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October 2, 2017

Superintendent Frank Gargiulo
Board Secretary Joseph Muniz
Hudson County Schools of Technology
8511 Tonnelle Avenue
North Bergen NJ 07047

Re: **Report of Unauthorized Political Activity At HCST Facility**

Gentlemen:

This letter is on behalf of a Hudson County resident and client of mine, who has discovered that County Freeholder Anthony L. Romano's mayoral campaign has produced, commissioned and/or is distributing a political campaign video advertisement which was filmed using the school gymnasium of Explore 2000 Middle School in Jersey City. That is public school property under the auspices of Hudson County Schools of Technology.

This video appears to violate N.J.S.A. 18A:20-34 which provides for the use of school facilities, "when not in use for school purposes, for any of" certain enumerated purposes, which do not include the creation, production or filming of political campaign advertisements.

We question the legality of this filming. In the alternative, we inquire (under both the common law right of access and the Open Public Records Act) to whomever requested authorization or permission for this activity, and whomever granted such authorization or permission, and the basis for doing so.

The video also, disturbingly, features numerous *half-clothed* minors identifiable by face. We also raise the issue as to whether the video's substantial footage of minors may constitute "personally identifiable information" under N.J.S.A. 18A:36-35. We ask that your offices further investigate whether these minors' parents or guardians consented in writing to their sons' appearance on school property in this video for a clearly non-educational, private and political use.

The video campaign advertisement is currently available on the Internet on the local news media website HudsonCountyView.com at

<http://hudsoncountyview.com/st-anthony-legend-hurley-endorses-freeholder-romano-for-hoboken-mayor/>

and on the "Anthony L. Romano for Mayor" Facebook page

<https://www.facebook.com/Romano4Mayor/videos/vb.471137509887028/514897792177666/?type=2&theater>

Thank you for your prompt attention to this matter.

Sincerely

A handwritten signature in blue ink, appearing to read "Eric Dixon".

Eric Dixon, Esq.