

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CASE NO. 1:14-CV-954**

**STUDENTS FOR FAIR
ADMISSIONS, INC.,**

Plaintiff,

v.

**UNIVERSITY OF NORTH
CAROLINA et al.,**

Defendants.

DECLARATION OF EZRA BAELI-WANG

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I, Ezra Baeli-Wang, hereby make this declaration from my personal knowledge and, if called to testify to these facts, could and would do so competently:

Background

1. I am an Asian-American male from Hillsborough, New Jersey. I attended Hillsborough High School ("HHS"), a public school with approximately 2,000 students. At HHS, I participated in track and was a National AP Scholar.
2. I graduated in May 2017 from the University of North Carolina at Chapel Hill ("UNC-CH"). My majors were Peace, War, and Defense ("PWAD") and Asian Studies with a concentration in Chinese, and my minor was Creative Writing.
3. I was a member of the UNC-CH varsity fencing team and served as captain of the men's foil squad during my sophomore and senior years.
4. As a sophomore, I received the Arthur Ashe, Jr. Sport-Scholar Award for my commitment to athletics, academics, community service, and student leadership.
5. I also received the Leader of Distinction Award as a junior. The Leader of Distinction Award is the Baddour Carolina Leadership Academy's highest honor.
6. My senior year, I served as president of the Atlantic Coast Conference ("ACC") Student-Athlete Advisory Committee. My junior year, I was a member of that committee. My junior and senior years, I was also co-president of UNC's campus chapter of the ACC's Student-Athlete Advisory Committee. In addition, I served as a student-athlete representative on the Faculty Athletics Committee at Carolina during my junior and senior years.

EBW

7. I made the Dean's List each semester and was named to the ACC Academic Honor Roll each year. In 2015 and 2016, I received the UNC 4.0 Club Scholar-Athlete Award for maintaining a 4.0 GPA for one or both semesters. I was elected to Phi Beta Kappa in 2016.

8. I am starting a position as an operations analyst at a global health firm, Vigilint. My dream job is to serve as the U.S. Ambassador to China.

Importance of Diversity at UNC-CH

9. I spent my entire childhood in New Jersey. When choosing a college, I knew I wanted to have new experiences in a warmer climate. My top two choices were UNC-CH and the University of California at Berkeley ("UC-Berkeley"). Financial considerations were an important part of my decision to attend UNC-CH, but so was school spirit. The Town of Chapel Hill exudes school spirit, and I had the impression that students at UNC-CH were genuinely excited to be at UNC-CH.

10. I grew up in a predominantly white, upper-middle-class, suburban area. Even as a high school senior, I knew that my upbringing had been sheltered and looked forward to interacting with people from different backgrounds in college.

11. The diversity at UNC-CH has played a critical role in my educational experience both inside and outside the classroom.

12. At UNC-CH, I actively sought out opportunities to interact with people who are different from me. There is diversity at UNC-CH, but in many cases it is still necessary to seek it out. It would be possible for students to insulate themselves, surrounded by other students who think and talk and look like they do.

13. During my freshman year, I lived in an on-campus residence hall. One of my suitemates, who later became my roommate, was Nigerian. When he pointed out how few Black males there are in our graduating class, I was shocked. He mentioned that he felt sad and lonely at times because it had been difficult to find or create a sense of community on campus. This interaction was eye-opening for me, because this was something I had not given much thought to.

14. One arena in which I found opportunities to interact with a diverse group of students was in athletics. In fact, being an athlete created opportunities to interact with many African-Americans on campus. While there were no Black athletes on the fencing team when I joined, I later recruited my roommate who was African to join; my senior year, there were three Black athletes on the team.

15. As a senior at UNC-CH, I became involved in a number of Asian student organizations, including the Asian Student Association and the Mixed Asian Student Heritage ("MASH") Club. This is the first time I was involved in an organization related to my Asian heritage.

16. In the academic sphere, diversity is especially important in classes that cover controversial issues and offer opportunities for debate. In some of my classes, we debated race-related issues like affirmative action even though there were no students of color in addition to myself there to offer their perspectives. Those conversations would have been far more interesting and robust if those classes had been more diverse. I believe we overestimate how many people share our perspectives, and insufficient diversity can restrict a conversation.

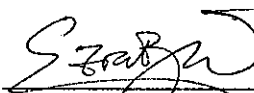
17. Even though it would be possible to remain insulated at UNC-CH, I met many students at UNC-CH who value diversity. In fact, our student body seemed to recognize that we live in a global world and that life after graduation will involve interactions with people who don't have the same background they have. Students at UNC-CH want to succeed and are interested in developing as individuals. As many of my classmates recognize, exposure to diversity is both critical to success today and conducive to becoming a better human being. Thanks to the diversity at UNC-CH, I have developed a clear appreciation for what diversity has to offer no matter the scenario or space.

Conclusion

18. Diversity has contributed to my personal experience at UNC-CH and is something that is important to students at UNC-CH today. I believe that the University would be an even better place and offer even more opportunities to learn from diverse peers if there were even more racial and ethnic diversity than we see today.

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

Executed on 07/17/2017.


Ezra Baeli-Wang

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DECLARATION OF RYE BARCOTT

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I, Rye Barcott, hereby make this declaration from my personal knowledge and, if called to testify to these facts, could and would do so competently:

Experience

1. I am a White male and a graduate of The University of North Carolina at Chapel Hill ("UNC-CH"). I graduated from UNC-CH in 2001 with degrees in Peace, War, and Defense and International Studies. After serving for five years on active duty in the Marine Corps, I received a Master of Public Administration (MPA) and a Master of Business Administration (MBA) from Harvard University.

2. My first calling was to serve in the Marine Corps. My dad served in the Marines and served in Vietnam. Growing up in Rhode Island, my earliest mentors were my dad and his friends, and I saw the Marine Corps as a path toward service and making a difference.

3. At UNC, I was in the Reserve Officers' Training Corps (ROTC) program. The ROTC program provides a scholarship for four years in exchange for a certain amount of full time service after graduation, so I went to UNC on a full scholarship. My parents are both graduate school alumni of UNC.

4. At Carolina, I formed Carolina for Kibera (CFK), a non-governmental organization that uses a model of participatory development to break cycles of violence and develop leaders in the Kibera slum of Nairobi, Kenya.

5. After I left UNC and completed my military service, I pursued a career in business and entrepreneurship. I co-founded Double Time Capital, a company that

finances clean energy projects, with a fellow marine. In 2010, I wrote a book for students titled *It Happened on the Way to War: A Marine's Path to Peace* about founding Carolina for Kibera (CFK) and my time in the Marine Corps.

6. I am still connected to UNC-CH through CFK. CFK is a major affiliated entity of UNC-CH, and Ron Strauss, the Executive Vice Provost and Chief International Officer at UNC, serves on the CFK board of directors. CFK is housed in the FedEx Global building. CFK sends student volunteers over to Kibera each year to conduct research and perform service activities. I am also on the board of the UNC Institute for the Environment.

Experience at UNC-CH

7. I had a tremendous experience at UNC-CH. The breadth of resources available at the University is breathtaking. As a large public university, its real strength is its diversity in so many respects—socioeconomic status, race, ethnicity, nationality, world view (conservative, liberal, moderate, you name it). Within the ROTC program, there was also significant diversity across all of those spectrums.

8. In my experience, diversity is important for the classroom experience, as it exposes students to how others think. Diversity added to the richness of discussion in virtually every class I took at UNC.

9. One UNC professor, Jim Peacock in the Department of Anthropology, taught me that I should aspire to connect talent to opportunity. He said that no matter where you live, there is enormous talent but not necessarily opportunity. If you are not exposed to that truth, you take things for granted and miss opportunities for things that

have a tremendous impact, including on your own life. You only recognize that talent is universal but opportunity is not when you escape from your own comfort zone. That concept resonated with me and influenced my work with CFK.

10. Assuming my military experience would involve peacekeeping, I took anthropology classes to gain a better understanding of why ethnic violence happens. One of my anthropology professors challenged me, saying that if I wanted to understand ethnic violence, I needed to talk with people who have experienced it. I studied Swahili and applied for a Burch Fellowship, which is granted to students who self-design unconventional experiences around the world. I used my Burch Fellowship to travel to Kenya.

11. While in Kenya as a twenty year old college student, I visited Kibera, a slum in Nairobi, where I met the individuals that I co-founded CFK with, Tabitha Atieno Festo, a nurse, and Salim Mohamed, a community organizer. We created CFK to develop local leaders, catalyze positive change and alleviate poverty in the Kibera slum. We founded CFK to connect talent and resources.

12. CFK is a pioneer of the movement called participatory development, drawing recognition from Time magazine as a "Hero of Global Health" and interest from Melinda Gates, President Barack Obama, and other dignitaries, who have visited to see its practices in action.

13. Through CFK, we have impacted the health, economics and social opportunities for Kibera. CFK focuses on these areas, which are fundamental to personal and community growth. CFK is founded on the belief that for health, ensuring

that individuals can face each day with strength is essential for the health of the community; for social development, preparing youth for the future requires education both in school and outside of it; for economic growth, having secure finance creates a solid foundation to explore even more opportunities.

14. In a typical year, thousands visit our medical clinic – receiving flu vaccinations, HIV care, treatment and education, counseling, and reproductive health services. We've added handwashing stations and taught proper hand-washing techniques. We have instituted education programs, Daughters United for girls, an annual soccer tournament, jump rope program, community trash cleanups, and safe space groups. We have awarded school scholarships, employed youth as garbage collectors and recycling center employees, and trained small business owners in computer-based entrepreneurship training.

15. CFK provides meaningful opportunities for UNC students and others in the community to learn how others in the world live. For example, the UNC women's soccer team hosted a fundraiser for Chapel Hill girls where they go through a series of stations to learn about Kibera. It helps broaden their understanding of the world. About half a dozen to a dozen students go to Kibera from UNC each year to do volunteer work.

16. CFK is a very unique program that would not have happened without UNC.

Importance of Diversity

17. Diversity is important to UNC because the core mission of the University is to educate young people from all over the world to be good citizens and effective agents

of change and to live healthy lives. The educational mission is about understanding your place in the world and how the world works. That requires being exposed to others.

18. Promoting the development of cross-cultural skills is important in the college experience to prepare students for lives and careers beyond UNC. We live in a global world with a global economy. Cross-cultural skills are also important from a military perspective, especially since the types of conflicts we face are increasingly counterinsurgency. The ability to understand how people think is the key to success in a military situation.

19. Diversity is basically a part of the military's fabric, and it makes the military stronger. It is just the natural reflection of America. Diversity gives us strength. Exposure to diversity and cross-cultural understanding is critical to effective military service.

Conclusion

20. UNC provided me with wonderful opportunities that exposed me to different people, cultures and perspectives, and provided me with a strong foundation for a life of military and public service. I believe that, as in the military, diversity is part of UNC's fabric, and UNC's diversity is an essential part of the education UNC provides to its students.

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

Executed on 07/25/17.

A handwritten signature in black ink, appearing to read 'Rye Barcott', written over a horizontal line.

Rye Barcott

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DECLARATION OF CHELSEA BARNES

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I, Chelsea Barnes, hereby make this declaration from my personal knowledge and, if called to testify to these facts, could and would do so competently:

Background

1. I am an American Indian (“Native”) and Caucasian woman. My mother is a citizen of the Lumbee Tribe, and my father is Caucasian. Like my mother, I am a citizen of the Lumbee Tribe.

2. I grew up in Hope Mills, North Carolina. Hope Mills is a small town near Fayetteville. It is about a 30-minute drive from my tribal community.

3. My parents divorced when I was two years old. Although my mother was my primary caregiver, I spent time with my father and his side of the family as well. Even as a young child, I was aware that the color of my skin stood out at extended-family gatherings.

4. My father received his associate’s degree when I was in middle school. My mother, who is now a speech language pathology assistant, received her bachelor’s degree when I was in high school.

5. No one in my family had attended The University of North Carolina at Chapel Hill (“UNC-CH”), but my father was a big fan of the UNC-CH basketball team. I decided at a young age that I wanted to attend college there. In high school, I worked hard to achieve that goal, even though it felt out of reach at times.

6. I attended South View High School (“South View”), a diverse school of approximately 1700 students. I estimate that less than half of my classmates were Caucasian, less than half were African-American, and a smaller number were Hispanic.

7. In addition to participating in the academically rigorous International Baccalaureate program at South View, I played two sports, was active in student government, and was inducted into the National Honor Society. I also received the Outstanding Senior Award in April 2011.

8. Although I was the valedictorian of my high school class, I did not apply to any Ivy League schools. In fact, UNC-CH was the only school to which I applied. As I look back on my senior year of high school, I remember being nervous about whether or not I would get into Carolina and if I did, what it would be like when I got there. Very few people where I was from went to college and of those that did, few went to schools like Carolina. I was ecstatic when I was offered admission through the early decision process.

9. I earned a Bachelor of Arts with Honors from UNC-CH in May 2015. I double-majored in Political Science and Communication Studies.

10. I am starting my third year at the University of North Carolina School of Law. I am a member of the Broun National Trial Team. I am president of the Student Bar Association. I have also served on the Student Attorney General's staff and as president of the Native American Law Students' Association. I anticipate that I will receive my law degree in May 2018.

Experience at UNC-CH

11. As an undergraduate, I served for two years as president of Carolina Indian Circle ("CIC"), UNC-CH's undergraduate Native student group, and was recognized as CIC's Member of the Year in 2014. I also was a member of Alpha Pi Omega Sorority and Unheard Voices A Capella Group, served as a Student Ambassador for the UNC-CH American Indian Center, and

participated in the Cultural Competence Leadership Institute. I served as a Resident Advisor for two years, earning the Hayden B. Renwick Award for Academic Excellence twice.

12. My freshman year at UNC-CH was not what I had expected. I struggled a little bit and was not very focused. I thought I wanted to be a nurse, but my science classes were less enjoyable than I had anticipated. My first-semester grade point average was a disappointing 2.67.

13. Becoming involved with the American Indian Center (“AI Center”) was a turning point for me. The AI Center was the first organization on campus to reach out to me, and the first person I became friends with at UNC was Native and Black. Even so, I was unsure at first whether I would feel at home at AI Center events. I had not grown up in a tribal community, and despite the racial diversity at South View High School, I had been one of just two American Indian students there. Before long, however, I realized that having a different perspective was a good thing.

14. In the spring of my sophomore year, I joined the Native American interest sorority. It was not a traditional social sorority. It was much smaller – just five or six members – and the recruitment process was very different, with lots of study halls and other low-key activities to get to know the other members. The semester I joined the sorority was the first semester that I made the Dean’s List, and my grades continued to improve. I seemed to be encountering fewer distractions, and I felt supported by everyone I was with. Once I experienced that feeling of support, UNC-CH became my home away from home.

15. The support of my sorority sisters was a catalyst for many other positive experiences at UNC-CH. I picked up a lot of good leadership experiences both within the sorority and beyond. As an example, my sisters encouraged me to become president of the

Carolina Indian Circle (“CIC”). I never would have fathomed I could do that. Some in the CIC were very engaged in their tribal communities, and I was not sure how they would evaluate me because I was less connected to mine. When I realized that my unique perspective could be an asset, however, I stepped out of my comfort zone and into that leadership role.

16. My junior year, I was a scholar with the Cultural Competence Leadership Institute (“CCLI”), a leadership development program. While UNC-CH is by no means perfect and has a long way to go (along with the rest of the world), UNC-CH made many efforts to be inclusive and I was proud to be part of these efforts. As a CCLI scholar, I was able to be a part of the small community of people who took the time to attempt to work and mediate the issues that still exist. Cultural competency is something that is perhaps taken for granted or even ignored in many contexts, and the CCLI program helped to educate myself and others about cultural competency and helped us to develop the skills needed to promote a diverse, yet inclusive, environment.

17. I wrote my senior thesis about the process of obtaining federal recognition for the Lumbee tribe. It was an opportunity to apply the skills and knowledge I was learning at UNC-CH to an issue impacting the Lumbee tribe.

18. As a senior, I was honored to receive the Irene F. Lee Award from Chancellor Folt. The Lee Award is given each year to the woman in the senior class judged most outstanding in leadership, character, and scholarship.

19. Though I worked hard to earn these opportunities, I wouldn’t have gotten there without the support system I established within the Native community at Carolina.

20. As a UNC-CH student, at times I was the only non-white person in the room. It would be easy to silo yourself and to not interact much with students of other backgrounds. That

said, there are many opportunities for interaction for those who were interested in reaching out. I never felt isolated because I became involved in campus activities so early.

21. Diversity played an important role in the educational experience I had at UNC-CH. In the classroom, I heard good and bad things about Native American culture. Fortunately, this provided opportunities to educate others. If there is no one in the room from a particular background, statements and assumptions about people from those backgrounds may be inaccurate and go unchallenged.

22. The diversity on campus and the importance of that diversity was especially apparent to me in my work as a Resident Advisor (“RA”). As an RA, you serve as the first point of contact for students experiencing challenges. In helping them to solve problems, it was especially important to understand residents’ cultural perspectives. Furthermore, a residence hall is supposed to serve as a student’s home away from home. That means it is important that residents respect and understand each other so that everyone can feel comfortable being himself or herself in that space. I believe that the presence of a diverse group of RAs helps many students feel more comfortable.

Conclusion

23. Having other students of color, and native students specifically, to support me made a big difference in how comfortable I was on campus and how willing I was to put myself out there and meet new people. Having students from different backgrounds and having other students who shared aspects of my race and ethnicity helped me to learn and thrive at UNC. I believe that having many students of color from different backgrounds on campus is very important to the learning environment and to minority students.

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

Executed on 08/21/17

Chelsea Barnes
Chelsea Barnes

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DECLARATION OF MELODY BARNES

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I, Melody Barnes, hereby make this declaration from my personal knowledge and, if called to testify to these facts, could and would do so competently:

Experience

1. I am an African-American woman and a graduate of The University of North Carolina at Chapel Hill (UNC-CH). I earned a Bachelor of Arts with Honors in History from UNC-CH in 1986, and a Juris Doctorate from The University of Michigan Law School in 1989.

2. I began my career as an attorney with the law firm of Shearman & Sterling in New York City as an associate in corporate finance and financial institutions.

3. From December 1995 until March 2003, I worked for Senator Edward M. Kennedy on the Senate Judiciary Committee. I served as Chief Counsel from 1998 until I left the Committee in 2003.

4. My professional experience also includes an appointment as Director of Legislative Affairs for the U. S. Equal Employment Opportunity Commission, serving as assistant counsel to the Subcommittee on Civil and Constitutional Rights of the House Judiciary Committee, and serving as a Principal at The Raben Group, a consulting firm.

5. I was the Executive Vice President for Policy at the Center for American Progress, a progressive research institute and think tank, before joining Senator Barack Obama's 2008 presidential campaign.

6. From January 2009 until January 2012, I was Assistant to the President and Director of the White House Domestic Policy Council. As Director of the Domestic Policy Council, I provided strategic advice to President Obama and worked closely with members of the Cabinet coordinating the domestic policy agenda across the Administration. Under my leadership, innovative new policies, practices, and partnerships were initiated to address significant national challenges, including education, health care, and the federal government's relationship with local governments and communities.

7. After leaving the White House, I started a consulting business. Currently, I am Co-Founder and Principal of MB2 Solutions LLC, a domestic strategy firm, and a senior fellow in presidential studies at the University of Virginia's Miller Center.

8. I also serve as an Independent Director on the Boards of Ventas, Inc. (NYSE:VTR); Booz Allen Hamilton Holding Corporation (NYSE:BHA); the Marguerite Casey Foundation; and Year Up. I chair the Aspen Institute Forum for Community Solutions and Opportunity Youth Incentive Fund, serve as Vice Chair of the Advisory Board of the Institute for Contemporary Art at Virginia Commonwealth University, and am a member of the Board of Trustees for the Thomas Jefferson Foundation that owns and operates Monticello.

9. My media appearances include *This Week with George Stephanopoulos*, *The Daily Show with Jon Stewart*, *Fareed Zakaria GPS*, *Charlie Rose*, *Morning Joe* and *the NewsHour*.

Experience at UNC-CH

10. I am from Richmond, Virginia. My father was a civilian employee with the U.S. Army and my mother was a curriculum specialist and administrator in the Richmond Public Schools System.

11. I was a successful high school student, and I eagerly sought a University experience in a new environment where I could challenge myself and my track record of past accomplishments. I saw UNC-CH as an opportunity to grow.

12. I fell in love with UNC-CH after visiting with my parents. UNC-CH had an excellent reputation and a highly regarded history department. After four years, I believed I would be well prepared to apply for law school.

13. Prior to attending UNC-CH, I was fortunate to attend school and build strong friendships with a wide range of individuals whose backgrounds did not mirror my own. That helped my transition to UNC-CH and made my experience more meaningful and expansive than it would have been otherwise.

14. However, not all of my peers had similar experiences, and some appeared to struggle to build a diverse community or take full advantage of all UNC-CH had to offer.

15. I met a range of people while at UNC-CH. I lived with two white women from North Carolina during my freshman and sophomore years at UNC-CH and had a diverse group of friends in the dorms. I participated in Campus Y (a campus organization focused on social justice) and other organizations because of people I met. I was able to

contribute to UNC-CH in a broad way and had a much richer experience because of the diversity of people I met at UNC-CH.

Experience After UNC-CH

16. My exposure to diverse groups of people and to a wide-range of experiences – including exposure in college – has been important to my success and to my ability to lead in professional environments.

17. One of the things that creates capacity for leadership is cross-cultural experience. Early cross-cultural experiences are the prerequisites to developing respect and appreciation for diverse opinions and experiences. They broaden the aperture to help us wrestle with complexity and approach problem-solving with greater creativity. With these critical badges of leadership, one is better able to build a robust network and achieve success in all fields, including business, academia, science and technology, public policy, the arts and beyond.

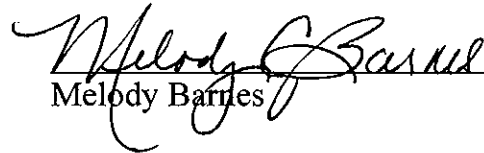
18. My cross-cultural experiences have been essential to my professional success. As a chief counsel on the Senate Judiciary Committee and as Director of the White House Domestic Policy Council, those experiences were important to understanding – and developing solutions to address – the challenges facing our country. My education at UNC-CH and particularly my exposure to a diverse community of students and faculty were essential preparation for my role as policy advisor.

CONCLUSION

19. Our world is becoming more diverse, and if we want UNC-CH graduates to be successful individuals and leaders, UNC-CH must continue to expose its students to classmates from different backgrounds who have different experiences than their own.

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

Executed on 7 August 2017


Melody Barnes

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DECLARATION OF RONALD F. BILBAO

DECLARATION OF RONALD F. BILBAO

I, Ronald F. Bilbao, hereby make this declaration from my personal knowledge and, if called to testify to these facts, could and would do so competently:

Background

1. I graduated from The University of North Carolina at Chapel Hill ("UNC-CH" or "Carolina") in 2010, and I majored in Political Science and minored in Social and Economic Justice. After leaving UNC-CH, I worked in-house as a lobbyist at the American Civil Liberties Union ("ACLU") in Tallahassee, where I worked on legislative issues. Following my tenure with the ACLU, I went to the Service Employees International Union ("SEIU"), where I represented doctors and nurses at a public hospital in Miami.

2. I am currently employed by the Florida Education Association, a state-wide teachers union, as a Legislative Specialist.

3. I was born and raised in Miami, Florida. My mom is from Venezuela, my dad is from Colombia, and my brother was born in Venezuela. I applied to Carolina because my brother was at the top of his class in high school and was accepted into Carolina and lots of other great schools. However, he was undocumented, and he could not go to any of the schools that he was accepted to since he did not meet the residency requirements for scholarships or in-state tuition. Since I was born in the U.S., I had the good fortune of being able to go to Carolina on a scholarship.

4. One of the reasons that I chose Carolina was because of the Carolina Covenant program. The Carolina Covenant provides eligible low-income students with grants, scholarships, and work study jobs so that they can graduate from Carolina debt-free. It has changed the game in terms of low-income students being able to attend Carolina. Before the

Covenant, low-income minorities mostly just had the option to go to community college if they could not afford the cost of college. In Miami, many Latinos went to Miami-Dade College. I was able to graduate from Carolina debt-free. The Carolina Covenant changed the course of my life and my career.

Experience at UNC-CH

5. As a minority student, I felt like a fish out of water when I arrived at UNC-CH. Hispanics are the majority of the population in Miami, but that is not the case in North Carolina or at UNC-CH. I did not really know what it meant to be Latino in a non-Latino majority environment until I got to North Carolina. In 2006, North Carolina's population was 4-5% Hispanic, and it doubled by 2010. North Carolina had the fastest growing Latino population in the country, as people from Mexico and Central America are settling in the State.

6. There are lots of cultural opportunities at UNC-CH, which enrich the campus environment. As UNC-CH already has the Sonya Hayes Stone Center for Black Culture and History, the Carolina Asia Center, and the American Indian Center, a Latino Center felt like the next logical step to support the changing demographics of the University and the State of North Carolina. The campus community was open to the idea.

7. In my four years at Carolina, there were two Chancellors, and they succeeded in taking the first steps towards opening a Center by creating the Latina/o Collaborative. The Collaborative is based on campus, provides cultural programs, and showcases Latino artists. It was fun to be part of this and to be someone who brought a different perspective and set of life experiences to a place that may have not been fully immersed in this emerging population and its culture.

