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IN THE
INDIANA SUPREME COURT

No. 18A-CR-02041

JOHN L. SOLOMON,
Appellant-Defendant,

v.

STATE OF INDIANA,
Appellee-Plaintiff.

Appeal from the
Marion Superior Court,
Criminal Division, Room 14,

No. 49G14-1704-CM-13921,

The Honorable
Jose Salinas, Judge.

STATE'S RESPONSE IN OPPOSITION TO PETITION TO TRANSFER

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Solomon waived the claim he raises on appeal, but it is unavailing regardless.

A. Solomon's claim is waived.

As the Court of Appeals correctly observed, "Solomon did not argue before the trial court that Ind. Code § 35-48-4-11 violates Article 1, Section 1 of the Indiana Constitution as applied to him." *Solomon v. State*, No. 18A-CR-2041, slip op. at 10 (Ind. Ct. App. Jan. 31, 2019). Rather, Solomon claimed that he did not know about the marijuana found in his possession inside the vehicle and stated that it did not belong to him (Tr. 23-24). On appeal, Solomon changed course and claimed that he had a constitutional right to possess marijuana in his pursuit of happiness and liberty (Appellant's Brief at 7).

Generally, a challenge to the constitutionality of a criminal statute must be raised by a motion to dismiss prior to trial, and the failure to do so waives the issue on appeal. *See e.g.*, *Payne v. State*, 484 N.E.2d 16, 18 (Ind. 1985); *Rhinehardt v. State*, 477 N.E.2d 89, 93 (Ind. 1985); *Lee v. State*, 973 N.E.2d 1207, 1209 (Ind. Ct. App. 2012), *trans. denied*; *Johnson v. State*, 879 N.E.2d 649, 654 (Ind. Ct. App. 2008); *Adams v. State*, 804 N.E.2d 1169, 1172 (Ind. Ct. App. 2004).

"The waiver rule is founded on important policy considerations, including 'the preservation of judicial resources, opportunity for full development of the record, utilization of trial court fact-finding expertise, and assurance of a claim being tested by the adversary process.'" *Slone v. State*, 912 N.E.2d 875, 878 (Ind. Ct. App. 2009), *trans. denied* (citation omitted). As this Court has stated, "judicial intervention to

address constitutional claims for the first time at the appellate level is not appropriate" especially where an appellant's "claims are dependent on potentially disputed facts." *Layman v. State*, 42 N.E.3d 972, 976 (Ind. 2015). For example, in *Layman*, this Court specifically noted that the appellant was "challenging the constitutionality" of the "statute on an 'as applied' basis" and that this was not appropriate where a record on this issue was not developed in the proceedings below. *Id.* at 976. Such was the case here as well because Solomon was also raising a challenge to the constitutionality of the statute on an "as applied" basis without providing the State with an opportunity to offer any evidence in support of the constitutionality of the statute. Thus, Solomon's claim is waived. *Id.*

That the State could have offered evidence to support the legislature's policy decision in this context, if the issue had been raised below, is beyond dispute. For example, in the case of *The First Church of Cannabis, Inc., et al, v. State of Indiana, et al.*, the trial court, in granting the State's motion for summary judgment, observed that the State "submitted and designated expert declarations from five experts[.]" (Order granting summary judgment at p. 5).[1] In that case, the trial court found that even "if it were appropriate to consider *de novo* whether the government has a compelling interest in preventing marijuana use, Defendants have designated evidence showing that it has such a compelling interest[.]" *Id.* at p. 12.

Here, Solomon has attempted an end run around the trial court's fact-finding expertise and requested that Indiana's appellate courts issue a ruling on the

[1] The trial court's July 6, 2018 ruling in that case can be viewed on the Online Docket under cause number 49C01-1507-MI-022522.

constitutionality of Indiana Code Section 35-48-4-11 without any evidence in the record regarding this issue. Because Solomon did not provide the trial court with an opportunity to consider a challenge to the constitutionality of the marijuana possession statute nor the State an opportunity to offer evidence in support of the constitutionality of the statute, his claim is waived. *Layman*, 42 N.E.3d at 976; *see also Hammer v. State*, 265 Ind. 311, 314 354 N.E.2d 170, 172 (1976) (there is "no basis for a decision" when a challenge to the constitutionality of a statute is raised on appeal "without the presentation of evidence by both parties" "at the trial court level").

