



FREEDOM
FROM RELIGION
foundation



Via email, webform, and first-class mail
sde.orr@sde.ok.gov

Oklahoma State Department of Education
2500 N. Lincoln Blvd.
Oklahoma City, OK 73105

Re: Open Records Act request

To Whom It May Concern:

The undersigned organizations—the American Civil Liberties Union of Oklahoma, the American Civil Liberties Union, the Freedom From Religion Foundation, Americans United for Separation of Church and State, and Oklahoma Appleseed Center for Law & Justice—are aware that, on June 27, in his capacity as State Superintendent of Public Education, Ryan Walters issued a directive (the “June 27 Directive”) to all school districts within the state, ordering them to incorporate the Bible “as an instructional support into the curriculum” for grades five through twelve. We are also aware that, on July 9, in an official news release (the “July 9 Release”), Superintendent Walters announced “a complete overhaul” to the state’s social studies standards and the creation of an Executive Review Committee to oversee those revisions, which “will incorporate the introduction of the Bible as an instructional resource,” according to the release. Finally, on July 24, Superintendent Walters issued a memorandum entitled “OSDE Instructional Support Guidelines for Teachers” (the “July 24 Memo”), which provides guidance on incorporating the Bible into public school classroom instruction.

Pursuant to the Oklahoma Open Records Act at 51 O.S. § 24A et. seq., the undersigned organizations request the following records:

Requested Records

1. All records¹ related to the June 27 Directive, the July 9 Release, and the July 24 Memo;

¹ “**Records**” has the same meaning throughout as set forth in 51 O.S. § 24A.3: “‘Record’ means all documents including, but not limited to, any book, paper, photograph, microfilm, data files created by or used with computer software, computer tape, disk, record, sound recording, film recording, video record or other material regardless of physical form or characteristic, created by, received by, under the authority of, or coming into the custody, control or possession of public officials, public bodies or their representatives in connection with the transaction of public business, the expenditure of public funds or the administering of public property.”

2. All records created after January 8, 2023, sent or received by Ryan Walters or any other official or employee of the Oklahoma State Department of Education (“OSDE”), related to teaching or using the Bible in public schools;
3. All records related to the selection of members of the Executive Review Committee described in the July 9 Release;
4. All communications, which occurred after January 8, 2023, with any member or prospective member of the Executive Review Committee described in the July 9 Release;
5. All records, including but not limited to communications, related to funding or paying for the copies of the Bible, U.S. Constitution, Declaration of Independence, Ten Commandments, or other documents that the July 24 Memo states “must be provided” “as resources in every classroom . . .”;
6. All communications with any representative of any school district or charter school regarding the June 27 Directive, the July 9 Release, or the July 24 Memo, and all other communications, which occurred after January 8, 2023, with any representative of any school district or charter school regarding teaching the Bible in public schools; and
7. All records requests under the Oklahoma Open Records Act received by OSDE related to the June 27 Directive, the July 9 Release, or the July 24 Memo; all records that were produced to the requestors in response to those requests; and all other records that are responsive to those requests.

For any records falling within the scope of this request that also contain confidential information or information otherwise outside the scope of required disclosure under the Oklahoma Open Records Act, we hereby request that reasonably segregable portions be provided, as outlined in 51 O.S. § 24A.5(3). Should any part of this request be denied, we hereby request a written response asserting the specific exemption or privilege that you believe allows the denial of each specific record withheld.

This request for records is made for noncommercial purposes. The request is made in the public interest, specifically so that the undersigned organizations and their Oklahoma members can determine whether those entrusted with the affairs of government are honestly, faithfully, and competently performing their duties as public servants. In addition, Americans United and FFRF function as part of the news media, producing the monthly magazine Church & State and newspaper Freethought Today, respectively, and the information requested is sought for use in those publications. This request is therefore exempt from record-search fees under Okla. Stat. tit. 51, § 24A.5(4) and Okla. Admin. Code § 210:1-3-11(d)(1).

In light of the importance of this issue, and per Okla. Stat. tit. 51, § 24A.5(6), which requires you to provide “prompt, reasonable access” to public records, I ask that you provide the requested records by August 10, 2024. Where possible, please provide responsive material in an electronic format by email to mlambert@acluok.org. Alternatively, please provide responsive

material in native format or in PDF format on a USB drive. Please send any responsive material being sent by mail to ACLU of Oklahoma Foundation, PO Box 13327, Oklahoma City, OK 73113. If it will accelerate release of responsive records, please also provide responsive material on a rolling basis.

Thank you for your assistance. Please do not hesitate to contact Megan Lambert at 405-286-1104 or mlambert@acluok.org with questions regarding this request. We authorize you to charge—and we commit to paying—any duplication fees that you may lawfully charge for this request up to \$250. If the fees would exceed that amount, please contact Megan Lambert for authorization before incurring higher charges.

Sincerely,



Megan Lambert

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