8. I used to write a Daily Tar Heel (“DTH”) column about Latino perspectives and race. I had a lot of conversations at the time about the DREAM Act. Many of my columns were about people having to see immigration from their own perspectives and through their own experiences, but people also have to accept that people have been immigrating to this country for a long time.

9. I wrote a lot about my brother, who came to this country at age one. He speaks perfect English and won spelling bees as a student. The notion that he is somehow not an American is crazy to me. He knows nothing about Venezuela, the country in which he was born. It would be wrong for someone to say that he is not an American and that he should go back to his country—he is a man without a country. This idea causes some discomfort to some people who do not understand our family's experiences, but it was important for me to share our perspective and to foster a conversation about the realities of being undocumented on the University campus.

10. I received a lot of backlash from my columns in the DTH. People told me to go back to my country, even though I was born in America.

11. I ran for Student Body President during my junior year, and I came in third. I believe part of the reason was because people were not ready to have a Hispanic Student Body President. I felt that as the “Hispanic candidate,” I was expected to act a certain way. Minorities experience those kinds of microaggressions in various aspects of their life, but it does not mean it is not hurtful.

12. I was at campus when they tried to bring Tom Tancredo, a Republican politician from Colorado, to speak on campus. There were lots of protests from liberal groups saying that Tancredo promotes hate speech. I was a part of those liberal groups, but I felt the opposite way

than the protestors. I believe that free speech and diverse opinions make the conversation richer. We do not stymie free speech in this country, we combat speech with more speech.

13. I was on the Chancellor's Committee about academic freedom and responsibility. Many conservative students said that teachers have liberal leanings, so the Committee did an analysis of whether faculty members were biased. The analysis found no direct evidence of so-called "liberal bias" but did find there was the "perception of bias" among some students and faculty, and that needed to be addressed. Instead of "academic freedom," there must be "academic responsibility" among faculty and staff to recognize that bias and teach both perspectives as much as possible. UNC-CH has always been a place that welcomes those conversations and lets students bring those issues to the highest level, including the Chancellor.

14. I took a few classes in the African, Afro-American, and Diaspora ("AAAD") Studies Department, and the students engaged in rich discussions about the new, emerging diverse population of Latinos versus the long-existing population of African-Americans. Diversity is not just about one thing. Experiences make the conversation rich—not just ethnicity or racial background, but how those experiences shape individuals.

15. I also took classes in the recently formed Latino Studies minor. I took a couple of classes, and while there were lots of Hispanic students, there were also white students who wanted to learn more about Latino and Hispanic culture. Not all Latinos or Hispanics have the same perspectives. I am Venezuelan and Colombian, while others at UNC-CH are Chicano, Mexican, Central American, Guatemalan, or Honduran.

16. I recall hearing that UNC-CH has students from 120 countries. That diversity is so beneficial, not in terms of whether you pass a test, but how you grow as a person -- which is really the purpose of going to college. Not everything you learn is in the classroom. The people

you build relationships with and the chance to learn from different people is what helps you build a career, launch a business, or become an entrepreneur.

17. It is a no-brainer that people benefit from learning from other people's experiences. This is important in the classroom but it goes beyond the classroom as well.

18. Cross-cultural understanding is hugely important. One of the most important aspects of my education was learning from and listening to conservatives. In other places, people have certain perspectives about the South that are all blown out of proportion. When you put conservatives and liberals in one place, they tend to figure out how to listen to one another. Every roommate I had was conservative, and we had conversations about issues, including immigration. Learning about my brother changed their perspectives, and understanding their backgrounds helped me see their arguments. For example, one roommate's parents were fourth generation farmers who feared that immigrants would take their jobs. This understanding helped me at the ACLU in representing people with other perspectives. This exposure to diverse viewpoints helped me when working with Republicans, and I have brought that understanding to my career.

19. I return to UNC-CH each Fall as a member of the Alumni Committee on Racial and Ethnic Diversity (ACRED) along with other alumni who represent diverse communities. The group tries to convey the feelings and experiences of minority and diverse alumni to University administration. We had these conversations with the Chancellor and we spoke to her about creating a Latino Center. We emphasized that having a Latino Center is a symbol that represents the University making a deeper commitment to the Latino community.

20. UNC-CH has done a really good job of making diversity a priority, but it certainly is not perfect. There were very few Hispanic or Spanish professors when I was at UNC-CH. To my knowledge, no one in the Chancellor's cabinet or on her senior staff is Hispanic.

Conclusion

21. With the changing population, diversity at UNC-CH is more important than ever. The diversity at UNC-CH truly mattered to me personally and greatly enriched my education. UNC-CH must continue its commitment to diversity for future generations. There are opportunities to improve and room to grow, and I hope UNC-CH will be permitted to embrace those opportunities.

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

Executed on: 6/26/17



Ronald F. Bilbao

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CASE NO. 1:14-CV-954**

**STUDENTS FOR FAIR
ADMISSIONS, INC.,**

Plaintiff,

v.

**UNIVERSITY OF NORTH
CAROLINA et al.,**

Defendants.

DECLARATION OF MARY COOPER

DECLARATION OF MARY COOPER

I, Mary Cooper, hereby make this declaration from my personal knowledge and, if called to testify to these facts, could and would do so competently:

Background

1. I am a Caucasian woman from Nashville, Tennessee.
2. My father was a representative in the U.S. House of Representatives. He also taught as an adjunct professor in the Owen School of Management at Vanderbilt University, teaching health care policy.
3. From eighth through twelfth grades, I attended a small, private boarding school in Massachusetts. There were 87 students in my graduating class.
4. As a senior in high school, I knew that I wanted to attend a large college or university, where I would have many different experiences and would be surrounded by classmates whose experiences had been different from mine. I also wanted to attend a school closer to Nashville.
5. My dad went to The University of North Carolina at Chapel Hill (“UNC-CH” or “Carolina”), so I filled out an application.
6. After I was admitted to UNC-CH, I spent a day on campus as part of a program for prospective students. I met many people and knew it was just a taste of what I would experience if I decided to go to college there. I also remember attending a session on the Carolina Southeast Asia Summer Program (“SEAS”), through which 25 rising sophomores have the opportunity to spend the summer in Southeast Asia. I was

excited to learn that the SEAS program really looked for students with different first-year experiences to form a well-rounded group of participants. I left eager to be a Tar Heel.

7. During my first two years as an undergraduate, UNC-CH felt like a big, brand-new place. I knew just one person when I was dropped off at Parker Residence Hall my freshman year, so I knew that I needed to develop a sense of community.

8. I joined Kappa Delta sorority and involved myself in different clubs and activities on campus, including women's rowing, Campus Y, and student government. I served on the Chancellor's Energy Task force where we encouraged the Chancellor to commit UNC-CH to ending its use of coal as a fuel for its cogeneration plant by 2020 and to make every possible effort to end its purchases of coal mined by mountaintop removal immediately. I also served as the co-chairwoman of HOPE Gardens, which employs Chapel Hill's homeless population and teaches self-sufficiency through growing food. These activities helped make the big campus feel smaller.

9. As I had hoped, I was selected for the SEAS program as a freshman and spent the summer of 2009 as a Summer Research Fellow at the National University of Singapore. My research focused on economics and immigration in Southeast Asia.

10. During the summer of 2010, I served as an intern in the White House. I assisted the First Lady, served as a point of contact for eight official trips in the District of Columbia, and wrote memoranda on meetings with dignitaries for East Wing staff.

11. In 2011, I was elected Student Body President. When campaigning, I learned so much by interacting with different affinity groups and talking with their members about their experiences and perspectives. Similarly, serving as Student Body

President allowed me to meet so many diverse people. Through these experiences, I was able to learn what the Carolina experience is like from many different points of view.

12. I graduated from UNC-CH in 2012 with a Bachelor of Science in Environmental Health Science.

13. After graduating from UNC-CH, I joined Teach for America and worked as a physics teacher at Wilmer Hutchins High School, an under-resourced public high school with many students from disadvantaged backgrounds in Dallas, Texas, from 2012 to 2014. I taught Physics and Advanced Placement Physics to 180 juniors and seniors. In 2013, the faculty at Hutchins High School voted me “Teacher of the Year.”

14. From 2014 to 2016, I worked for Deloitte as a consultant in Washington D.C..

15. In 2016, I returned to teaching. In 2016-17, I taught freshman algebra and geometry at a high school in Washington, D.C. I am currently teaching 8th grade math at a public charter school in Nashville, Tennessee.

The Impact and Importance of Diversity at UNC-CH

16. As a UNC-CH student, I was involved in diversity-related issues and activities from the very start. In both the academic and student government settings, I saw the positive impact that diversity had on my own experience and on the campus as a whole.

17. In the UNC Gillings School of Global Public Health, students often were encouraged to share personal experiences. In one instance, for example, a student who lived near a hog farm talked about the public health impact that hog farming had on his

family. Hearing different perspectives from other students in my biostatistics and epidemiology classes really pushed me to think about my own experiences in new ways. My education truly benefitted enormously from the diversity in my classes.

18. Learning about and promoting diversity as Student Body President also greatly enhanced my experience at UNC-CH. Campaigning for and serving in that role allowed me to meet so many diverse people and helped me to understand their perspectives. That understanding was crucial to my decision-making as a member of the Board of Trustees, especially with respect to issues like financial aid. I had many conversations with Shirley Ort, the former Director of the Office of Scholarships and Student Aid, about the Carolina Covenant and the value of keeping UNC-CH accessible. Thinking through issues like how to increase graduation rates for African-American students and how to help them succeed was important to me personally and also to the Board of Trustees.

19. In short, UNC-CH taught me the power of individual voices and perspectives. It is crucial that we support that diversity and also that we come together in our commonalities. I met many people at UNC-CH who did not look like me but who shared my love for Carolina and my desire to make it a better place. I learned that while we may be different, we have a lot in common.

20. UNC-CH has a long history of producing leaders. If you are going to be a leader in the world today, you have to have had diverse experiences or have supported the diversity of others. We do not operate in silos anymore. It is critical that leaders have the ability to engage and speak about issues. To develop that leadership ability, it is

important that students in the learning mindset have the chance to learn from different voices. A doctor needs to understand not only organic chemistry, but also the experience of those who he or she will encounter as patients. In the learning environment at UNC-CH, one can learn intentionally about diversity but also through random teamwork assignments in class. If there were a reduction in the diversity of the student body, those spontaneous opportunities to learn from peers would be negatively affected.

21. My experiences with diversity at UNC-CH and beyond have made me confident in my ability to work with, coach, and teach others who do not look like me or who have not had the same experiences. That confidence and that ability to connect with others have been critical in my role as a teacher. In one instance, I bonded with my students over our common love of pizza. One of my students had never had a white teacher before. “But when I saw you eating pizza,” he said, “I knew I could trust you.” He then brought ten of his friends to my classroom to ask questions about their physics homework.

22. Even though I do not teach in North Carolina, every wall in my classroom is decorated with something from UNC-CH, and I encourage my students of color to apply. I know that their presence would benefit students like me who had not experienced diversity before.

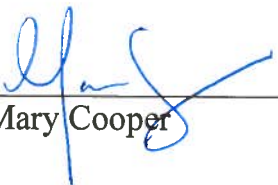
Conclusion

23. UNC-CH’s diversity is one of its greatest assets. The diversity I experienced enriched my education and made me a better leader. It was an honor to

serve a diverse population as Student Body President, and my experience at UNC-CH helped prepare me to teach and serve diverse populations.

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

Executed on: 10/13/2017



Mary Cooper

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CASE NO. 1:14-CV-954**

**STUDENTS FOR FAIR
ADMISSIONS, INC.,**

Plaintiff,

v.

**UNIVERSITY OF NORTH
CAROLINA et al.,**

Defendants.

DECLARATION OF MARTY DAVIDSON

DECLARATION OF MARTY DAVIDSON

I, Marty Davidson, hereby make this declaration from my personal knowledge and, if called to testify to these facts, could and would do so competently:

Background

1. I am a Black male from Fanwood, New Jersey.
2. I attended Union Catholic Regional High School, a private school in Scotch Plains, New Jersey.
3. In 2016, I received a Bachelor of Arts in Political Science from The University of North Carolina at Chapel Hill ("UNC-CH"), where I was a member of the Honors Program.
4. I currently am pursuing a doctorate (Ph.D.) in Political Science at the University of Michigan in Ann Arbor.

Experience and Involvement at UNC-CH

5. At UNC-CH, I served as Co-Chair of the Carolina Millennial Scholars Program ("CMSP"). CMSP is a two-year program designed to recruit, connect, and support undergraduate males from diverse backgrounds. First-year CMSP Scholars are encouraged to form a community, to explore campus resources for academic and personal success, and to learn more about leadership principles and opportunities. They also are introduced to academic research. Second-year CMSP Scholars continue their community and academic engagement activities while gaining hands-on experience with research, leadership, and networking.

6. I also was elected to serve as a Vice Chair of the UNC-CH Honor System (“Honor System”). The Honor System is responsible for adjudicating alleged violations of the Honor Code and, when necessary, for administering disciplinary sanctions to students found responsible for Honor Code violations. In addition to these responsibilities, I conducted research on race and punishment during my time as a Vice Chair.

7. I further served as a member of the Executive Committee of The Drake Group, an organization that promotes academic integrity in college sports.

8. In addition, I was an Orientation Leader for the Office of New Student and Carolina Parent Programs. As an Orientation Leader, I guided 4,000 incoming first-year and transfer students during 18 orientation sessions. In that role, I facilitated group activities for 20 incoming students per session.

9. I also was a Student Educator at the Morehead Planetarium and Science Center, an appointee to the Provost’s Committee on Inclusive Excellence and Diversity, a member of the UNC Men’s Project, a peer tutor, and an intern for Minority Male Engagement Coordinator Chris Faison.

Diversity at UNC-CH

10. I am from an area approximately 25 miles from Manhattan in the New Jersey suburbs, to which White people fled when Black people moved into Brooklyn, Queens, and the Bronx. As a result, I have interacted with people of other races for most of my life. Accordingly, the biggest eye-opener for me at UNC-CH was geographic diversity. I had not interacted with many people from the South.

11. Diversity was not the primary reason I chose to attend UNC-CH, but it played a role in my decision. Ultimately, I chose UNC-CH because it was one of my less expensive alternatives and the best value overall with respect to cost and quality of education. But among the colleges and universities to which I applied and was admitted – including the University of Virginia, Swarthmore College, Rutgers University, and the University of Rochester – UNC-CH was the second most diverse. Lack of diversity was the primary reason why I did not apply to Boston College, the University of Notre Dame, Villanova University, and some of the other schools in the area where I grew up.

12. Even though UNC-CH is more racially diverse than some of the other schools to which I applied, it is not representative of the State. Some of the other schools in the University of North Carolina system, including UNC-Greensboro and UNC-Charlotte, are much more representative. I felt that UNC-CH could have benefitted from more diversity.

13. Nevertheless, Hinton James Residence Hall, where I lived as a freshman, is a perfect example of the diversity on the UNC-CH campus. I had seven suitemates, all of whom were from different backgrounds and had different academic interests. My roommate was from China and never had been to the United States before. There also were people from several different parts of North Carolina. One of my friends had a roommate who had never interacted with anyone who was not White. Sometimes this diversity created uncomfortable situations, especially for first-year students who were just beginning to explore their identities. Importantly, however, the diversity in Hinton James facilitated experiences based on more than just appearance.

14. Although I had a great overall experience at UNC-CH and benefitted somewhat from the diversity on campus, I also experienced significant isolation and tokenism. In several of my classes, I was one of ten or fewer students – and sometimes even the only student – who was Black or a person of color. In a 200-person class, I could sometimes count the number of Blacks and Latinos on one hand.

15. Often, as a person of color, I brought a different perspective to a class discussion. In my constitutional history class, for example, I was the only Black student. Because many people watch Law and Order or similar television shows, they have idealized conceptions of America's judicial process. When we discussed *Lawrence v. Texas*, which struck down a sodomy law in Texas, I noted that the case actually began with a complaint that a Black man was waving a gun. That observation highlighted the fact that most cases are multi-faceted, with no one conception of the truth. Absent my presence, the class conversation would not have gone in that direction; rather, it would have been missing a component.

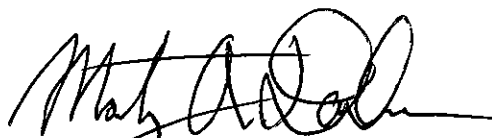
16. Similarly, as an orientation leader, I led several 15- to 30-minute discussions of diversity following various events. For example, when one student called another student a derogatory term for being gay, I was able to start a discussion about diversity with 20 people I did not know yet and who did not know each other yet. That is an example of a situation in which talking about diversity and being around diverse people had a clear impact. It takes some effort to speak about diversity, and the new student orientation program would not have been as effective if the team of orientation leaders had not been diverse.

Conclusion

17. Diversity cannot be found within one person. It is in the collective. While the diversity-related programming at UNC-CH benefitted me significantly, there is more work to be done. If UNC-CH is to continue providing its students with a quality education, diversity must be considered.

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

Executed on: 7/24/17


Marty Davidson

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CASE NO. 1:14-CV-954**

**STUDENTS FOR FAIR
ADMISSIONS, INC.,**

Plaintiff,

v.

**UNIVERSITY OF NORTH
CAROLINA et al.,**

Defendants.

DECLARATION OF LAURA GAMO

DECLARATION OF LAURA GAMO

I, Laura Gamo, hereby make this declaration from my personal knowledge and, if called to testify to these facts, could and would do so competently:

Background

1. I graduated from The University of North Carolina at Chapel Hill (UNC-CH or Carolina) in 2016 with a degree in Media and Journalism and Global Studies, with a concentration in Public Relations. I am currently pursuing a Master in Public Relations at the University of Tennessee, Knoxville. I am a Hispanic female.

2. I was an out-of-state student from Florida, and I did not know that UNC-CH existed until my senior year of high school. The thing that first caught my attention was the school colors on a mailing. When I started looking at mass communications programs, I learned that Carolina's program was highly rated, and I began to pay closer attention to the mailings that Carolina sent.

3. I applied late to Carolina. UNC-CH offered a travel grant that paid for my flight and hotel to come for a campus visit. I would not have been able to come to campus otherwise, as it was a tough year financially for my family. My mother was sick and unable to work, and my whole family depended on my father's income. As soon as I visited campus, I fell in love with the place. I felt welcome when I saw how diverse the campus was. I knew that, at the time, the University of Florida was the least diverse college in the state. I also visited Florida State University, but the only people who looked like me worked in the dining hall. This was also somewhat the case at Carolina,

and a lot of the Hispanic women working at Lenoir Hall became like aunts and moms to me. That was the case for other Latinx students as well.

4. I was praying for guidance on where to go to school when I visited Carolina, but I was fearful that I would like it, and as an out-of-state student, would have to go into debt or would not be able to afford the cost of attendance. I became a Carolina Covenant Scholar, part of a program that allows low-income students to graduate debt-free with the help of scholarships, grants, and work-study jobs. When I saw that I could receive everything I needed financially, it was the last piece to fall into place in terms of establishing that Carolina was the place for me.

Experience at UNC-CH

5. I had difficulty transitioning to college during my first year. I am very close to my family, and being three states away from home was tough for me. It made me realize who I am. I began to understand that my Hispanic and Colombian heritage and faith are very important to me.

6. I became involved with a campus ministry, which was very racially and ethnically diverse. The Carolina Hispanic Association (CHisPA) and the Latinx Collaborative also took me in and guided me through my first year. That was crucial to helping me find my niche and giving me a sense of belonging. During my freshman year, I was the first-year co-chair of CHisPA, and I later became the secretary. During my sophomore year, I started working with the Latinx Peer Mentoring program as part of my work-study. Natalie Borrego, a 2014 graduate, started the program, and I eventually became the director. The program allowed students to serve as mentors for first-year

Latinx students. Faculty and staff also mentored three or four undergraduates who each had three or four first-year mentees themselves. The program included social events, personal and professional development, and monthly mentor talks. These talks were really beneficial, and we asked professors about their successes and failures and learned about perseverance.

7. Carolina is great about celebrating diversity. During the Week of Welcome, there are Culture on the Quad performances. I really appreciated that celebration of different cultures.

8. Coming from central Florida, I quickly recognized that some areas of North Carolina have not been exposed to certain people or experiences. I am super patient because I know that it is not those students' fault, it is just what they have or have not been exposed to. At the same time, I get frustrated when someone refuses to understand. I remember one African-American student who kept asking me, "Are you sure you're not white? You don't sound Hispanic." I asked her to please stop asking me that question. Because I moved to the United States when I was six, and although my family members do have an accent, I do not have an accent and fail to fit certain stereotypes perpetuated in popular culture and media.

9. I had some ups and downs at Carolina. I made a point to assure that my group of friends was diverse. I had many Covenant Scholar friends, and not all of my friends were Hispanic. I still sometimes experienced microaggressions.

10. There were times at Carolina where I was the only immigrant in the room. It was sometimes difficult for me to identify with people who are not Carolina

Covenant scholars, and it was also hard for others to understand my perspective. Some students assumed that because I am an immigrant that I am undocumented.

11. A professor once asked me, not maliciously, to talk about immigration in a group presentation because it was not covered in class. I sometimes felt like I was asked to be a spokesperson, but when people are willing to listen and understand, I do not mind at all.

12. It is important to interact with students from different backgrounds and ethnicities. It was cool and important to have people around me that I could relate to, but what taught me most about who I am and who I want to be was exploring different perspectives and ideas. I had meaningful interactions with friends in the dining hall where we would talk about current events and what we thought of them. At other times, professors created those meaningful conversations, often in the School of Media and Journalism. These conversations happened in and out of the classroom, and they helped me solidify my identity, my values, and what I believed in. Sometimes conversations led me to change or shift my perspective.

13. I was a Resident Advisor (RA) for three years. Through the Department of Housing, I was able to work with a diverse group of people. I worked on community immersion and building relationships, and realized that many people had never interacted with people from different backgrounds. Some students from Boone or Murphy, North Carolina had never interacted with Hispanic or international students. It was great to see students forge relationships and identify commonalities, like interest in a TV show or struggling in the same class. It was great seeing those bridges built between people of

different racial identities, ethnic identities, and sexual orientations. It was my favorite thing that I took away from my experience at Carolina and from being an RA.

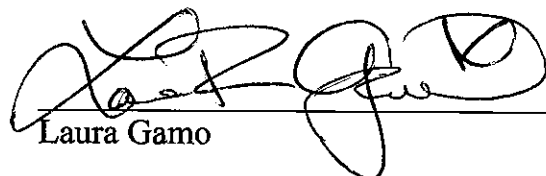
14. As a Public Relations major, I realized that I would be reaching out to all sorts of audiences, trying to figure out how to engage all sorts of people for a specific purpose or goal. It is crucial to understand that your audiences can be really broad and it can be difficult to identify your target audience. Gaining a variety of perspectives helps you identify with whom you are trying to communicate with and how you should go about reaching those people. I want to pursue a career in diplomacy or perhaps with a not-for-profit group, and it is important to find human interest as a common ground.

Conclusion

15. I hope that I contributed to other students' experiences at Carolina, and I know that my diverse classmates contributed to mine. Through my time at UNC-CH, I learned to understand who I am, to find empowerment in that and recognized how I can utilize my experiences to understand and communicate with people that have similar and different identities and experiences. The opportunity that I had to attend Carolina as a Covenant Scholar, and the experiences I had at Carolina, have created a great foundation for my future career as a professional communicator.

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

Executed on: 7/25/17


Laura Gamo

DECLARATION OF RACHEL GOGAL

I, Rachel Gogal, hereby make this declaration from my personal knowledge and, if called to testify to these facts, could and would do so competently:

Background

1. I graduated from The University of North Carolina at Chapel Hill (“UNC-Chapel Hill” or “Carolina”) in 2016 with degrees in Public Relations and Political Science. From May 2016-June 2017, I served as a Chancellor’s Fellow, a year-long fellowship in the Office of the Chancellor. I am currently serving as Manager of University Communications for the Office of University Communications. I am offering this declaration to share my perspective as a recent graduate of the University.

2. I am from Garner, North Carolina which is outside of Raleigh. I went to Garner Magnet High School, an International Baccalaureate (“IB”) high school. I came from a lower-performing school, and students who needed to be challenged academically were brought into the IB program. I graduated third in my class of 500 students. Going through an IB program, I was challenged to examine what I was learning on a global scale. It was a great segue to continue that way of thinking during my college career.

3. I applied to UNC-Chapel Hill, The University of North Carolina at Wilmington, and Appalachian State University, but when I got accepted to UNC-Chapel Hill, I knew I wanted to attend. Carolina was my number one choice. My grandfather attended Carolina for undergraduate and law school.

4. When I came to Carolina, I was interested in political communications, but I soon became interested in communications in higher education. I hope to continue pursuing communications in higher education after my Chancellor’s Fellowship ends.

Experience at UNC-Chapel Hill

5. I knew I wanted to get involved in student government at Carolina since I had been in student government in middle school and high school. I started from the bottom of the ladder and worked my way up to Student Body Vice President. I was able to interact with students from different cultures and backgrounds as well as with professional and graduate students. I also served on the Eve Carson Scholarship Committee, and I was an Office Assistant in the Office of Housing and Residential Education. I was involved in intramural sports and played on a soccer team.

