

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA

(1) BLACK EMERGENCY RESPONSE TEAM,
(2) UNIVERSITY OF OKLAHOMA CHAPTER OF THE
AMERICAN ASSOCIATION OF UNIVERSITY
PROFESSORS,
(3) OKLAHOMA STATE CONFERENCE OF THE
NATIONAL ASSOCIATION FOR THE ADVANCEMENT
OF COLORED PEOPLE,
(4) AMERICAN INDIAN MOVEMENT INDIAN
TERRITORY,
(5) PRECIOUS LLOYD, AS NEXT OF FRIEND OF S. L.,
(6) ANTHONY CRAWFORD, AND
(7) REGAN KILLACKEY,

PLAINTIFFS

VS.

CASE No. CIV-21-1022-G

(1) JOHN O'CONNOR, IN HIS OFFICIAL CAPACITY AS
OKLAHOMA ATTORNEY GENERAL, ET AL.,

DEFENDANTS.

AFFIDAVIT OF JACQUELINE RASNIC

I, Jacqueline Rasnic, being first duly sworn upon oath, deposes and state as follows:

1. I have personal knowledge of the following facts and could and would testify competently thereto if called as a witness in this proceeding.

2. I am the English Language Arts Content Specialist for Edmond Public Schools ("EPS") and have been in this position since July 2020. Under the supervision of Emily Steele, Executive Director for Educational Services for EPS, I oversee secondary (grades 6–12) English curriculum, which includes the selection of required novels (texts) and English Language Arts ("ELA") textbooks.

3. On June 7, 2021, I met with EPS 11th- and 12th-grade English teachers to discuss, among other things, the ramifications of H.B. 1775. This was an informal meeting to brainstorm about issues related to curriculum, including concerns raised by staff about H.B. 1775.

4. On June 28, 2021, I disseminated a PowerPoint slideshow of notes from the June 7, 2021, meeting. The notes did not represent a directive from EPS about how teachers should respond to H.B. 1775; they only represented a summary of the discussions at the meeting. The PowerPoint did contain a slide that stated: “Diversity: Avoid the terms ‘diversity’ and ‘white privilege’ in class and on [online learning platforms]” but, again, this reflected an issue that was raised in the meeting by staff members for possible future consideration for the 2021–22 school year and was not a directive to teachers. The teachers who attended the June 7, 2021, meeting were informed that the purpose of the meeting was an informal discussion, not that EPS was providing directives regarding H.B. 1775.

5. After disseminating the notes from the June 7, 2021, meeting, I received further guidance and analysis of H.B. 1775 from EPS Executive Director of Educational Services Emily Steele that alleviated concerns voiced in the June 7, 2021, meeting.

6. Attached hereto is the ELA text list for all EPS students in grades 6–12, for the 2021–22 school year. The phrase “on-level” refers to the basic English class for that grade level, as opposed to an advanced course. Starting in the eighth grade, the classes are divided into small groups, referred to as a Literature Circle (“Lit. Circle”). In addition to the required readings for each class, each Lit. Circle must select from the texts on the list for that grade.

7. On August 9, 2021, I provided an updated slideshow to EPS English teachers. This version replaced the slide that stated “Diversity: Avoid the terms ‘diversity’ and ‘white privilege’ in class and on [online learning platforms]” with one that read:

H.B. 1775 (Look at yellow guidelines sheet)

* We will still be discussing diversity.

* Be able to tie your lessons to standards.

* Be thoughtful about how you name your lessons. Ex: A Diversity Journal Entry= Journal Entry 2.

Be aware that parents in certain [Facebook] groups will take pictures of anything they believe to be [Critical Race Theory] and post it.

8. EPS had been contacted by parents who expressed concerns that EPS staff was teaching about Critical Race Theory (or intended to), even though that was not the case. The reasoning behind recommending to teachers that they not title lessons with words like “diversity” was to minimize the possibility that parents would view the title and jump to conclusions about whether EPS was teaching Critical Race Theory. “Diversity” is not a stand-alone standard of the Oklahoma Academic Standards for English Language Arts. Nevertheless, teachers would still be including diversity and related topics in their classroom work as appropriate given the specific content of a particular lesson.

9. Reagan Killackey teaches Advanced Placement Literature, Advanced Placement Language, Advanced Placement and two sections of English III. These courses are taken by 11th and 12 grade (high school) students.

