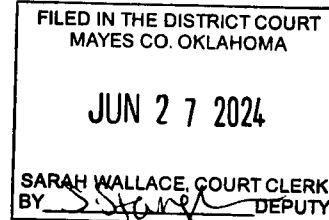


IN THE DISTRICT COURT OF MAYES COUNTY, STATE OF OKLAHOMA

Joseph Loren Price,  
Plaintiff,

v.

STATE OF OKLAHOMA and RYAN WALTERS, in his official capacity as  
Superintendent of Public Instruction,  
Defendants.



Case No. CS-24-151

**COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF**

Plaintiff, Joseph Loren Price, hereby alleges as follows:

**INTRODUCTION**

1. This is an action for declaratory and injunctive relief to prevent the enforcement of the policy announced by Defendant Ryan Walters, Superintendent of Public Instruction for the State of Oklahoma, which mandates the teaching of the Bible in every state school classroom, in violation of the Establishment Clause of the First Amendment to the United States Constitution and Article II, Section 5 of the Oklahoma Constitution.

**JURISDICTION AND VENUE**

2. This Court has jurisdiction over this action pursuant to 28 U.S.C. § 1331 (federal question) and 28 U.S.C. § 1343(a)(3) (civil rights), as this action arises under the First Amendment to the United States Constitution.
3. Venue is proper in this district under 28 U.S.C. § 1391(b) because the events giving rise to the claims occurred in this district, and Defendants are residents of this district.

**PARTIES**

4. Plaintiff Joseph Loren Price is a resident of Locust Grove, Mayes County, Oklahoma, and a concerned citizen and parent of children attending public schools in Oklahoma.
5. Defendant State of Oklahoma is a governmental entity responsible for the public education system in the state.
6. Defendant Ryan Walters is the Superintendent of Public Instruction for the State of Oklahoma and is sued in his official capacity.

**FACTUAL ALLEGATIONS**

7. On or about 6/27/2024, Defendant Ryan Walters announced a policy requiring the teaching of the Bible in every state school classroom in Oklahoma.
8. This policy mandates that public school teachers incorporate the Bible into their curricula, regardless of the subject matter being taught.

9. The policy has been widely publicized and is intended to take effect in the upcoming school year.
10. Plaintiff is concerned that this policy violates the constitutional separation of church and state, infringes on the religious freedom of students and parents, and imposes religious beliefs on public school students.

### **CLAIMS FOR RELIEF**

#### **COUNT I: VIOLATION OF THE ESTABLISHMENT CLAUSE OF THE FIRST AMENDMENT TO THE UNITED STATES CONSTITUTION**

11. Plaintiff realleges and incorporates by reference the allegations set forth in paragraphs 1 through 10.
12. The Establishment Clause of the First Amendment prohibits the government from making any law "respecting an establishment of religion."
13. By mandating the teaching of the Bible in public school classrooms, Defendants are endorsing and promoting a particular religious text, in violation of the Establishment Clause.

#### **COUNT II: VIOLATION OF ARTICLE II, SECTION 5 OF THE OKLAHOMA CONSTITUTION**

14. Plaintiff realleges and incorporates by reference the allegations set forth in paragraphs 1 through 10.
15. Article II, Section 5 of the Oklahoma Constitution prohibits the use of public money or property for the benefit of any religious or sectarian institution.
16. By mandating the teaching of the Bible in public school classrooms, Defendants are using public resources to promote a religious text, in violation of the Oklahoma Constitution.

### **PRAYER FOR RELIEF**

WHEREFORE, Plaintiff respectfully requests that this Court:

- A. Declare that the policy mandating the teaching of the Bible in every state school classroom violates the Establishment Clause of the First Amendment to the United States Constitution and Article II, Section 5 of the Oklahoma Constitution;
- B. Issue a preliminary and permanent injunction preventing Defendants from implementing or enforcing the policy;
- C. Award Plaintiff compensatory damages in the amount of \$250,000 for the harm suffered as a result of the policy;
- D. Award Plaintiff reasonable costs associated with this lawsuit;
- E. Grant such other and further relief as the Court deems just and proper.

Dated: 6/27/2024

A handwritten signature in black ink, appearing to be the initials 'PJR' or similar, written in a cursive style.