6. The biggest mission of student government is not to speak on behalf of students but to elevate students' voices so that their voices are heard by the administration. I often spoke with individuals from groups such as the Black Student Movement and Latino/a Collaborative to better understand their experiences and their needs. I worked to bring those concerns forward.

7. In my capacity as Vice President, I interacted with students of different backgrounds on a daily basis. I was responsible for external appointments, the system by which students are appointed to sit on University committees across the campus. These committees included the University Teaching Awards, the Provost's Committee on Inclusive Excellence and Diversity, Faculty Council, the Committee on Student Conduct, and the Campus Health Advisory Board. Some of these groups touched on the topic of diversity. Representatives to these groups were able to provide different perspectives on diversity and inclusion. I interacted with a variety of students representing the student body who raised their concerns related to diversity and inclusion to me and to the University administration.

8. I also served as the Chair of The Student Advisory Committee to the Chancellor. The committee consisted of ten undergraduate students and three graduate students. Many of our

discussions related to diversity and inclusion. A recent example of an issue that raised concerns about inclusion was the passage of House Bill 2 (“HB2”), an act requiring individuals to only use restrooms and changing facilities in government buildings that correspond to the sex on their birth certificates. We were able to provide the Chancellor with reactions and concerns of the student body about the bill.

9. My education was fueled by the diverse perspectives of students in my classes. I benefitted from hearing the perspectives of others.

10. One significant class I remember where diversity made an impact was a crisis communication class. We discussed real-world crises, and we would have to address those crises as public relations representatives by presenting press conferences on each crisis. In preparation, we focused on current events like HB2. We discussed these topics from an academic and corporate perspective, and we spoke about race, diversity, and inclusion. The class consisted of individuals from a variety of different backgrounds and cultures, which provided important perspectives. Considering real-world, current issues helped us learn how to be better crisis communicators.

11. One of the biggest things I have gained from my higher education experience at Carolina is perspective. I grew up shielded from the world around me. At Carolina, I became exposed to the realities of the world. As a white female, I cannot relate in some ways to a black female’s experiences but now, I am able to have open-minded conversations, understand where people from different backgrounds are coming from, try to help in my capacity to elevate concerns, and drive the conversation.

12. Many students at Carolina are well educated and understand the importance of issues related to diversity and inclusion. When students express concerns, there is intent and

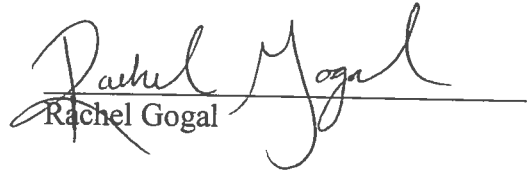
meaning behind those concerns. The University has done a great job of taking those concerns to heart, and I hope the University continues to take those concerns seriously.

Conclusion

13. I am fueled by my deep love of Carolina. I believe diversity is essential to the Carolina experience and to Carolina's excellence.

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

Executed on: 07-06-17


Rachel Gogal

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CASE NO. 1:14-CV-954**

**STUDENTS FOR FAIR
ADMISSIONS, INC.,**

Plaintiff,

v.

**UNIVERSITY OF NORTH
CAROLINA et al.,**

Defendants.

DECLARATION OF TEODORO (“TEDDY”) GONZALEZ

DECLARATION OF TEODORO (“TEDDY”) GONZALEZ

I, Teodoro (“Teddy”) Gonzalez, hereby make this declaration from my personal knowledge and, if called to testify to these facts, could and would do so competently:

Background

1. I am a Hispanic male. I graduated from The University of North Carolina at Chapel Hill (“UNC-CH” or “University”) in 2016 with a Bachelor of Science in Health Policy and Management.

2. I was born in San Juan, Puerto Rico. When I was a child, my family moved to North Carolina so that my father could pursue his Master of Business Administration at The University of North Carolina’s Kenan-Flagler Business School (“KFBS”). My father went to KFBS on a scholarship called the Consortium Fellowship, which aimed to increase diversity within KFBS.

3. After my father graduated from KFBS, my family moved to South Florida, where I spent most of my childhood. South Florida has a large Hispanic population. I grew up speaking Spanish at home. When I would go into a bakery or other store, I would have to order in Spanish, not English. And although I spoke mostly English in high school, my high school made an effort to engage with Hispanic culture. One time, my high school teacher, during a discussion about affirmative action, asked if any students felt like a minority; only one White male raised his hand.

4. Currently, I am working as a management consultant for Accenture in Raleigh, North Carolina. I work with health care clients.

My Experience as a Hispanic Student at UNC-CH

5. When I began applying to colleges, UNC-CH was high on my list because of my father's great experience at KFBS.

6. At UNC-CH, my experience was eye-opening. It was a completely different environment from what I was used to. But I loved it. In particular, I loved how each person I met was welcoming, exciting, and engaging.

7. However, I was shocked when I first arrived at UNC-CH. I was starting to see all of the different things that come with being at college, including being on my own for the first time and being in an environment that was not predominantly Hispanic. South Florida was very different from the environment at UNC-CH. It was interesting for me to call my parents and speak Spanish and know that other people around me did not understand me. But it was also great to learn about Southern culture.

8. During my first year at UNC-CH, I applied to and was accepted into the Carolina Millennial Scholars Program, a two-year program that provides a community and networking experience for males from diverse backgrounds. For me, this was a cool way to get involved in campus and make more friends. As a minority, it was interesting learning about different minorities from different kinds of life. I met two young men from Africa and many people from all over the country.

9. I never felt isolated at UNC-CH. I knew I came from a different perspective and I felt like I had a unique perspective to present. I knew I had some different things to bring to the table in terms of culture and roots, but I never was isolated. It actually made my campus experience more engaging. I felt as though people

wanted to know my opinion, not because I was Hispanic, but because it was different from their experience.

10. In my class on religion, we explored how different legends and myths within cultures stem from where the religion comes from or the history of the place. The class focus was on the Caribbean and Latin America. We ended up talking about a myth from Puerto Rico: the Chupacabra. We did not question whether the myth was real, but we talked about what it symbolized for people who lived there. This was fascinating for me because it was a household thing in my home. I could share my personal experience with my classmates.

11. I joined UNC's SLI, or Scholars Latino Initiative, my sophomore year. SLI is an organization that creates educational, professional, and civic engagement opportunities for a new generation of Latinx leaders in North Carolina. I was assigned a young male student from Chapel Hill to mentor. We would meet once or twice a month to talk about college goals and how our lives were going.

12. I got a lot out of the mentorship opportunity and SLI. I was not just working with mentees and helping them with their goals, but I also interacted with other mentors/mentees. The group became almost like a big family setting. Even when my mentee had to drop the program for personal reasons, I still attended meetings to keep up with other mentees and mentors. I realized how big a piece mentorship had played in my life. Doing something like this at such a young age with youth in high school can really help in lots of communities. Because of this experience, I am helping friend establish similar program in the Research Triangle Park region of North Carolina.

My Cross-Cultural Interactions at UNC-CH

13. Diverse interactions occurred everywhere. The first friend I met at UNC-CH was from Greensboro and Jewish. We talked about everything related to our experiences.

14. In classes, professors were so welcoming of student opinions. I was always encouraged – not as a Hispanic, but just as a student – to share my thoughts. I always thought it was cool to have those types of discussions – at football games, in classrooms, in dorms.

15. A woman in my friend group was Hispanic, but also other races. We had routine conversations about how our cultures differed and what about those cultures each of us enjoyed. I remember talking with her about the movie *My Big Fat Greek Wedding* and its depiction of that culture. We talked about how that movie was true of Hispanic culture too.

16. It was cool to bring cultures all together during family weekends as well. We would experience culture as part of family.

17. My ability to work with diverse populations will absolutely be important in the future. In health care, it is important to consider reach within diverse communities. Everyone needs health care, and the challenge is to figure out how to reach so many populations. Being a global individual makes a huge difference. Experience with people from different backgrounds has helped me with my current position doing business all over the world.

Conclusion

18. I loved my experience at UNC-CH, and UNC-CH's diversity was part of what made the experience so amazing. The chance to interact with people from many different backgrounds helps prepare UNC-CH's students for their future careers and life in a global world.

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

Executed on: 10/7/17


Teodoro Gonzalez

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CASE NO. 1:14-CV-954**

**STUDENTS FOR FAIR
ADMISSIONS, INC.,**

Plaintiff,

v.

**UNIVERSITY OF NORTH
CAROLINA et al.,**

Defendants.

DECLARATION OF ATRAYUS O. GOODE

DECLARATION OF ATRAYUS O. GOODE

I, Atrayus O. Goode, hereby make this declaration from my personal knowledge and, if called to testify to these facts, could and would do so competently:

Experience

1. I am an African-American male and a first generation college student. I am a 2007 graduate of The University of North Carolina at Chapel Hill ("UNC-Chapel Hill"), have a Master of Science degree from American University, and am currently pursuing a Master of Arts degree from Duke Divinity School.

2. I am the President and Chief Executive Officer of Movement of Youth, Inc., ("MOY") a youth development organization for underserved youth. I have served in this position since founding the organization in 2006 as a junior at UNC-Chapel Hill.

3. As the President and Chief Executive Officer of MOY, I am currently working with approximately 1,000 college students across four states to provide youth development services to underserved youths. We provide team mentoring, leadership academy, college and university tours, international delegations, and college scholarships.

4. While at UNC-Chapel Hill, I was inducted into the Order of the Golden Fleece, which is the University's oldest and highest honorary society.

5. I have worked for Public Allies, an AmeriCorps program that advances diverse leaders through paid apprenticeships in nonprofits.

6. I gave a TED talk at Duke University in 2014.

Personal Background

7. I grew up in Clarkston, Georgia living with my mother and father as an only child.

8. I had a rocky childhood. I first noticed my mother was using crack when I was five years old. My dad tried to shield me from it as best he could, but my mother still took me to crack houses and to buy drugs. My mom went to prison and rehab.

9. Police brutality became real for me at a young age. I remember seeing my mom snatched out of the house and slammed onto concrete floors by large police officers.

10. In middle school, we moved to Charlotte, North Carolina.

11. I tried to live a normal life, but I had many problems as a result of my childhood. I was recommended to a mentoring program.

12. I began a mentoring program with 100 Black Men of America. Their motto was “what they see is what they’ll be.” For the first time, I was exposed to seeing people who looked like me in professional settings, including African-American doctors and lawyers.

13. My mentor was an African-American banker. Seeing successful African-American members of society helped me understand that I could be successful

too. This mentorship program expanded my world, helped me to reconcile my past, and supported me in charting a different life course. It made me want to go to college.

Giving Back Through Movement Of Youth

14. My high school guidance counselor recommended that I apply to UNC-Chapel Hill. I was accepted and received a full scholarship from 100 Black Men of America. I felt I was standing on the shoulders of giants, of those who had laid the foundation for me. I immediately felt an overwhelming urge to give back.

15. As a student at UNC-Chapel Hill, I was very involved in campus life. I was involved with the University's Office of Diversity and Multicultural Affairs, became a Project Uplift counselor to introduce high school students of color to UNC-Chapel Hill and college in general, was a resident advisor, worked with the Black Student Movement (a Black affinity group), sang in an acapella group, and pledged a Black fraternity, Alpha Phi Alpha. During my junior year, I started MOY. MOY began because I saw a need to address the educational and social needs of underrepresented populations. I also formed MOY as a way to give back to those who helped me be successful.

16. MOY started as a Black Student Movement service project working with young men of color from Hillside High School in Durham, North Carolina. At the time, Hillside was facing a lot of scrutiny from the State because it was a lower performing school with a lot of behavioral problems. Hillside had not performed as well as other schools in the district, although it was receiving a great deal of attention and support from

the district, including Durham Public Schools bringing in instructors from North Carolina Central University to teach. At the time, Hillside was under state court supervision for mandated improvement. A fraternity brother teaching at Hillside connected me to the principal. I selected 11 mentors from UNC-Chapel Hill, and we began mentoring students one-on-one at a Saturday academy.

17. This program continued to grow, and 10 years later, MOY now works with 1,000 students across four states. We have mentors who are students at UNC-Chapel Hill, Duke University, North Carolina Central University, North Carolina Agricultural and Technical State University (“NC A&T”), Shaw University, Winston Salem State University, Howard University, Hampton University, and Columbia University.

18. MOY prepares diverse youth to lead and succeed in the 21st Century through mentoring and targeted enrichment activities led by college students. MOY exposes students to a number of opportunities, including Leadership Academy, Team Mentoring, College Tours, Summer Enrichment Academy, international travel via the J.U.S.T Global Fellowship, and scholarships through the Tyreic E. Hemphill Memorial Scholarship Fund. Through this dynamic design, participants receive intellectually challenging programming, positive role models to help set long-term aspirations, and the support required to nurture and fulfill those aspirations.

19. At present, MOY impacts hundreds of middle and high school students annually and is in the process of scaling nationally. We focus on students who are in the

middle academically. Since MOY's inception, 99% of participants have been students of color with the following outcomes: (1) 100% of students complete at least eight (8) hours of community service per school year (MOY mentors and mentees have completed 25,000+ volunteer hours since 2006); (2) 100% of high school students enroll in at least one Honors or Advanced Placement Course; (3) 100% of students graduate from high school; and (4) 96.5% of students enroll in college.

20. MOY aspires to be the nation's leading movement for young people to disrupt the status quo and build a safer, smarter, more socially conscious world. Our investment in diverse students today is an investment in America's future. We believe that everyone is born with what it takes to make a difference in this world. To that end, we work to empower youth to discover their unique gifts, helping them achieve and advance towards a successful life.

21. We have had graduates of the MOY program who help us expand. For instance, one of our graduates went to NC A&T and started the program there. We hope to continue to grow the program nationally and serve more underrepresented students.

22. MOY started because of my personal experiences and the opportunities I was given at UNC-Chapel Hill.

The Importance of Diversity at UNC-Chapel Hill

23. Picture the world as a lake, and you see that some of those fish are struggling and dying. You spend day after day trying to help and fix those fish, but they

keep struggling and dying. The question becomes not just what is wrong with those particular fish, but more broadly what is wrong with the lake.

24. From my work and research, I have learned that there is an empathy gap when it comes to race. Negative messages from the media about people of color are impacting the ability of White people to empathize with people of color. This effect is compounded when you understand that 90 percent of the social networks of White people are White. These people may not have regular interactions with people of color.

25. Institutional and structural racism present barriers to people of color. Having mentors and role models who are successful people of color help to break down those barriers and to create opportunities for other people of color.

26. At UNC-Chapel Hill, my interactions with people of different races were mostly positive. However, I did experience some microaggressions, and several times, my fellow students questioned whether I was qualified to be at UNC-Chapel Hill. I worked hard to get into UNC-Chapel Hill and it was difficult for me to have my work questioned for no reason other than my race. It lowered my self-esteem.

27. At UNC-Chapel Hill, I was able to regularly interact with people of different races and different backgrounds. However, when I was a biology major, my classes were not diverse. In several larger classes, I was the only person of color in the room.

28. Regular interaction with people of different races and backgrounds is important for understanding each other. If people do not know how to connect with one another, the opportunity to understand each other may be lost. Diversity and equity is critical. The only way to promote racial healing is through active dialogue and plans for reconciliation. We all need a common space for understanding, even if not always in agreement. I had this opportunity at UNC-Chapel Hill. Maybe not always in classroom, but on campus. That is what college should be about.

Conclusion

23. I will forever be grateful to those who paved the way for me and showed me that I could succeed. Students of color who succeed in higher education can reach back and help others like them so that students from challenging backgrounds can have better lives.

24. College is a place where students can learn from each other and prepare for life. If we do not have the opportunity to meet others who are different in college, we may miss that opportunity. Experiencing equity and diversity helps us all connect, develop empathy for one another, and reconcile the issues that divide us.

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

Executed on: 8/28/17

Atrayus Goode

A handwritten signature in black ink, appearing to read 'Atrayus Goode', written in a cursive style.

DECLARATION OF PETER HENRY

I, Peter Henry, hereby make this declaration from my personal knowledge and, if called to testify to these facts, could and would do so competently:

Background

1. I am the ninth Dean of New York University (“NYU”)’s Leonard N. Stern School of Business (“Stern”). I assumed the Deanship in 2010 and also joined the faculty at NYU as the William R. Berkley Professor of Economics and Finance. NYU Stern has the 8th most selective MBA program in the United States, is ranked #3 for research productivity, and has produced a global alumni community of more than 105,000 members in 125 countries.

2. Prior to becoming Dean of Stern, I was the Konosuke Matsushita Professor of International Economics, the John and Cynthia Fry Gunn Faculty Scholar, and Associate Director of the Center for Global Business and the Economy at the Stanford University Graduate School of Business.

3. I currently serve on the Board of Directors of two Fortune 100 companies: Citigroup Inc. and General Electric. In addition, I am a board member of the Council on Foreign Relations, the National Bureau of Economic Research, and the Economic Club of New York.

4. I led the external economics advisory group for then-Senator Barack Obama’s presidential campaign in 2008. Following President Obama’s election, I was chosen to lead the Presidential Transition Team’s review of international lending agencies such as the International Monetary Fund (“IMF”) and the World Bank. In June 2009, President Obama appointed me to the President’s Commission on White House Fellowships.

5. I regularly speak at the IMF and have testified before the United States Senate Committee on Foreign Relations and before various ambassadors to the United Nations. Additionally, I have served as a macroeconomic advisor to the governments of Ghana and Jamaica.

6. As an economist with a focus in the areas of emerging markets and international finance, I have authored numbers articles and book chapters, including a series of publications on

the topics of debt relief, international capital flows, and the role of institutions in economic growth: “Debt Relief” *Journal of Economic Perspectives* (Winter 2006); “Capital Account Liberalization: Theory, Evidence, and Speculation:” *Journal of Economic Literature* (December 2007); and “Institutions vs. Policies: A Tale of Two Islands” *American Economic Review* (May 2009).

7. I received a Bachelor of Arts in Economics with Highest Honor (and Phi Beta Kappa) from The University of North Carolina at Chapel Hill (“UNC-Chapel Hill”), a Bachelor of Arts in Mathematics from Oxford University, and a Ph.D. in Economics from the Massachusetts Institute of Technology. I attended UNC-Chapel Hill with a Morehead Scholarship and attended Oxford University as a Rhodes Scholar.

8. In addition, I played varsity football at UNC-Chapel Hill and basketball at Oxford University.

9. I was born in Kingston, Jamaica and became a United States citizen in 1986.

10. I am a Black male.

Importance of Diversity in the Business World & in Higher Education

11. Diversity of perspective is not just a nice thing for companies. Diversity of perspective is a critical competitive consideration in the business world. Business is frequently about selling your work or your product for your company. Businesses must interact with diverse clients and customers, and business people benefit substantially from exposure to every dimension of diversity – race, ethnicity, religion, political, undergraduate major, interests, and so forth.

12. Business men and women are increasingly in positions in which their clients or customers come from different backgrounds. In that world, it is a significant competitive handicap if these business men and women have not been in an educational environment exposing them to people from diverse backgrounds. Exposure to diversity in an educational environment provides the perspective that produces business school graduates who are going to be effective business professionals.

13. As Dean of a business school that prepares students to succeed in the business world, we teach our students that if they want to be effective leaders, they cannot make informed decisions without full information – a 360 degree perspective. If the information they receive is coming from colleagues who are all of the same background, they lack valuable perspective.

14. I became Dean at Stern in 2010 in the middle of the global financial crisis. When I became Dean, I was faced with an important question: how do we build our school into a 21st century model? I took the perspective that what we had to do was deepen and diversify the school. In my view, diversity is essential for preparing our students to succeed in an increasingly global world.

15. Diversity of the student body, broadly defined, provides critical educational benefits and prepares students for success in a global world.

16. At Stern, our students learn as much from their classmates as they do from professors. Students need to be challenged with diverse perspectives, and that comes from their educational environment. Building a diverse classroom experience is how to turn out the most informed critical thinkers. Classroom diversity is crucial to producing employable, productive, value-adding citizens in business. If our students are only around other students with similar backgrounds, they might as well be with only one other student.

Diversity at UNC-Chapel Hill

17. Exposure to diversity is important not just for business students, but also for students in higher education more generally.

18. I experienced the educational benefits of diversity first-hand as a student at UNC-Chapel Hill. As an African-American from a predominantly white high school in a wealthy suburb of Chicago (Winnetka, Illinois), who happened to be both a national merit scholar and a three-sport athlete, people had not met anyone like me before. And coming to a school that was

85 percent in-state students as an out of state student, I had not met many people like the ones attending UNC-Chapel Hill.

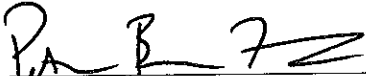
19. One moment in particular stands out. In my first-year physics class, I was in class with a young man from a rural town in North Carolina. We were both on the pre-medical school track and in the same physics lab. He wanted to study with me. I had gone to a fancy public high school, thought I had it under control, and was a little too self-assured. He was Caucasian from a small, southern town, spoke slowly with a drawl, and was rough around the edges. I brushed him off and decided not to study with him. I shunned him a bit because I felt like I had the class under control and made mistaken assumptions about how smart he would be. My grade was a B+ in the class and his was an A. He taught me a real lesson about the implicit assumptions I was making about people. The next class, we studied together and both ended up with As. That is what college is all about: experiencing diversity and changing assumptions as a result.

Conclusion

20. As Dean of Stern and an alumnus of UNC-Chapel Hill, I have observed and experienced the importance in higher education of exposure to diversity across many dimensions, including race. Having a diverse student body, including a racially-diverse student body, helps students break down stereotypes, improves their critical thinking, and prepares them for success in today's competitive global world.

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

Executed on: _____



Peter Henry

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CASE NO. 1:14-CV-954**

**STUDENTS FOR FAIR
ADMISSIONS, INC.,**

Plaintiff,

v.

**UNIVERSITY OF NORTH
CAROLINA et al.,**

Defendants.

DECLARATION OF BRITTANY HUNT

DECLARATION OF BRITTANY HUNT

I, Brittany Hunt, hereby make this declaration from my personal knowledge and, if called to testify to these facts, could and would do so competently:

Experience

1. I am a Native-American woman from the Lumbee Tribe of Robeson County, North Carolina.
2. I have a Bachelor of Arts in Psychology from Duke University and a Master's Degree from The University of North Carolina ("UNC-CH") School of Social Work.
3. I am the Assistant Director of Native American Student Affairs at North Carolina State University. I have served in this position since 2015.
4. My first job after graduate school was as a school social worker for Lumberton High School. Robeson County is the most racially and ethnically diverse in the state of North Carolina, and the student body reflected that diversity.

Lumbee Tribe Community

5. I grew up in Lumberton, North Carolina. The town I grew up in was about one third Native-American.
6. My tribe is very communal. We identify not as individual, but as part of a collective.
7. Growing up Lumbee, I learned that intelligence cannot just be measured quantitatively. I was respected in my youth because I did well in school and on standardized tests. But others are respected more because of their cultural knowledge or

life experience. There is not one way to measure intelligence or value, and growing up Lumbee taught me to respect intellectual diversity.

Experience at University

8. When I went to Duke University, I experienced extreme cultural shock. It was difficult to transition from a largely Native community into an environment where I was the only one. I found that people did not believe that Native people still existed or relied on tropes that misinformed them about our identities.

9. When I began my Master's degree program at the University of North Carolina School of Social Work, I hoped I would have more Native classmates and colleagues. However, upon entry, I found I was the only Native-American in my cohort.

10. Still, my transition was easier than my transition to college, because UNC-CH has taken proactive steps to being Native-friendly.

11. While at UNC-CH, I worked for UNC-CH's American Indian Center. This made my experience at UNC-CH wonderful and gave me an incredibly supportive community. This support helped me to be successful in my Master's program.

12. Even with this support and UNC-CH's proactive stance, I still experienced microaggressions, stereotypes, and other problems because of my race. For example, my roommate, a pharmacy student at UNC-CH, threw a Native American party at our house while I was away.

13. Additionally, people were not aware that the language they used was frustrating and offensive. Plenty of times in references to meetings, people would say "we'll have a pow wow about this." Pow wow means something different to me than just

a meeting. We can avoid using offensive language if we better understand people from different races and backgrounds.

14. In order to help UNC-CH embrace diversity, I participated in a “Dear Chancellor” video to lobby for more Native American representation on campus and call attention to instances of racism on campus. A true and correct copy of the video we prepared is attached hereto as Hunt Declaration Exhibit 1. In the video, we explained about some of the frustrating experiences that we had and asked for greater representation. I believe that greater representation of underrepresented groups will improve the UNC-CH experience both for minority students and for other students.

15. America is not homogeneous but is made up of distinct people and cultures that need to find ways to collaborate and include one another. It is important to represent that in the classroom to facilitate multi-faceted discussion where students can begin to understand people of different races.

16. It is important in higher education that universities are intentional about how they recruit to gain the buy in of a community and to inspire more students to want to come. Many at UNC-CH still feel isolated, even though I found that UNC-CH is making efforts to help Native students feel welcome and supported.


Conclusion

16. I chose to lobby for more students of color at UNC-CH because of my own personal experiences. As a Native student, having other students of color – and especially Native students – better represented on campus matters greatly to me, because

I know it provides critical support to Native students who may feel alone and contributes important perspectives to the campus community.

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

Executed on: 06-29-17



Brittany Hunt

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CASE NO. 1:14-CV-954**

**STUDENTS FOR FAIR
ADMISSIONS, INC.,**

Plaintiff,

v.

**UNIVERSITY OF NORTH
CAROLINA et al.,**

Defendants.