10. Prior to the 2021–22 school year, EPS did not require on-level English students to read four texts identified in paragraph 13 of the Affidavit of Regan Killackey: TO KILL A MOCKINGBIRD by Harper Lee; A RAISIN IN THE SUN by Lorraine Hansberry; THEIR EYES

ARE WATCHING GOD by Zora Neale Hurston; and NARRATIVE OF THE LIFE OF FREDERICK DOUGLASS, AN AMERICAN SLAVE by Frederick Douglass.

11. For example, in 2019–20 and 2020–21, Grade 11 students were required to read THE CRUCIBLE by Arthur Miller, THE GREAT GATSBY by F. Scott Fitzgerald, and *either* I KNOW WHY THE CAGED BIRD SINGS by Maya Angelou *or* THE HOUSE ON MANGO STREET by Sandra Cisneros (chosen by the English teacher with input from students). The three campus choices (choices left up to a school site) for a fourth required (or “anchor”) text were JURASSIC PARK by Michael Crichton, A RAISIN IN THE SUN by Lorraine Hansberry, and THE SOULS OF BLACK FOLKS by W.E.B. Du Bois. Thus, Grade 11 students at each high school campus had only five possible books to read for their English class. TO KILL A MOCKINGBIRD by Harper Lee was one of two choices for Grade 9 Pre-Advanced Placement English only.

12. In 2021, EPS worked with its English teachers to develop reading lists that supplied students more flexibility and diversity in their choice of texts. This was in response to input from students and staff. Over the course of the summer of 2021, secondary English teachers met to discuss current novels that were being read in class, and to read and discuss new titles for possible addition to ELA extended reading lists. The priority in making changes to the reading lists was to be more aligned across all these school sites. I collaborated with the teachers at the various sites to come up a list of the ELA texts, and ultimately that list was approved by Ms. Steele.

13. Regan Killackey did not attend the meetings referenced in paragraph 11.

14. Beginning with the 2021–22 school year, Grade 11 students must still read THE CRUCIBLE and THE GREAT GATSBY but may choose one text from a list titled The Individual

and Society Nonfiction Literature Circle while their teachers choose multiple pieces from a list titled American Voices Packet.

15. The Individual and Society Nonfiction Literature Circle consists of six titles from which students may choose to study:

- a. BORN A CRIME (YOUNG ADULT VERSION) by Trevor Noah (South African author);
- b. BRAIN ON FIRE by Sussanah Cahalan (woman author)
- c. EVERYTHING SAD IS UNTRUE by Daniel Nayeri (Iranian-American refugee author);
- d. INTO THE WILD by Jon Krakauer;
- e. THE NAZI HUNTERS by Neal Bascomb (chronicling how Holocaust survivors helped capture Nazi war criminal Adolf Eichmann); and
- f. UNBROKEN by Laura Hillenbrand (woman author).

16. The American Voices Packet consists of 21 pieces of poetry, 27 pieces of nonfiction, and 18 pieces of fiction, including many pieces written by BIPOC (Black, Indigenous, and People of Color) authors:

BLACK

- Malcolm X
- James Baldwin
- Brent Staples
- Toni Morrison
- Zora Neale Hurston
- Chimamanda Ngozi Adiche
- Lorraine Hansberry (A RAISIN IN THE SUN)
- Dick Gregory
- Michelle Obama
- Amanda Gorman
- Claude McKay
- Langston Hughes
- Gwendolyn Brooks
- Paul Laurence Dunbar
- Maya Angelou (I KNOW WHY THE CAGED BIRD SINGS)
- Sojourner Truth
- Dr. Martin Luther King, Jr.

LATINX

- Elizabeth Acevedo
- Luis J. Rodriguez
- Rudolfo Anaya
- Erika L. Sanchez
- Justin Torres
- Matt de La Pena

NATIVE AMERICAN

- Joy Harjo
- N. Scott Momaday
- Sherman Alexie

ASIAN

- Amy Tan

17. The restructuring of the ELA reading lists was in no way in response to H.B. 1775.

18. The guidelines provided to EPS teachers [Doc. No. 50-1] provide that the College Board curricula referenced in Paragraphs 5–8 of the Affidavit of Regan Killackey is not affected by H.B. 1775:

College Board curriculum may still be taught. If there is something in the College Board curriculum that you feel may fall under one of these 8 prohibitions, please let us know and we will seek additional guidance.

