

# **Exhibit 2**

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA

BLACK EMERGENCY RESPONSE TEAM,  
et al.,

*Plaintiffs,*

v.

Civil Action No.: 21-CV-1022-G

JOHN O'CONNOR, in his official capacity as  
Oklahoma Attorney General, et al.,

*Defendants.*

**Declaration of a John Doe, a University of Oklahoma Instructor of Human  
Relations**

I am John Doe, an Instructor of Human Relations for the University of Oklahoma.  
Pursuant to 28 U.S.C. § 1746, I declare the following:

1. I have submitted this declaration under John Doe, a pseudonym, because sharing my identity puts me at risk of retaliation from my employer, a defendant named in this matter. I am untenured faculty and an at-will employee. I could be fired for participating in a legal matter of significant public interest against my employer and could lose my livelihood. Due to the fear of reprisal and the growing scrutiny of these issues in the public, I have submitted this declaration under a pseudonym.
2. The facts set forth in this declaration are based on my personal knowledge, and if called as a witness, I could and would competently testify to the following matters under oath.
3. I am a member of the University of Oklahoma Chapter of the American Association for University Professors (OU-AAUP), in the above captioned matter. I have been a member since August of 2021.

4. By restricting classroom discussion and curriculum content regarding race, gender, and sexual orientation, H.B. 1775 is a direct affront to academic freedom and the free exchange of ideas, the very purpose of the AAUP and the academic profession.
5. I am an Instructor of Human Relations in the Arts and Sciences College of the University of Oklahoma. I teach classes that are core classes within the Human Relations major and that directly address issues of gender, class, race, and their intersectionality. I help students analyze the ways in which people are raced, gendered, and classed, and how these social categorizations give people unique experiences with discrimination and oppression. I also teach about the processes by which systems of power reinforce each other and are replicated. The concepts of race, gender, and sexual orientation are fundamental to the study of Human Relations.
6. I am unsure whether my curricula violate H.B. 1775. I am unsure whether the law applies to my curricula, as a “requirement” for a part of my course or as a “requirement” for a Human Relations major. I am also unsure what discussions of discrimination, oppression, and identity may be considered “race or sex stereotyping” or “bias.”
7. I was informed by my Department Chair that the Office of the Dean of the Arts and Sciences College had instructed them that, because of H.B. 1775, I can no longer test students on Critical Race Theory in my Human Relations class, Human Relations Theory, a class in the Human Relations Department about social categorization and its impact on systems of power. Critical Race Theory as a concept and as it applies to other learning objectives is a central theme of the class. I have lost the ability to test on and ensure students understand key concepts in my class. This enforcement of H.B. 1775 against me is a violation of my academic freedom. I am not tenured and fear losing my job if I test on Critical Race Theory or otherwise am seen to violate H.B. 1775. I am also concerned that my queer identity will make me more vulnerable to the consequences of H.B. 1775’s enforcement. I fear that H.B. 1775 will embolden students to target me on the basis of my sexual orientation. As an openly gay Instructor, I fear I could be made an example of for teaching a curriculum that students or parents believe is in violation of H.B. 1775.
8. H.B. 1775 deprives students of the benefits of inclusive education, harming the classroom environment. The fear and sense of surveillance accompanying H.B.

1775 decreases class discussion, as does the lack of empirically engaging content around race and gender. During class discussions of previous semesters, students were much more engaged when discussing issues of race, class, and gender. H.B. 1775 prevents me from providing an effective and complete education to my students.

I certify under penalty of perjury that the foregoing is true and correct based upon my personal knowledge. Executed in Oklahoma this \_\_12\_\_ day of January 2022.

A handwritten signature in cursive script that reads "John Doe".

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John Doe