No. 98824-2

IN THE SUPREME COURT
OF THE STATE OF WASHINGTON

CITY OF SEATTLE,

Respondent and Cross-Petitioner,

v.

STEVEN G. LONG,

Petitioner and Cross-Respondent.

CITY OF SEATTLE'S ANSWER TO BRIEFS OF *AMICI CURIAE* INSTITUTE FOR JUSTICE, et al.; PUBLIC JUSTICE, et al.; JUVENILE LAW CENTER, et al.; and PROFESSORS

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I. INTRODUCTION

Amici curiae[1] ("Amici") assert that requiring Steven G. Long to reimburse the City of Seattle for part of the costs of towing and impounding his illegally parked truck violated the Excessive Fines Clause. A Seattle Municipal Court magistrate, after considering Mr. Long's circumstances, waived his fine and eliminated his obligation to pay the towing company. Mr. Long was able to retrieve his truck without paying anything to anyone. Mr. Long did promise to pay the City $547.12, via interest-free monthly installments of $50 each (the "Payment Plan"), and it is this arrangement that Amici challenge as a violation of the Eighth Amendment.

Amici's arguments presume facts that are not those of this case. Mr. Long was not charged with a crime; he was not saddled with interest-bearing debt, restitution payments, or legal financial obligations (LFOs)[2];

[1] This brief answers the amicus briefs of (1) Institute for Justice, Fines and Fees Justice Center, Southern Poverty Law Center, Oregon Law Center, Equal Justice Under Law, Policy Advocacy Clinic, and Macarthur Justice Center; (2) Public Justice, the Institute for Constitutional Advocacy and Protection, the National Center for Law and Economic Justice, and the Rutherford Institute; (3) Juvenile Law Center, African American Juvenile Justice Project, Center For Children and Youth Justice, Children and Family Justice Center, Civitas Childlaw Center, Coalition for Juvenile Justice, Justice Policy Institute, Legal Counsel for Youth and Children, National Center for Youth Law, National Juvenile Defender Center, National Juvenile Justice Network, Public Counsel, Teamchild, UC Berkeley School of Law Policy Advocacy Clinic, W. Haywood Burns Institute, Youth Advocate Programs, Inc., and Youth Correctional Leaders for Justice; and (4) Professors Alexes Harris and Mary Pattillo. Although these briefs raise different arguments, they all seek to bolster Mr. Long's Eighth Amendment claim. Hence, the City is filing a single omnibus answer.

[2] *See WA State Superior Courts: 2018 Reference Guide on Legal Financial Obligations (LFOs)*, WASH. STATE S. CT. MINORITY & J. COMM'N (June 2018), https://www.courts.

and he was not penalized for being homeless or for using his truck as a residence.

Instead, after Mr. Long refused to move his truck for a week, the City's towing contractor did so for him. To retrieve his truck, Mr. Long would normally have had to pay the full costs of towing and impoundment, which amounted to $946.61. CP 884. Here, however, the magistrate listened to Mr. Long, waived the $44 fine for his infraction, and reduced the impoundment costs by 42 percent.[3] CP 884. The magistrate also permitted Mr. Long to pay the resulting amount over time, via a series of unsecured, interest-free monthly payments of $50, rather than in a lump sum. *See* CP 117–18. The magistrate then waived any down payment. CP 875–76. This enabled Mr. Long to retrieve his truck and drive it to Brier without paying anything to the City or the towing company.

This case does not involve punishing someone for his status or for committing an involuntary act. Rather, Mr. Long refused to move a vehicle that was parked illegally, despite knowing that it was illegally parked and that, unless he moved it, the City would likely impound it. The City took remedial action by moving his truck for him. Mr. Long was ordered to

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wa.gov/content/manuals/Superior%20Court%20LFOs.pdf

[3] $547.12 is less than 58% of $946.61. *See* CP 884.

reimburse the City and, even then, only for so much of its costs as the magistrate deemed appropriate for Mr. Long to pay given his circumstances.

As the City has explained in its briefing to the court of appeals and to this Court, Mr. Long's Eighth Amendment claim fails under *Bajakajian v. United States*, 524 U.S. 321, 118 S. Ct. 2028, 141 L. Ed. 2d 314 (1998). Amici's arguments do not alter that conclusion. Amici instead rely on cases involving criminal punishment, other constitutional provisions, and facts different from those here. Although Amici raise valid concerns about the cycle of homelessness and the plight of those experiencing it, the Excessive Fines Clause is not the right tool to address those challenging societal issues. In any event, the clause protects citizens from fines that are excessive relative to their conduct. This case involves no such fine.

