UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

COALTION TO DEFEND AFFIRMATIVE ACTION, INTEGRATION AND IMMIGRANT RIGHTS AND FIGHT FOR EQUALITY BY ANY MEANS NECESSARY, *et al.*,	:	
Plaintiffs,	:	Civ. No. 2:06-cv-15024-DML-RSW
v.	:	HON. DAVID M. LAWSON
JENNIFER GRANHOLM, *et al.*,	:	HON. R. STEVEN WHALEN
Defendants,	:	
and	:	STATEMENT OF WILLIAM ALLEN
ERIC RUSSELL and TOWARD A FAIR MICHIGAN,	:	
Intervenor Defendants.	:	

WILLIAM ALLEN states:

1. I am a citizen of Michigan, a former member and Chair of the United States Commission on Civil Rights, and a professor of political science at Michigan State University. I also chair "Toward A Fair Michigan" (TAFM), a 501(c)(3) corporation whose mission is to further understanding of the equal opportunity issues involved in guaranteeing civil rights for all citizens and to preserve Michigan's tradition of progressively affirming equal rights (as it did so helpfully in the darkest hours of segregation), and to provide a civic forum for a fair and open exchange of views on the question of affirmative action. TAFM's mission included promoting and fostering balanced debate on Proposal 2 prior to the November 7, 2006 election in order to insure that the deliberate will of the people, whatever it would be, would be upheld and enforced. I make this statement in support of TAFM's motion to intervene.

2. In addition to the foregoing efforts, TAFM has been advising organizations and agencies who wish to comply with Art. 1, § 26 (the constitutional provision that will be added to the Michigan Constitution as a consequence of the electors of Michigan having voted in favor of Proposal 2). These efforts include considering new ways to promote diversity, fairness, and equality. For example, on December 8, 2006, TAFM held a Leadership Assembly, a day-long workship devoted to appraising the current status of programs of reconciliation and inclusion within Michigan, and to planning for progressive change within the state. The actions of both the plaintiffs and the University Defendants in this action have frustrated these efforts, and TAFM's efforts to advise and to promote non-discriminatory methods of fostering inclusion, by casting doubt on the validity and applicability of Art. 1, § 26.

I state under penalties of perjury that the foregoing is true and correct. Executed on December 14, 2006.

WILLIAM ALLEN

Certificate of Service

I hereby certify that on December 14, 2006, I electronically filed the foregoing Allen Statement with the Clerk of the Court using the CM/ECF system which sent a Notice of Electronic Filing to the following persons:

George B. Washington (attorney for plaintiffs)

Leonard Niehoff (attorney for defendants Regents of the University of Michigan, Board of Trustees of Michigan State University, and the Board of Governors of Wayne State University)

Michael E. Rosman