B. Article 1, Section 1 contains no judicially enforceable rights.

Waiver notwithstanding, Solomon's claim fails. Solomon alleges that the statute criminalizing possession of marijuana is unconstitutional as applied to him because it violates his right to liberty and the pursuit of happiness under Article 1, Section 1 of the Indiana Constitution (Pet. at 6-7). This provision states,

> WE DECLARE, That all people are created equal; that they are endowed by their CREATOR with certain inalienable rights; that among these are life, liberty, and the pursuit of happiness; that all power is inherent in the people; and that all free governments are, and of right ought to be, founded on their authority, and instituted for their peace, safety, and well-being. For the advancement of these ends, the people have, at all times, an indefeasible right to alter and reform their government.

This Court has cast serious doubt that Article 1, Section 1 is a self-executing provision capable of judicial enforcement rather than an unenforceable expression of the general principles that animate our Constitution. *See Doe v. O'Connor*, 790 N.E.2d 985, 989-91 (Ind. 2003). In *Doe*, the Court called Section 1's enforceability

into question and compared Section 1 to similar provisions in other states' constitutions that have been deemed not to create any judicially enforceable rights. *Id*.

For example, the Ohio Constitution provides that "'[a]ll men are, by nature, free and independent, and have certain inalienable rights, among which are those of enjoying and defending life and liberty, acquiring, possessing and protecting property, and seeking and obtaining happiness and safety." *See State v. Williams*, 728 N.E.2d 342, 352 (Ohio 2000) (quoting Ohio Const., art. I, § 1). The Ohio Supreme Court held that this expression of natural rights, in and of itself, is "not an independent source of self-executing protections." *Id*. at 354. "Rather, it is a statement of fundamental ideals upon which a limited government is created" but that "requires other provisions of the Ohio Constitution or legislative definition to give it practical effect." *Id*. Moreover, even these fundamental ideals or natural rights may be regulated or restricted in ways that bear a "real and substantial relation to the public health, safety, morals, or general welfare" and that are not "arbitrary or unreasonable." *Id*. at 355.

Similarly, the Vermont Supreme Court held that an analogous provision in the Vermont Constitution "expresses fundamental, general principles…that infuse the rights of individuals and powers of government specified elsewhere in the constitution." *See Shields v. Gerhart*, 658 A.2d 924, 928 (Vt. 1995). As such, these principles are not self-executing, enforceable rights, but merely provide the "philosophical truisms" that should guide all legislative decision-making. *See id*. at

928-29. Other states have also declared that similar state constitutional declarations of natural rights do not provide a basis, in and of themselves, upon which legislation may be challenged. *Doe*, 790 N.E.2d at 991; *see also*, *e.g.*, *Sepe v. Daneker*, 68 A.2d 101, 105 (R.I. 1949) (stating that an analogous constitutional provision was advisory rather than mandatory and was "addressed rather to the general assembly by way of advice and direction, than to the courts, by way of enforcing restraint upon the law-making power") (citation omitted); *Blea v. City of Espanola*, 870 P.2d 755, 759 (N.M. Ct. App. 1994) ("vague references to safety or happiness" in an analogous constitutional provision "are not sufficient" to support a claim).

Although the natural rights philosophy expressed in Section 1 informs our understanding of the other provisions in our Bill of Rights, the language of that section is not sufficiently complete and definitive to provide the meaningful guidance necessary for uniform judicial enforcement. *See Williams*, 728 N.E.2d at 354 (stating that the overarching natural rights language in Ohio's analogous provision "lacks the completeness required to offer meaningful guidance for judicial enforcement"). An overarching declaration of a right to liberty or a right to pursue happiness does not provide sufficient guidance for a court to determine what activities would fall within this protection or what limits might be placed upon those activities. To allow unexpressed, enforceable rights to spring forth from these vague references to fundamental ideals would be to invite improper judicial legislating under the guise of constitutional law.