II. ARGUMENT

A. Amici wrongly assume that the Eighth Amendment applies.

Amici assume that the Payment Plan is subject to the strictures of the Excessive Fines Clause. In this respect they follow the lead of the court of appeals, which assumed, without deciding, that the Payment Plan was a penalty subject to the Excessive Fines Clause before it rejected Mr. Long's Eighth Amendment claim on proportionality grounds.

As the City argued in its supplemental brief, this Court need not reach the issue of proportionality because Mr. Long was never fined. "Fines" are payments meant, at least in part, as "punishment for some offense." *Bajakajian*, 524 U.S. at 328 (internal quotation marks and citation omitted). If a payment "serve[s] the remedial purpose of compensating the Government for a loss," then the liability is not "punishment" and does not constitute a "fine." *See id.* at 329. And where, as here, a payment obligation does not fit within the historical tradition of punitive criminal forfeitures, that also suggests it is not a "fine." *See id.* at 330–32.

Towing Mr. Long's truck was not a punitive forfeiture but rather a temporary deprivation of property that did not amount to a fine. *See* City Supp. Br. at 11–12.[4] Mr. Long admits that no forfeiture occurred. Long Supp. Br. (10/21/2019) at 7 ("Impoundment nearly led to forfeiture in this case, but fortunately it did not."). While Mr. Long has maintained that temporary forfeiture should be treated similarly to permanent forfeiture, case law does not support his position.

Unlike a criminal fine or the kind of punitive *in personam* forfeiture at issue in *Bajakajian*, Mr. Long's only liability was to ***reimburse*** the City

[4] None of the Amici attempt to support Mr. Long's claim that the act of impounding his truck constituted an excessive fine. But even if impounding Mr. Long's truck could be considered a "fine," that would not make requiring him to reimburse the City for towing costs any less remedial.

for a portion of costs it ***actually incurred*** to tow his illegally parked truck. CP 884. The Payment Plan was purely remedial; it had no punitive purpose. *See Krueger v. City of Eastpointe*, 452 F. Supp. 3d 679, 696 (E.D. Mich. 2020), *appeal docketed,* No. 20-1385 (6th Cir. May 1, 2020) ("[R]equiring that an owner simply pay expenses incurred in towing and storing a vehicle does not implicate the Eighth Amendment.").

B. A court need not consider individual circumstances under the Excessive Fines Clause.

There is no authority for Amici's assertion that the Eighth Amendment imposes a categorical requirement to consider individual circumstances. The United States Supreme Court effectively rejected this assertion in *Harmelin v. Michigan*, 501 U.S. 957, 111 S. Ct. 2680, 115 L. Ed. 2d 836 (1991). Although the Constitution requires individualized consideration of whether a death sentence is appropriate, the Court held, "there is no comparable requirement outside the capital context, because of the qualitative difference between death and all other penalties." *Id.* at 995.

Amici try to escape this conclusion by citing a footnote in a portion of Justice Scalia's *Harmelin* opinion that only Chief Justice Rehnquist joined. *See id.* at 978 n.9. That footnote says that the Excessive Fines Clause is more protective than the Cruel and Unusual Punishment Clause in that the former requires a proportionality assessment and the latter may not.

Even if the proposition had commanded a majority, however, this would not mean that a proportionality analysis under the Excessive Fines Clause entails examining individual circumstances. Rather, the Excessive Fines Clause requires that the fine imposed not be grossly disproportional to the gravity of the defendant's offense. That is what *Bajakajian* holds.

The Punishment Clause cases on which Amici rely are inapposite. The Supreme Court has never endorsed a wholesale importation of its Punishment Clause jurisprudence for use in the Excessive Fines context. *Cf. State v. Timbs*, 134 N.E.3d 12, 38–39 (Ind. 2019) (*Timbs II*) (explaining that the Punishment Clause and the Excessive Fines Clause impose two separate, analytically distinct constitutional protections).

C. The test Amici propose is impractical and fails to focus on the defendant's ability to earn a living.

Amici urge this Court to adopt the framework of the Indiana Supreme Court in *Timbs II*, where the court said it is proper to consider the effect the penalty will have on the defendant. 134 N.E.3d at 36. The Court should decline Amici's invitation, for several reasons.

