society, and the National Achiever's Society, which is specifically designed to recognize and encourage achievement among students of color. I take extra art classes at Art Space and the Blue Ridge Art Museum and I volunteer at the Marbles Museum. I enjoy participating in Dream Achievers, the YMCA's robotics program. I am also involved with my church, the Cross Roads Fellowship Church.

- 10. My racial and ethnic background has contributed to my personal development. Although I am multi-racial, I grew up in a predominately African-American environment. That background encouraged me to find out more about other parts of my heritage. When I found out that my grandfather came from the Siksika and Cherokee Native American tribes, I decided to get a DNA test to learn more about my background and history.
- 11. I am proud of my heritage, and though other students have often asked me insensitive questions about my race and ethnic background and have made negative assumptions about me based on my appearance, it makes me feel knowledgeable when I am able to correct their inaccurate stereotypes and provide a positive and genuine representation of my race.
- 12. I want to attend a university that has a significant representation of students from a variety of racial and ethnic backgrounds. Campus diversity will be an important factor in deciding where I enroll.
- 13. As an African-American and Native-American female, I believe my ethnic background would contribute to the community at UNC Chapel-Hill because I plan to major in Computer Science and the Computer Science major seems to be dominated by white males. In my high school, I am often one of the only women or one of the only students of color in these courses. I think there is value in adding diversity to the Computer Science field.

14. I intend to apply to UNC-Chapel Hill as an undergraduate. It is my first-choice school. I think the campus is beautiful and very diverse. When I toured the campus, I found the people there to be very welcoming. In-state tuition is also an important factor in my decision to apply to UNC-Chapel Hill. I am hoping that attending UNC will save me money since I am a resident of North Carolina. I also know that the school has a great reputation – I would like to be accepted into its computer science program and make a strong contribution to UNC-Chapel Hill's great arts program.

I declare under penalty of perjury that the foregoing is true and correct. Execute	d
this <u>13</u> day of <u>June</u> , 2015.	
A.J.	
A.J.	

STUDENTS FOR FAIR ADMISSIONS, INC,

Plaintiff,

v.

THE UNIVERSITY OF NORTH CAROLINA AT CHAPEL HILL, et al.,

Defendants.

Civil Action No. 1:14-cv-954-LCB-JLW

#### **DECLARATION OF I.N.**

I.N., pursuant to 28 U.S.C. § 1746, declares the following:

- 1. My name is I.N., I am under 18 years of age, and I am fully competent to make this declaration.
- 2. I was born in Kings County, in the State of New York, and I have lived in North Carolina for three years.
  - 3. My Mother, Julia Nieves, is representing me in this litigation.
- 4. I attended public elementary and middle school in Ohio and Wake County, North Carolina. I currently attend a public high school in Wake County, North Carolina, and am a rising sophomore.
  - 5. I am African American and Hispanic.

- 6. The student body at my school is fairly diverse because the school is located in a minority neighborhood. However, the Honors classes I take are populated by mostly white and Asian students. There are very few African-American and Latino students in those courses. I often feel underrepresented.
- 7. My school coursework includes the following Honors courses: English I, Civics and Economics, and Earth Science. I speak some Spanish. I have a B average, and I made my high school's honor roll this year.
- 8. My primary extracurricular activity is dance. I've been dancing since I was two years old and it requires a lot of my time. Dance made me very good at balancing responsibilities. I am at my studio four to five times a week and attend a dance camp for 4-5 weeks during the summer. I study choreography, ballet, several techniques of Modern dance, Jazz, and West African dance. I taught and planned a class for pre-school aged children from 2012-2013. During my Professional Division level classes at the Raleigh School of Ballet, I was one of the only students of color in attendance.
- 9. I volunteer for Advocates for Children's Services, assisting with clerical duties, community presentations, and general outreach. I also volunteer for Small Farmz Urban Agricultural Projects, where I've been trained in soil creation, composting techniques, and harvesting. I also work as a babysitter.
- 10. For the past few years, my family has moved frequently I attended four different middle schools. During the second semester of the 2014-2015 school year, I experienced an illness that took me out of school for a month. Yet I still successfully

completed all of my classes and exams. Additionally, I support my family a lot because my mother was recently diagnosed with a chronic illness. I am proud of my ability to overcome the challenges that these experiences posed for my school studies.