The sounder approach is to recognize that these fundamental ideals are the guiding principles by which the specific protections in the Bill of Rights or statutory enactments should be interpreted rather than to treat them as self-executing language. Therefore, Section 1, standing alone, does not provide a basis upon which a constitutional challenge to a statute may be brought. *See National Organization for Reform of Marijuana Laws v. Gain*, 100 Cal.App.3d 586, 598, 161 Cal. Rptr. 181, 187 (Cal. Ct. App. 1979) (holding that marijuana statutes did not violate appellants' state constitutional rights to liberty and pursuit of happiness because the guarantees of article I, section 1 of the California Constitution "do not operate as a curtailment on the basic power of the Legislature to enact reasonable police regulations").

Solomon fails to cite a single case from the last 65 years that has found a statute unconstitutional solely on the basis of Article 1, Section 1 of the Indiana Constitution. Further, the cases he does cite from the early to mid-1900's do not consider the validity of criminal statutes, but rather, address the authority of the State or a political subdivision thereof to regulate a lawful trade, profession or business (Pet. at 10; Appellant's Brief at 11). *See*, *e.g.*, *Department of Financial Institutions v. Holt*, 231 Ind. 293, 301, 310, 108 N.E.2d 629, 633, 637 (1952) (invalidating statute limiting prices on retail installment contracts based on asserted Section 1 "freedom of contract"); *Kirtley v. State*, 227 Ind. 175, 182, 84 N.E.2d 712, 715 (1949) (invalidating law requiring tickets to any "place of public amusement" to be resold only at face amount based on asserted Section 1 "property

rights of the ticket owner"); *Department of Insurance v. Schoonover*, 225 Ind. 187, 193-94, 72 N.E.2d 747, 750 (1947) (invalidating insurance agent compensation law based on "freedom to contract"); *State Board of Barber Examiners v. Cloud*, 220 Ind. 552, 572, 44 N.E.2d 972, 980 (1942) (striking down barber regulation that established minimum prices and maximum hours based on asserted "right to engage in a lawful business"); *Street v. Varney Electrical Supply Co.*, 160 Ind. 338, 66 N.E. 895, 897 (Ind. 1903) (invalidating public work minimum wage legislation based on asserted "liberty to contract").

This Court at one time also found a right to possess alcohol as a species of property right while referring to Article 1, Section 1. *See Beebe v. State*, 6 Ind. 501, 1855 WL 3616 (Ind. 1855); *Herman v. State*, 8 Ind. 545, 1855 WL 3695 *8 (Ind. 1855). But the Court ultimately rejected this right and effectively overruled *Beebe* (and by implication *Herman*). *See Schmitt v. F.W. Cook Brewing Co.*, 187 Ind. 623, 120 N.E. 19, 21 (1918) (upholding prohibitions on liquor sales and saying of *Beebe*, "[i]t cannot be determined…on what principle the court was acting").[2]

That Section 1 has provided meaningful protection only for economic interests (and then only sporadically) is important because economic rights doctrine has been discredited. Indiana's Section 1 economic rights cases are the product of

[2] As to Solomon's claim that subsequent opinions have not noted that *Herman* was impliedly overruled by *Schmitt*, that is likely because the Court in *Schmitt* did not specifically mention *Herman* by name but instead referred to *Beebe* "and a few cases following…" *Schmitt*, 120 N.E. at 20. *Beebe* was a forerunner to *Herman* and the decision in *Herman* borrowed from *Beebe*, such as the reference to the widespread use of alcohol in Indiana at the time the Indiana Constitution was adopted, which will be discussed below. *See Beebe*, 6 Ind. at 513 (discussing the large scale use of alcohol); *cf. Herman*, 8 Ind. at 559 (using similar and at times identical language).

an old model of judicial supremacy over public policy that was discredited long ago. The United States Supreme Court's analogous economic rights era is most closely associated with *Lochner v. New York*, 198 U.S. 45 (1905), where the Court invalidated a New York State law that limited the hours employees in bakeries could work based on notions of the "right of contract between the employer and employees." *See id*. at 53. The entire *Lochner* era, of course, has long been discredited, disavowed and overruled by the United States Supreme Court. *See*, *e.g.*, *Lincoln Fed. Labor Union v. Northwestern Iron & Metal Co.*, 335 U.S. 525 (1949); *West Coast Hotel Co. v. Parrish*, 300 U.S. 379 (1937). "The doctrine is seen as a violation of sound democratic procedures in that it permits judges to substitute their judgment as to political policy for that of the legislature." Monrad G. Paulsen, *The Persistence of Substantive Due Process in the States*, 34 Minn. L. Rev, 91, 92 (1950) (citation omitted).