19. The guidelines provided to EPS teachers [Doc. No. 50-1] specifically state, “This law does not prohibit conversations about race, ethnicity, diversity, or gender. You still have all the tools you had before, and as always, do not interject your opinion.”

FURTHER AFFIANT SAYETH NOT.

12/15/2021

DATE



JACQUELINE RASNIC

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Edmond Public Schools Secondary Extended Text List 2021-2022

The list below is a working document, meaning it is reviewed and updated annually following the guidelines outlined in the [Oklahoma Academic Standards](#). All books on this list have been approved under district and state guidelines for use at Edmond Public Schools.

Grade 6
<p>English (2nd Semester)</p> <ul style="list-style-type: none"> ● <i>Freak the Mighty</i> by Rodman Philbrick <li style="text-align: center;">OR ● <i>Refugee</i> by Alan Gratz
<p>Literacy (Whole-Class Options One per semester)</p> <ul style="list-style-type: none"> ● <i>City of Ember</i> by Jeanne DuPrau ● <i>Esperanza Rising</i> by Pam Munoz Ryan ● <i>Hatchet</i> by Gary Paulsen ● <i>Out of My Mind</i> by Sharon M. Draper ● <i>Flipped</i> by Wendelin Van Draanen ● <i>Running Dream</i> by Wendelin Van Draanen ● <i>The War that Saved My Life</i> by Kimberly Brubaker Bradley
Grade 7
<p>English (2nd Semester)</p> <ul style="list-style-type: none"> ● <i>The Giver</i> by Lois Lowry
<p>Literacy (Whole-Class Options One per semester)</p> <ul style="list-style-type: none"> ● <i>Goodbye, Vietnam</i> by Gloria Whelan ● <i>Long Walk to Water</i> by Linda Sue Park ● <i>Full Tilt</i> by Neal Shusterman ● <i>Harbor Me</i> by Jacqueline Woodson ● <i>Piecing Me Together</i> by Renee Watson ● <i>Hero</i> by S.L. Rottman ● <i>Wild Bird</i> by Wendelin Van Draanen
Grade 8
<p>On-Level</p> <ul style="list-style-type: none"> ● <i>The Outsiders</i> by S.E. Hinton ● <i>The Diary of Anne Frank (Drama)</i> ● <i>The Crossover</i> by Kwame Alexander ● Verse Lit Circle (Student Choice) <ul style="list-style-type: none"> ○ <i>Brown Girl Dreaming</i> by Jacqueline Woodson ○ <i>Alone</i> by Megan E. Freeman ○ <i>Other Words for Home</i> by Jasmine Warga

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- *Long Way Down* by Jason Reynolds
- *Under the Mesquite* by Guadalupe Garcia McCall
- *Out of the Dust* by Karen Hesse
- *Full Cicada Moon* by Marilyn Hilton

Intro to Advanced

- *The Outsiders* by S.E. Hinton
- *The Diary of Anne Frank* (Drama)
- *And Then There Were None* by Agatha Christie
- *Fahrenheit 451* by Ray Bradbury (Optional Text)
- *The Crossover* by Kwame Alexander
- Verse Lit Circle (Student Choice)
 - *Brown Girl Dreaming* by Jacqueline Woodson
 - *Alone* by Megan E. Freeman
 - *Other Words for Home* by Jasmine Warga
 - *All the Broken Pieces* by Ann E. Burg
 - *Long Way Down* by Jason Reynolds
 - *Under the Mesquite* by Guadalupe Garcia McCall
 - *Out of the Dust* by Karen Hesse
 - *Full Cicada Moon* by Marilyn Hilton

Grade 9

On-Level

- *The Odyssey* by Homer
- *Night* by Elie Wiesel
- Shakespeare's *Romeo & Juliet*
- *The Bonds Between Us* Lit Circles (Student Choice)
 - *A Separate Peace* by John Knowles
 - *All American Boys* by Brendan Kiely & Jason Reynolds
 - *Dreamland Burning* by Jennifer Latham
 - *Farewell to Manzanar* by Jeanne Watkatzuki Houston & James D. Houston
 - *House on Mango Street* by Sandra Cisneros
 - *Punching the Air* by Ibi Zoboi & Yusef Salaam
 - *They Both Die at the End* by Adam Silvera