- 11. My racial and cultural background has contributed to my personal development. I am multi-racial, and people often assume I am foreign, label me "exotic," or stare at me. Their assumptions and insensitivity have made me more aware of racial issues in this country. Racism and racial stereotypes exist in our society.
- 12. My presence at UNC-Chapel Hill would help to make the campus more diverse. I think it is important to increase the number of multi-racial students on campus so other students can interact with people who have different backgrounds from them. I'm also devoted to the art of dance and interested in pursuing marine biology and psychology as my majors. These qualities make me stand out as an individual.
- 13. It is important that I attend a university with diverse students and professors. A less diverse campus would make me feel isolated and I think it would be harder to make friends and be included in community and campus activities. I want to interact with students from many different backgrounds.
- 14. I intend to apply to UNC-Chapel Hill as an undergraduate. The school offers a great education for a very low price. It would be difficult for my family to pay a larger amount of tuition. The fact that UNC-Chapel Hill is close to home makes it even more appealing. UNC-Chapel Hill also has a great arts program, which is one of the things I am interested in studying.

I declare under penalty of perjury that the foregoing is true and correct.	Executed
this <u>U</u> day of <u>JMU</u> , 2015.	

I.N.

STUDENTS FOR FAIR ADMISSIONS, INC,

Plaintiff,

v.

THE UNIVERSITY OF NORTH CAROLINA AT CHAPEL HILL, et al.,

Defendants.

Civil Action No. 1:14-cy-954-LCB-JLW

#### **DECLARATION OF CECILIA POLANCO**

Cecilia Polanco, pursuant to 28 U.S.C. § 1746, declares the following:

- 1. My name is Cecilia Polanco, I am over 18 years of age, and I am fully competent to make this declaration.
- 2. I am a full-time undergraduate student at UNC-Chapel Hill. I am a rising senior and am pursuing a major in Global Studies, with a focus on Health and Environment and Latin America.
  - 3. I am Hispanic.
- 4. UNC-Chapel Hill was my dream school and my number-one choice when I was applying to colleges. When I received UNC's Morehead Cain Scholarship I withdrew my applications to other schools, even though I was on the wait list at higher ranked schools. I then received the Global Gap Year Fellowship, which allowed me to

take a year before college to travel the world and volunteer. By choosing UNC-Chapel Hill, I was being paid to go to school and being paid for volunteer experiences. Carolina was creating opportunities I wouldn't find anywhere else even before I set foot on campus.

- 5. I believe my background enables me to offer unique perspectives and cultural experiences in my academic and campus activities. I came to UNC-Chapel Hill with the perspective of someone who doesn't receive much financial help from my parents. I am often surrounded by peers who had many more opportunities than I had. I applied for scholarships because of need, and while I was lucky enough to receive a merit scholarship, for many of my peers paying for college wouldn't have been an issue.

  Though I came from a racially diverse high school, I was still one of the only Latina students in attendance in higher-level courses, and one of few students of color who took AP classes. Two minority students from my high school went to UNC Chapel-Hill, and less than a handful attended other top-tier universities. I grew up very conscious of race, how my appearance categorizes me, and what assumptions people have about me. What UNC students don't all have in common is a constant consciousness of their identity. It is important to me that I can express that perspective at UNC.
- 6. I believe the benefits of racial or ethnic diversity play an important role in a number of academic and campus activities that affect my undergraduate experience, including lectures, seminars, residential life, student government, communities of faith, extracurricular activities and community service programs. In particular, I have been

involved with the Foundation for Sustainable Development, NOLS Alaska, and the Carolina Hispanic Association, first as Political Action Chair, then as President. I'm also a Senior Advisor for Student Government and a Mentor and Health and Wellness Advisor for the Scholars' Latino Initiative (SLI). SLI is an organization within UNC-Chapel Hill's Center for Global Initiatives that creates three year mentoring partnerships between UNC-Chapel Hill students and high achieving Latino/a students to prepare the high school students for enrollment in a college or university. These activities and positions benefit enormously from racial and ethnic diversity and by the membership of people with different backgrounds.