This Court utilized language similar to the Supreme Court's Fourteenth Amendment economic rights activism in 1903 when it spoke of a "liberty to contract" and invalidated public works minimum wage legislation under Section 1. *See Street*, 66 N.E. at 897. That same year, the Court invalidated (in part based on Section 1) a statute that prescribed when wages must be paid and that proscribed their assignment, declaring that it was "the duty of the court, when called on, to decide whether the particular regulation is *just and reasonable*…" *Republic Iron & Steel Co. v. State*, 160 Ind. 379, 66 N.E. 1005, 1007 (1903) (emphasis added). These are very nearly the same non-deferential words that *Lochner* used two years later.

Lochner, 198 U.S. at 556 ("Is this a fair, reasonable, and appropriate exercise of the police power…?"). This non-deferential spirit continued in Indiana until the middle part of the Twentieth Century. *See Cloud*, 220 Ind. at 572, 44 N.E.2d at 980; *Schoonover*, 225 Ind. at 192-93, 72 N.E.2d at 749-50 (dismissing any notion of legislative deference in determining whether an action is in the public's interest); *Kirtley*, 227 Ind. at 181, 84 N.E.2d at 714; *Holt*., 231 Ind. at 307-10, 108 N.E.2d at 636-38 (second-guessing legislative determinations regarding the market effects of free price competition in the area of retail installment sales contracts).

However, this era of judicial activism and supremacy in the arena of public policy—economic or otherwise—is now over in Indiana. *See McIntosh v. Melroe Co.*, 729 N.E.2d 972, 975 (Ind. 2000) (describing *Lochner* and other property rights cases as "now discredited"). As far as the State is aware, the last time this Court invalidated legislation based on economic (or other) rights under Section 1 was in 1952, in the *Holt* case. Accordingly, the *Lochner*-esque reasoning of *Herman*, *Beebe*, *Holt*, *Kirtley*, *Schoonover*, *Cloud*, and *Street* provides a rickety doctrinal foundation for finding a new constitutional right to possess marijuana that Solomon apparently believes the legislature was unaware of when it prohibited the possession of marijuana over eighty years ago. In light of the serious questions that *Doe v. O'Connor* poses for the judicial enforceability of Section 1 as a general matter, it would be a mistake to assume that any meaningful and enforceable economic rights protections remain, let alone infer that they lay the foundation for a new right to possess marijuana. Given "the fact that no statute has been invalidated under

Article 1, § 1 for over [sixty-five] years, and that prior cases that did invalidate statutes under Article 1, § 1 did so using a now-discredited view of the scope of the government's police power to regulate businesses[,]" Section 1, by itself, does not provide a basis upon which a constitutional challenge to a statute may be brought. *Morrison v. Sadler*, 821 N.E.2d 15, 32 (Ind. Ct. App. 2005), *trans. denied*.[3]

C. There is no right under Section 1 to possess a controlled substance.

Even if Section 1 were to provide some level of judicially enforceable protection for some asserted "natural rights," there is no textual or historical basis for concluding that it protects any right to possess marijuana. Thus, Solomon has failed to establish that criminalizing the possession of marijuana violates this provision.