Intro to Advanced

- *The Odyssey* by Homer
- *Night* by Elie Wiesel
- Shakespeare's *Romeo & Juliet*
- *The Bonds Between Us* Lit Circles (Student Choice)
 - *A Separate Peace* by John Knowles
 - *All American Boys* by Brendan Kiely & Jason Reynolds
 - *Dreamland Burning* by Jennifer Latham
 - *Farewell to Manzanar* by Jeanne Watkatzuki Houston & James D. Houston
 - *Punching the Air* by Ibi Zoboi & Yusef Salaam
 - *They Both Die at the End* by Adam Silvera

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Grade 10

On-Level

- *The Glass Castle* by Jeannette Walls
 - Alt Course - *A Long Way Gone* by Ishmael Beah
OR *I am Malala* by Malala Yousafzai
- *Animal Farm* by George Orwell
- Shakespeare (Choose one)
 - *Twelfth Night*
 - *Macbeth*
 - *A Midsummer Night's Dream*
 - *Julius Caesar*
- *Ourselves and Others* Lit Circles (Student Choice)
 - *57 Bus* by Daska Slater
 - *Hearts Unbroken* by Cynthia Letitch Smith
 - *Dear Martin* by Nic Stone
 - *A Very Large Expanse of Sea* by Tahereh Mafi
 - *The Kite Runner* by Khaled Hosseini
 - *The Sun is Also a Star* by Nicola Yoon
 - *I Am not Your Perfect Mexican Daughter* by Erika Sanchez
 - *The Astonishing Color of After* by Emily X.R. Pan
 - *Patron Saints of Nothing* by Randy Ribay

Intro to Advanced

- *The Glass Castle* by Jeannette Walls
 - Alt Course - *A Long Way Gone* by Ishmael Beah
OR *I am Malala* by Malala Yousafzai
- *Animal Farm* by George Orwell
- *The Kite Runner* by Khaled Hosseini
 - Alt Course - *Life of Pi* by Yann Martel
OR *Things Fall Apart* by Chinua Achebe
- *Antigone* by Sophocles
- Shakespeare (Choose one)
 - *Twelfth Night*
 - *Macbeth*
 - *A Midsummer Night's Dream*
 - *Julius Caesar*
- *Ourselves and Others* Lit Circles (Student Choice)
 - *57 Bus* by Dashka Slater
 - *The Book Thief* by Markus Zusak
 - *Hearts Unbroken* by Cynthia Letitch Smith
 - *Dear Martin* by Nic Stone
 - *A Very Large Expanse of Sea* by Tahereh Mafi
 - *The Sun is Also a Star* by Nicola Yoon
 - *I Am not Your Perfect Mexican Daughter* by Erika Sanchez
 - *The Astonishing Color of After* by Emily X.R. Pan
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Grade 11
<ul style="list-style-type: none"> ● <i>The Crucible</i> by Arthur Miller ● <i>The Great Gatsby</i> by F. Scott Fitzgerald ● <i>The Individual and Society</i> Nonfiction Lit Circle (Student Choice) <ul style="list-style-type: none"> ○ <i>The Nazi Hunters</i> by Neal Bascomb ○ <i>Born a Crime (YA Version)</i> by Trevor Noah ○ <i>Brain on Fire</i> by Sussanah Cahalan ○ <i>Into the Wild</i> by Jon Krakauer ○ <i>Unbroken</i> by Laura Hillenbrand ○ <i>Everything Sad is Untrue</i> by Daniel Nayeri
AP Language
<ul style="list-style-type: none"> ● AP Language texts are selected according to standards set forth by College Board in order to support students in passing the exam. Please see teacher's syllabus for more information regarding specific texts for this course.
Grade 12
<ul style="list-style-type: none"> ● <i>Beowulf</i> ● <i>1984</i> by George Orwell ● <i>Frankenstein</i> by Mary Shelly ● <i>Lord of the Flies</i> by William Golding ● Shakespeare's <i>Hamlet</i>
AP Literature
<ul style="list-style-type: none"> ● AP Literature texts are selected according to standards set forth by College Board in order to support students in passing the exam. Please see teacher's syllabus for more information regarding specific texts for this course.

* As part of our district emphasis on developing an appreciation of literature and encouraging lifelong reading, EPS offers students choice selections through literature circles, also referred to as book clubs, and independent reading opportunities.

*Alternative texts are available upon request.