First, the *Timbs II* standard is unwieldy and impractical. As Amici acknowledge, it is a four-factor test with approximately ten sub-factors. *See* Inst. J. Br. at 11–13. Justice Slaughter observed that this test will create "a hodgepodge of factors that yields varied, unpredictable outcomes from case

to case." *Timbs II*, 134 N.E.3d at 40 (Slaughter, J., dissenting). Justice Slaughter pointed out that if the *Timbs II* totality-of-circumstances test is the right one, "it should be the Supreme Court of the United States that says so authoritatively." *Id.* Barring that, this Court should follow the test that the U.S. Supreme Court has specified, which is *Bajakajian*. *See State v. Grocery Mfrs. Ass'n*, 195 Wn.2d 442, 476–77, 461 P.3d 334 (2020).

Second, to the extent that one's ability to pay is relevant to the Eighth Amendment analysis (though the Supreme Court has never so held), Amici misunderstand how that factor should operate. The Institute for Justice argues that "for a destitute individual living in his truck[,] . . . a $50-per-month payment can mean the difference between having . . . food . . . or . . . needed medication. For someone with nothing, a $557 [sic—$547.12] penalty might as well be a $557,000 penalty." Inst. J. Br. at 16. Amici's approach assumes that Mr. Long has no earning potential and, therefore, no ability to pay a fine of any amount. That is wrong. The indigent are not categorically exempt from all fines. The historical antecedents of the Excessive Fines Clause were not concerned with a person's net worth or liquidity at one point in time, but rather with the risk that a fine might "deprive a wrongdoer of his livelihood." *See Bajakajian*, 524 U.S. at 335.

The Second Circuit explained this distinction when it rejected consideration of an offender's present ability to pay:

> We also emphasize that asking whether a forfeiture would destroy a defendant's ***future*** livelihood is different from considering as a discrete factor a defendant's ***present*** personal circumstances, including age, health, and financial situation. While hostility to livelihood-destroying fines is deeply rooted in our constitutional tradition, consideration of personal circumstances is not.
>
> [W]e hold that courts may not consider as a discrete factor a defendant's personal circumstances, such as age, health, or present financial condition, when considering whether a criminal forfeiture would violate the Excessive Fines Clause. In so holding, we are in accord with every sister circuit that has addressed the question directly.

United States v. Viloski, 814 F.3d 104, 112 (2d Cir. 2016) (emphasis in original). A court cannot focus on an offender's ability to pay at present because the offender may very well come into money in the future that the government has a right to seize to satisfy an order. *See United States v. Levesque*, 546 F.3d 78, 85 (1st Cir. 2008); *United States v. Smith*, 656 F.3d 821, 828–29 (8th Cir. 2011).

This distinction is subtle but important: A fine might deplete a wrongdoer's account but, if it preserves the defendant's ability to earn a living, that fine will satisfy any protection the Eighth Amendment gives to protecting livelihoods. In short, even if it is necessary for a court to consider ability to pay, its focus should not be a narrow snapshot of current net worth or current income but rather the fine's impact on continued earning

capacity. And nothing in the record suggests that Mr. Long cannot pay $50 per month. Mr. Long has a truck and tools that he uses to work as a general laborer, and he earns enough to pay the amounts that the magistrate specified.[5]

D. The municipal court considered Mr. Long's circumstances in establishing his Payment Plan.

It is ironic that Mr. Long (with Amici's support) urges individualized consideration of financial circumstances. He received exactly that kind of consideration through the magistrate's conscientious application of the Seattle Municipal Code.

Amici argue that the court of appeals' analysis "foreclose[s] judges from considering culpability and personal circumstances." Juv. Law Ctr. Br. at 5. Not so. The *Bajakajian* framework requires courts to evaluate an individual's culpability. In doing so, courts may consider the defendant's personal situation, including the reasons for his conduct.[6] Thus, *Bajakajian*

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[5] When Mr. Long claimed indigent status before the municipal court, he noted that his monthly income was $700 and that his monthly expenses were as follows: (1) $125/month storage fees; (2) $25/month for telephone; and (3) $300/month for food. CP 152. Based upon his application for indigent status, Mr. Long would have $250 left over each month, which would allow him to pay $50 per month under the Payment Plan. A monthly payment equal to 20% of Mr. Long's surplus income cannot be said to be constitutionally excessive, much less to have been required without regard for Mr. Long's personal situation.