"The constitutionality of statutes is reviewed de novo." *Conley v. State*, 972 N.E.2d 864 (Ind. 2012). However, such review is "'highly restrained'" and "'very deferential,'" beginning "'with [a] presumption of constitutional validity, and therefore the party challenging the statute labors under a heavy burden to show that the statute is unconstitutional.'" *Id.* (quoting *State v. Moss-Dwyer*, 686 N.E.2d 109, 110 (Ind. 1997)). "The legislature has wide latitude in determining public policy, and [a reviewing court will] not substitute [its] belief as to the wisdom of a

[3] Solomon is apparently confused by the State and the Court of Appeals' reference to *Morrison v. Sadler* (Pet. at 10-11). As a result, Solomon digresses into a discussion of same-sex marriage under the federal constitution, while overlooking that the reason that the decision in *Morrison* is cited is because it provides an overview of Indiana jurisprudence under Article 1, Section 1 of the Indiana Constitution, including this Court's decision in *Doe v. O'Connor* (Pet. at 11 n.4). *Morrison*, 821 N.E.2d at 31-32.

particular statute for those of the legislature." *State v. Rendleman*, 603 N.E.2d 1333, 1334 (Ind. 1992) (quoting *Sidle v. Majors*, 264 Ind. 206, 209, 341 N.E.2d 763, 766 (1976)). "'A statute is not unconstitutional simply because the court might consider it born of unwise, undesirable, or ineffectual policies.'" *Id*. (quoting *Johnson v. St. Vincent Hospital, Inc.*, 273 Ind. 374, 382, 404 N.E.2d 585, 591 (1980)).

Solomon has failed to carry his burden of establishing that the statute is unconstitutional as applied to him. Because there is no evidence in the record to support Solomon's argument, he is forced to refer to items outside the record, in particular, a newspaper article, which he claimed states that a report indicated that marijuana is not as bad as other drugs (Pet. at 13 n. 7; Appellant's Brief at 10 n.5). However, as discussed previously, if this matter had been litigated in the trial court, the State would have been able to offer a number of studies as well as expert witness testimony to support the legislature's conclusion that marijuana should be illegal (Brief of Appellee at 18-19). To the extent that Solomon wishes to challenge any of the studies that the State notes it could have offered, he misses the point (Pet. at 14-15). Neither Solomon's newspaper article nor any of the studies to which the State could refer are part of the record because Solomon did not raise this issue below. The time for offering such evidence would have been before trial, after a challenge to the constitutionality of the statute was raised, not on appeal after the record was closed.

The fact that the evidence supporting the legislature's policy decision is not in the record is solely due to Solomon's litigation choices. Thus, it is odd that Solomon faults the State for not offering additional arguments or evidence in support of the legislature's determination without providing the State the opportunity to develop an evidentiary record in support of such arguments in the trial court (Pet. at 14). This is just another example of Solomon attempting to skip the fact-finding process on this issue in the trial court and then criticizing the State for not offering more support for its position on a question that was not litigated below.

The State also disagrees with Solomon's assertion that there was a right to possess and use marijuana that was well established in Indiana when our present constitution was adopted (Pet. at 11). In fact, there is no evidence in the record to support that claim because there is no evidence in the record whatsoever regarding the use of marijuana in Indiana in the 1850's. However, even if that were the case, it is of no greater significance than the fact that cocaine and heroin were once legal in the United States before the harmful effects of such substances were known. In fact, in the 1850's there were no laws against many things that are illegal now, such as child pornography, identity theft, etc., but that does not mean that all those things were constitutionally protected.

Indiana's position that marijuana is detrimental to individuals and the community is hardly novel as the federal government itself criminalized marijuana. 21 U.S.C.A. § 844. Marijuana's status as a Schedule I controlled substance under

federal law means "that it has a high potential for abuse…" *See* United States Department of Justice, Drug Enforcement Administration, *Drugs of Abuse, A DEA Resource Guide* 75 (2017).[4]

Solomon's claim also fails to establish that the use of marijuana was widespread in Indiana at the time the Indiana Constitution was drafted in 1851. Thus, *Herman v. State*, 8 Ind. 545, 558 (1855), upon which Solomon relies, is readily distinguishable.[5] *Herman* found unconstitutional a law prohibiting the sale of "any ale, porter, malt beer, lager beer, cider, wine," and prohibiting the use of these items as a beverage. *Herman*, 8 Ind. at 547-48. The Court determined "that the right of liberty and pursuing happiness secured by the constitution, embraces the right, in each *compos mentis* individual, of selecting what he will eat and drink, in short, his beverages…" *Id.* at 558. In support of this conclusion, the Court observed,

> there were in the State fifty distilleries and breweries, in which a half a million of dollars was invested, and five hundred men were employed; which furnished a market annually for two million bushels of grain, and turned out manufactured products to the value of a million of dollars, which were consumed by our people, to a great extent, as a beverage. With these facts existing, the question of incorporating into the constitution the prohibitory principle was repeatedly brought before the constitutional convention, and uniformly rejected.

