

LAW OFFICES
HARTMAN & WINNICKI, P.C.

Dariusz M. Winnicki *^o
Brian T. Keane ^o
Richard L. Ravin *^o
Daniel L. Schmutter*
Andrew T. Wolfe ^o
Samantha N. Polizzi^o
Steven B. Gladis^o×

74 PASSAIC STREET
RIDGEWOOD, NEW JERSEY 07450

* * *

WEBSITE
www.hartmanwinnicki.com

Phone: (201) 967-8040
Fax: (201) 967-0590

Porter E. Hartman (1920-2009)
Charles R. Buhman (1938-1994)
William T. Marsden (1943-1993)
Cyrus D. Samuelson (1911-1998)

* New York and New Jersey Bars
^o Florida Bar
^o Washington, D.C. Bar
^o New Jersey Bar
× Pennsylvania Bar

April 20, 2018

**VIA FAX (856-468-7493),
EMAIL (mdicken@gcecnj.org), AND UPS OVERNIGHT**

Michael Dicken
Superintendent
Gloucester County Special Services School District
and Vocational – Technical School District
1360 Tanyard Rd
Sewell, NJ 08080

RE: Unconstitutional Suppression of Student Speech by GCIT

Dear Mr. Dicken:

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.

We understand that in or about February of this year Gloucester County Institute of Technology (“GCIT”) violated a student’s First Amendment rights by unlawfully demanding that a student remove a t-shirt that depicts firearms in a non-threatening manner, and disciplining him for failing to do so.

The foregoing 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 reveals a disturbing lack of regard for the Constitutional rights of students. Suppressing the right of free speech about firearms issues is unlawful and will not be tolerated.

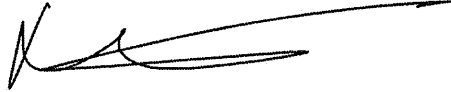
Michael Dicken, Superintendent
April 20, 2018
Page 2

Accordingly, so that the District may avoid legal action, ANJRPC hereby demands that GCIT immediately cease its illegal conduct as follows:

- 1) Immediately rescind and expunge any disciplinary action and record that has been imposed upon the student.
- 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,

A handwritten signature in black ink, appearing to read 'Daniel L. Schmutter', with a long horizontal flourish extending to the right.

DANIEL L. SCHMUTTER, ESQ.

DLS/srs
cc: James Dundee, Principal (via fax 856-468-1035,
email: jdundee@gcecnj.org, and UPS Overnight)
Scott Bach, ANJRPC Executive Director