DECLARATION OF JOSEPH ALEXANDER KENLEY

DECLARATION OF JOSEPH ALEXANDER KENLEY

I, Joseph Alexander Kenley, hereby make this declaration from my personal knowledge and, if called to testify to these facts, could and would do so competently:

Experience

1. I am a White male. I graduated from The University of North Carolina at Chapel Hill ("UNC-Chapel Hill" or the "University") in 2009.
2. I was born in Indianapolis but grew up in Sarasota, Florida. I went to high school in Florida, where I was a Florida state and national champion gymnast.
3. While at UNC-Chapel Hill, I was a varsity athlete on the UNC-Chapel Hill Swimming and Diving team. I became a competitive diver at UNC-Chapel Hill, where I lettered for four years and achieved scores that ranked in the University's all-time Top 10 for diving scores on the one meter, three meter, and platform events.
4. While at UNC-Chapel Hill, I also participated in the GLOBE program through the University's Kenan-Flagler Business School ("KFBS"). I wanted to pursue international business, and the launch of the GLOBE program, which provided opportunities for business students to study at foreign universities, was one of the things that drew me to UNC-Chapel Hill.
5. After graduating from UNC-Chapel Hill, I obtained a Master of Business Administration at Northwestern University's Kellogg School of Management.
6. Currently, I am a Manager at Deloitte Strategy & Operations in Chicago, where I focus on recruiting and coaching new consultants in the United States and China.

7. During business school, I worked as a Global Strategist intern at Samsung in Seoul, South Korea, in Samsung's Global Strategy group, which is focused on globalizing Samsung's operations across all of their business units.

8. Before business school, I worked for three years as a consultant at Deloitte in Atlanta. My work was focused on financial services post-merger integration, pharmaceutical supply chain, and aerospace and defense manufacturing. At Deloitte Atlanta, I had the opportunity to lead a global workshop with product leaders from Asia Pacific, Europe, the Middle East and Africa, and Latin America focused on developing an initial global rollout plan for the pharmaceutical sales and operations planning process designed and implemented in the U.S.

9. At Deloitte Atlanta, I coordinated Deloitte's undergraduate recruiting efforts at UNC-Chapel Hill, resulting in 31 consultants hired from 2010-2012. I was also one of two consultants chosen nationally to serve as a peer coach for the first analyst training program as part of Deloitte's venture with China and coached 134 analysts on leadership techniques with a focus on mentorship.

Importance of Diversity

10. As a member of the diving team who spent a lot of time with the team, I did not find UNC-Chapel Hill to be particularly diverse and did not have a lot of exposure to diversity until I started the GLOBE program through KFBS as a junior. The GLOBE program is a partnership between KFBS and two international business schools: Chinese University of Hong Kong and Copenhagen Business School.

11. In the GLOBE program, I was able to spend two semesters studying abroad with other UNC-Chapel Hill students and students from China and Denmark, one at Chinese University of Hong Kong and one at Copenhagen Business School.

12. As a young adult, my point of view was narrow, but meeting people from different cultures and backgrounds broadened my perspective. It opened my world and helped me ask more questions. Spending time in Denmark and China helped me to relate to people from different backgrounds. Coming out of the GLOBE program made me want to meet more people from different backgrounds.

13. I took away from GLOBE cross-cultural empathy and the ability to not only “work well with others” but to actively seek out and thrive in the face of diversity – diversity of thought, diversity of experience, diversity of ethnicity or origin. That human understanding allowed me to succeed in a relationship-focused industry (consulting) and also to excel at the Kellogg School of Management. My global perspective and ability to relate to my peers, regardless of their background or experience, enhanced the experience that I had and what I was able to bring to my classmates, as well as what I am able to bring to my career.

14. At the same time, the lack of racial diversity I personally experienced at UNC did not prepare me very well for the diversity of the world I live and work in. I do not think I realized how segregated UNC-Chapel Hill was when I attended until several years later when I reflected on the experience. Fortunately I had many diverse classmates at Kellogg, including racially diverse classmates. Through my interactions with racially diverse peers at Kellogg, I learned about racial prejudices and stereotypes I was not even

aware I had. This group of classmates and friends helped me realize my own biases. They impacted me in a way that is not possible in a heterogeneous group.

15. I met my wife, who is Black, at Kellogg, and made many close friends of different races there. In that way, my openness to, experiences with and exposure to diversity have been an essential part of my personal fulfillment in life.

16. The best way to understand something is through exposure. It is difficult to have empathy unless you have understanding and exposure. Empathy is very important in light of the racial tension in today's world. The way to overcome that is to be empathetic and to try to understand other people's perspectives.

17. As a consultant at a major firm working on global issues with global partners, having experience with people from different cultures and backgrounds is essential to success. Business is about relationships and about getting along with people. I work with all kinds of people, including clients who come from different backgrounds. Many of my clients are located outside of the United States.

18. Meeting people from different backgrounds helps you relate to others, challenges your preconceptions, and helps you to be more open-minded. It also helps you to be sensitive to others and to be more inclusive. Although it is human nature to stereotype, a lot of times those stereotypes are not true or helpful. Getting to know people helps break down those stereotypes.

19. When recruiting for Deloitte, diversity was a significant factor. It is important to have a diverse workplace because our world is diverse. In business, it is more effective to be diverse and to have multiple points of view. Rather than being a

roadblock or something that is frustrating, diversity can be a strength. I sought not only to recruit diverse individuals but also to recruit employees who had the skills to work with diverse teams and clients.

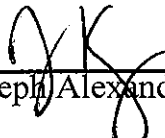
20. It is important not only to recruit, but also to retain diverse employees. If minority employees do not see people who look like them in the upper ranks, they may feel there is not a path forward for them. It is important for organizations to create an inclusive environment where people from all backgrounds can stay and thrive.

Conclusion

21. As someone whose career is in international business, I am a huge proponent of increased diversity. I wish I had been exposed to more diversity from the beginning at UNC-Chapel Hill. The GLOBE program and my career have taught me about the importance of understanding different cultures and perspectives. I believe UNC-Chapel Hill should continue to value and promote diversity on campus.

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

Executed on: 4/20/17



Joseph Alexander Kenley

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CASE NO. 1:14-CV-954**

**STUDENTS FOR FAIR
ADMISSIONS, INC.,**

Plaintiff,

v.

**UNIVERSITY OF NORTH
CAROLINA et al.,**

Defendants.

DECLARATION OF CRYSTAL KING

DECLARATION OF CRYSTAL KING

1. I am Director of the Carolina Union at The University of North Carolina at Chapel Hill (“UNC-Chapel Hill,” “Carolina,” or the “University”) and have held that position since 2013.

2. I am responsible for the management of the Carolina Union organization and the operation of the Frank Porter Graham Student Union Building. The Carolina Union builds a vibrant campus community by offering a host of diverse programs and activities while supporting 22,000 reservations in over 100 Carolina Union, general-purpose classrooms, and outdoor spaces across the University of North Carolina at Chapel Hill campus. My portfolio also includes overseeing the Student Activities Fund Office, Student Life & Leadership Office which houses support for our approximately 800 student organizations, campus-wide student leadership development, and the traditional campus programming board. I also serve as an advisor to Student Government.

3. Previously, I served as the Associate Executive Director of University Unions at the University of Texas at Austin (“UT Austin”). I was directly responsible for managing the building operations of four student life facilities.

4. Other positions I held on the UT Austin campus included serving as Director of the Student Activity Center, Associate Director of Student Programs and Assistant Director of Student Programs.

Carolina Union

5. Our motto is “Carolina Union: More than a building.” Our mission is to create safe, inclusive, and educational experiences that enable students to maximize their time at Carolina. The Union is the nerve center for the campus: a place where members of the University community can gather for debate, discussion, information exchange, association with other students and faculty, relaxation and quiet contemplation. Through our extensive variety of programs and services, the Union complements the academic experience by providing a well-planned and diverse offering of educational, cultural, social and recreational activities and events.

6. To put it simply, we are the campus community builders. That’s what a union is – a place you can enjoy a bagel and engage in a new experience that sparks thinking and conversation at the same time.

7. We believe that Carolina is not just about formal classroom education. Instead, we believe it is essential to teach students to interact in a community setting to better the world. We are the location where students come back together to grapple with what they are learning in class.

8. Students who participate in our programs, activities, and organizations learn by doing and are challenged to think creatively, analytically, and critically. It is here that Carolina students are afforded the opportunity to put into practice what they are learning in the classroom and to develop their core leadership skills, enabling them to create change and community.

The Union and Educational Benefits of Diversity

9. The University's mission is to "to teach a diverse community of undergraduate, graduate, and professional students to become the next generation of leaders."

10. At the Carolina Union, we strive to further the University's mission by supporting and welcoming diverse community members and creating opportunities for them to interact, engage, and develop leadership abilities.

11. Based upon my education, training, and experience, I believe there are key educational benefits of diversity, and seeking to achieve those benefits informs my work. I have personally observed the educational benefits of diversity while at Carolina.

12. By participating in student organizations that support diversity, students broaden their worldviews and strengthen their tolerance and acceptance of other students who are not like them. Through informal conversations with other members of their organization, students are exposed to different ways of life. Through formal workshops, discussion series, and guest speakers, student organizations provide information and experiences to community members to which they might not have had access otherwise.

13. We know from the literature that it is erroneous to assume that students will naturally learn about their peers. Rather, it is up to educators to facilitate structured opportunities for dialogue to transpire.

14. The Council for the Advancement of Standards in Higher Education has published a best practices guide book, entitled the *CAS Professional Standards for Higher Education*. This resource provides that campus activities program staff must

design and implement strategies for involving and engaging diverse student populations, offer educational programs that emphasize self-assessment and personal responsibility for creating and improving relationships across difference, and create a welcoming and nurturing environment for all students.

15. We think carefully about the ways our programs further the key learning and development outcomes and competencies articulated in the *CAS Professional Standards for Higher Education*. For instance, our approximate 150 student employment positions throughout the Union operation further outcomes of interpersonal development, while participation in student organizations or the Carolina Union Board of Directors furthers outcomes of humanitarian and civic engagement. Our student body diversity contributes substantially to our programs and these outcomes.

16. The various ways the Union contributes to the realization of the educational benefits of diversity outside the classroom at UNC-Chapel Hill are discussed below.

Leadership Development at Carolina

17. At Carolina, we take seriously our responsibility to develop campus and world leaders. Carolina students have a number of opportunities to participate in leadership programming.

18. All of these leadership programs are greatly enhanced by the diversity of our students. Diversity of the students participating in these programs helps better train leaders who can relate to and serve diverse populations. Moreover, by training leaders from diverse groups, we develop leaders with great potential for broader reach to diverse communities within North Carolina and beyond.

19. Examples of leadership programming offered through the Carolina Union are described below.

20. The Atlantic Coast Conference (“ACC”) Student Leadership Symposium is an annual program designed to develop a community of ACC undergraduate students who understand the relationship between global and local issues and who work collaboratively to create innovative initiatives that advance students’ capacity for global leadership. Student-participants from each of the 15 ACC colleges and universities have the opportunity to engage in educational sessions, hear keynote addresses, explore topical content, and participate in experiential application through their group project collaboration and presentations. Prior Symposiums have explored themes including: race/ethnicity, religion, sexual orientation, physical ability, family background, socio/economic status, physical appearance, immigration status, gender, homelessness, gentrification, and education.

21. Carolina United is another leadership program designed to create a safe environment for students to candidly discuss issues of diversity and multiculturalism. This four-day program takes place the week before classes begin and focuses particularly upon the diversity of viewpoints, as determined by students’ unique experiences, personalities, and perspectives. The program is intended to foster collaborative dialogue that unites participants across their differences in a safe, accepting environment. Carolina United, as a program ascribing to this broad definition of diversity and leadership, brings together students from all walks of life and types of campus involvement. Throughout the week, students attend sessions on topics such as Interfaith Dialogue, Dimensions of

Power and Privilege, and Conflict Resolution. Students also learn to create and implement programs that will continue the mission of Carolina United once they return to campus. The students who participate in this program also have the opportunity to annually discuss their individual program idea and plan with University administration at the highest levels. King Decl. Ex. 1 is a photograph of Carolina United participants in 2017.

22. The NC Fellows program is a four-year, cohort-based leadership program that has been present at UNC since 1968. It is designed to motivate undergraduate students to maximize their leadership potential. The program seeks to rethink conventional understandings of leadership; to facilitate learning between and among program members; build a supportive community through methods like storytelling and dialogue; and to encourage positive social change by way of those mechanisms. The program strives to build a community of students who are motivated, service-oriented, creative, and ethical. Program highlights include a three-credit sophomore seminar, monthly seminars facilitated by campus and community leaders, and annual retreats. Diversity of thought, experience, perspective, and background contribute to richness of discussion, depth of relationships, and stronger community.

23. The Office of Student Life & Leadership partners with LeaderShape® to offer a six-day intensive institute during spring break. The mission of LeaderShape® is to transform the world by increasing the number of people who lead with integrity and a healthy disregard for the impossible while solidifying one's own passion and vision for the future. A diverse group of students participates in this leadership training. Students

participating in the program work on building community and creating their ideal visions for the world.

24. The Union also offers two academic courses on leadership through the School of Education: EDUC 317: Dynamics of Effective Leadership: Leadership Through Self-Awareness, and EDUC 309: An Examination of Quality and the Pursuit of Betterness.

Carolina Union Activities Board

25. The Carolina Union Activities Board (“CUAB”) is the largest student volunteer programming organization at UNC Chapel Hill. CUAB’s mission is to enhance the quality of life for the undergraduate, graduate and professional students at UNC through high-quality social, educational, fun, diverse, inclusive, and engaging programming that enhance intellectual life, offer cultural experiences, and promote social interactions and citizenship. This mission is achieved through intentionally programming to the distinct and varied needs and populations of our campus community. CUAB’s dynamic organizational structure enables them to be able to actively engage students in every stage of the programming process.

26. The programming board has an executive team and multiple committees including a diversity committee, which is responsible for engaging students and community members in diverse conversations, with topics including but not limited to gender, sexuality, race, age, religion, socio-economic status, nationality, disability, and veteran status. They work collaboratively to bring events to the annual Martin Luther King Jr. Day lecture, and Hispanic Heritage Month, as well as secure programs that

engage our students in important conversation around identity development, sexual assault, and mental health.

27. For instance, CUAB has hosted internationally regarded scholars and leaders like Angela Davis, Marc Lamont Hill, Junot Diaz, Hasan Minhaj, Michael Sam, and Soledad O'Brien. Through its Art Committee it has featured the thoughtful travelling gallery, "Love Makes a Family," that portrayed queer families and their experiences, and also brought internationally renowned galleries like the, "Windows on Death Row" exhibit, which featured over 90 pieces of art from both famous political cartoonists, and death row inmates in order to create an intentional conversation around the experience of those living on death row. Our nearly 100 CUAB events provide opportunities for over 20,000 students from all backgrounds and experience to come together on campus to build community and lasting connections.

28. For instance, CUAB collaborated with the Carolina Latinx Collaborative in the fall of 2016 to bring Rita Moreno to speak with the Carolina community. Rita engaged the campus in important dialogue about the Latinx experience. Rita also met with a smaller group of students for a more intimate dialogue allowing students to connect to her better.

29. CUAB also collaborated with the LGBTQ Center, UNC Athletics, and Student Life & Leadership to bring Michael Sam to speak to the campus community. Michael engaged in honest and sincere conversation with the students about his experiences coming out as an NFL recruit and also the experiences and challenges facing the LGBTQ community.

30. Another notable collaboration was with the Muslim Student Association & 10 other campus organizations in order to bring Hasan Minhaj to campus in the fall of 2016. Hasan shared with the students in both large groups and small about his experiences being a first generation Muslim American and the challenges he has experienced throughout his life with experiencing racism and discrimination in a post 9/11 America.

31. CUAB collaborated with the Alpha Kappa Alpha Sorority Inc. as well as Student Wellness to bring Slam Poet, Neil Hilborn, to campus. Neil presented on his experiences with mental health and how it has inspired him to pursue a life of art and use his mental health challenges to create open and honest dialogues about mental health in people's lives.

Student Government

32. Diversity in student government is very important to ensure that all students have a voice. Diversity within student government leadership also promotes legitimacy for the students who are represented. Moreover, having diverse students participate in student government helps students to understand other viewpoints and issues, negotiate cross-cultural interactions, and develop their capacity for leadership.

33. UNC-Chapel Hill's Student Government represents and advocates for students before administrators, faculty, the Board of Trustees, the Board of Governors, and the state legislature. Carolina's Student Government tackles the policy issues that matter to the University and its students.

34. Student Government consists of the Undergraduate Student Executive Branch, Graduate & Professional Student Federation Executive Branch, Undergraduate Student Senate, Graduate & Professional Student Federation Senate, the Honor System, and the Student Supreme Court.

35. Officers of the Undergraduate Executive Branch lead the campus community and make approximately 150 student appointments to committees across campus that address specific issues and policies affecting the campus. Policy areas include civic engagement, multicultural affairs and diversity outreach. The Undergraduate Executive Branch has issued statements to the campus community about topics such as the Black Lives Matter movement; House Bill 2, which required individuals to use the bathroom that corresponded to their biological sex; Presidential Executive Order barring immigration from seven Islamic-majority countries; and the rallies near Silent Sam, a campus statue of a Confederate soldier.

36. Undergraduate Student Senate and Graduate & Professional Student Federation Senate are the legislative branches of Student Government at UNC-Chapel Hill. Both Student Senates allocate student fees in accordance with funding requests from student organizations, maintain the Student Government Code (the rules by which Student Government operates), and responds to requests for help from students regarding student life at UNC Chapel Hill.

37. The University also has a student-run Honor System and a Student Body Supreme Court.

38. King Decl. Ex. 2 is a photograph of UNC-Chapel Hill's student government leaders in the executive branch for 2017-18. King Decl. Ex. 3 is a photograph of UNC-Chapel Hill's student government leaders in the executive branch for 2016-17. King Decl. Ex. 4 is a photograph of UNC-Chapel Hill's student government leaders in the legislative branch for 2016-17.

Student Organizations

39. The Office of Student Life & Leadership works with student organizations to provide services, programs, and activities that enhance the academic experience, extend learning, and build community.

40. We have approximately 800 student organizations and are constantly adding new ones. Some of these organizations are related to ethnic or cultural identities. King Decl. Ex. 5 is a list of student organizations as of August 30, 2017. Each of these groups has a different purpose or mission, and no two groups are alike. With such a wide range of offerings, our students can find organizations that interest them or that address issues about topics which they may be passionate.

41. How to work cooperatively with other organizations with interests different from our own, is a fundamental, and most important lesson to learn in democracy, and is an opportunity the Union provides. Our student organizations seek each other out to forge partnerships and collaborations that enhance their experience, the experience of their peers, and adds to the diverse array of event and activity offerings available to our campus community.

42. An example of these student-driven collaborations includes *Holi Moli 2017*. Holi Moli UNC collaborated with UNC Sangam, the Campus Y, Hindu YUVA, and MADO to produce *Holi Moli 2017*, a large-scale event that promotes multiculturalism and diversity at UNC by celebrating the arrival of spring through the Hindu holiday of Holi and by raising awareness and funds for social justice initiatives in our community. To pursue its mission, Holi Moli UNC unites organizations across campus to plan events that convey the cultural and social justice messages of Holi. The culmination of these events is seen in the Holi Moli event, in which thousands of Tar Heels gather on Hooker Fields to throw their colors in the air in celebration of their identities and that of others.

43. Our student organizations create key spaces for forging bonds and building community across difference. They create an opportunity for students from different backgrounds to find similar passions and interests. When our student body is diverse, we have diversity within our student organizations that help to foster collaborative dialogue. This in turn builds a better appreciation for unity across difference and a validation of one's own identities.

44. In addition to student organizations, the Union provides our students with the resources to plan and facilitate events. An example, would be "Spark," a three-year program for women of color to engage in meaningful dialogue around identity and what it means to be a woman of color on UNC's campus. This program was started last year by two juniors who had a desire to eliminate the feelings of disconnect and despair by student women of color trying to navigate a predominately white campus. The SPARK program begins with a retreat to assist first-year women of color in their transitions and to

enhance the overall success of women of color on campus. The founders wanted to create meaningful relationships and a support system for women of color at UNC-Chapel Hill. In September 2016, more than 50 women applied for 25 spots and 30 women ultimately attended the first Spark retreat, for which the institution provided financial support and an advising model. Now in its second year, the Union has worked with the students to create a sustainable model for the program so it will exist well into the future.

Assessment of the Union's Efforts and Future Plans

45. The Union works hard to assess whether its programs are providing meaningful interaction opportunities for students and how the Union can continue to improve its service to the campus community.

46. A full-time, Master's degree level professional serves as the Co-Curricular Learning and Assessment Program Coordinator for the Carolina Union. This coordinator directs and implements ongoing visioning, development and assessment of programs that involve direct interaction and impact on the quality of educational experiences outside the classroom. A key responsibility for this position is directing, implementing, facilitating, and evaluating culturally inclusive programming around an array of student life and leadership topics, including, but not limited to, educational programming for international, veteran, Greek, transfer, first-generation, and first year students.

47. We have also participated three times (2009, 2012, 2015) in the Multi-Institutional Study of Leadership ("MSL") Data to help inform our efforts. The MSL was initially developed as a means to enhance institutional practice by better aligning the theory–research–practice cycle. The MSL examines the role of higher education in

developing leadership capacities with a focus on specific environmental conditions that foster leadership development. Researchers have also used data to explore campus climate, sense of belonging, student involvement and diversity education.

48. General findings from the most recent MSL survey affirm the importance of our diversity and inclusion work. These results indicate that socio-cultural conversations, or conversations about a set of beliefs, customs, practices, and behavior that exist within a population, improve leadership efficacy, complex cognitive skills, social perspective, and hope. Our data also showed that participation in a student group related to a racial or ethnic group improved all areas of leadership outcomes compared to those not involved in those groups. It further showed that students who have socio-cultural conversations and feel they belong on campus rate higher in all areas of leadership outcomes. King Decl. Ex. 6 is a summary of MSL survey results from 2015.

49. The Union also participates in The Skyfactor (formerly EBI MAP-Works). The goal of The Skyfactor survey is to help develop a standard for comparison between peer and aspirant institutions and the offerings provided through their Student Unions. This year is the fourth time, since 2008, that the Carolina Union has participated in the biannual survey. These findings also help us assess our comparative effectiveness in meeting student needs.

50. During the 2016-2017 academic year, our student majority Board of Directors, initiated and paid for, a feasibility study to evaluate the existing Frank Porter Graham Student Union. The recommendations from the study were intended to achieve a few goals: (1) inform the Board of Directors of the current and future needs the student

body desires from the Carolina Union, (2) help to inform the development of the University Master Plan as it relates to the student experience, and (3) articulate a clear and specific vision of a new Union.

51. At the beginning of the project, the selected design firm worked with key student stakeholders and building managers to establish guiding principles for the project. In the end, six critical principles emerged and remained central to the project. They are (as listed in order of importance by our students): (1) Diversity and Inclusivity, (2) Greater Sense of Campus Community and Student Connectivity, (3) a building of distinction, that is both simultaneously forward-looking and modern with a respect for tradition, (4) adaptable and flexible, (5) sustainable and environmentally conscious, and (6) reflects the spirit and aspirations of UNC Chapel Hill.

52. Shortly after the guiding principles were established a web-based survey was emailed to the 29,048 enrolled students in order to quantify student satisfaction with the current Carolina Union and identify student preference for the future regarding satisfaction levels of various spaces, and consideration for future programming space in a renovated or enhanced union facility.

53. The web-based survey yielded a 19% response rate. Overall, the survey population was demographically representative of UNC Chapel Hill student demographics with an even response distribution between class levels. The data collected from the survey formed a platform from which the design firm developed a set of recommendations for the types and amount of spaces that are needed to meet the demands of current and future users.

54. The survey indicated that our students desire intracultural spaces and want more of them. They want more intentionality and the opportunity to meet and interact with others who different from them. We responded to these results during the Facility Program phase of our year-long feasibility study.

55. The completed Carolina Union Feasibility Study, accepted by the student majority Board of Directors, and presented to the University, recommends that the Union dedicate almost 12,000 gross square feet to spaces related to embracing, celebrating, and exploring diversity and inclusion.

Conclusion

56. The University of North Carolina at Chapel Hill's diversity is essential to the student experience. The world is changing and it is imperative that our students are equipped to function successfully in a global society. By providing enriching, intentional diverse experiences in challenging but supportive environments like a college campus, we facilitate the social, emotional, intellectual, moral, and career development of our students for their overall wellness.

57. Through these countless touchpoints of exposure, students recognize, respect and celebrate individual and cultural differences, practice inclusiveness, and demonstrate civility in all discourse. Thereby, enhancing the quality of student life at Carolina and preparing each individual to thrive in our world.

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

Executed on: 10/25/17

Crystal King
Crystal King

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CASE NO. 1:14-CV-954**

**STUDENTS FOR FAIR
ADMISSIONS, INC.,**

Plaintiff,

v.

**UNIVERSITY OF NORTH
CAROLINA et al.,**

Defendants.