Id. at 559.

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[4] This document can be accessed at: https://www.dea.gov/sites/default/files/drug_of_abuse.pdf#page=75

[5] As noted above, *Herman* was impliedly overruled by *Schmitt v. F.W. Cook Brewing Co.*, 187 Ind. 623, 120 N.E. 19, 21 (1918). However, as it is the principal case upon which Solomon relies, the State will address its applicability to Solomon's claim.

Unlike *Herman*, there is no indication that the prohibition of marijuana was brought before the constitutional convention and rejected. Also distinguishing this case from *Herman* is that there is no evidence in the record that there was a large-scale marijuana industry in Indiana when the present constitution was adopted.[6] The Court in *Herman* also relied on the universal use of alcoholic beverages in Western civilization, which "show[ed] the judgment of mankind as to their value." *Id.* at 560. The Court further cited "Biblical history" and concluded that the scriptures indicated "that these stimulating beverages were created by the Almighty expressly to promote [humanity's] social hilarity and enjoyment." *Id.* at 561.

Finally, the Court cited economic reports regarding the large scale use of alcoholic beverages in the United States, Great Britain, Ireland, and France and stated, "We have thus shown, from what we will take notice of historically, that the use of liquors, as a beverage, and article of trade and commerce, is so universal that they cannot be pronounced a nuisance." *Id.* at 562. The Court concluded, "The world does not so regard [liquor as a nuisance], and will not till the Bible is discarded, and an overwhelming change in public sentiment, if not in man's nature, wrought." *Id.*

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[6] Solomon mistakenly claims that the Court in *Herman* did not rely on the "widespread" or "large scale" use of alcohol in reaching its decision (Pet. at 12 n.5). Contrary to Solomon's claim, the *Herman* Court specifically stated that its reasoning was "confirmed" by the large amount of alcohol Hoosiers were using at the time of "the adoption of our present constitution." *Id.* at 559. Without this confirmation, there is no reason to believe the Court would have ruled as it did.

In other words, the use of alcohol was deemed a constitutional right because: (1) alcohol was in widespread use by the residents of Indiana at the time the Indiana Constitution was adopted and the drafters had expressly rejected the prohibition of alcohol; (2) there was a long-standing tradition of alcohol use in Western civilization; and (3) the use of alcohol was approved in the Bible. *Id*. at 558-62. None of those factors are present here.

Unlike *Herman*, Solomon fails to cite a long-standing, universal use of marijuana by the inhabitants of Western civilization in general, or the citizens of Indiana specifically, that the framers of the Indiana Constitution would have had in mind when adopting Article 1, Section 1. While Solomon goes north to Alaska in search of an opinion to support his argument (Pet. at 16), the Hawaii Supreme Court has more aptly stated, "We cannot say that smoking marijuana is a part of the 'traditions and collective conscience of our people.'" *Hawaii v. Mallan*, 950 P.2d 178, 183 (Haw. 1998). There simply is no evidence that the legislature's decision to make marijuana illegal falls outside of the legislature's police power recognized by the Indiana Constitution.

CONCLUSION

For the foregoing reasons, the State respectfully requests that this Court deny transfer.

Respectfully submitted:

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WORD COUNT CERTIFICATE

I verify that this brief in response to transfer contains no more than 4,200 words according to the Microsoft Word program used to prepare this document.

/s/ George P. Sherman
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CERTIFICATE OF SERVICE

I certify that on April 8, 2019, the foregoing document was electronically filed using the Indiana E-filing System ("IEFS"). I certify that the following person was electronically served with the foregoing document April 8, 2019 via IEFS:

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