[6] *See, e.g.*, *Bajakajian*, 524 U.S. at 337–38 ("The money was the proceeds of legal activity and was to be used to repay a lawful debt. Whatever his other vices, respondent does not fit into the class of persons for whom the statute was . . . designed," such as money launderers, drug traffickers, or tax evaders); *United States v. Yu Tian Li*, 615 F.3d 752 (7th Cir. 2010) (considering the value of the defendant's home in analyzing the proportionality of forfeiture of the home compared to defendant's crime of harboring an alien for financial

permits a court to consider that Mr. Long did not maliciously interfere with traffic or monopolize parking and that he was living in his truck. But the *Bajakajian* test also permits consideration of Mr. Long's willful refusal to move his truck despite repeated notices.[7]

The individualized consideration that Mr. Long received from the lower courts in this case is manifest in what he was actually required to pay. Amici argue that the $547.12 assessed against Mr. Long "equals a month's earnings" for him. Pub. J. Br. at 16. But Mr. Long never had to pay a month's earnings. Instead, the magistrate required him to pay $50 per month to repay the City for 58 percent of the towing and impoundment costs that the City had to pay in full.[8] Moreover, the Payment Plan did not require any down payment, accrue any interest, or require Mr. Long to pledge any property to secure his promise of payment. CP 117. Whatever level of individualized assessment the Excessive Fines Clause may permit or require, Mr. Long has already received it.

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gain); *United States v. Ferro*, 681 F.3d 1105, 1115 (9th Cir. 2012) ("[N]othing in *Bajakajian* directs a court to ignore the culpability of the owner and focus solely on whether the fine is excessive given the conduct that subjected the property to forfeiture").

[7] The court of appeals' opinion states that "Long did not move his truck because he did not believe it was running well enough to drive." *City of Seattle v. Long*, 13 Wn. App. 2d 709, 718, 467 P.3d 979 (2020). But it is undisputed that the truck ran well enough to drive, since Long drove it off the impound lot even though no repairs were performed there.

[8] Amici argue that a $547.12 payment would equal a whole month's earnings for Mr. Long, Pub. J. Br. at 16, but they simultaneously argue that "payment plans only exacerbate the disproportionality of monetary sanctions." *Id.* at 17–18. Amici cannot have it both ways.

E. The Payment Plan is not a "fine for homelessness." In any case, the Excessive Fines Clause does not categorically bar fines for offenses related to homelessness.

Amici argue that the Excessive Fines Clause categorically bars fines for offenses caused by homelessness. This is paradoxical, to say the least. How can the same constitutional text both require assessment of personal circumstances and single out an entire class of persons against whom any fines are "categorically excessive, even without . . . a detailed analysis of the defendant's individualized circumstances"? Pub. J. Br. at 9. In fact, neither proposition is correct.

Amici's categorical exemption claim is unsupported by precedent and judicially unmanageable. For example, when is an offense "caused by" a person's homelessness? Who decides this, and how? Must a jury do so, or may a judge do it when setting the penalty? Or might that conflict with Supreme Court precedent regarding the right to a jury trial?[9] Would this rule categorically exempt people experiencing homelessness from certain statutes and ordinances, even before there is any disposition that results in a "fine"? What about harm caused to property or to other persons?

[9]*See, e.g.*, *United States v. Booker*, 543 U.S. 220, 125 S. Ct. 738, 160 L. Ed. 2d 621 (2005); *Apprendi v. New Jersey*, 530 U.S. 466, 120 S. Ct. 2348, 147 L. Ed. 2d 435 (2000).

Regardless of how one might answer these questions, it is clear that Mr. Long's "offense"[10] resulted not from his homelessness but from his failure to move his truck the requisite one block after being specifically notified of his obligation, warned about the consequences of failing to meet it, and given seven days to comply. Mr. Long's willful refusal to follow the law is underscored by his removal of the sticker placed on his truck in hopes that the City would simply forget that it was parked illegally. CP 766–67.

