

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

C.K.-W., et al.,)	
)	
Plaintiffs,)	
)	Case No. 4:22-cv-00191-MTS
v.)	
)	
WENTZVILLE R-IV SCHOOL)	
DISTRICT,)	
)	
Defendant.)	

DECLARATION OF KERI SKEETERS

I, Keri Skeeters, hereby declare that:

1. I am of legal age and competent to make this declaration.
2. I have personal knowledge of all facts set forth herein.
3. I am the Assistant Superintendent for Teaching and Learning for the Wentzville R-IV School District (the "District").
4. I have served as the Assistant Superintendent of the District during the 2021-2022 school year.
5. As the District's Assistant Superintendent of Teaching and Learning, I am familiar with the District's Policies and Regulations.
6. The District's Policies and Regulations are available to the public via the internet at <https://go.boarddocs.com/mo/wsdr4/Board.nsf/Public>.
7. Exhibit A is a true and accurate copy of District Policy 0120.
8. Exhibit B is a true and accurate copy of District Policy 0310.
9. Exhibit C is a true and accurate copy of District Policy 1480.

10. Exhibit D is a true and accurate copy of District Policy 6240.
11. Exhibit E is a true and accurate copy of District Policy 6241.
12. Exhibit F is a true and accurate copy of District Regulation 6241.
13. The "days" referred to in District Regulation 6241 refer to school days.
14. Exhibit G is a true and accurate copy of District Policy 6310.
15. Exhibit H is a true and accurate copy of District Regulation 6310.
16. Exhibit I is a true and accurate copy of District Policy 0340.
17. As the Assistant Superintendent of the District, I am familiar with the practices of the District with respect to book challenges and the formal challenges submitted regarding *The Bluest Eye*, by Toni Morrison; *Fun Home: A Family Tragicomic*, by Alison Bechdel; *All Boys Aren't Blue*, by George M. Johnson; *Heavy: An American Memoir*, by Kiese Laymon; *Lawn Boy*, by Jonathan Evison; *Gabi, A Girl in Pieces*, by Isabel Quintero; *Modern Romance: An Investigation*, by Aziz Ansari; and *Invisible Girl: A Novel* by Lisa Jewell (collectively, the "Subject Books").
 18. The District received a formal challenge to *The Bluest Eye* by a local resident on October 8, 2021, and then temporarily removed the book from circulation in District libraries.
 19. The District formed a review committee for *The Bluest Eye* on October 18, 2021.
 20. The review committee met and prepared its report for *The Bluest Eye* on November 29, 2021.
 21. The District's Board elected to take up the challenge to *The Bluest Eye* at its January 20, 2022 meeting.
 22. On January 20, 2022, a majority of the District's Board of Education (the "Board") sustained a motion to not retain *The Bluest Eye*.

23. I attended the Board's January 20, 2022 meeting. The District publicly posted video of its Board meeting on January 20, 2022, at <https://bit.ly/36vooWK>, which presents a true and accurate depiction of what I saw and heard at that meeting.

24. On February 25, 2022, a majority of the Board sustained a motion rescinding the January 20, 2022 decision and then sustained another motion to retain *The Bluest Eye* without restrictions.

25. The District subsequently returned *The Bluest Eye* into circulation in District libraries without restrictions on or about February 26, 2022.

26. The District received a formal challenge to *Lawn Boy* by a local resident on October 1, 2021, and then temporarily removed the book from circulation in District libraries.

27. The District formed a review committee for *Lawn Boy* on October 18, 2021.

28. The review and preparation of the committee report for *Lawn Boy* has been delayed due to logistical difficulties in obtaining copies of the book for all committee members.

29. *Invisible Girl: A Novel*; *Gabi, A Girl in Pieces*; and *Modern Romance: An Investigation* were temporarily removed from circulation in District libraries upon receipt of formal challenges to each of these books.

30. Exhibit J is a true and accurate copy of the formal challenge received by the District for *Invisible Girl: A Novel*.

31. Exhibit K is a true and accurate copy of the formal challenge received by the District for *Modern Romance: An Investigation*.

32. The appointment of review committees for *Gabi, A Girl in Pieces* and *Modern Romance: An Investigation* were delayed due to the necessity of locating nine individuals willing and able to review the book in accordance with the District's committee guidelines.

33. The District received a withdrawal of the challenge to *Invisible Girl: A Novel* prior to the formation of a review committee for the book.

34. The review and preparation of committee reports for *Gabi, A Girl in Pieces* and *Modern Romance: An Investigation* were delayed due to the delay in committee formation, the amount of material under consideration, and scheduling constraints.

35. The District received a withdrawal of the challenge to *Modern Romance: An Investigation* prior to the completion of a committee report for the book.

36. Upon withdrawal of the respective challenges, the District returned *Invisible Girl: A Novel* and *Modern Romance: An Investigation* into circulation in District libraries without restrictions.

37. On February 15, 2022, a majority of the Board sustained a motion to retain *Gabi, A Girl in Pieces* without restrictions.

38. The District subsequently returned *Gabi, A Girl in Pieces* into circulation in District libraries without restrictions on or about February 16, 2022.

39. *All Boys Aren't Blue; Heavy: An American Memoir*, and *Fun Home: A Family Tragicomic* were removed contemporaneously with the receipt of formal challenges to each of these books on September 30, 2021.

40. The appointment of review committees for *All Boys Aren't Blue*, *Heavy: An American Memoir*, and *Fun Home: A Family Tragicomic* were delayed due to the necessity of locating nine individuals willing and able to review the book in accordance with the District's committee guidelines.

41. The review and preparation of committee reports for *All Boys Aren't Blue*, *Heavy: An American Memoir*, and *Fun Home: A Family Tragicomic* has been delayed due to the amount of material under consideration and scheduling constraints.

42. Amber Crawford has never served on any District review committee for the Subject Books.

43. Andy Wells has never served on any District review committee for the Subject Books.

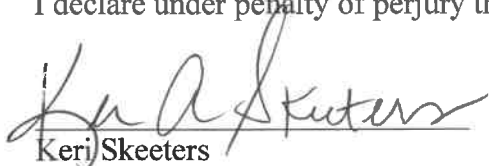
44. As the Assistant Superintendent of the District, I have access to and general familiarity with the District's school library collections.

45. As of the signing of this Declaration, there are numerous titles in the District's library collections, excluding the Subject Books, that contain viewpoints from individuals of different races and sexual orientations, and which are currently available without restriction to students. As of the signing of this Declaration, the District has not received a formal challenge for any of these books.

46. Additionally, as of the signing of this declaration, the following titles are currently available without restriction in District library collections: *Woke: A Young Poet's Call to Justice* by Mahogany L. Browne, Olivia Gatwood, Elizabeth Acevedo, and Theodore Taylor III (illustrator); *White Fragility* by Robin DiAngelo; *Stamped: Racism, Antiracism, and You* by Jason Reynolds and Ibram X. Kendi; *Dear Martin* by Nic Stone; *Dear Justyce* by Nic Stone; *Seeing Gender: An Illustrated Guide to Identity and Expression* by Iris Gottlieb; *The Handmaid's Tale* by Margaret Atwood; and *This Book is Gay* by Juno Dawson. As of the signing of this Declaration, the District has not received a formal challenge for any of these books.

47. If I were called upon to testify in any proceeding concerning these events and documents, my testimony would be no different than that set forth in the foregoing paragraphs.

I declare under penalty of perjury that the foregoing is true and correct.


Kerj Skeeters

Executed on: 3/28/2022