

The quietest place on Earth is an anechoic chamber located at Orfield Laboratories in Minnesota, a room that has been designed to eliminate all external sounds except for the heartbeat and breathing of its visitors. The valleys of Antarctica, barren sand dunes of the Mojave Desert, and empty concert halls are also viable contenders (Cox). However, I must disagree with the scientists on this matter. Though I cannot tell you the number of decibels or offer an official Guinness world record, I can say with confidence that the quietest place on Earth was the 17-minute vigil my middle school held for the victims of the Parkland shooting. I remember the cloudy day, when the typically rambunctious lot of us gathered in the courtyard and stood, silent, around the American flag at half-mast. We stared at the flag and at each other, thinking about the lives lost and fearing for our own.

However, what followed was not quiet. After the Parkland shooting, a heated debate over gun control swept the nation. During that time, I watched the survivors march in Washington DC, read about the NRA's defense of gun ownership, and witnessed several fierce disagreements in my home and school. The Second Amendment was thrown around like a grenade, used to win arguments in one blow without the attacker really knowing its true meaning.

The meaning of the Second Amendment is not as clear cut as many Americans believe. In fact, there have been several different interpretations of it throughout American history, and there will undoubtedly be many more in the future. The amendment reads, "A well regulated Militia, being necessary to the security of a free State, the right of the people to keep and bear Arms, shall not be infringed." (U.S. Const. amend. II). Do not feel ashamed if you could not grasp the meaning of this amendment upon your first, second, or even third read through, as you are not alone. Even Supreme Court Justices cannot agree on what the Founding Fathers were trying to say. Changes in the English language over the years and differing interpretations have convoluted the intended

meaning of this amendment and incited a nationwide debate that has been ongoing for over 200 years. For one, it is argued whether the first clause concerning the necessity of a militia is related to the second clause stating the people's right to bear arms. Should US citizens only have access to arms in order to maintain a militia, or is that just one of many reasons one may own a firearm? Several Supreme Court Cases have attempted to answer this question.

United States vs Miller (1939) provided a very literal interpretation of the amendment, confirming that the right of individuals to bear arms is limited to use in state militias. Therefore, guns belonging to individual citizens were not protected and were subject to federal regulation (Harris, 71). *Miller* guided the constitutionality of gun laws through the early 2000s, and was the precedent during the Columbine massacre. Although *Miller* denied an individual's right to arms and promoted gun control, it was unable to protect the lives of public school students.

A more recent Supreme Court Case, *D.C. vs Heller* (2008), gives an opposite take. When the city of Chicago attempted to reduce inner-city violence by instating a law that limited citizen's ability to possess handguns and required that they be kept unloaded and locked inside private homes, security guard Dick Anthony Heller took the issue to the Supreme Court (Harris, 69-70). He believed that this law violated his constitutional rights as it prevented individuals from being able to properly defend themselves with their lawfully owned guns. The Supreme Court ruled in his favor, declaring that individuals had the right to bear arms for personal use, such as self defense. However, there are limitations to this right. Justice Antonin Scalia, who delivered the Court's opinion, said, "It is not a right to keep and carry any weapon whatsoever in any manner whatsoever and for whatever purpose." (*DC vs Heller*, 2) Scalia included several exceptions in his opinion. For example, felons and those with severe mental illnesses could be barred from possessing firearms, firearms could be banned in sensitive places like public schools, and dangerous and/or

uncommon weapons could be prohibited (Rose). As a result of *Heller*, the modern interpretation of the Second Amendment is that individuals hold the right to bear arms, but some gun control laws are permitted.

Since the *Heller* case, 259 children have died as a result of gun violence within public schools (K-12 School Shooting Database). If the Supreme Court declared gun control constitutional, how did so many young people lose their lives? How has an entire generation of young people become scarred? How did a mentally ill boy with several FBI tips to his name bring a semi-automatic AR-15 into a school zone that fateful February day at Marjory Stoneman Douglas High School (Bowdich)?

The hard truth is that Supreme Court rulings are judgements, not laws. The Supreme Court can outline gun control regulations, but it is up to lawmakers and executives at local and state levels to put their principles into practice. Therefore, it could be argued that the Supreme Court's interpretation of the Second Amendment doesn't matter in public schools. No matter what the higher-ups in black robes say, school shootings will still happen, and children will still die so long as our nation's politics regarding the issue remain divided, confused, and incomplete.

Beyond establishing legal doctrines, the Supreme Court has the power to sway public opinion and offer moral guidance (Dorf, 14). In a post-*Heller* USA, the youth of Generation Z grew up knowing their rights. They knew they had the liberty as an American to speak freely and own guns if they wished. In a post-*Heller* USA, the youth of Generation Z grew up watching their rights being stolen, as school shooters took away their right to live and lawmakers attempted to limit their freedom to own guns. Current laws and interpretations of the Second Amendment have failed to protect public school students, but with *Heller* as a precedent in their back pockets, the memory

of the Parkland students in their minds, and half healed scars over their hearts, the mindset and beliefs of young people have changed forever.

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