- 7. I currently experience academic and personal benefits from UNC-Chapel Hill's racially diverse student body. For example, before attending UNC-Chapel Hill I had gone most of my life without meeting an academically successful Latino male, which may have created stereotypes in my mind of whether there were any. By meeting and working alongside other Latino students, I realized some of the prejudices I had and how I had made unfair assumptions about others. I've also been able to find peers who can relate to the same racial or ethnic hostility I face sometimes. I've learned about what other people have historically gone through and better understand how racism and social injustices have come about.
- 8. I believe my education would be harmed if UNC-Chapel Hill stopped considering race in its admission decisions. The current policy facilitates the admission of strong Hispanic students, which improves my educational experience by allowing me

to learn alongside a greater number of Hispanic students so that I do not feel singled out as a spokesperson for my race/ethnicity. The policy likewise facilitates the admission of underrepresented minority students with racial or ethnic backgrounds different from my own and from whom I feel I learn both inside and outside the classroom. Having a diverse student body exposes us to people who think, solve problems, and communicate differently – an exposure that makes us more culturally competent and capable of interacting well with people from different backgrounds. If we don't surround ourselves with people who are different from us in an academic setting, when we are faced with people who are different from us outside of the university, we won't know how to cope, and our initial reactions will be fear, distrust, and maybe even hate.

9. I want to learn and live alongside students who are each a part of a critical mass of their race/ethnicity. To facilitate that, I would like to see an increase in the number and diversity of underrepresented racial groups admitted to UNC-Chapel Hill. I'd like for UNC to be representative of North Carolina or even the United States as a whole. I think that an increase in in the number of minority students would make it so people couldn't physically ignore our presence. I often feel invisible as a minority student – I felt this most my first year when I walked around campus and barely saw anyone who looked like me. Even given the current admissions policy, it's possible for a UNC student to make it through their four years here without diversifying their friend group or experiences.

- often feels like people aren't expecting for me to perform well, or to be insightful and effective. My intelligence, value, and worth are not assumed at UNC and I often feel like I have to prove myself. One of the hardest days at UNC was after I was interviewed for a local news channel about my academic achievements and involvements on campus. Comments were made alleging that I got into UNC-Chapel Hill because I was Latina, received the scholarships because I was Latina, and had no barriers in attending and paying for college. It was sickening, stressful, and brought me to tears. It brought about a lot of self-doubt and emotional distress that made me question my worth and the value of my accomplishments. To attribute my successes to this one identity is to not fully see me as a person. This type of experience is common among students of color, and other underrepresented student populations.
- among students of color by not affirmatively standing in support of underrepresented students. For example, during a campus scandal related to the athletic department, student government encouraged the student body to wear blue in support of athletes. At the same time, many minority students were wearing black and the Black Student Movement was trying to generate awareness and support of the "Black Lives Matter" movement, but neither the student government nor the administration acknowledged this work. We want our administration to stand in support of our experiences as students, and it seems that only some students' experiences are officially recognized. The

administration tries to be politically correct, and I think there is a serious problem with the power and mindsets of the Board of Governors and the Board of Trustees that harms minority students at UNC-Chapel Hill.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 23 day of June, 2015.

Cecilia Polanco

# EXHIBIT 1.7

### UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

STUDENTS FOR FAIR ADMISSIONS, INC,

Plaintiff,

v.

THE UNIVERSITY OF NORTH CAROLINA AT CHAPEL HILL, et al.,

Defendants.

Civil Action No. 1:14-cv-954-LCB-JLW

#### **DECLARATION OF LUIS ACOSTA**

Luis Acosta, pursuant to 28 U.S.C. § 1746, declares the following:

- 1. My name is Luis Acosta, I am over 18 years of age, and I am fully competent to make this declaration.
- 2. I am a full-time undergraduate student at UNC-Chapel Hill. I am a rising junior and am pursuing majors in Chemistry and Global Studies.
  - 3. I am Hispanic.
- 4. I chose to attend UNC-Chapel Hill because it is known as a prestigious public institution and has a great Pre-Med program. I knew that it would be a big change for me. I wanted to move farther from home and to be able to meet a diverse group of people. At UNC-Chapel Hill I have been able to do just that. I also received a lot of

financial assistance from UNC-Chapel Hill, which was an important factor in my decision to attend UNC-Chapel Hill.

