

# **Exhibit 8**

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

[1] BLACK EMERGENCY RESPONSE TEAM, et al.,	)	
	)	
<i>Plaintiffs,</i>	)	
v.	)	Case No. 5:21-cv-01022-G
	)	
	)	Hon. Charles B. Goodwin
[1] JOHN O'CONNOR, in his official capacity as Oklahoma Attorney General, et al.,	)	
	)	
<i>Defendants.</i>	)	

**Declaration of Anthony Crawford**

I, Anthony Crawford, pursuant to 28 U.S.C. § 1746, declare the following:

1. The facts set forth in this declaration are based on my personal first-hand knowledge, and if called as a witness, I could and would competently testify to the following matters under oath.
2. I am an English teacher in the Millwood Public School District. I currently teach English 3 and English 4 at Millwood High School. This is my third year teaching at Millwood High School, and this is my sixth year teaching in Oklahoma schools. Students enrolled at Millwood High School predominantly identify as Black or African American, but I teach students of all racial and ethnic backgrounds. I personally identify as Black and male, and I strive to expose my students to authors and thinkers from all walks of life.
3. My goal is for students to gain the skills that they need to be strong writers, readers, and analytical thinkers who can form their own opinions after considering multiple sources of facts, experiences, and sources of evidence. This is essential for my students to succeed in high school and state exams. But equally important, it is essential for them to excel in any college and graduate courses, and it is necessary for them to succeed as workers, leaders, and citizens in the broader society that they will enter as graduates.

4. In my English 3 course, students are reading Paulo Coelho's *The Alchemist* and George Orwell's *1984*. As part of teaching these books, I engage my students by asking them tough questions and providing writing prompts that require further reflection, examination, and discussion with one another. By creating an atmosphere of inquiry, I can achieve multiple instructional goals: the state standards are covered, my students are more engaged and participatory, and my students are prepared to be open-minded and independent thinkers. An atmosphere of inquiry is also what makes learning fun.
5. My English 4 course is a more advanced course that engages students on topics that can help them better understand the world around them. We read books such as *PowerNomics* that raise questions and ideas about poverty, homelessness, and the wealth gap. Most of my English 4 students are seniors who are beginning to search for work and college, start businesses, and navigate society. They are most interested in learning about topics that touch upon their day-to-day lives.
6. As an English teacher, I teach them the art of debate and how to use facts and statistics in order to craft persuasive arguments. This requires me to expose my students to a variety of ideas so that they can comprehend the bigger picture. I help my students open their minds to new and additional information by getting them to write about topics which interest them.
7. In my course readings, I try to include authors of all racial backgrounds. I include Black authors because I believe that representation matters. Reading books by authors who are Black, Indigenous, and people of color (BIPOC) can be empowering for my students, who mostly identify as Black, because it helps them see people of color as writers and intellectuals when the media often portrays people of color in negative, stereotypical ways. Many of my students have expressed the mentality that they cannot be writers or academics because they have never seen someone like themselves do that work. I want all of my students to realize that they can be part of the literary world and that they can achieve their greatest potential. Including BIPOC authors also helps to show the diversity of thought within the BIPOC community. I have also observed a high degree of engagement and participation from BIPOC students when they read materials by BIPOC authors.
8. While I try to make sure my students can see themselves in course materials, I teach texts from racially diverse authors who express diverse viewpoints. I do not try to indoctrinate students with my personal perspectives. I teach all of my students the importance of considering ideas from perspectives that are not their own, in order for them to develop the

skills necessary to be cross-cultural communicators and problem solvers today, and in the future.

9. To create a classroom culture of learning, I raise questions and ideas that will prompt debate because I believe that classrooms should be student-led environments. The students in my classroom are the teachers, and help lead dialogues and facilitate conversations about topics in which they are interested, like wealth, sports, and mass incarceration. I believe that learning requires some struggle. My course is like a college class in that I ask my students questions to push their learning, in order to prepare them for life after completing their education. Some of my favorite questions to ask are: “What did you learn? What is your view on what you read? What do you disagree with?”
10. Each year, I ask my students what topics they want to learn about in class. This year, I got a lot of interesting responses, including: taxes, credit, and economics; critical race theory; and the LGBTQ+ community. I try to be responsive to what my students want to learn about by incorporating these topics into my courses through readings, writing prompts, and discussions.
11. It is necessary to discuss issues around race, sex, gender, and power in the classroom because my students bring up these topics when they engage in readings or respond to writing prompts. Readings also discuss topics like race, gender, and power. For example, I have taught texts that discuss the eugenics movement, which exposes students to how people have historically discussed race and intelligence and makes them think deeply about how we frame these discussions today. I think that it is crucial that I expose my students to a wide range of concepts and ideas because in order to be productive and engaged civic participants, we must have a better understanding of the systems in which we exist and operate.
12. My students want access to the full gambit of information, even ideas that may cause discomfort or that they may disagree with. Discomfort can lead to growth, and growth leads to learning. I believe these forms of social-emotional learning and conversations help our students understand complex issues and comprehend the world around them.
13. At the beginning of the year, we create classroom “agreements” to support a classroom culture of learning and vigorous dialogue. One of those agreements is “do not take anything personally” because the purpose of class is to push ourselves to think in new ways so we can become more analytical and informed thinkers. This requires hearing multiple ideas and hearing multiple perspectives so we can come to a greater understanding.