DECLARATION OF DONOVAN LIVINGSTON

DECLARATION OF DONOVAN LIVINGSTON

I, Donovan Livingston, hereby make this declaration from my personal knowledge and, if called to testify to these facts, could and would do so competently:

Experience

1. I am a graduate of The University of North Carolina at Chapel Hill (UNC-CH). I came to UNC-CH from my hometown of Fayetteville, North Carolina. I earned a Bachelor of Arts in History from the UNC-CH in 2009.
2. Upon graduation, I served in the Carolina College Advising Corps from 2009 to 2010. Carolina College Advising Corps is a UNC-CH outreach program that helps low-income, first-generation, and underrepresented students find their way to colleges that will serve them well. As an African-American male graduate of UNC-CH, I thought my perspective would be helpful to advisees in the program, many of whom had backgrounds and experiences similar to mine.
3. I earned a Master's of Arts Degree in Higher and Postsecondary Education from Columbia University Teaching College in 2011.
4. From 2013 through 2015, I worked as an Academic Advisor for Upward Bound, which is a Carolina Higher Education Opportunity Program. I also served as a Lead Counselor at the Emily K Center and as a College Advisor with Student U. All of these programs are focused on academic success and college access for students from underrepresented or disadvantaged backgrounds.
5. I received a Master's of Education in Learning and Teaching from the Harvard University Graduate School of Education in 2016.

6. I am currently pursuing my Ph.D. in Educational Leadership and Cultural Foundations at The University of North Carolina at Greensboro.

7. While pursuing my PhD, I am working as a Program Manager for Pre-college Programs at Wake Forest University.

Experience at UNC-CH

8. Growing up in Fayetteville, I had a strong interest in going to Duke University. But after I visited UNC-CH, I fell in love. UNC-CH felt accessible to me, and I found that the campus had many things to offer.

9. Unfortunately, when I got to UNC-CH, I struggled being an underrepresented minority. I am a six foot six inch tall African American male, and I often found myself subjected to comments that reflected stereotypes about African American men. All too frequently, other students would see me and ask if I was on the basketball team. I felt like I should be playing basketball, and much of my identity was based around this. For the first two months at UNC-CH, I tried to make the varsity basketball team. After I did not make the basketball team, students, friends, and family would tell me I was a waste of height. This ate away at me and left me discouraged.

10. I wanted to establish a strong foundation at UNC-CH, so I gravitated towards African-American cultural activities, programs, and initiatives. I was very involved in the campus, including as an active member of the Black Student Movement (affinity group), a mentor for Movement of Youth (mentoring program for high school kids), a Vice-President of Phi Beta Sigma (black fraternity), and as a counselor for Project Uplift (pre-college program), a program coordinated by UNC-CH's Office of Diversity and Multicultural Affairs. I was not doing a lot outside of the black community at UNC-CH.

11. There are many reminders of the segregated history of UNC-CH on campus, and I kept thinking about how it was built by slave labor. It was a constant subtle reminder that I did not belong and that this institution was not constructed for me. It weighed on me as a student.

12. My failure to make the basketball team as well as the campus history made me feel that I was not meant to thrive here. I began performing poorly in class, and by the end of my first year, my G.P.A. was 1.6 out of 4.0.

13. My experience with Carolina United was a turning point. Carolina United is a program that brings students together to explore diversity. Student leaders across campus went to Efland, North Carolina for a week-long camp. We talked about race, ethnicity, religious diversity, and sexual orientation. It exposed me to another side of UNC-CH.

14. After this experience, my friend group and social network began to expand. My grades began improving and I gained more confidence. I found that I could reach out to other organizations for support like the UNC Interfraternity Council, Panhellenic Council, and Campus Y. I felt more integrated into the University after my experience with Carolina United.

15. Ultimately, through more connections to the diverse community at UNC-CH, I was able to find myself and succeed in and after my time at UNC-CH.

Spoken Word Poetry

16. One of the ways I express myself best is through spoken word poetry. At UNC-CH, I was co-president of the Ebony Readers/Onyx Theater, a performance group in the Black Student Movement that specializes in poetry, spoken word, and theatrical drama.

17. I have been able to share my perspective with others and educate them about issues related to race through poetry. Through my spoken word performances, I share a piece of myself in my most authentic voice.

18. In 2016, I performed two widely-viewed poems. The first was a joint poem titled *Dear Abby (An Open Letter Abigail Fisher)* that I performed with Michael Lee (also from the Harvard University Graduate School of Education) at the Black Policy Conference at the John F. Kennedy School of Government. The poem is about why race should play a factor in the admissions process and why race matters in college. We explored white privilege, the unfairness of standardized testing, historical context, school inequalities, systemic racism, and other issues.

19. The second poem, called *Lift Off*, I performed when speaking at Harvard University Graduate School of Education's 2016 convocation exercises. At the convocation, I quoted Horace Mann: "Education then, beyond all other devices of human origin, is a great equalizer of the conditions of men." The quote is from 1848. If I was alive in the United States at that time, I would not have been able to read or write that quote. And often, any attempt by me to do so would have been punished by death.

20. In *Lift Off*, I describe how I found my voice:

I was in the 7th grade, when Ms. Parker told me,
"Donovan, we can put your excess energy to good use!"
And she introduced me to the sound of my own voice.
She gave me a stage. A platform.
She told me that our stories are ladders
That make it easier for us to touch the stars.
So climb and grab them.
Keep climbing. Grab them.
Spill your emotions in the big dipper and pour out your soul.
Light up the world with your luminous allure.

21. In *Lift Off*, I also talk about how I turn frustration and isolation into education of others:

There are days I feel like one, like only —
A lonely blossom in a briar patch of broken promises.
But I've always been a thorn in the side of injustice.
Disruptive. Talkative. A distraction.

With a passion that transcends the confines of my consciousness

—
Beyond your curriculum, beyond your standards.
I stand here, a manifestation of love and pain,
With veins pumping revolution.
I am the strange fruit that grew too ripe for the poplar tree.
I am a DREAM Act, Dream Deferred incarnate.
I am a movement – an amalgam of memories America would care
to forget
My past, alone won't allow me to sit still.

22. UNC-CH is looking at ways to incorporate spoken word poetry into its THRIVE initiative to promote male minority success, and I am helping with that effort. We know that the transition to college can be hard for minority students, and the idea is to let these students know they do not walk alone.

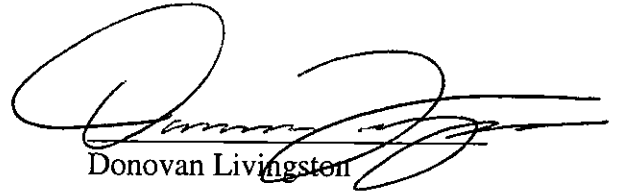
23. The poets who are part of this effort are UNC-CH alums and current students willing to talk about the struggles that have impacted them along the way. Our goal is to give students a place to join the conversation and share their journey. For this effort, I prepared a spoken word piece entitled *Donovan's Journey*. This video has been provided as Livingston Declaration Exhibit 1. The video speaks to my experiences at UNC-CH, including how I overcame challenges, and I hope that it will inspire others to believe and to succeed.

Conclusion

17. Diversity in education, and including underrepresented voices like mine in the conversation, is critical to truly learning and understanding the history of race in this country and making the world better. I benefitted, and was ultimately able to succeed at UNC-CH, Columbia, and Harvard, due to programs at UNC-CH that embraced and promoted diversity.

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

Executed on 05/17/2017



Donovan Livingston

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CASE NO. 1:14-CV-954**

**STUDENTS FOR FAIR
ADMISSIONS, INC.,**

Plaintiff,

v.

**UNIVERSITY OF NORTH
CAROLINA et al.,**

Defendants.

DECLARATION OF KAROL MASON

DECLARATION OF KAROL MASON

I, Karol Mason, hereby make this declaration from my personal knowledge and, if called to testify to these facts, could and would do so competently:

Background

1. I served as the Assistant Attorney General for the Office of Justice Programs during President Obama's administration. I held this position from 2013 when I was confirmed by the United States Senate through early 2017 when the administration changed. As of August 2017, I am the President of the John Jay College of Criminal Justice at the City University of New York.

2. The Office of Justice Programs works in partnership with the justice community to identify the most pressing crime-related challenges confronting the justice system and to provide information, training, coordination, and innovative strategies and approaches for addressing these challenges. As Assistant Attorney General, I oversaw an annual budget of approximately \$4 billion that supported state, local, and tribal criminal justice agencies; an array of juvenile justice programs; a wide range of research, evaluation, and statistical efforts; and comprehensive services for crime victims.

3. I grew up in Amityville, New York, a town of less than 10,000 people. My father, Dennis Edward Mason, was a public health administrator who worked for New York City's Health and Hospital Corporation. My mother, Hattie Vertelle Mason, was one of the first Black public school teachers on Long Island. The NAACP sued on her behalf to allow her to teach. My father and mother were college-educated and earned Master's Degrees. I have three siblings, all with graduate degrees.

4. I graduated from The University of North Carolina at Chapel Hill (“UNC-Chapel Hill”) in 1979. I earned a Bachelor of Arts in Mathematics in 1979 at UNC-Chapel Hill. I earned a Juris Doctor at the University of Michigan Law School in 1982.

5. After graduating from law school, I served as a Judicial Law Clerk for Judge John F. Grady of the United States District Court for the Northern District of Illinois. I practiced law in Atlanta at the law firm of Alston & Bird from 1983 to 2009, becoming the firm’s first Black female partner in 1990. I concentrated on public and project finance, chaired the firm’s Public Finance Group, and served as chair of its Management Committee.

6. I left private practice to serve as a Deputy Associate Attorney General from April 2009 to February 2012. I then returned to private practice prior to my confirmation as Assistant Attorney General.

7. I was a member of the Board of Trustees at UNC-Chapel Hill from 2001 to 2009, serving as Vice-Chair, as Chair of the Audit and Finance Committee, and as a member of the Endowment and Investment Committees.

My Experience at UNC-Chapel Hill

8. I wanted to attend UNC-Chapel Hill because it was exciting to go to school at a place where I did not know a soul.

9. I graduated from high school in New York, and I was awarded a Regents Scholarship for college, which I declined to attend UNC-Chapel Hill. I received a Regents Diploma with commendations in both Foreign Language and Math, so I felt I could pursue either at UNC-Chapel Hill.

10. When I got to UNC-Chapel Hill, I met with an advisor before classes started. He was a law school professor and recommended that I pursue foreign language because he knew I wanted to go to law school and he thought this was the easier academic approach. I decided to pursue both math and foreign language.

11. In the Math Department, I was frequently the only Black student in class. I was not intimidated, but I worried about professors and their perceptions of me because of my race.

12. I went through UNC-Chapel Hill during a time when there were serious disputes about tenure for Black Faculty Members. There were protests about it. There were also issues about the inclusion of Black students on campus and whether we were welcome at UNC-Chapel Hill.

13. My experiences taught me the importance of having other students of color on campus. Representation is very important to make sure that the campus is welcoming and inclusive, as well as to ensure that diverse perspectives are represented.

Importance of Diversity

14. Based on my professional experience, I am a firm believer that as an organization leader, you reach better decisions when there are different perspectives at the table helping you make those decisions.

15. In my experience, in the educational context, diversity is particularly important because education is about teaching people how to think. Diversity of perspective and background is critical to learning and developing critical thinking skills.

If students are in an environment where all they do is hear people regurgitate the same ideas, they do not learn and grow. There is no debate or critical thinking.

16. One of the challenges we have with young people is being able to develop the critical skills of thinking and questioning. If everyone is saying the same thing, there is no chance to question or think. That does not prepare them for the real world that is constantly changing.

17. In many cases, perspectives fall on race and background. It is important to understand why people think the way they do. You cannot understand the range of solutions if you do not understand the people you are trying to help. As the Assistant Attorney General, for instance, it was essential to have cross-cultural understanding as we addressed issues that impacted diverse communities.

18. Education is the great equalizer. If people are not given the chance to experience each other and learn from each other, we are missing out as a country. Learning from one another has to be mutual and not just a one-way street. It is important to have diversity of experience at universities because these are the places that grow future leaders. Understanding diversity helps us have more successful communities and states.

19. I have observed that with minorities and first-generation college students, the issue is not one of intellectual ability, but one of support. Anyone going to college has problems with adjustment. If we put the right support around them, they will succeed.

20. I am proud to be a product of affirmative action. Race may or may not have been a factor in my admissions decisions, but I had to perform at a certain level to graduate, and I excelled in my performance using any measure of success. You are dealing with a pool of people who all have the capacity to succeed. The question is, which students will be given the opportunity to succeed at UNC-Chapel Hill.

Conclusion

21. As an alumna and former member of the UNC-Chapel Hill Board of Trustees, I care deeply about UNC-Chapel Hill. Racial and ethnic diversity at UNC-Chapel Hill helps students develop the skills they will need to succeed in life, become leaders, and solve society's pressing problems. Moreover, the opportunity I had to attend UNC-Chapel Hill greatly impacted my life, and high-achieving students from all backgrounds can and will succeed at UNC-Chapel Hill if they are given the opportunity.

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

Executed on: September 21, 2017 Karol J. Mason
Karol Mason

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CASE NO. 1:14-CV-954**

**STUDENTS FOR FAIR
ADMISSIONS, INC.,**

Plaintiff,

v.

**UNIVERSITY OF NORTH
CAROLINA et al.,**

Defendants.

DECLARATION OF LINDSAY-RAE MCINTYRE

DECLARATION OF LINDSAY-RAE MCINTYRE

I, Lindsay-Rae McIntyre, hereby make this declaration from my personal knowledge and, if called to testify to these facts, could and would do so competently:

Background

1. I graduated from The University of North Carolina at Chapel Hill (“UNC-Chapel Hill” or the “University”) in 1997. I received my Master of Business Administration from Duke University in 2004.
2. I am originally from Canada.
3. I am the Human Resources Vice President and Chief Diversity Officer at IBM. During my tenure at IBM, I have lived in Dubai and in Singapore.

Experience at UNC-Chapel Hill

4. At UNC-Chapel Hill, I had the benefit of learning from and interacting with individuals from different backgrounds both in class and outside of the classroom. Prior to attending the University, I had never been to North Carolina, but I learned a tremendous amount during my time at UNC-Chapel Hill.
5. I lived in Carmichael Residence Hall and benefited from the UNITAS program. UNITAS is a residence floor that is designed to expose students to sociocultural diversity. Through an application process students that are accepted commit to helping students discover similarities through differences. UNITAS works to challenge stereotypes and prejudice based on identities such as gender, race, nationality, religion, and sexual orientation. The floor had many diverse students and was like the

United Nations, both in the residence hall and on campus. At that time, there was little global presence on campus – this was a beacon of light imagined by the University.

6. I was a Morehead Scholar at UNC-Chapel Hill. The Morehead experience, in particular, provided me with the skill set, and courage and confidence to navigate rough waters. I learned core skills, including resiliency, creativity, crisis navigation, and relationship-building, that have served me since.

7. While I was a student, UNC-Chapel Hill brought numerous speakers to campus, including Gloria Steinem, Cornel West, and Amy Tan. These speakers were role models that inspired all of the students, regardless of our backgrounds.

8. At UNC-Chapel Hill, I was the Vice President of the student body. In this role, I had the opportunity to understand how a diverse student body allowed UNC-Chapel Hill to be a compelling force for the State.

9. With the support of the Morehead Program, I had the opportunity to write my honors thesis and do research for a Deaf School outside Harare, Zimbabwe. One of the memorable moments from the trip was being the first white person an African toddler had ever seen. I also had the opportunity to visit my roommate's hometown in rural North Carolina, where her father was the town postman and a pig farmer. My travels in North Carolina were as instructive as my trip to Zimbabwe. Both experiences developed my cultural acumen and my ability to navigate foreign spaces.

10. UNC-Chapel Hill has become significantly more diverse and inclusive since I graduated, indicating its commitment to growing competitive leaders and citizens for the world beyond UNC-Chapel Hill

The Benefits of Diversity in the Private Sector

11. IBM has been committed to diversity and inclusion for over a century. IBM knows that diverse teams fuel innovation in any industry and consistently outperform homogeneous teams.

12. Leading in difficult times is challenging. Companies have to navigate uncharted waters in this global and dynamic business world. If businesses do not have diverse talent across their markets and industries they will be blindsided by the competition.

13. Individuals who develop in homogeneous environments are far less competitive as leaders. The ability to relate to and grow people from different backgrounds is an essential differentiator in today's business world. Leadership is increasingly earned, not granted, through followership and inclusion. The workforce today wants leaders who are authentic and demonstrate a genuine interest. If a leader is not curious about people's backgrounds, and does not have the skill to unleash discretionary effort, employees will chose to work elsewhere.

14. IBM does business in 170 countries across all major industries. We are as diverse as the markets we serve. We need that diversity to drive innovation and form credible, trusting business relationships. When we are recruiting, it is no longer enough for a candidate to be an incredible scholar. There are plenty of high-performing and smart students; we are looking for candidates who are curious, self-starters, and possess the ability to lead their peers. The most competitive candidates must have an inclusive, global mindset.

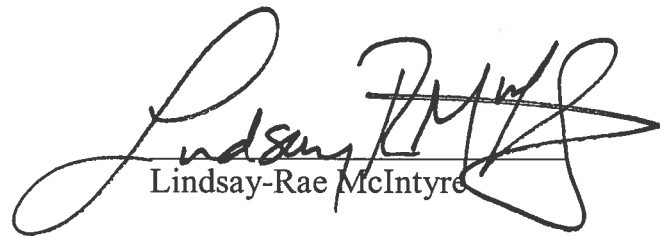
Conclusion

15. I have spent a lot of time outside of the United States. In comparison to other countries, such as India, America is a homogenous environment. American graduates have to be competitive in the world, and students cannot do that if they do not have the ability to grow, test and exercise their leadership muscles during their undergraduate experience. In order for UNC-Chapel Hill to graduate competitive, compelling future workers, the University has to provide a learning environment that develops global leaders. It cannot be incumbent on companies to grow graduates; this leadership formation must occur during their undergraduate career.

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

Executed on:

July 10, 2017


Lindsay-Rae McIntyre

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CASE NO. 1:14-CV-954**

**STUDENTS FOR FAIR
ADMISSIONS, INC.,**

Plaintiff,

v.

**UNIVERSITY OF NORTH
CAROLINA et al.,**

Defendants.

DECLARATION OF ASHLEY MCMILLAN

DECLARATION OF ASHLEY MCMILLAN

I, Ashley McMillan, hereby make this declaration from my personal knowledge and, if called to testify to these facts, could and would do so competently:

Background

1. I am an American-Indian female graduate of The University of North Carolina at Chapel Hill (“UNC-Chapel Hill” or the “University”).
2. I graduated from UNC-Chapel Hill in 2009 with a Bachelor of Arts in Psychology.
3. I am a Lumbee Indian from Lumberton, North Carolina and am a first-generation college student.
4. At UNC-Chapel Hill, I was involved with the Carolina Indian Circle (“CIC”) and with the Diversity and Multicultural Affairs office (“DMA”).
5. Currently, I am working toward a Doctor of Philosophy degree in Higher Education at North Carolina State University.

Experience at UNC-Chapel Hill

6. I participated in Project Uplift as a high school student. Project Uplift is a program that allows rising high school seniors to visit UNC-Chapel Hill, go to several classes, and meet with UNC-Chapel Hill students and faculty. This was a wonderful opportunity for me, particularly because I was the first person in my family to go to college.
7. Before Project Uplift, I thought UNC-Chapel Hill was an institution full of people who did not have my background. Project Uplift gave me a chance to see that

there were a few people like me at UNC-Chapel Hill and that people would care about me once I got to the University. That was important to me and impacted my decision to attend UNC-Chapel Hill.

8. Before coming to UNC-Chapel Hill, I lived in a community where most people looked like me and acted like me. My hometown was only a two-hour drive from UNC-Chapel Hill, so I was not expecting the UNC-Chapel Hill community to be that different from my town. But when I got to the University, it felt like another world. It was completely different from anything that I had experienced before. It was overwhelming.

9. When I first arrived at UNC-Chapel Hill, I realized that I was often the only person of color in the classroom. I felt like I had to be the spokesperson for all American-Indian people. I often felt like American-Indians on campus were nonexistent, like we were the invisible minority.

10. Very often, I would get asked "what are you?" I wanted to reply "I'm human." When I told them I was Lumbee, some people would laugh and would not believe that I was an American-Indian. They would tell me that I was "mixed." I felt like I had to become a historian just to explain who I was and where I was from.

11. At UNC-Chapel Hill, I was a part of CIC. CIC is a student organization that assists Native American-Indian students by providing a positive atmosphere. CIC provided me with an American-Indian community. Hearing my peers' struggles and sharing mine gave me comfort. In that community, we were allies for each other and understood each other's experiences on campus.

12. I also was involved with DMA. DMA is an office at UNC-Chapel Hill that works to build and sustain an inclusive campus. With DMA, I was involved in peer mentoring and outreach programs. In the outreach programs, we would go to high schools and talk with students about UNC-Chapel Hill. I loved that initiative because it was important for American-Indian high school students to see college students who looked like them and were successful at UNC-Chapel Hill.

13. Sometimes, at UNC-Chapel Hill, I felt I could get lost in the crowd. If I had not been involved with CIC and DMA, I would have felt lost. It was very challenging for me at times. Working with DMA helped me be a part of a community and gave me a chance to work with other students of color.

14. Despite the challenges, there were definitely benefits from interacting with others with different backgrounds at UNC-Chapel Hill. I learned from them, and I believe that they learned from me.

15. I majored in Psychology and found that I loved doing social work and therapy with children. I wanted to be a person who could help others. Because of this, I am getting my Doctor of Philosophy degree in Higher Education at North Carolina State University. I am focusing on how to make universities more aware of the American-Indian experience and how to provide support to American-Indian students on campus.

Conclusion

16. Although being a minority student at UNC-Chapel Hill was challenging, I am very grateful for the opportunity to attend the University. I found support from other American-Indian students and students of color on campus, which allowed me to pursue

my goals and succeed academically. The presence of other people like me at UNC-Chapel Hill was essential. I look forward to a career in which I can help other students like me to succeed in higher education.

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

Executed on: 8/7/17


Ashley McMillan

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CASE NO. 1:14-CV-954**

**STUDENTS FOR FAIR
ADMISSIONS, INC.,**

Plaintiff,

v.

**UNIVERSITY OF NORTH
CAROLINA et al.,**

Defendants.

DECLARATION OF J. MICHAEL ORTIZ

DECLARATION OF J. MICHAEL ORTIZ

I, J. Michael Ortiz, hereby make this declaration from my personal knowledge and, if called to testify to these facts, could and would do so competently:

Background

1. In 2014, I retired from my position as the fifth President of California State Polytechnic University, Pomona (“Cal Poly”). I had held that position since 2003.
2. Prior to my appointment as President of Cal Poly, I was a Professor of Education at Appalachian State University and Vice President for Academic Affairs at California State University, Fresno.
3. I received my Doctor of Philosophy degree in Early Childhood Special Education from The University of North Carolina at Chapel Hill’s (“UNC-Chapel Hill” or the “University”) School of Education. Before coming to UNC-Chapel Hill, I received my Bachelor’s and Master’s degrees from The University of New Mexico.
4. In 2014, I was awarded the Latina/o Alumnus Award from the Carolina Latina/o Collaborative at the Fifth Annual Latina/o Alumni Reunion. I was also awarded the Distinguished Leadership Award from the College of Education in October 2015. I also recently received the President’s Award from Region IV of NASPA, the leading association for student affairs administrators in higher education. I have been named among *Latino Leaders* magazine’s “Top 25 Latinos in Education” and was listed as one of the 100 most influential Hispanics in 2005 by *Hispanic Business* magazine.
5. My service activities include the American Council on Education’s Commission on Advancement of Racial and Ethnic Equity; the American College & University Presidents Climate Commitment Leadership Circle; the Aspen Institute’s Commission on No Child Left

Behind; CSU Presidents' Council on Underserved Constituencies; the Hispanic Association of Colleges and Universities; the United States Department of Defense's Hispanic-Serving Institutions Task Force; and the United States Department of Agriculture's Hispanic-Serving Institutions Collaborative Advisory Board.

Experience in North Carolina

6. I first came to North Carolina as a faculty member at Appalachian State University. No one in the Spanish Department was Latino. All of the faculty members were Anglos who spoke Spanish. Students were able to learn the language but did not get a taste of Latino culture. When students have a limited sample from which they draw perspective, it limits the effectiveness of the teachings.

7. I obtained my Doctorate of Philosophy at UNC-Chapel Hill. Diversity at UNC-Chapel Hill was pretty limited when I was there. There were African-Americans but, for the most part, that was the extent of racial diversity in the student population. I was invited to participate in a program that included 10 students from diverse geographic locations, but here again there were two African Americans and myself with little other racial and ethnic diversity. Since my time at UNC-Chapel Hill, the University has undergone remarkable changes. I have been back to campus several times to work with a Hispanic organization. I have been really amazed by the number and quality of Hispanic students admitted to UNC-Chapel Hill.

Importance of Diversity in Higher Education

8. In my experience, which goes back more than 44 years in higher education, when you have a group of individuals who are all of like mind and experience and come from the same background, you do not get a full picture of what the world is like. We live in a very diverse

world. However, we limit our ability to see the world when we do not consider backgrounds different from our own.

9. In California, we are prohibited by Proposition 209 from considering race in admissions. This has limited the racial and ethnic diversity we and other public institutions in the State are able to achieve. These numbers are changing, however, because of the significant number of college aged students from different ethnic and racial backgrounds.