- 5. I believe my background enables me to offer unique perspectives and cultural experiences in my academic and campus activities. Almost all of my family lives outside of the United States, which sets me apart from many of my peers. I am the first member of my family to attend college, and I did not grow up with English as my first language. My parents are very supportive, but they could not give me advice on picking a college or help me navigate the admissions process like the parents of many other UNC-Chapel Hill students. I have had to figure a lot out on my own. I am also at a disadvantage financially compared to most of my peers. I came from a high school that was primarily white and I was one of two minority students in my graduating class to attend UNC-Chapel Hill. We were the only minority students in our class to attend a toptier university. Growing up speaking Spanish and without many resources from my parents has made me a lot more independent, and other students have asked me about my journey. Sharing my experiences with other UNC students has allowed them to see and understand a different perspective of life. I like being able to share my culture with people who are different from me.
- 6. I believe the benefits of racial and ethnic diversity play an important role in a number of academic and campus activities that affect my undergraduate experience, including lectures, seminars, residential life, student government, communities of faith, extracurricular activities, and community service programs. In particular, I have been

involved with the Mezcla Spanish Magazine Committee, the Scholars' Latino Initiative, Student Action with Farmworkers, the Rural Health Group, the Pielak Chemistry Lab, and several tutoring and mentoring programs. I am a mentor and volunteer at the Boys and Girls Club of Henderson County, McDougle Middle School, and Frank Porter Graham Elementary Bilingual School. During my Freshman year, I was also a mentor and volunteer at Helping Youth by Providing Enrichment. These activities benefit enormously from racial and ethnic diversity and by the membership of people from different backgrounds.

- 7. I currently experience academic and personal benefits from UNC-Chapel Hill's racially diverse student body. It has been fascinating learning about the different cultures here and how some are so related to mine. I have enjoyed being able to hear all the stories of ethnically diverse students and I also enjoy being in a different setting than where I grew up. Back home I felt a lot more ethnic tension. I often felt uncomfortable and sometimes encountered really ugly situations or comments. I would feel like I did not belong in my Honors and AP classes, but at UNC-Chapel Hill I do not have that problem. The environment here is different and better because when I interact with others, I see a pool of all different colored faces instead of a sea of white faces like back home. I feel like I belong at UNC-Chapel Hill.
- 8. I believe my education would be harmed if UNC-Chapel Hill stopped considering race in its admission decisions. The current policy facilitates the admission of strong Hispanic students, which improves my educational experience by allowing me

to learn alongside a greater number of Hispanic students so that I do not feel singled out as a spokesperson for my race/ethnicity. The policy likewise facilitates the admission of underrepresented minority students from racial or ethnic backgrounds different from my own and from whom I feel I learn both inside and outside the classroom. For example, I have been able to spend time with some Indian and Asian students at UNC-Chapel Hill from whom I have learned a lot and who broke down a lot of the stereotypes I held about people of their ethnic background. A diversity of perspectives allows me to learn about cultures different from my own, but has also helped me realize that everyone has a lot more in common than one would first think. I have been able to learn a lot academically from other students and have been able to grow as a student because of the diversity I see every day.

- 9. I want to learn and live alongside students who are each a part of a critical mass of their race/ethnicity. To facilitate that, I would like to see an increase in the number and diversity of underrepresented racial groups admitted to UNC-Chapel Hill. I felt isolated as a Latino in my hometown, and while this campus is far more diverse than where I came from, it never hurts to enroll more diverse and qualified students.
- 10. I feel very comfortable around the students at UNC-Chapel Hill, but sometimes students can be unfair or insensitive to each other when an issue involving race or ethnicity comes up on campus. For example, I talk to a lot my peers about getting more support for undocumented students. A lot of people do not agree with me that these students have a right to education, and that if they get to UNC-Chapel Hill, they should

pay in-state tuition, especially when they have lived in North Carolina most of their lives. A lot of students do not understand the struggle that undocumented and Latino students face in attaining education. Some of my peers can be very stubborn when it comes to these issues. I have also overheard students make mean comments toward fellow peers who protest campus policies that they believe to be racially insensitive. I would like students to listen to each other and learn from each other when it comes to issues of race and ethnicity. Putting everyone together brings the best out in everyone.