14. It is not clear to me what type of conduct violates HB 1775 because the law's language is extraordinarily confusing and vague. Its terms are not clearly defined. For example, it is not clear what the law means when it says a teacher cannot "make part of a course" the idea that certain races or genders have been racist or sexist "consciously or unconsciously." Racism and sexism have been part of our society for centuries and so it comes up in readings and in my students' responses to writing prompts.
15. It is also not clear to me what the law means when it says teachers cannot "make part of a course" the idea that individuals "bear[] responsibility for actions committed in the past." Student-led discussions and debates in my class about wealth, taxes, and power sometimes raise ideas about the racial and gender wealth gap. There are different opinions on the sources of the wealth gap and its solutions. HB 1775 makes it unclear whether students can be exposed to the idea that the wealth gap results from systemic racism, alongside the alternative idea that the wealth gap results from individual decision-making.
16. It is not also not clear to me what the law means when it says teachers cannot "make part of a course" ideas that suggest individuals should "feel discomfort, guilt, anguish or any other form of psychological distress" related to race or sex. Based on my experience, discussions that raise multiple, diverse viewpoints can create discomfort but they also stimulate learning and growth.
17. I am also confused by the law's exception stating that "the provisions of this section shall not prohibit the teaching of concepts that align to the Oklahoma Academic Standards." This creates a contradiction in the law that I do not know how to resolve. The Oklahoma Standards expect students in grade 12 to critically examine and analyze bias in a text. For example, the English Language Arts standards for grade 12 state that:

"Students will evaluate how authors writing on the same issue reached different conclusions because of differences in assumptions, evidence, reasoning, and viewpoints, including examining rhetorical appeals, bias, and use of logical fallacies."

But the prohibitions in HB 1775 suggest that teachers cannot "make part of a course" concepts that include bias related to race or sex. As another example, students in grade 12 are expected to "acknowledge counterclaims or alternate perspectives." But the prohibitions in HB 1775 suggest that teachers must restrict students' exposure to alternate perspectives.

18. It is not clear to me whether I am allowed to include a concept that is “prohibited” but could allow a student to meet these standards. In short, the exception makes the law even more confusing instead of adding clarity because I do not understand how deeply or extensively I – or my students – can discuss, write about, or read about issues related to race or sex.
19. Furthermore, as shown above, the standards are more general and are not intended to be proscriptive. As a teacher, I am responsible for selecting our curriculum and instruction. Because of the vague and overbroad language in HB 1755, I am at a loss of determining whether my teaching and materials may convey a concept that falls within the standards and one that falls with the banned concepts under HB 1755.
20. I am aware that the law allows parents, teachers, or anybody in the public to file a complaint not only with my school district, but also with the State Board of Education or the State Attorney General. While I believe the content and structure of my courses further the state’s learning goals for students, I fear that somebody might file a complaint against me. I am not clear how state authorities will interpret the vague language of HB 1775 and so I fear punishment for teaching material that I believe best meets the needs of my students but may be interpreted as violating HB 1775.
21. I believe HB 1775 harms students, our educational system, and our greater society. If we do not prepare students to respond to diverse and varying viewpoints before they graduate high school, then students will be stuck viewing issues from a narrow perspective as adults. Moreover, depriving students of color access to information related to race and sex, and racially diverse authorship, hampers their ability to connect with—and thrive in—an academic environment that too often leaves out the experience of BIPOC communities. We need a generation of analytical, open-minded thinkers who have the skills to address today’s issues that often involve sex, race, and inequality. HB 1775 takes these skills away by trying to silence certain ideas that are important for understanding our past, examining our present, and building a better future.

I certify under penalty of perjury that the foregoing is true and correct based upon my personal knowledge. Executed in Oklahoma this 13th day of October 2021.

A handwritten signature in black ink, appearing to read "A. Crawford", written over a horizontal line.

Anthony Crawford