10. In higher education, we have to consider the type of students we are trying to produce and the type of world we are becoming. California is a majority minority state, but increasing the numbers of underrepresented minorities in higher education is still a challenge. The numbers of minorities in elite institutions like the University of California, Berkeley or Stanford University is abysmal, considering that 70% of students in our public schools are minority.

11. We are part of a world environment, not just part of California, or the United States, or North America. Individuals interact daily with people from a variety of different cultures, and not understanding those backgrounds as part of the educational process puts us at a disadvantage.

12. If students do not see themselves as belonging in higher education, the chances of those students ending up in higher education are very slim. Mentoring students is critical to help students feel that they belong in these institutions. That feeling takes time. That process can be sped up if students see people of similar racial or ethnic backgrounds in higher education. Being a good high school student does not ensure college success, in part, because students may not be able to envision themselves in higher education.

13. Universities can help instill in students that they are capable of success and a significant aspect of this is having like students involved in higher education. We need faculty members, not just students, who are from different cultural, ethnic, and racial backgrounds so students can identify with individuals who have demonstrated success. It is a critical factor, and I do not know of any university that does not try to recruit more minority faculty. However, we need to establish a pathway to attract and prepare more minorities at the doctoral level in top colleges and universities, as the first step toward increasing the number of minority faculty.

14. My experience is completely contrary to the idea that schools like UNC-Chapel Hill are harming minorities by admitting them. College transforms the lives of minorities in a positive way. I have seen in my own family the transformation that occurs when someone goes to college. There is a major transformation that impacts the entire family when one family member graduates from college. Once students get to college and they realize that they have the necessary support to succeed, this realization creates a pattern that siblings and other children will follow.

15. Once we create a sense of belonging, students will demonstrate the abilities to succeed. They understand that as they participate in the learning process, they play an important role by providing different perspectives and sharing different experiences that enhance the conversation. At Cal Poly, many of our students are first-generation college students. They have to overcome significant challenges to adjust to the rigors and the culture of the University, but they get established, and the transformation takes place.


Conclusion

16. As a Latino, higher educational leader, former college president, and friend of UNC-Chapel Hill, I strongly support UNC-Chapel Hill's efforts to enroll a racially and

ethnically diverse group of students in order to provide life-changing opportunities to minority students, their families, and their communities, and to improve the experiences and lives of all students by exposing them to greater diversity in college.

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

Executed on: July 27, 2017



J. Michael Ortiz

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CASE NO. 1:14-CV-954**

**STUDENTS FOR FAIR
ADMISSIONS, INC.,**

Plaintiff,

v.

**UNIVERSITY OF NORTH
CAROLINA et al.,**

Defendants.

DECLARATION OF MERRICK OSBORNE

DECLARATION OF MERRICK OSBORNE

I, Merrick Osborne, hereby make this declaration from my personal knowledge and, if called to testify to these facts, could and would do so competently:

Background

1. I am a Black male.
2. I am from South Charlotte, North Carolina. I went to Ardrey Kell High School, a public high school in Charlotte. Before moving to South Charlotte, I lived in Portland, Oregon with my family until I was about 14.
3. I have a younger sister who is currently enrolled at Howard University, a historically black university in Washington, DC.
4. I graduated from The University of North Carolina at Chapel Hill (“UNC-CH” or “University”) in 2016 with a major in Psychology and minors in Business Administration and Spanish for the Professions with a health focus.
5. At UNC-CH, I was the first Black male president of the Carolina Union Activities Board (“CUAB”), an organization that provides and sponsors diverse programs for the entire student body. I was also the Vice Chair of the Carolina Union Board of Directors.
6. Additionally, at UNC-CH, I served as co-chair of Diversity and Inclusiveness in Collegiate Environments (“DICE”), a campus organization that aims to change the campus climate through innovative initiatives that promote diversity awareness.
7. I was also vice president of the Mu Zeta Chapter of Alpha Phi Alpha Fraternity, Inc., a black fraternity.
8. I served as secretary for the UNC-CH Caribbean Student Organization. My grandfather is from Barbados so I was interested in learning more about that aspect of my identity.
9. While at UNC-CH, I conducted research with the Moore Undergraduate Research Apprenticeship Program (“MURAP”) and the Ronald E. McNair Post-Baccalaureate Achievement

Program (“McNair Scholars Program”). The McNair Scholars Program is a federal program designed to prepare undergraduate students for doctoral studies through involvement in research and other scholarly activities. The focus of my research was on improving the experiences of African-American students through an understanding of psycho-social measures. In particular, I focused upon what makes students perform well and the concept of homophily, which is the idea that people who share a similar identity gravitate toward one another. I was also a research assistant in Professor Enrique Neblett’s African-American Youth Wellness Lab and in the Behavior Lab at the UNC-CH Kenan Flagler School of Business. The Behavior Lab helps support and promote research on judgment and decision making, as well as other work related to individual, group, and organizational phenomena.

10. While on campus, I was an orientation presenter for Carolina Leadership Development, giving weekly 90-minute presentations. I presented to first-year students about opportunities and leadership development on campus. I also advised first-year students about how to handle the college experience and avoid becoming overwhelmed.

11. At UNC-CH, I was Captain of Men’s Club Lacrosse team and the only Black player for part of my experience with the Club Lacrosse team. I also served as a practice player to help train the UNC-CH Women’s Varsity Lacrosse Team. In 2013, the Women’s Varsity Lacrosse Team won a national championship. I also volunteered as a lacrosse goalie coach for a local high school, East Chapel Hill High.

12. At UNC-CH, I was accepted into the Order of the Golden Fleece and the Order of the Grail-Valkyries. The Order of the Golden Fleece is the University’s oldest and highest honorary society, and those eligible for selection must possess exemplary character and must have made a significant, lasting contribution to the University. I was selected for the Order of the Golden Fleece for my mentorship as a Black male based upon my stewardship to the Carolina community, including my service as CUAB president. The Order of the Grail-Valkyries recognizes students and faculty of outstanding character who have made significant contributions to the University’s academic climate through excellence in scholarship, dynamic

leadership, and innovative service. I was selected for the Order of the Grail-Valkyries for my service to the Carolina community, including my research with Professor Neblett and MURAP.

13. Currently, I am a Social Science Research Coordinator at the Stanford Graduate School of Business Organizational Behavior Lab. I plan to pursue a doctorate degree in Organizational Behavior.

My Experience as Minority Student at UNC-CH

14. As a Black male, I faced many challenges at UNC-CH. Because there were few Black males on campus, I was concerned that without my voice, my experience, those like me would not be heard.

15. The sheer numbers were daunting. Sometimes, in classes of 200 or more, I would be the only person of color or the only Black male. In fact, I dropped my business major because I felt ostracized. I distinctly remember not seeing anyone like me in the business school building on the days when I had classes there.

16. One moment in particular stands out. In the spring of 2015, the video of the Sigma Alpha Epsilon (“SAE”) fraternity chapter from the University of Oklahoma performing a racist chant went viral. At the time, I was taking a class at UNC-CH focused on ethics and morality in business. My professor brought up the topic of the SAE video and asked the students to share their thoughts. I noticed I was the only student of color in the class, and I decided that I needed to set the tone for the conversation. I knew that if I made my presence as a Black male known, there was a lower probability of my having to deal with prejudice. I remember saying something fairly generic, but I felt like I still got my point across. I remember being proud of myself for speaking up and handling it that way. In response, a girl in the front of the room said “I don’t get why it is a big deal. It’s just a song.” I had no one to even share a look with. I know the professor was taken aback by the comment as well. I raised my hand again to explain that whether or not the SAE fraternity brothers meant what they were saying – they were talking about homicide. I had to be careful to not fall into the “angry-Black” stereotype and still feel like I could address the reality of the situation. I felt compelled to speak up, and I also

recognized that I was likely the only one that could bring the perspective those students needed to hear.

17. It is hard to be looked to as the one who has to do the “teaching” in formal settings like the classroom. Similarly, it is hard to have pressure to represent a particular perspective in classroom discussions or social settings. As the only Black male in the classroom, I do not have the psychological safety of being supported by someone who shares my sentiments about society. But I also recognize that I needed to be able to do that. I wish I had had more minority peers who could walk through the experience with me.

18. I do not feel like I would have had an adequate liberal arts education without having the opportunity to interact with people who are not like me. For me, it taught me how to be resilient and a better global citizen. The efficacy of my work increased as my perspective grew. But at the end of the day, the absence of like individuals certainly was a challenge.

19. I have struggled with feeling valued by the University. Students who share my ancestral history are often only valued in the capacity of generating entertainment and revenue as athletes. Sharing an academic space with other Black people and other people of color is a reminder that the institution to which I pay my tuition values my education and my contribution to the Carolina community.

20. I understand UNC-CH was not built for Black people, but now it has to be a place where Black people are supposed to belong. I truly hope that one day, we can be valued as the scholars we are capable of becoming.

21. At UNC-CH, I graduated from the Honors College, whose slogan is “Come Here, Go Anywhere.” My experience as a student drove me to realize that where we *go* is just as important from as where we *come from*, and I would want for my children to *go* to a place that values and builds people as they *come*. And we all come with potential. We all come deserving to get an education.

22. One of the extracurricular activities in which I was involved was the Mu Zeta chapter of Alpha Phi Alpha Fraternity, Inc. While it is a group composed exclusively of black

men, it became a haven to understand diversity on campus. We shared conversations with Latinx students, the Pride community, and other marginalized groups of students. We shared laughs and good times, but we also shared pain. The classroom was not the most welcoming environment. It was critical to my success to have that opportunity to relate to people who identified with my experience.

23. Students of color sometimes have to retreat to stay psychologically safe since not every person in power is our ally. That is a function of the culture of the University, but also because there are not enough of us (students of color) to facilitate our own growth.

24. Part of my job as a leader at UNC-CH was to be visible. Part of my goal as “Merrick” was always to support people like me, and I think from my leadership positions I was able to do that. I think about that often – if I did not go to UNC-CH, how different would this campus be?

25. It is important to me to be in a space filled with a plethora of perspectives – some competing – because the best ideas and movements have grown from contrast. As a student, you cannot get full development of a mind and soul unless you hear ideas that you disagree with. At UNC-CH, it is hard to find competing ideals because of the culture of the school and the makeup of the student body. Having more people of color would benefit the University, increase the intentional learning of the students, and ultimately enhance the productivity of the institution.

26. UNC-CH is an incubator for success because it attracts students who have the capacity to do great things. However, many in-state residents come from broken high schools that are part of a broken state educational system. UNC-CH can help lift those students as they climb. It cannot do that well right now because its most critical resource – students of color – is depleted. The role of the University is to increase the capacity of its students to be impactful and intentional global citizens. You can only do that when you bring in people who have not yet seen the globe. Their perspective and voice matter, even if their high school and the system that their high school is in does not remind them of that.

My Cross-Cultural Interactions at UNC-CH

27. With the right mentorship and encouragement, and after finding the right support, I was able to turn frustration into leadership and take advantage of many opportunities to contribute to the larger campus community.

28. At UNC-CH, I had many opportunities to interact with students from different backgrounds and ethnicities, including as a campus leader.

29. I was the first African American male president of CUAB. At CUAB, my role was to discuss common problems among the members of the Board, study the techniques of effective group work, and serve the University community. I had to responsibly use student fees to formulate social, cultural, entertaining, and educational programs. I believe I was successful in that endeavor because of my background and the support of Black Board members. I also was able to hear the perspectives of immigrants and other students who saw the campus differently. Our perspectives nicely complemented those of the white Board members. CUAB became a safe space because we could critically challenge each other and, thus, the status quo.

30. My goal at CUAB was to lift as I climb. I wanted to make sure that the events that CUAB hosted, which welcomed students of all backgrounds, either encouraged discussion about racism and prejudice or made people of color feel like they had a home. In that way, I feel that I was able to help expose my classmates at UNC-CH to impactful education regarding diversity issues. Leading a board of people that had different experiences than I did but still had similar obstacles was one of the most liberating challenges that I accepted.

31. As isolating as UNC-CH can be, the greatest growth I had was when I came together with my peers and we shared our perspectives.

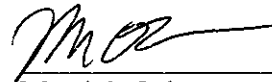
32. If we want for our student to be part of a competitive market, they need to be fluent in the languages of the world and some of them we may not easily understand without adding those voices to the student experience.

Conclusion

33. For all of these reasons, I believe that UNC-CH still has substantial room for improvement in terms of bringing students of color to campus. More diversity at UNC-CH, not less, is critical to make sure the University is inclusive and welcoming to students of color and that the University strives for greatness and does not remain stagnant in today's global world.

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

Executed on 6/12/2017



Merrick Osborne

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CASE NO. 1:14-CV-954**

**STUDENTS FOR FAIR
ADMISSIONS, INC.,**

Plaintiff,

v.

**UNIVERSITY OF NORTH
CAROLINA et al.,**

Defendants.

DECLARATION OF JORDAN PETERKIN

DECLARATION OF JORDAN PETERKIN

I, Jordan Peterkin, hereby make this declaration from my personal knowledge and, if called to testify to these facts, could and would do so competently:

Experience

1. I am an African-American male and a 2017 graduate of The University of North Carolina at Chapel Hill (“UNC-Chapel Hill”).

2. At UNC-Chapel Hill, I was a Business major, an acapella singer with Harmonyx, a photographer for the *Daily Tar Heel*, and the Vice President of the Undergraduate Business Student Association. I also worked with the Diversity and Multicultural Affairs office (“DMA”) and with UNC-Chapel Hill student government.

Diversity at UNC-Chapel Hill

3. When I started at UNC-Chapel Hill in 2013, there were 98 Black males in my class. This included African males and athletes. The Black males from Africa had vastly different experiences from me as an African-American male. Also, athletes have completely different experiences and are not always part of the campus community in the same way due to their busy schedules. Thus, I found that there were only about 40 to 50 students from my entire class who were Black males with similar experiences to me. Out of a class of many thousands, this was a very small number.

4. This small number got even smaller when you broke us up by major. At the Business School, there were only a few Black students, and regularly I was the only Black student in classes. In addition to having only a small number of Black students in

these classes, there were only a few Black faculty members. I felt as though I did not have class members to rely on or faculty members who understood my background.

5. My fellow students and I have voiced concerns about feeling isolated at UNC-Chapel Hill. When we do not have people to compare experiences with, it can lead to many students not wanting to remain at UNC-Chapel Hill. I have had many friends transfer from UNC-Chapel Hill because they felt like they did not fit in. Recruitment and retention of African-American students is a significant issue.

6. As the only Black member in many classes, I was often called out by professors based on my race for my perspective on having a low socioeconomic status and being Black. One experience in particular stands out to me. One professor in the business school had a class in which we discussed the market share of Walmart and how it appealed to lower socioeconomic people and Black and Hispanic people. He asked me to comment on behalf of these people. It was humiliating and alienating.

7. Race is not the only mark of diversity, but race is dynamic and important. Lack of racial diversity is also a disadvantage for White students. They may end up interacting with Black or Hispanic individuals in the real world, but will not know how to relate to them.

8. For instance, there are fifteen or so trillion dollars in buying power in the Black and Latino markets. The American population is becoming more colorful, and our demographics are changing. If students are at a school where they only get to interact with people who look and act like them, and then they enter the business world and many of their customers are different from them, they are at a disadvantage.

9. UNC-Chapel Hill is doing many good things to improve diversity. DMA works to try to get more minority students to apply to UNC-Chapel Hill and to feel welcome when they arrive. UNC-Chapel Hill has established programs and services through their Writing and Learning Centers to help minorities. Chancellor Carol Folt has done an excellent job with Carolina Conversations, which allows for discussion of challenging issues. Black faculty have done a great job creating a shared digital site to engage with one another virtually. It is not perfect, but it is a work in progress.

10. Having diverse classmates helps us all learn from one another. I had a great experience discussing the Black Lives Matter movement in class. My Philosophy professor had just come from Harvard University, and it was his first semester at UNC-Chapel Hill. He was not used to walking past the Chancellor's building and seeing hundreds of people talking about Black Lives Matter. He was intrigued and wanted to talk about it in class. He related it to social biases and existentialism. Students discussed their personal experiences together, talked about fulfillment, and explained how they go through life carrying their own burdens. It was an excellent discussion. The discussion would never have occurred without so many students with different perspectives in class, a professor being open, and a protest happening on campus with students talking about Black Lives Matter. That is the kind of culture you want to cultivate at a university.

Conclusion

11. My experience suggests that we need more, not less, racial diversity at UNC-Chapel Hill. Having more African-American males on campus would help this group feel less isolated and contribute to better recruitment and retention. In addition,

having more minority students would benefit the campus as a whole in an era where students need to learn to interact with other groups and address pressing issues related to race.

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

Executed on: July 19th, 2017



Jordan Peterkin

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CASE NO. 1:14-CV-954**

**STUDENTS FOR FAIR
ADMISSIONS, INC.,**

Plaintiff,

v.

**UNIVERSITY OF NORTH
CAROLINA et al.,**

Defendants.

DECLARATION OF MICAH POULSON

DECLARATION OF MICAH POULSON

I, Micah Poulson, hereby make this declaration from my personal knowledge and, if called to testify to these facts, could and would do so competently:

Background

1. I am a 2014 graduate of at The University of North Carolina at Chapel Hill (“UNC-Chapel Hill, ” or the “University”), and I was a member of the Air Force Reserve Officers’ Training Corp (“ROTC”) at UNC-Chapel Hill.
2. I am currently a Maintenance Officer with the United States Air Force.
3. I am a Black male and came to the University from Virginia. Both of my parents are well-educated. My father is a professor and my mother is in business.
4. In high school, I began looking at top schools. I applied to schools like The University of Virginia and UNC-Chapel Hill. I was accepted at all of the schools I to which I applied, but UNC-Chapel Hill offered me financial aid so I decided to attend.

Experience at UNC-Chapel Hill

5. It took me a while to figure out what I wanted to major in at UNC-Chapel Hill. When I first got to the University, I thought I wanted to be a writer, but I was not sure.
6. On a whim, I decided to go to the ROTC office. I saw it as practical, as a means to pay for graduate school. After I joined the ROTC, I had to declare a major, and I chose to major in African, African-American and Disapora Studies with minors in History and Aerospace Studies. ROTC helped me orient my goals toward being an officer in the Air Force.

7. My experience at UNC-Chapel Hill was overwhelmingly positive, but there were been a couple of instances where I felt microaggressions. Once, a friend from Senegal and I were in Chapel Hill but not on campus. There was a guy harassing us, and there seemed to be racial overtones. There was another instance with a guy I was friendly with. It was a Friday night and we were arguing about a math problem. Earlier, we had talked about him not having a dating life, and I said that if he wanted a date, he should not be spending his Friday night arguing about a math problem. He was offended by my comment and responded by saying “at least I’m not Black.”

8. On campus, there were times during my freshman year where I felt like the dormitory was not diverse. I had an Indian roommate, and everyone else in the dorm was a White male. While there was socioeconomic diversity in the dorm, there was not racial diversity.

9. There was diversity at UNC-Chapel Hill my freshman year, I just did not know it yet. Although I am from a predominantly Black area, I had been in other environments where I was one of few minorities and I was not necessarily uncomfortable. At UNC-Chapel Hill, I wanted to feel like people understood where I was coming from.

10. During my sophomore year, I moved to a different residence hall and my friends there were very racially diverse, including Blacks, Whites, and Asians. I felt really comfortable but I wanted an even more diverse experience with a lot of perspectives.

11. I learned a lot from people of all different backgrounds. During my sophomore year, I met many Native-American and multi-racial people, and I wanted to know more about their backgrounds.

12. I grew the most when I was able to find mentors who I identified with. My closest mentor in ROTC was a Black captain in the Air Force. He was a good role model for me. When you see leaders on campus that you identify with, it helps you realize that you can be successful. People do not have to be the same race to connect, but it does help sometimes.

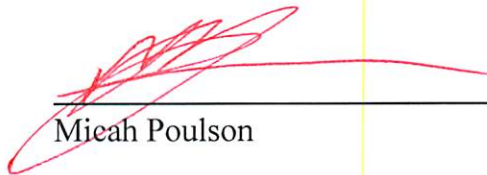
13. Diversity at Carolina is important because we live in a diverse country. The divisions over issues, whether based on race, class, or religion, can only benefit from interactions with those from different backgrounds. It would be a misstep to do anything else. If you look at America's history, there have always been segregated communities where people do not know the perspectives of people from different communities well. We need to make efforts to change that.

14. The Commander of ROTC brought in a Muslim professor to teach us about the Middle East. In order to serve and work in other countries, we need to have an understanding about other cultures. Someone brought up a situation where military members had taken pictures of themselves doing offensive things to Muslims. The students were very receptive to learning about how to make themselves better people and better soldiers.

15. I cannot emphasize enough how important I think diversity is to educate people and to help people understand each other and grow together. We need those different voices in the room. Diversity was important not only to my educational experience but in helping me develop skills for the military as well.

I declare under penalty of perjury under the laws of the United States that the forgoing is true and correct.

Executed on: 6/27/17



Micah Poulson

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CASE NO. 1:14-CV-954**

**STUDENTS FOR FAIR
ADMISSIONS, INC.,**

Plaintiff,

v.

**UNIVERSITY OF NORTH
CAROLINA et al.,**

Defendants.

DECLARATION OF JONATHAN RECKFORD

DECLARATION OF JONATHAN RECKFORD

I, Jonathan Reckford, hereby make this declaration from my personal knowledge and, if called to testify to these facts, could and would do so competently:

Background

1. I grew up in Chapel Hill, North Carolina, and I attended The University of North Carolina at Chapel Hill (“UNC-Chapel Hill” or “the University”) on a Morehead Scholarship. I received my Bachelor of Arts degree in Political Science in 1984. After I graduated, I worked for Goldman Sachs as a financial analyst, and I left Goldman Sachs when I received a Henry Luce Foundation scholarship to do marketing for the Seoul Olympic Organizing Committee and coach the Korean rowing team. I received my Master of Business Administration degree, focused on Public and Non-Profit Management, from Stanford University Graduate School of Business (“Stanford GSB”) in 1989.

2. I have been the Chief Executive Officer for Habitat for Humanity International (“Habitat”) since 2005. Before working at Habitat, I was the Executive Pastor of Christ Presbyterian Church in Edina, Minnesota. I also previously held executive and managerial positions at Goldman Sachs, Marriott, The Walt Disney Company, and Best Buy.

3. I currently serve on the boards of the Federal Reserve Bank of Atlanta, Stanford GSB, and Duke University’s Center for the Advancement of Social Entrepreneurship. I am also a member of the Council on Foreign Relations and the Urban Steering Committee for the World Economic forum.

4. My wife, Ashley, and I have three children and live in Atlanta.

Experience in Higher Education

5. My dad taught in the Classics Department at UNC-Chapel Hill for 44 years, and I grew up on Franklin Street. I went away for high school and came home for college. The Morehead Scholarship was an amazing opportunity, and although my dad and all our relatives

went to Harvard University, it was an easy decision for me to come to UNC-Chapel Hill. I loved my experience at UNC-Chapel Hill, and the Morehead Scholars program was a driver in that.

6. I attended UNC-Chapel Hill from 1980 to 1984. At that time, UNC-Chapel Hill was diverse but, in some ways, it was not as fully integrated in its diversity. I was in the only integrated fraternity on campus. Other than my fraternity, all of the sororities and fraternities were either Black or White. There is a cost to that, although it is human nature to self-segregate and there was a fair amount of that. My roommate, who was African-American, was under huge pressure not to join a predominately White fraternity.

7. There was a higher amount of diversity in student government. I was a rower, a sport that was not at all diverse. I also played soccer, which was very diverse. The larger classes were fairly diverse and the smaller classes were less so.

8. For me, diversity contributed to my education. People bring their experiences to the classroom but so much of education is not in the classroom, but is broader.

9. At business school, I had five roommates. We were like the United Nations in terms of diversity, but there was not much economic diversity. Each person brought a different makeup to the group, which was a great strength.

Experience in the Corporate World

10. The world has changed so much. I worked at Goldman Sachs right after I graduated from UNC-Chapel Hill, and it was not diverse. It was heavily dominated by White males, which is probably different now. I contrast that with the work I did with the Olympics in South Korea, where I was the only non-Korean in the office. This enhanced my cultural awareness and sensitivity. Marriott was exemplary on that front, and recognized that building a global workforce was the key to success. Disney was so passionate about great customer service and serving a diverse customer base.

11. At my church in Minnesota, we had to fight hard to attract a diverse staff and congregation. The most segregated house of the week is Sundays at 11. It is possible but not easy to build diverse churches.

12. Based on my experiences in the corporate world, Habitat for Humanity has a very high commitment to diversity. Non-governmental organizations (“NGOs”) are not so different from global corporations, and the same skillsets are needed in NGOs as in multi-national corporations. At Habitat, we take a servant-leadership view. We believe that you need to lead through influence, not authority, and this works well in both private and non-profit sectors. It is deep in our ethos at Habitat, which began with Clarence Jordan, a pastor/farmer who launched an inter-racial farm in southwest Georgia in the 1940’s to be a “demonstration plot for the kingdom of God.” Jordan was instrumental in the founding of Habitat. He believed in non-violent protest and inspired others, including Martin Luther King, Jr. While the farm was ultimately not successful, he inspired the idea of bringing different people together, crossing social boundaries, and building community through shelter. For us to do that, it is really important to have leadership and a workforce that look like the communities we serve. You can build relationships with those we do not look like but in our culture, having people who have experienced the deprivations we are trying to eliminate, as well as for us to serve all the countries and cultures we serve, would be hard if we did not have a diverse workforce. It is very important to our ability to be successful.