I declare under penalty of perjury that the foregoing is true and correct. Executed this day of June, 2015.

Luis Acosta

# EXHIBIT 1.8

## UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

STUDENTS FOR FAIR ADMISSIONS, INC,

Plaintiff,

V.

.

Civil Action No. 1:14-cv-954-LCB-JLW

THE UNIVERSITY OF NORTH CAROLINA AT CHAPEL HILL, et al.,

Defendants.

### **DECLARATION OF STAR WINGATE-BEY**

Star Wingate-Bey, pursuant to 28 U.S.C. § 1746, declares the following:

- 1. My name is Star Wingate-Bey, I am over 18 years of age, and I am fully competent to make this declaration.
- 2. I am a full-time undergraduate student at UNC-Chapel Hill. I am a rising senior and am pursuing a major in Communications and a minor in History.
  - 3. I describe my race and/or ethnicity as Black and Moorish American.
- 4. I chose to attend UNC-Chapel Hill because of its amazing opportunities, academic and otherwise, and its affordable tuition. I always imagined myself going to UNC-Chapel Hill.

- 5. I believe my background enables me to offer unique perspectives and cultural experiences in my academic and campus activities. Every UNC student has a different set of experiences that make him or her unique, and contributions from all students are valuable.
- 6. I believe the benefits of racial or ethnic diversity play an important role in a number of academic and campus activities that affect my undergraduate experience, including lectures, seminars, residential life, student government, communities of faith, extracurricular activities and community service programs. In particular, I have been involved with Delta Sigma Pi and the Misconception Hip-Hop Dance Company as a club executive officer, the Star Heels Dance Company as a choreographer, and One Heart Source as a volunteer in South Africa. These activities benefit enormously from racial and ethnic diversity and by the membership of people from different backgrounds.
- 7. I currently experience academic and personal benefits from UNC-Chapel Hill's racially diverse student body. Learning about the racial and ethnic backgrounds of others has made me more knowledgeable, accepting, and understanding of people's histories and cultures. For example, in my participation in Carolina United a week-long leadership retreat for incoming students I was able to explore different religious, sexual, and racial identities with other students, and discuss social issues surrounding those identities. It was a week filled with self-discovery, diversity, inclusivity, and thought. Students went out of their way to learn about the things that make them different from each other and became more accepting as a result. It is a great program that shows how

important diversity is in every setting. Many people, myself included, describe the program as one of the best decisions they made at Carolina.

- 8. I believe my education would be harmed if UNC-Chapel Hill stopped considering race in its admission decisions. The current policy facilitates the admission of well-qualified Black students, which improves my educational experience by allowing me to learn alongside a greater number of Black students so that I do not feel singled out. If I am the only Black person or Black woman in a classroom setting it often feels like I have to be the fact checker for a conversation or the spokesperson for my entire race or gender. The policy likewise facilitates the admission of underrepresented minority students with racial or ethnic backgrounds different from my own and from whom I feel I learn from both inside and outside the classroom.
- 9. I want to learn and live alongside students who are each a part of a critical mass of their race/ethnicity. To facilitate that, I would like to see an increase in the number and diversity of underrepresented racial groups admitted to UNC-Chapel Hill. To have more diversity would allow for a better discussion of racial issues in an open and non-imposing way.
- 10. Though UNC-Chapel Hill tries to foster dialogue about racial and ethnic issues on campus through programs like Carolina United, I often feel like the administration is not focused on real action. For instance, when many students of color were attempting to have Saunders Hall, which is named after a UNC alumnus and member of the Ku Klux Klan, renamed, it was very clear from the administration's response to protestors that UNC-Chapel Hill would not entertain that action. One

member of the Board of Trustees told a student activist to "focus on something more important." Such an attitude does not make students of color feel welcome on the campus. There are actions that UNC-Chapel Hill could take to make those students feel more a part of the community.