Amici cite *Martin v. City of Boise*, 920 F.3d 584 (9th Cir. 2019). There the Ninth Circuit held that "[a]s long as the homeless plaintiffs do not have a single place where they can lawfully be," *id.* at 617, ordinances that criminalize camping and sleeping on public property violate a component of the Punishment Clause that "prohibits the state from punishing an involuntary act or condition if it is the unavoidable consequence of one's status or being," *id.* at 616. Even if it were valid to import doctrines from Punishment Clause cases into the Excessive Fines context, and even if the 72-hour rule were part of the City's criminal code, Mr. Long plainly fails this standard: He lawfully could have been elsewhere (indeed, he could have

[10] Mr. Long's failure to move his illegally parked truck was not an "offense" but rather a civil infraction. The 72-hour rule is contained in SMC 11.72.440, codified in the City's traffic code. *See* Title 11, Subtit. 1, SMC. It is not part of the City's criminal code, which is codified at Title 12A SMC.

moved anywhere that was at least a block away), and he ***voluntarily*** did not move his truck.[11]

Amici's argument underscores that the Eighth Amendment simply is not a satisfactory tool for addressing all the challenges facing people experiencing homelessness or the oppressive weight of structural racism. Nor does the severe, chronic nature of those problems mean that the Eighth Amendment must form part of their solution. It is true that homelessness is almost always involuntary, that systemic bias causes the criminal justice system to perpetuate racial oppression, and that youth are particularly vulnerable. But it is equally true that addressing these issues requires making policy judgments about the causes of inequality, how structural bias harms marginalized peoples, and what the parties to the social contract must do about it. The Eighth Amendment is not suited for these challenges. It was never supposed to be. As the U.S. Supreme Court stated in *Gore v. United States*:

> In effect, we are asked to enter the domain of penology, and more particularly . . . the proper apportionment of

[11] *Martin* also cautions that its holding is "a narrow one." 920 F.3d at 617. It "does not cover individuals who ***do*** have access to adequate temporary shelter" (emphasis in original), such as Mr. Long's truck. *Id.* at 617 n.8. "Even where shelter is unavailable," an ordinance prohibiting specified activities "at particular times or in particular locations might well be constitutionally permissible." *Id.* This is certainly true of the City's 72-hour rule, which applies only to vehicles in certain places (on the same block as their current position) during particular times (more than 72 hours). Amici seek a ruling that would allow someone to claim effective ownership of the slice of public property where they chose to park.

> punishment. Whatever views may be entertained regarding severity of punishment, whether one believes in its efficacy or its futility, these are peculiarly questions of legislative policy.

357 U.S. 386, 393, 78 S. Ct. 1280, 2 L. Ed. 2d 1405 (1958) (citation omitted).[12]

F. The court of appeals granted appropriate deference to legislative judgments.

Amici mischaracterize the court of appeals' ruling when they argue that the court has shielded any legislatively approved penalty from constitutional scrutiny. To say that legislatively set penalties are entitled to a presumption of constitutionality is hardly radical: it is the basis for the "grossly disproportional" standard. *See Bajakajian*, 524 U.S. at 336–37. Nothing in the court of appeals' ruling can be read to mean that a legislatively approved penalty is free from judicial scrutiny.

The towing and impoundment costs for which Mr. Long was held liable are a fraction of the expenses the City actually incurred, and the Payment Plan is directly proportional to the offense that Mr. Long committed. *Bajakajian*'s concern that penalties would be "indefinite and unlimited . . . if the government could seize whatever . . . the unwitting exporter happened to be carrying when caught," simply is not implicated.

[12] For a discussion of some of the practical problems that accepting Amici's position would cause, *see* Amicus Brief of International Municipal Lawyers Association at 15–16.

Grid Radio v. FCC, 278 F.3d 1314, 1322 (D.C. Cir. 2002) (internal quotation marks omitted). To be sure, legislative authorization alone is not determinative. But in the absence of other factors establishing gross disproportionality, a party may well fail to rebut the default presumption of constitutionality.

Amici are also wrong in arguing that the court of appeals' decision could leave people at the caprice of a for-profit towing company that could "impoverish individuals with minimal . . . oversight." Inst. J. Br. at 6. Mr. Long's liability was capped at what the towing company actually charged the City. And Amici's argument is implausible, too. It would be a poor moneymaking scheme for a tow operator to overbill a large governmental customer in hopes of impoverishing people who fail to move their vehicles for three or more days. That would alienate the tow operator's customer, attract regulatory scrutiny, and be unlikely to generate any windfall.

III. CONCLUSION

The City respectfully asks this Court to affirm the court of appeals' ruling rejecting Mr. Long's Eighth Amendment claims.

DATED this 26th day of February 2021.

Respectfully submitted,

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