Importance of Diversity

13. I think public universities have a particular responsibility to provide access and to educate students from low-income families. The best way to get doctors to rural North Carolina is to bring in and train medical students from rural North Carolina. If we want to build the state of North Carolina, we have to educate everyone from the state.

14. The increasing economic segregation in our cities is a relatively recent phenomenon. It is so important to have economic integration. Historically, cities were more economically integrated. We pay a price if you go through school and do not have the chance to meaningfully interact with people from different backgrounds. There is a significant cost when students leave school and are thrust into environments where, to be successful, you must engage with people from a wide variety of backgrounds and experiences.

15. When I look at the competencies we hire for Habitat, you almost cannot succeed in this environment if you cannot work cross-culturally, cross-functionally, and cross-geographically. I am always working with multiple departments and organizations, and the ability to work across those boundaries is critical to working at Habitat. Empathy and communications skills are key, which ties back to diversity. Working with people from different cultures, races, and genders better prepares students to be citizens and to be professionally successful.

16. I acknowledge the complexity of this issue. UNC-Chapel Hill is a selective institution but yet, it seems to me, if the heart of UNC-Chapel Hill is for the public good, the public good is to build the capacity of North Carolina. I have always argued for more out-of-state students, and I think that would be good for UNC-Chapel Hill. But for the University's mission, it seems to me that it is critical to educate a broad cross-section of the state geographically and along other diverse lines. If you want the best and the brightest to come to UNC-Chapel Hill, we need to provide them an education that increases their empathy and provides the chance to work with others unlike themselves.

I declare under penalty of perjury under the laws of the United States that the forgoing is true and correct.

Executed on: May 29, 2017


Jonathan Reckford

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CASE NO. 1:14-CV-954**

**STUDENTS FOR FAIR
ADMISSIONS, INC.,**

Plaintiff,

v.

**UNIVERSITY OF NORTH
CAROLINA et al.,**

Defendants.

DECLARATION OF VISHAL REDDY

DECLARATION OF VISHAL REDDY

I, Vishal Reddy, hereby make this declaration from my personal knowledge and, if called to testify to these facts, could and would do so competently:

Background

1. I graduated in May 2016 from The University of North Carolina at Chapel Hill (“UNC-Chapel Hill” or the “University”) with a Bachelor of Arts in Anthropology and minors in Chemistry and Spanish. I am currently working as a Campus Coach for Open Doors Academy, facilitating after-school programming for middle schools in Cleveland, Ohio. Down the line, I plan to be a public interest attorney.

2. I am an Indian male, and I was born in Canada but raised in Cleveland, Ohio.

3. In high school, I narrowed my college choices down to UNC-Chapel Hill, Northwestern University, The Ohio State University, and McGill University. At the time, I wanted to attend a public university because public institutions seemed to have more pride in their school and sports teams than private universities. UNC-Chapel Hill was farther from home but even as an out-of-state student, it was affordable compared to other schools like Northwestern University.

Experience at UNC-Chapel Hill

4. From a nostalgic perspective, what UNC-Chapel Hill graduates remember most about their time at the University is sitting outside on a sunny afternoon at the Pit, a social gathering spot in the heart of campus. The Pit provides a lens into UNC-Chapel

Hill student life. The breadth of student activities is incredible, from dance groups to multicultural fraternities to service organizations. As I saw at UNC, if you have a diverse student body, it likely results in diverse student interests. Having diverse interests at the University is very powerful and can incubate passions that lead to innovative, progressive thinking. If we are attempting to raise a new generation of leaders, diversity is critical to facilitate that kind of thinking.

5. At UNC-Chapel Hill, I was very involved with social justice endeavors. I encouraged people to volunteer, to go abroad, to support public health, and to generally be involved in my larger advocacy efforts, such as raising issues with the Board of Governors and the North Carolina Legislature.

6. I was actively involved with the Campus Y, UNC's Center for Social Justice on campus. During my senior year, I served as Co-President of the Campus Y.

7. During my sophomore year, I joined the student organization, Helping Youth by Providing Enrichment ("HYPE"). I Co-Chaired the organization my junior year. I served as a tutor, going twice-a-week to afterschool community centers in local low-income neighborhoods. This experience helped me realize UNC was a bubble that did not sufficiently reflect the real world. I first started tutoring because I enjoyed working with kids, but I soon realized different patterns of inequality. I started seeing poverty in Chapel Hill and became intellectually curious about the causes of poverty.

8. During my senior year, I signed up as an Editorial Board Member for the *Daily Tar Heel*. It was a great opportunity, and there were so many voices in the room

that brought different perspectives, from staunch socialism to ardent conservatism. The position allowed me to have a macro understanding of people's perspective on what was happening on campus and in Chapel Hill. We talked a lot about diversity, service, advocacy, and the UNC and North Carolina administration.

9. My friends were not all social-justice-minded like I was. I had different pockets of friends from different groups. In my first year, I met many of my friends in my residence hall. I lived on South Campus my first year, and it was an incredible experience. I met some of my best friends there, and they are from a variety of races, places, and socioeconomic statuses. I also found that student organizations were a great way to get involved, both as a member and as a leader. As a member, I interacted and became friends with different tutors and people who were interested in working with educational initiatives in Chapel Hill. There was a racially diverse group of tutors, which I found to be very enlightening. As a leader of HYPE, I often met and coordinated with other racially-diverse leaders. Many of the projects we worked on had to do with diversity, which was a great experience as we were able to confront together the difficult questions of race and class.

10. I was enrolled in a couple of Anthropology and Sociology classes that addressed, amongst other issues, how concepts like racism became institutionalized. I started to think more critically about power structures and our relationship to them. I took these classes at the same time as I was volunteering and serving in the Chapel Hill community. The intellectual and moral impact this work had on me was exacerbated

because I was fortunate enough to take classes that helped provide a framework through which to understand poverty and class struggles.

11. One class that stands out to me was Society and Medicine, taught by Dr. Liana Richardson. We talked about systemic, institutional racism and micro-aggressions from a public health perspective. This was before those terms became commonplace to me, and it was impactful to learn about them from an academic perspective instead of just learning them through informal conversations with friends or on social media. I was the only male in the class, with 34 women, and there was significant racial diversity. When we discussed intersectionality, it was helpful to hear about the experience of a Black woman from a middle class background and how those three identities shaped her experience. The professor was half-Black and the teaching assistant was Chinese-American. Being that there were a diverse set of identities represented by our class, it was fascinating to hear how people identified themselves. It was also great to hear White classmates talk about their responsibility, experience, and accountability. When discussing issues that are happening in the world, it is critical to have people from different parts of the world in the discussion.

12. One of the biggest ways you can grow is through conversations with friends and with people in class. If all of your friends share the same background, you will operate in a silo. I think everyone can agree that the more perspectives you bring into an issue and a discussion, the more enlightening that discussion is for everyone. If we are talking about racism, it is one thing for me as an Indian male to offer a perspective and

another to have the perspective of a Black woman or a White man. It is important to hear not just the Black experience but also the White experience, and it is important for both of those people to hear each other's perspectives. Through these dialogues, people become more tactful, aware, and empathetic when they encounter people from different backgrounds. It is an enlightening experience if you come to UNC-Chapel Hill from one section of America and encounter people who have had and will continue to have different life experiences from you.

13. **Conclusion**

When I came to UNC-Chapel Hill, I thought it would be a great college experience, and I knew that UNC-Chapel Hill had a terrific basketball team. It was indeed a great college experience, but, looking back four years later, I think completely differently about what tenets of a public university make it valuable. From my experience, public universities have a responsibility to make sure students are educated about the world, which means not insulating them from the world. Having racial diversity at UNC-Chapel Hill is an important part of that. Students need the opportunity to hear other perspectives.

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

Executed on: 7/21/17


Vishal Reddy

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CASE NO. 1:14-CV-954**

**STUDENTS FOR FAIR
ADMISSIONS, INC.,**

Plaintiff,

v.

**UNIVERSITY OF NORTH
CAROLINA et al.,**

Defendants.

DECLARATION OF NEILS RIBEIRO-YEMOFIO

DECLARATION OF NEILS RIBEIRO-YEMOFIO

I, Neils Ribeiro-Yemofio, hereby make this declaration from my personal knowledge and, if called to testify to these facts, could and would do so competently:

Background

1. I am the Managing Director of Recruitment and Admissions of the Mid-Atlantic Region for City Year, a nonprofit organization that focuses on helping historically underrepresented students succeed in school.

2. I graduated from The University of North Carolina at Chapel Hill (“UNC-Chapel Hill” or the “University”) in 2008 with a Bachelor of Arts in Management and Society. I also received a Master of Science in Nonprofit Management with a concentration in Organizational Leadership from Northeastern University.

3. I was born and raised in Alexandria, Virginia, and my family is originally from Ghana. I am a first-generation United States citizen and a Black male. Early on, I did not have the best schooling experience. My parents have not been together since I was eight or nine, and my mom moved us constantly in search of better educational opportunities. I must have moved to four or five different schools.

4. I do not remember a time when I did not want to go to UNC-Chapel Hill. When I was five years old, I wanted to go to UNC-Chapel Hill because I liked Michael Jordan and the University’s colors. For a while after that, I wanted to attend a Historically Black College or University (“HBCU”) like Howard University or Morehouse College. When I got to high school, I knew I wanted to live in North Carolina, where my dad lived. I realized UNC-Chapel Hill was the best school in North

Carolina, so I had tunnel vision about going to UNC-Chapel Hill from then on. It all came full circle for me—the school I wanted to go to when I was young then became, in my mind, the best school in the State, if not the world.

Experience at UNC-Chapel Hill

5. When I was growing up, the makeup of Northern Virginia was a hub of diversity with lots of first and second-generation United States citizens. It was shocking to come from Northern Virginia to a place where the majority is White.

6. During my first semester at UNC-Chapel Hill, I did not feel like it was the right place for me, and it did not feel like home. I did not need to study in high school, so I had to learn how to study quickly. My Academic Advisor supported me and told me that my struggles were normal, and I know that my Academic Advisor also helped three or four of my friends. I wized up and started attending office hours and talking to my professors. I changed my major five times before finally settling on Management and Society. These experiences with my Academic Advisor and my professors changed my attitude about not feeling at home at UNC-Chapel Hill.

7. When I came to UNC-Chapel Hill, I was not polished. I did not know how to speak eloquently, and I had a southeast Washington, D.C. accent. My professors and Academic Advisor looked at me and saw a Tar Heel. They helped me reach my potential, and now I am a national leader in a national organization.

8. One of the amazing things about UNC-Chapel Hill is FallFest, where there are organizations for everyone to join, whether you like math or whether your family is from Africa. I joined five different organizations at FallFest, and after a few months, I

had a network at UNC-Chapel Hill. I joined the Organization for African Students' Interests and Solidarity ("OASIS"), the Black Student Movement ("BSM"), a club football team, and served as a referee for campus recreation. I also joined a fraternity, Omega Psi Phi, and served in Greek Affairs and Greek Government on a Hiring Affairs Committee for the Greek Director. I worked in Diversity and Multicultural Affairs ("DMA") and with Project Uplift, a program that brings rising seniors from historically underserved populations to campus to experience UNC-Chapel Hill life. I also volunteered in the Admissions Office, calling prospective students in the Washington, D.C., Maryland, and Virginia area to tell them about my experiences at UNC-Chapel Hill.

9. UNC-Chapel Hill, through its diverse student organizations, makes students feel like members of a community, provides opportunities for students to feel like they are not alone, and helps them find people who will support them. The friends that I met through student organizations helped me overcome my academic struggles and helped me feel at home at UNC-Chapel Hill. Having other students from diverse backgrounds at UNC-Chapel Hill was important in helping me feel comfortable and supported.

10. In my African and Afro-American Studies ("AFAM") class, my professor was White, and only five Black students were enrolled in the class. I found that class so rewarding. Granted, it was great to hear perspectives of people who look like me, talk like me, and act like me, but it was also great to hear the perspectives of potential allies with different backgrounds, who can empathize and share their thoughts. Our class had a robust exchange of ideas, where students had a true desire to learn about African-

American history. This was different than being in a class with people who pick courses because they are easy, or fun, or engaging; people took the AFAM class out of a true desire to learn about people who are different than they are, and because they truly wanted to understand different backgrounds. There are not many places where you feel like you have the opportunity to share personal perspectives with those from different backgrounds, so this experience really stood out.

11. Martin Luther King, Jr. calls the feeling I felt at UNC-Chapel Hill the beloved community—where despite what you look like or where you come from, people respect you for who you are and for your character. I felt that intentional beloved community in all of my classes at UNC-Chapel Hill. If anyone wanted to be malicious or judgmental, they were not welcome. It was a magical feeling. If I could put it in a bottle and sell it, I would be a millionaire.

12. I cannot think of a time at UNC-Chapel Hill when I felt pressure, as the only Black person in a class or group, to speak for my race. There was a network of Black students, and I felt connected to that network. If there was a time when I felt like a representative of my race, there was an intentionality to it, such as through BSM or my fraternity. Greek Affairs held leadership meetings where leaders from different councils would gather to give reports about their successes and struggles, and I represented my fraternity. As a representative of a historically Black fraternity, I spoke about my experiences on campus and suggested ideas that would make members of historically Black fraternities feel more a part of campus.

13. While these were my experiences, I know other minority students who struggled more at UNC-Chapel Hill. If UNC-Chapel Hill's enrollment of minorities were to drop, I would be very concerned about minority students being able to find community on campus.

Life after UNC-Chapel Hill

14. Before coming to UNC-Chapel Hill, I was an angry child, and my anger stemmed from the fact that I moved schools so many times. I realized that my educational experience had improved, but I never considered why until I arrived at UNC-Chapel Hill. When we moved to nicer neighborhoods, the schools were better, the teachers were nicer, and the students were more engaging. At UNC-Chapel Hill, I learned about the achievement gap, and the fact that a zip code change can correlate with a better academic experience. The fact that UNC-Chapel Hill helped me name the achievement gap inspired me to pursue a career in social justice.

15. While at UNC-Chapel Hill, I was recruited by Teach for America but realized it was not a good fit for me. Then, a UNC-Chapel Hill classmate connected me to City Year. City Year has an educational nonprofit gap year program where participants dedicate one year to serve as tutors, mentors, and role models in underserved areas. I started by doing the gap year program, and it was a great fit. I have now worked for City Year for approximately eight years.

16. My experience at UNC-Chapel Hill was a huge reason for my career, and I now encourage kids to go to UNC-Chapel Hill. Graduates of UNC-Chapel Hill know the

importance of service and appreciate justice. UNC-Chapel Hill is one of the top schools where City Year recruits.

17. Having the ability to interact with people of different backgrounds is critical when working not only at City Year but everywhere else as well. It is a hindrance if you do not have experience with diversity. If you do not have experience interacting with diverse people before starting at City Year, you have to learn in order to participate. Power comes from bringing different voices to the table, and you learn and grow from those voices. Coming from UNC-Chapel Hill, graduates, including myself, have a leg up. UNC-Chapel Hill graduates do not have to get used to working with different types of people—we have done that for four years.

18. It is important for high school students to see students of color who graduate from college. When I speak with high school students, they see me as someone who looks like them, speaks like them, and acts like them. They think, “if he can do it, I can do it.” It happens without me even explicitly saying the words. Once I build relationships with these students, I tell them that I believe in them and they can do it. I am not a special case. I am just a typical UNC-Chapel Hill alum.

Conclusion

19. I was able to overcome challenges to find a strong sense of community at UNC-Chapel Hill. UNC-Chapel Hill prepared me well for a career in service, and I am honored to use my education to help other minority students succeed in school and achieve their dreams. UNC-Chapel Hill’s diversity matters to its students and should be embraced.

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

Executed on: 7/5/17



Neils Ribeiro Yemofio

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CASE NO. 1:14-CV-954**

**STUDENTS FOR FAIR
ADMISSIONS, INC.,**

Plaintiff,

v.

**UNIVERSITY OF NORTH
CAROLINA et al.,**

Defendants.

DECLARATION OF SHRUTI SHAH

DECLARATION OF SHRUTI SHAH

I, Shruti Shah, hereby make this declaration from my personal knowledge and, if called to testify to these facts, could and would do so competently:

Background

1. I graduated from The University of North Carolina at Chapel Hill (“UNC-Chapel Hill” or the “University”) in 2011 with a degree in Political Science and a minor in Entrepreneurship. I later received my Master’s degree in Urban Education from Johns Hopkins University.

2. I grew up in Memphis, Tennessee in an interracial household. My dad is Indian and my mom is a Jewish New Yorker. I look like I am Indian, and I have an Indian name, but I grew up in a Jewish household in the South.

3. UNC-Chapel Hill was the only school in the South to which I applied. I had heard wonderful things from friends who attended UNC-Chapel Hill, and I loved the campus when I visited. I ultimately decided to attend UNC-Chapel Hill in part because it was a public school. I attended a public high school, and I loved public school because of the diverse perspectives of my classmates.

4. At UNC-CH, I worked with former Chancellor Holden Thorp and with Judith Cone, the Vice Chancellor for Innovation, Entrepreneurship, and Economic Development, to help craft the roadmap for innovation and entrepreneurship at UNC. The goal was to equip students, faculty, and staff with the resources to solve some of the world's greatest challenges through an entrepreneurial lens.

5. After leaving UNC-Chapel Hill, I was accepted into Teach for America in Baltimore, where I taught 4th, 5th, and 2nd grade at Graceland Park O'Donnell Heights Elementary Middle School while also working toward my Master's degree in Urban Education at Johns Hopkins University.

6. I then moved to San Francisco where I worked for a small seed venture capital fund that invested in early stage education technology companies. I left the seed fund to start my own company.

7. Three years ago, I co-founded a company called Move Loot, an online marketplace for buying and selling furniture. Building, operating, and scaling the company was an amazing learning experience. In 2016, we ceased operations.

8. I am currently an Entrepreneur in Residence at Silicon Valley Bank.

Experience at UNC-Chapel Hill

9. UNC-Chapel Hill is a special place. I was involved in a number of extracurricular activities where I feel I was able to do meaningful, impactful work.

10. I was active in student government throughout my time at UNC-Chapel Hill. Student government was a diverse place with students from different backgrounds, but I am not sure that was reflected in the larger student body.

11. I observed that many students at UNC from different racial and ethnic backgrounds spent time with others of their group both socially and as part of student organizations that represented the interests of that group. I believe that more racial and ethnic diversity within the student body would provide many more students with

additional exposure to people with different backgrounds, helping students become more comfortable with people who are different.

12. In college, I enrolled in a political science class where we discussed the American dream. I struggle with the concept of the American Dream. My family came to the U.S. because of the freedom and opportunity that exists here. However, I gained a deeper, more layered understanding of how that dream can fall short after attending a public high school in Memphis, TN and teaching in a public school in Baltimore. This is particularly true for people of color who don't necessarily have access to the same opportunities and social connections as their white counterparts. The discussion in my college class, was nuanced. Some students felt very strongly that the dream existed while others were more skeptical, believing that the dream existed, but not for people of color. I believe the class discussion would have been richer had more children of immigrants and/or people of color been part of it.

13. As a student at UNC-Chapel Hill, I became increasingly aware of the disconnect between how an individual can view him or herself and how other people might view him or her. For example, as the daughter of a Jewish New Yorker from the Bronx and an Indian immigrant, I have a mixed identity. I was raised in a Jewish household in the South but my name and physical appearance lead many people to assume that I am fully Indian, speak Hindi, and observe the Hindu religious practices, none of which I do. This disconnect was often frustrating as a college student because I wanted to be seen the way I see myself. I often think that if students had more exposure to individuals from varying racial and ethnic backgrounds, they might be less inclined to

make assumptions about another person's identity. This type of cultural awareness and competency is likely developed through increased exposure to people who are different. The understanding I developed of the complexity of one's racial or ethnic identity was helpful during my experience as a classroom teacher through Teach for America. I was teaching students from many different racial, ethnic, and socio-economic backgrounds, and because of my own life experiences, I was able to approach issues related to race in a thoughtful and sensitive manner.

14. As an entrepreneur in Silicon Valley, I, unfortunately, have had multiple offensive encounters— with investors or partners who have made uncomfortable comments about my skin color, and questioned my credibility and ability to do my job – largely because of my age, skin color, and gender. I wish I had been better prepared to handle those situations. If UNC had a more diverse student body, it's possible that I would have been able to connect with more students who had encountered uncomfortable situations like these, learning from them about how to navigate those difficult situations.

15. Additionally, having a more racially diverse student body would help equip college students with a language to talk about and navigate complex conversations about race and identity. They hopefully would be better equipped with a thoughtful and culturally aware skill set to use in the working world. Majority students might have more opportunities to interact with students of color, thus increasing their sensitivity and ability to navigate a more diverse environment. As our society becomes more diverse, having this awareness will be increasingly important.

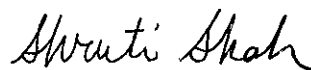
16. I believe that deep cultural awareness particularly related to race was lacking on campus, and having an even more racially diverse student body would have made a huge difference and would have changed perspectives inside and outside the classroom.

Conclusion

17. My experiences as a student at UNC-Chapel Hill were critical in helping me develop a deeper understanding of the complexity of identity as it relates to race, gender, class, and sexual orientation. But, UNC-Chapel Hill can and must do more to attract students from diverse backgrounds, particularly students of color. Doing so will better prepare graduates for the world they will experience beyond University walls. I strongly support UNC-Chapel Hill's efforts to create a diverse student body across many dimensions.

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

Executed on: July 20, 2017



Shruti Shah

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CASE NO. 1:14-CV-954**

**STUDENTS FOR FAIR
ADMISSIONS, INC.,**

Plaintiff,

v.

**UNIVERSITY OF NORTH
CAROLINA et al.,**

Defendants.

DECLARATION OF RICHARD VINROOT

DECLARATION OF RICHARD VINROOT

I, Richard Vinroot, hereby make this declaration from my personal knowledge and, if called to testify to these facts, could and would do so competently:

Background

1. I am an attorney in Charlotte, North Carolina, and from 1991 to 1995, I served as Mayor of the City of Charlotte. I ran for Governor of North Carolina in 1996, 2000, and 2004, securing the Republican nomination in 2000.

2. I attended The University of North Carolina at Chapel Hill (“UNC-CH”) on a Morehead Scholarship, and I was a member of the UNC-CH men’s basketball team under Coach Dean Smith. I received my Bachelor’s degree in 1963 and my Juris Doctorate from the University of North Carolina School of Law in 1966.

3. I met my wife at UNC-CH, and she graduated in 1965. All three of our children graduated from UNC-CH as well.

Experiences with Diversity

4. I attended a segregated public high school. I went to UNC-CH in the 1960s when there were only three or four African-American students in my class. I did not know them personally at the time, but I have gotten to know them over the years. They have all added great value to my life, and I wish I had known them when I was a student.

5. My first experience with diversity was during my time in the United States Army. I was thrown in with kids from a variety of backgrounds during the draft era in Vietnam. I also served as a scout master to a Black Boy Scout troop for seven years.

6. I had dinner with Martin Luther King, Jr. as a young student at UNC-CH. It was eye-opening to hear him talk about what he encountered as a young minister in Alabama. Because of that experience, I began to pay more attention to developing my own sensitivities and to experiencing diverse friendships—something I had largely ignored during my time at UNC-CH up until that point.

7. Many of my peers have overcome the lack of diversity—as I hope I have—but some reflect that lack of diversity and sensitivity. I do not know of anyone in my kids' generation who does not have a broader and better view of the world in which they live than people of my generation, simply because of their broader experiences.

Children's Experiences

8. My experiences with diversity were limited early in my life, and I believe this made a difference in my upbringing. My children were exposed to diverse individuals from kindergarten on, and I believe they have had broader and better experiences as a result.

9. Throughout their schooling, my kids attended school with and visited the homes of kids with wholly different experiences. They knew much more than I ever did or will know just by hearing, seeing, and living with diverse individuals. Before attending UNC-CH, one of my daughters went to high school in West Charlotte and the other went to high school in New England.

10. My son is an emergency medicine doctor in a large Cleveland Clinic hospital in Abu Dhabi. Before going to Abu Dhabi, he worked in a large, public hospital

in New Orleans, Louisiana. He also spent a year as part of Doctors without Borders in Nairobi, Kenya, and he served in the military in the Middle East.

11. I visited my son recently in Abu Dhabi. Abu Dhabi is a large, modern place with two or three million people from all over the world. We went into the desert, and I watched and admired my son's interactions with so many people from so many places. It was interesting to see how natural and easy it was for him. I spoke to him on our way back and noted that I could not have interacted so naturally with so many others at his age. Part of that comes from being a doctor in a large hospital, but a lot of it came from UNC-CH.

12. My son was exposed to diverse classmates throughout his education, including at UNC-CH. He started going to Africa during his sophomore year at UNC-CH to work in the summer, and many of his friends did too. They acquired a cultural experience and are better able to live in the world as a result.

13. It is a more normal and natural experience not going to a school where every student is from the Eastover neighborhood in Charlotte. I cannot imagine wanting to stay on that same track and thinking that I am better for that and prepared to live in a multicultural world. We need to do things to embrace experiences with diversity.

Importance of Diversity

14. Without diversity, UNC-CH would create warped graduates who are technically sound but lack the humanity we brag about at UNC-CH. We are a university "of the people and for the people." We would not be true to our mission without diversity of all kinds, in my opinion.

