

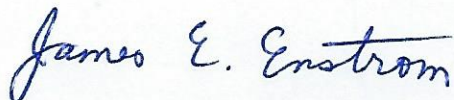
1 **DECLARATION OF DR. JAMES E. ENSTROM**

2 I, Dr. James E. Enstrom, declare:

3 1. I am an epidemiologist and I have had a long career on the faculty of the UCLA
4 School of Public Health. I received a Ph.D. in Physics from Stanford University and a M.P.H. and
5 Postdoctoral Certificate in Epidemiology from UCLA. I am concerned about the politicization of
6 research at American universities, particularly the University of California, and I have undertaken a
7 variety of efforts to increase accountability and integrity in higher education. The matters stated in
8 this declaration are true of my own personal knowledge.

9 2. On August 21, 2020, the New York Times published an article discussing the work
10 of Zachary Bleemer from the University of California, Berkeley. The article suggested that Mr.
11 Bleemer's research showed that California's ban on the use of racial preferences (created by the
12 passage of Proposition 209 in 1996) had produced a variety of negative effects for underrepresented
13 minorities in California. On August 23, 2020, I wrote to Mr. Bleemer via email regarding the
14 importance of his findings being replicated by other scholars and I requested access to his data. On
15 August 26, 2020, I received a reply, not from Mr. Bleemer, but from Pamela Brown, the Vice
16 President for Institutional Research & Academic Planning (IRAP) at the University of California
17 Office of the President (UCOP). She informed me that no one but employees of IRAP and UCOP
18 have access to this data, and she explained to me that Mr. Bleemer is an employee of IRAP. A true
19 and correct copy of the foregoing email correspondence, including the forwarded message I initially
20 sent Mr. Bleemer on August 23, 2020, is attached as **Exhibit JJ** to this Declaration.

21 This declaration was executed on September 1, 2020, at Los Angeles, California. I declare
22 under penalty of perjury under the laws of the State of California that the foregoing is true and
23 correct.

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26 Dr. James E. Enstrom
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