I declare under penalty of perjury that the foregoing is true and correct. Executed this  $\frac{2}{3}$  day of  $\frac{3}{3}$  day of

ar Wingate-Bev

# EXHIBIT 1.9

## UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

STUDENTS FOR FAIR ADMISSIONS, INC,

Plaintiff.

V.

THE UNIVERSITY OF NORTH CAROLINA AT CHAPEL HILL, et al.,

Defendants.

Civil Action No. 1:14-cv-954-LCB-JLW

### **DECLARATION OF LAURA ORNELAS**

Laura Ornelas, pursuant to 28 U.S.C. § 1746, declares the following:

- 1. My name is Laura Ornelas, I am over 18 years of age, and I am fully competent to make this declaration.
- 2. I am a full-time undergraduate student at UNC-Chapel Hill. I am a rising junior and am pursuing a major in Hispanic Linguistics and Latin American Studies.
  - 3. I am Hispanic.
- 4. I chose to attend UNC-Chapel Hill because of its proximity to home and the low cost of attendance. Being close to home was very important to me.
- 5. I believe my background enables me to offer unique perspectives and cultural experiences in my academic and campus activities. I came to UNC-Chapel Hill from a high school that was predominately white, and I am one of only a handful of minority students from my school who went to a top-tier university. This environment

was very different than the upbringing my parents had, so I have a varied perspective on what it means to experience life as a Latina. It is easier for me to understand different perspectives because the people closest to me have experienced a lot. I think many other UNC-Chapel Hill students have a more limited experience with different cultural perspectives.

- 6. I believe the benefits of racial or ethnic diversity play an important role in a number of academic and campus activities that affect my undergraduate experience, including lectures, seminars, residential life, student government, communities of faith, extracurricular activities, and community service programs. In particular, I have been involved with the Scholars' Latino Initiative (SLI), as a mentor and a member of the Executive Board. SLI is an organization within UNC-Chapel Hill's Center for Global Initiatives that creates three-year mentoring partnerships between UNC-Chapel Hill students and high achieving Latino/a students to prepare the high school students for enrollment in a college or university. These activities benefit enormously from racial and ethnic diversity and by the membership of people from different backgrounds.
- 7. I currently experience academic and personal benefits from UNC-Chapel Hill's racially diverse student body. I've met people at UNC-Chapel Hill from a variety of backgrounds who have had life experiences similar to my own. Attending school in a predominantly white school system made me feel I was the "exception to the rule" for a very long time. Meeting other minority students at UNC-Chapel Hill made me realize that there are plenty of minority students accomplishing the same things I am.

- 8. I believe my education would be harmed if UNC-Chapel Hill stopped considering race in its admission decisions. The current policy facilitates the admission of strong Hispanic students, which improves my educational experience by allowing me to learn alongside a greater number of Hispanic students so that I do not feel singled out, or made to feel that I have to be a spokesperson for my race/ethnicity. The policy facilitates the admission of underrepresented minority students with racial or ethnic backgrounds different from my own and from whom I feel I learn both inside and outside the classroom. I want to work in an international setting, so it is important for me to be around people who have different backgrounds and world views.
- 9. I want to learn and live alongside students who are each a part of a critical mass of their race/ethnicity. To facilitate that, I would like to see an increase in the number and diversity of underrepresented racial groups admitted to UNC-Chapel Hill. Though I have many more Latino peers at UNC-Chapel Hill than I did in high school, I still feel that we are underrepresented. I would love to see more minority students on campus because we have a variety of perspectives that are not always heard on campus.
- 10. Racial issues among UNC-Chapel Hill students can be difficult. I noticed racial tension most during the debate over whether or not to rename Saunders Hall. William L. Saunders was a UNC alumnus and a member of the Ku Klux Klan. Many of my peers think it is insensitive to students of color to name a building after a person with such a history. At the same time, Saunders is still part of our past and changing the name can be seen as trying to change history, which is impossible. When issues like this arise,

the university administration has the difficult job of balancing diverse, and sometime opposing, perspectives. It is difficult to handle issues fairly in an unfair world.

I declare under penalty of perjury that the foregoing is true and correct. Executed this <u>23</u> day of <u>June</u>, 2015.

Laura Ornelas