15. There was a riot in Charlotte in September 2016 following the shooting of a Black man by a police officer. The whole community, particularly the community in which this occurred, was in an uproar for several days and it was well-publicized. On one side of town, people see a police officer and hide because they are fearful. On the other side of town, where I grew up, children smile and wave at police officers. These starkly different reactions may explain what caused the riot. On the first side of town, the police officer was seen as the enemy who killed one of their own. On the other side of town, people could not understand why anyone would be angry that an officer was protecting himself from an enemy. This happens over and over again—two people see the same events and understand them completely differently. It is similar to the Black Lives Matter versus All Lives Matter movements. People resent each of those phrases depending on the side they are on. To bridge those divides, we have to better understand each other and that requires interaction and dialogue.

16. In the world today, I can talk with people halfway around the continent. We deal with so many things that are not limited to a small community. How can it not be a value to know those other people's experiences? So many people have such different views of America. How can someone minister to people all over the world unless he or she has spoken with and talked with those people, and learned something about their life experiences?

17. If there were diminished racial and ethnic diversity at UNC-CH, UNC-CH would not be true to the mission of serving all of North Carolina. UNC-CH graduates

also would not be as enlightened when they come out of UNC-CH. To serve the diverse world, diverse experiences are critical.

18. I have always felt better about UNC-CH as a place that believes in the value of diversity. I love walking across campus and seeing kids from so many different walks of life. I hope the University will keep cultivating this diversity.

I declare under penalty of perjury under the laws of the United States that the forgoing is true and correct.

Executed on:

June 29, 2017


Richard Vinroot

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CASE NO. 1:14-CV-954**

**STUDENTS FOR FAIR
ADMISSIONS, INC.,**

Plaintiff,

v.

**UNIVERSITY OF NORTH
CAROLINA et al.,**

Defendants.

DECLARATION OF RICHARD (“STICK”) WILLIAMS

DECLARATION OF RICHARD (“STICK”) WILLIAMS

I, Richard (“Stick”) Williams, hereby make this declaration from my personal knowledge and, if called to testify to these facts, could and would do so competently:

Background, Leadership Experience, and Honors

1. I am a Black male.
2. I was born in the Ray Warren Homes housing project in Greensboro, North Carolina. My single mother raised me and my two brothers.
3. I graduated from Dudley High School, a low-resourced, all-Black school in Greensboro.
4. With an academic scholarship to attend The University of North Carolina at Chapel Hill (“UNC-Chapel Hill”), I became the first person in my family to go to college. I studied Accounting and graduated with a Bachelor of Science from UNC-Chapel Hill in 1975.
5. Immediately after graduating, I went to work for Duke Power Company as an internal auditor. I later worked for Arthur Andersen & Company before returning to Duke Energy Corporation (“Duke Energy”) in 1979. I worked for Duke Energy for 37 years. Most recently, I served as Vice President of Corporate Community Affairs and President of the Duke Energy Foundation. Previously, I served as Vice President of Diversity, Ethics, and Compliance. I retired in December 2015.
6. I served on the UNC-Chapel Hill Board of Trustees (“BOT”) from 1999 to 2007. In 2003, I was the first African-American individual elected to serve as Chair of the BOT. Prior to my service on the BOT, I was the first African-American Chair of the

UNC-Chapel Hill General Alumni Association Board of Directors. I also have served as the Chair of the UNC-Chapel Hill Board of Visitors, as a trustee of the UNC-Chapel Hill Foundation, as a member of the Chancellor's Advisory Committee on the Sonja Haynes Stone Center for Black Culture and History, and as a member of the search committee that recommended James Moeser as Chancellor.

7. I am a Co-Chair of Project Leadership & Investment For Transformation ("Project LIFT"), a philanthropic initiative to improve educational opportunities for traditionally underserved students in the Charlotte-Mecklenburg school system.

8. In addition, I have served as a trustee of Brevard College and have held leadership positions with Communities in Schools of North Carolina, an organization dedicated to surrounding students with a community of support, empowering them to say in school and achieve in life, and with the North Carolina Mentoring Council. I am a past Chair of the Boards of Directors for the Durham and Chapel Hill-Carrboro Chamber of Commerce, the Greater Triangle Regional Council, the Triangle Community Foundation, the Charlotte Mecklenburg Community Foundation, the Durham County United Way, and the YMCA of Greater Charlotte.

9. I received the Harvey E. Beech Outstanding Alumni Award in 2003 and a Distinguished Service Medal Citation from the UNC-Chapel Hill General Alumni Association in 2005. In December 2015, I was awarded the Order of the Long Leaf Pine for extraordinary service to the State by the Governor of North Carolina.

My Experience at UNC-Chapel Hill

10. My experience at UNC-Chapel Hill was very different from any of my prior experiences, in part because I had not had much exposure to Whites, Asians, or other different ethnic groups.

11. During the first semester of my freshman year, I tried out for the football team. That experience helped ease my transition into college, in some ways, because a shared interest in the game naturally created a group of individuals with whom to associate. Football also helped ease my transition because I felt a sense of equality on the football field that, at first, I did not feel in the classroom. Regardless of race, we were out there on the field just trying to make the team. To that extent, we were equal.

12. I was less confident in the classroom than on the football field. Not only did I have doubts about the quality of my academic preparation, but I incorrectly assumed that all White people were geniuses. I intentionally placed myself in the back of the classroom. One day, however, I realized that I needed to approach my school work the way that I approached football. I told myself that if I were on the football field instead of in the classroom, I would be doing everything I could to earn a place in the starting lineup. I needed to do the same thing in class. After that realization, I began sitting in the front. There, I did not see the other geniuses. It seemed as though the professor was talking just to me.

13. My new approach worked. Once I gained my footing and confidence, I learned I could compete with anyone and be successful. That lesson remained with me

for the rest of my career. No matter what the situation was or who the other participants were, I knew I could succeed.

14. Another important turning point for me was the realization that all of my classmates were human, too. Maybe we had not come from the same place or from places with similar resources, but we all wanted to be successful and were concerned about passing exams and courses. In that sense, all of us on campus were in the same boat. Despite our differences, we all could talk about what a tough test our professor had just given. After this realization, I learned to be less suspicious, and I began interacting more extensively with my classmates. Understanding that we are all human has powerfully shaped my approach to life, to engagement, and to community service in a positive way.

15. A third important lesson I learned at UNC-Chapel Hill was that there is no single standard for success or excellence. It was eye-opening to see how different people put varying levels of effort into achieving success.

16. The diversity I encountered at UNC-Chapel Hill was transformative. I benefitted immeasurably from experiencing other cultures and from listening to others students' stories. In some instances, I also benefitted from hearing other students' parents talk about what had shaped them and helped them to succeed in business. I learned a lot about what is important in life, and I left UNC-Chapel Hill a very different person than I was when I arrived on campus.

The Impact of Diversity

17. Diversity is essential from a business perspective, as well as an educational one. In order to optimize the quality of a project and products we produce, we must have people who come from different perspectives. Early on in my career at Duke Energy, I thought I was stupid because the solutions to problems that I came up with in my mind were very different from everyone else's. I really wondered if I would make it. But one day, I dared to put my stupid idea out there, and it changed the conversation. I learned another big lesson then. I had caused people to sit back and think about something different. That became the basis for how I ran staff or board meetings. I compelled people to bring ideas to the table instead of sitting on the sidelines, because I knew that diversity of ideas made the product better. Diversity of ideas comes from having people around the table who have a diversity of experiences and perspectives.

18. Employers' interest in diversity is reflected in the increase in funding that corporate foundations are investing in K-12 diversity-related initiatives to stimulate talent pools. As an example, the most important project I have been involved with in my career is Project LIFT. Project LIFT is an initiative to address the achievement gap in Charlotte-Mecklenburg Schools. When I learned that West Charlotte High School ("West Charlotte") had a 51 percent graduation rate, it tore my heart. West Charlotte was my high school sports rival. I had seen West Charlotte ascend to national prominence and then sink when integration efforts stopped. Project LIFT is my effort to help students like me, who have grown up with few resources and low expectations. We raised \$55 million for underserved elementary, middle, and high schools in the Charlotte-

Mecklenburg school system. In four years the graduation rate has increased to 86 percent, and we expect to reach 90 percent in five years. It is critical that we not allow so much talent to sit on the sidelines. Ultimately, the entire State benefits from these students' success. The opportunities I had at UNC-Chapel Hill put me in a position to reach back and help others from backgrounds like mine.

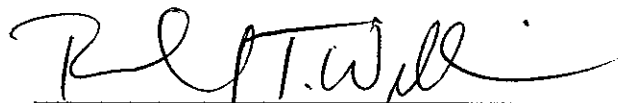
19. Similarly, the entire State benefits from programs like the Carolina Covenant, which attracts students to UNC-Chapel Hill who otherwise would not have considered attending or who would have been left with so much debt. It draws students like me—not necessarily Black students, but students who never would have imagined that they could attend or be successful at UNC-Chapel Hill. It has been incredible to see those students' success.

Conclusion

20. As General William Davie said when UNC-Chapel Hill was established, the purpose of a public university is to prepare the common man for service. Diversity, including racial diversity, is essential to that preparation. UNC-Chapel Hill simply cannot afford to leave its students' talent on the table.

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

Executed on: 07/26/2017


Richard ("Stick") Williams

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CASE NO. 1:14-CV-954**

**STUDENTS FOR FAIR
ADMISSIONS, INC.,**

Plaintiff,

v.

**UNIVERSITY OF NORTH
CAROLINA et al.,**

Defendants.

DECLARATION OF CAMILLE WILSON

DECLARATION OF CAMILLE WILSON

I, Camille Wilson, hereby make this declaration from my personal knowledge and, if called to testify to these facts, could and would do so competently:

Background

1. I received my Bachelor of Arts from The University of North Carolina at Chapel Hill (“UNC-Chapel Hill” or the “University”) in 2007, and a Master in School Counseling from North Carolina Central University. I am currently an Associate Director of College Readiness at the Emily Krzyzewski (“Emily K”) Center, a nonprofit organization in Durham, North Carolina that works to help low-income students access and succeed in higher education.

2. I am a Black woman and a native North Carolinian. Most of my education was in Wake County Schools, which were very diverse. However, in ninth grade, I attended school in Pitt County, which was much less diverse than Wake County. It was a culture shock moving from Wake to Pitt County.

3. In high school, I started noticing that the higher-achieving students and the student leaders were all going to UNC-Chapel Hill, and that became my goal as well. After junior year, I attended Project Uplift, a program that invites high-achieving high school students from historically under-served populations to experience the academic rigors and social climate on UNC-Chapel Hill’s campus. I came home singing camp songs and knew that I would definitely apply to UNC-Chapel Hill.

4. When I was accepted, I had to decide between UNC-Chapel Hill and Winston-Salem State University (“WSSU”), which offered me a scholarship and is my parents’ alma mater. One of the factors that helped me to choose UNC-Chapel Hill was that, after Project Uplift, I wanted to return to an environment in which I could be surrounded by and learn from people from different backgrounds. I wanted to be in an environment surrounded by a diverse group of people I could learn and grow with. I was looking for an environment like my childhood in Raleigh. While I was mindful of the fact that WSSU is a family school, and UNC-Chapel Hill was more expensive, I still chose to go to UNC-Chapel Hill because diversity was important to me. My twin brother chose to go to school at North Carolina A&T University, a historically black university (HBCU).

UNC-Chapel Hill Experience

5. I was overinvolved at UNC-Chapel Hill, but I thoroughly enjoyed all of my experiences. During my freshman year, I was a Class Council participant. I was a part of the Black Student Movement (“BSM”). I also was a member of the UNC-Chapel Hill Gospel Choir and became an Officer. I was a Residential Advisor (“RA”), and I participated in work study.

6. I was involved with the Diversity and Multicultural Affairs office (“DMA”) every year as a student volunteer, and during my sophomore year, I became a Student Administrative Staff Member to lead DMA programming. I worked as a Campus Visitation Coordinator with DMA and travelled with the former director of DMA, Terri

Houston, to the University of California, Los Angeles; Rice University; and the University of Florida. These were amazing experiences, and I learned about diversity initiatives at other schools. In my work with DMA, I tried to make sure that minority students and those from disadvantaged backgrounds knew that UNC-Chapel Hill, which is a selective institution, is still an option for them. I grew the most from my DMA experiences.

7. I was very naive as a young person, and I only thought about diversity in terms of race. I thought that if you looked like me, we probably had a lot in common and would get along. That myth was debunked at UNC-Chapel Hill, and I learned that was absolutely untrue.

8. I met my friend Sheena through DMA. She is an American-Indian from the Lumbee Tribe. She was from a rural background in Robeson County and spoke with a thick Southern accent. We are so different, but we are lifelong friends. She is an amazing woman, and we have so much in common that does not depend on the color of our skin, as she looks Caucasian. There is so much more that can bond and link you to another person than how you look. We had an “aha” moment when we found that we both love our grandmas, Southern cooking, cheesy jokes, and snack food. We are also both very family-oriented. We went to my first pow wow together, which was an amazing experience I may never have had without that friendship.

9. I had many experiences and interactions with students from different racial backgrounds at UNC-Chapel Hill. I can recall one specific instance where unfair

assumptions were made about me based on my race. Two Black female roommates and two White female roommates had a conflict with each other about noise and they sought a mediation session with me as an RA. The two White roommates accused the two Black roommates of being noisy. The White students did not want me to do the mediation because they felt I was too close to the Black roommates. I thought I was friendly to everybody; I am a jovial person and never meet a stranger. I think that I act like the same person, no matter who I am with. I personally felt the White students did not want me to facilitate the discussion because they did not think I could be fair to them because of my race. I pulled in my co-RA, a White female, to sit in with me on the mediation. We successfully worked through the issues, and I felt like the participants walked away feeling heard.

10. Diversity was very important in my courses and academic work as well. At UNC-Chapel Hill, I took a Sociology course that dealt with education. I recall thinking that the professor did a great job of choosing material for the course and helping us think through the material. The material addressed the development of policies like the welfare system and educational policies. It opened my mind to how politics and policy-making work. I learned that educational policies affect which kids get access to what kind of education, and it has a lot to do with socioeconomic status and race. I was fortunate to grow up as middle class, and I was not aware of welfare. The diversity of the students in that classroom made the course and its material more impactful and personal.

Compelling Interest in Diversity

11. I cannot overstate the importance of diversity at UNC-Chapel Hill. Coming to UNC-Chapel Hill and seeing people like Terri Houston, a Black female, running an entire department and Dean Harold Woodard, a Black male, in charge of the Center for Student Success and Academic Counseling was inspirational. I cannot overstate the importance of being a student of color and seeing these people have an amazing impact on the University. Diversity on campus gives people safe spaces in which to voice concerns and places where people can come for assistance.

12. If a Black woman is doing something, it gives that thing some validity to other Black women. While you may not have a shared identity in many ways, if you see someone who looks like you doing something, you think you can do the same thing. People are more likely to feel welcome and capable of achieving success if they see others like them succeeding. It is about having an example and a footprint to follow. This matters and this makes a difference, not just for people of color.

13. In college and in my post-college experiences working with students from disadvantaged backgrounds, I have seen first-hand the importance of having a meaningful representation of people from different racial and ethnic backgrounds at UNC-Chapel Hill. Seeing college students and college graduates of color gives students of color hope for their own futures and helps them to see themselves in college and succeeding.

14. When I did not make it through the final round of Teach for America, a friend sent me the job description for Carolina College Advising Corps (“Advising

Corps”). The Advising Corps aims to help low-income, first-generation, and under-represented students from North Carolina attend college by placing recent UNC-Chapel Hill graduates as college advisers in selected public high schools throughout the State. Advisers assist students with admission, financial aid, and scholarship applications.

15. I was part of the first cohort of the Advising Corps. I was placed in Greensboro for two years, and I advised two high schools where the student body was almost entirely comprised of students of color. Working with both Black and brown low-income students solidified the fact that I want to serve young people and families. My time with the Advising Corps was my most impactful career experience to this day.

16. I have continued to work in the area of college success and access. At the Emily K Center, I am working on the mission of propelling academically-focused, low-income K-12 students and graduates toward success in college through its K to College programs while also offering college information and advising support to any local high school student. I am grateful for the opportunity to use my education to better the lives of others.

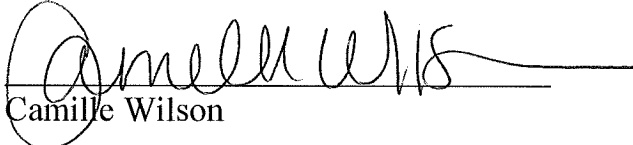
Conclusion

17. The diversity at UNC-Chapel Hill was an important reason that I chose to go to school there, and it contributed greatly to my own education. North Carolina is a very diverse state, and it is important that the flagship institution embrace diversity and provide an opportunity for students from all backgrounds and walks of life to attend. When young students see UNC-Chapel Hill students and graduates from similar

backgrounds, it opens their own minds to the possibility of attending a school like UNC-Chapel Hill (or college in general). UNC-Chapel Hill would be greatly diminished without its racial, ethnic, and socioeconomic diversity.

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

Executed on: July 12, 2017


Camille Wilson

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CASE NO. 1:14-CV-954**

**STUDENTS FOR FAIR
ADMISSIONS, INC.,**

Plaintiff,

v.

**UNIVERSITY OF NORTH
CAROLINA et al.,**

Defendants.

DECLARATION OF ANAN ZHOU

DECLARATION OF ANAN ZHOU

I, Anan Zhou, hereby make this declaration from my personal knowledge and, if called to testify to these facts, could and would do so competently:

Background

1. I graduated from The University of North Carolina at Chapel Hill (“UNC-Chapel Hill”) in 2016, where I double majored in Women’s and Gender Studies and Biology. I am currently pursuing a Master in Public Health at Columbia University.

2. I immigrated from China to the United States when I was four. I attended public school from kindergarten to twelfth grade in North Carolina, including the North Carolina School of Science and Mathematics, a statewide residential magnet school. Prior to attending UNC-Chapel Hill, the majority of my peers hailed from similar socioeconomic backgrounds as I did.

Experience at UNC-Chapel Hill

3. My interests at UNC-Chapel Hill focused primarily on biology research and qualitative studies, as well as a strong interest in interpersonal violence prevention. I was also interested in exploring concepts of identity, especially the identities I inhabited, in the context of the UNC-Chapel Hill campus, in the South and in the United States.

4. Before I declared my second major in Women’s and Gender Studies, I considered both the English and History departments. In my English courses, I was usually the only person of color. Approaching the literature, I often took a different

perspective than other students due to my own personal background, and was able to share these opinions with the class.

5. I took a Gender, Race, and Class course, with a very diverse class. The student composition impacted the conversation in the course significantly; our education was richer as my peers brought in their own lived experiences and we learned from each other. The ability to explore how concepts from the course can impact a person's life in an academic context was both incredibly important and productive. The diverse student makeup of the class allowed us to collectively approach difficult topics in a more comfortable environment. There was a sense of trust. When one is around peers that they are comfortable with and with whom one shares similar experiences and feels solidarity, they are often more enthusiastic in sharing their own thoughts and perspectives.

6. In one of my required courses for my Women's and Gender Studies major, I was particularly frustrated with the way my professor neglected to discuss the Asian-American experience. After discussing with other Asian-American students who felt similarly, we spoke to the faculty member as a group. As a result, she sought to rectify her oversight by devoting an entire class to Asian-American history and actions. Had I not first spoken to my fellow Asian-American students, I would not have felt comfortable enough to approach the professor. Had I not had the support of my peers, the entire class would not have been exposed to the course material the professor ultimately covered, nor would the professor have permanently altered their syllabus.

7. At UNC-Chapel Hill, I was actively involved in a student organization, Radical Asians (“Rad Asians”). This group was started my sophomore year with twelve other students. By my graduation, the organization had grown to sixty members. Rad Asians worked to fill a vacuum by addressing the lack of political organization in the Asian-American community at UNC-Chapel Hill. Collectively, we were interested in exploring what it means to be Asian-American in the South. We collected information and stories, organized actions and rallies, and discussed our different experiences growing up and the diversity inherent in the Asian-American experience. Especially in the context of the black and white racial paradigm, we felt it imperative to interrogate the stereotypes of Asian-Americans, and to define, in our own personal ways, what this label meant to us. Frequently challenged was the Model Minority myth, the false idea that Asian-Americans are high-achieving and in the upper or middle class, a belief that we had at some point all internalized, and struggled to shake loose. Prior to having this space to navigate the false messages I was receiving in American media, I often felt both confusion and emotional distress in living up to, as well as existing in contrast to these stereotypes.

8. Rad Asians also frequently worked with the Real Silent Sam Coalition, especially around the renaming of Saunders Hall. The real Silent Sam Coalition is a broad and diverse group of community members who hope to create honest public dialogue and provoke critical thought surrounding the monuments and buildings in Chapel Hill and Carrboro. Saunders Hall was a building on campus that had been named

after a Grand Wizard in the Ku Klux Klan. After, the Real Silent Sam Coalition raised awareness about this issue, the building was renamed to Carolina Hall. This activism allowed me to meet and work with students from many different backgrounds, including various racial and ethnic backgrounds. The struggle with UNC administration to rename Saunders Hall was a decade long difficult struggle. It was a change that would not have happened without black and brown students advocating for it. When you bring diversity, and different bodies to campus, the students can push the greater institution in the right direction.

9. One of the most striking moments of my college career was the murder of three Muslim Americans in my community, Razan Abu-Salha, her sister Yusor, and Yusor's husband Deah Barakat. Prior to this event, I had interacted many times with the Muslim Student's Association ("MSA) and had an opportunity to meet the students in the organization, as well as befriend many. MSA was integral in the response to the murder of these three members of the Chapel Hill community, an event (in 2015) that terrified students on campus, some who no longer felt safe to leave their room, or walk at night. The period of fear and grief was incredibly difficult for students in MSA, as well as other brown bodies on campus. In situations like these, it is the school's obligation to ensure the emotional and physical health of their students. However, I felt that MSA did the majority of the leg work, bringing the campus together, hosting a vigil, and calling for solidarity, unity and healing. It was not their responsibility to do so, but in opening an arena to openly mourn, grieve, and process the pain and trauma for the entire campus,

these students created an incredible sense of community, one that reached across the entire campus. Diverse bodies see and hold space for each other, often in a way that the University alone cannot.

10. I was very interested in the concept of knowledge through lived experiences at UNC-Chapel Hill. I grew up surrounded by people like myself, leading to the internalization of the belief that everyone who had immigrated to the United States from China had my same story—upper middle class, high-achieving, and first-generation. With a childhood rooted firmly in an upper-middle class background, and existing in an insular community where I mainly only interacting with people in the same socioeconomic bracket I do not believe I understood the severity and true impact of poverty until I met students at UNC from backgrounds other than mine. Nor do I believe this knowledge and understanding I now command is something I could have learned from a textbook or a classroom, but instead it was one I gained from befriending people who were willing to be open about their experiences, and discuss in great detail, how their upbringings contrasted from mine.

11. The most meaningful interactions I had at UNC-Chapel Hill were student-driven. In 2015, when issues arose around Silent Sam and the name of Saunders Hall, students of color called for a caucus. As a result, around eighty students gathered to discuss ‘what’ it meant to be a student of color on UNC Chapel hill’s campus. As we filed in, it became apparent that we were self-segregating by race and ethnicity, with pockets of Latino students next to pockets of Black students next to pockets of Indian

students next to pockets of Middle Eastern students. I self-segregated as well, surrounded by my East-Asian peers. There were many reasons for this. One was simply that we were sitting with our friends, looking for a bit of support in an environment that demanded openness and vulnerability. However, the self-segregation at the event came out of a recognition that our different racial identities led to different experiences and understandings of what it meant to be a person of color. As East Asian students, we will never know what it is to be Black in this country. I don't feel an innate fear for my life when I get pulled over by the police, nor do I know what it means to be racially profiled in public places, nor condescended to based on my skin color. Not in the ways that happen for my black peers. There were innate tensions at the caucus, the silent recognition of difference not all of us felt comfortable in voicing, that even when we band together, we don't all share the same things. However, I believe these tensions made the caucus richer, as it demanded more intention of everyone present, as we tried to address these tensions, as well as listen to each other's experience. Once again, this was completely student organized, not at all helped by the University.

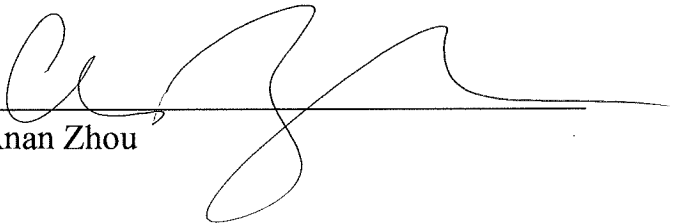
Conclusion

12. The diversity I experienced at UNC-Chapel Hill shaped and enriched my college experience. It provided me with an opportunity that I had never previously had to learn about people from backgrounds very different from my own. It played an important role in my own process of understanding and accepting my personal identity. It allowed me to find a meaningful community. Often, the force that lead to these lessons were

completely student driven, and without the richness of our UNC community in experience, background, religion, and race, I do not believe I would have gained the knowledge nor education I bear now. For all of these reasons, I support UNC-Chapel Hill's efforts to achieve a diverse student body across many dimensions, including race and ethnicity, because UNC-Chapel Hill's diversity is critical to the UNC-Chapel Hill experience.

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

Executed on: 9/25/2017


Anan Zhou