

October 19, 2023

**By U.S. Mail & Email**

Marley Billingsley, Open Records Coordinator  
Oklahoma State Department of Education  
Office of Legal Services  
2500 North Lincoln Boulevard  
Oklahoma City, OK 73105  
[OpenRecordsRequests@sde.ok.gov](mailto:OpenRecordsRequests@sde.ok.gov)

Re: *Request for Public Records*

Dear Ms. Billingsley:

On behalf of the Oklahoma members of Americans United for Separation of Church and State, we request that the Oklahoma State Department of Education provide the documents requested below pursuant to the Oklahoma Open Records Act, 51 O.S. § 24A.1 *et seq.*

Definitions

1. “Documents” means any record included in the law’s definition of “public records,” 51 O.S. § 24A.3(1).
2. “Department” means the Oklahoma State Department of Education or any of its officials, officers, boards or board members, councils, committees, administrators, agents, representatives, or employees.
3. “Prager” means Prager University Foundation—commonly known as PragerU—or any of its officials, officers, boards or board members, councils, committees, administrators, agents, representatives, or employees.

Document Requests

1. All documents relating or referring to the Department’s review or approval of Prager materials for use in Oklahoma public schools. This request includes, but is not limited to, any documents analyzing Prager materials and any documents that reflect conclusions, recommendations, cautions, or concerns raised by such analysis.

2. All internal Department communications relating or referring to the review or approval of Prager materials for use in Oklahoma public schools.
3. All communications between the Department and Prager.

#### Instructions

1. If any documents are available electronically, we would appreciate it if you would send them to Ian Smith by electronic file transfer or by email at [ismith@au.org](mailto:ismith@au.org). For documents that cannot be sent electronically, we would appreciate it if you would burn the documents to a DVD or CD and send the documents to the following address:

Ian Smith, Staff Attorney  
Americans United for Separation of Church and State  
1310 L Street NW, Suite 200  
Washington, DC 20005

2. We agree to pay reasonable copying and postage fees of not more than \$100. If you estimate that the total fee for this request will exceed \$100, please inform us as to the amount of the estimated fee and obtain authorization before you incur costs above that amount.

\* \* \*

Thank you for your prompt attention to these requests. If you have any questions, you may contact Ian Smith at (202) 466-3234 or [ismith@au.org](mailto:ismith@au.org).

Sincerely,



Ian Smith, Staff Attorney