

# EXHIBIT 4

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
BOSTON DIVISION**

STUDENTS FOR FAIR ADMISSIONS, INC,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF  
HARVARD COLLEGE (HARVARD  
CORPORATION),

Defendant.

Civil Action No. 1:14-cv-14176-ADB

**DECLARATION OF JONATHAN PAEK  
(HARVARD-RADCLIFFE ASIAN AMERICAN ASSOCIATION)**

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

1. My name is Jonathan Paek. I am a rising junior at Harvard and expect to earn my bachelor's degree in Sociology in 2020. I am writing this declaration individually and on behalf of the Harvard-Radcliffe Asian American Association ("AAA") in support of race consciousness in Harvard College's admissions policy.

2. Along with Genevieve Hu, I am Co-President of AAA. After consulting with AAA's board members, I have been given authority to submit this declaration on behalf of AAA.

3. AAA was founded in 1976 to unite Asian American students at Harvard and raise greater awareness of Asian American issues through social, cultural, and political events. AAA seeks to foster a community within Harvard dedicated to embracing our shared identity and promoting greater awareness of Asian American issues and perspectives; provide a forum for Asian Americans at Harvard to voice their opinions and comfortably explore their culture, identity,

and individuality; address political, economic, and social issues affecting our communities at Harvard, as well as at the local and national levels; celebrate achievements of Asian Americans, including those in the arts, entertainment, politics, business, science, and academia; develop long-lasting partnerships between students, alumni, community activists, and scholars; and inspire participants to contemplate their roles and responsibilities in forging the future of Asian America.

4. AAA supports the consideration of race in admission because race plays a serious role in our lives and greatly affects each person's lived experiences. Race is a factor, among many, that should be considered for a university to better understand its applicants and their experiences. Moreover, it is important to note that we are not currently in a society where all racial backgrounds have equal opportunities and access to higher education. As such, it is even more critical to take into consideration the distinct challenges that minority groups face.

5. In addition, it is important to have a diverse student body in order to promote a well-rounded educational experience. Learning from people who have lived experiences that are different from our own helps with the development of genuine human connection and understanding. I have been able to learn so many valuable lessons from my peers that I have not—and would not have—been able to experience or understand myself. While these lessons should never be interpreted as the sole explanation for an entire community or as tokenizing individuals, they have added different perspectives to my life and have made me a better person.

6. Outlawing the consideration of race in admissions would detrimentally affect the student experience at Harvard. Not only would we be deprived of the benefits of learning from a wealth of experiences of others who are different from us, but students of color would also feel much less comfortable on campus. Having a sufficient number of students from different minority groups is imperative to promote genuine environments of inclusion and for organizations like AAA

to function properly and serve their communities. If Mr. Blum's efforts to end the consideration of race in admissions are successful, future students may not enjoy a sense of belonging and organizations that historically serve minority communities could lose members of their population as well as their ability to serve them.

7. Nevertheless, AAA firmly opposes racial discrimination and is very troubled that Harvard has been accused of intentionally discriminating against Asian American applicants.

8. While we are not in a position to say whether those allegations are true, AAA does believe that those in Harvard's admissions process may be affected by implicit bias.

9. It is absolutely imperative that Harvard takes these allegations seriously and takes deliberate steps to make its admissions process more equitable. We strongly recommend that Harvard conducts deeper reviews of its admissions process, hires more Asian American admissions officers, recruits more Asian American alumni interviewers, and does implicit bias training to ensure that everyone involved in the admissions process is aware of the myriad lived experiences of applicants from various Asian American subgroups.

10. Likewise, AAA condemns the prevailing treatment of Asian Americans as a monolith—as though all Asian Americans have access to the same opportunities and share the same lived experiences. Asian Americans are incredibly diverse with vastly different lived experiences. Asian Americans have and do benefit from race conscious policies, and applying blanket statements on behalf of the population is misleading and irresponsible.

11. As such, we believe that it is incredibly important that Asian American organizations on campus are given the opportunity to have conversations with administrators to help ensure that steps are taken to move forward towards a more equitable admissions process.

12. AAA and its board strongly oppose the usage of Asian Americans as a political weapon to pit minority groups against each other. We are proud of our history of representing Asian Americans and lending to our fellow minority communities and people of color. We will not waver from that support now.

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

Executed on this day, July 29, 2018

/s/ Jonathan Paek  
Jonathan Paek