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March 19, 2018

**VIA FAX (609-242-9406),
EMAIL (cwigley@laceyschools.org), AND UPS OVERNIGHT**

Craig Wigley
Superintendent
Lacey Township School District
200 Western Blvd.
Lanoka Harbor, NJ 08734

**RE: SECOND VIOLATION: Unconstitutional Suppression of Student Speech
by LTHS**

Dear Mr. Wigley:

As you know, we represent the Association of New Jersey Rifle & Pistol Clubs (“ANJRPC”). ANJRPC represents the interests of over 1 million law-abiding New Jersey gun owners.

It has come to our attention that Lacey Township High School (“LTHS”) has, within the last several weeks, committed another First Amendment violation by unlawfully compelling a student to remove a sticker from his vehicle portraying the image of a type of firearm lawfully owned by millions of Americans, including many New Jersey residents.

We already warned the School District last week about the illegal and unconstitutional written policy in the LTHS Student/Parent Handbook 2017-2018 and about the unconstitutional disciplinary action taken against two other students for photos posted to social media relating to their lawful participation in firearms practice and training.

Regarding the coerced removal of the vehicle sticker, be advised that prohibiting the mere display of images of legal firearms plainly violated the student’s First Amendment rights. See Tinker v. Des Moines Indep. Cmty. Sch. Dist., 393 U.S. 503 (1969); Layshock v. Hermitage School District, 650 F.3d 205 (3d Cir. 2011); J.S. v. Blue Mountain School District, 650 F.3d 915 (3d Cir. 2011); Newsom v. Albemarle County, 354 F.3d 249 (4th Cir. 2003).

This incident, along with the incident about which we wrote you last week, reveals a disturbing pattern of disregard for the Constitutional rights of students. Whether suppressing the exercise of Second Amendment rights off of school grounds, or suppressing the right of free speech about firearms issues on school grounds, these violations will not be tolerated.

Craig Wigley, Superintendent
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Accordingly, so that the Lacey Township School District may avoid legal action, ANJRPC hereby demands that LTHS immediately cease its illegal conduct as follows:

- 1) Immediately rescind its prohibition of the subject firearm sticker.
- 2) Issue a written apology to the student and the student's family.
- 3) Provide assurances that such violations of law will not take place in the future.

Be guided accordingly.

Very Truly Yours,



DANIEL L. SCHMUTTER, ESQ.

DLS/srs

cc: Gregory Brandis, Principal (via fax - 609-242-0873,
email: gbrandis@laceyschools.org, and UPS Overnight)
Scott Bach, ANJRPC Executive Director