No. 122202

IN THE
SUPREME COURT OF ILLINOIS

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| PEOPLE OF THE STATE OF ILLINOIS<br><br>Plaintiff-Appellant,<br><br>v.<br><br>JOHN W. PLANK,<br><br>Defendant-Appellee. | )<br>)<br>)<br>)<br>)<br>)<br>)<br>)<br>) | On Appeal from the Circuit Court of the Sixth Judicial Circuit, Douglas County, Illinois<br><br>No. 16-CF-101<br><br>The Honorable Richard L. Broch, Chief Judge Presiding |

**BRIEF OF DEFENDANT-APPELLEE**
**JOHN W. PLANK**

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ORAL ARGUMENT REQUESTED

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## POINTS AND AUTHORITIES

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## NATURE OF THE ACTION

This is a direct appeal from a trial court ruling finding an Illinois Statute to be unconstitutional. Douglas County Circuit Judge Richard Broch found that, as a basis for a criminal statute, 625 ILCS 5/1-140.15 was facially void for vagueness.

## ISSUES PRESENTED FOR REVIEW

The Vehicle Code defines a "low-speed gas bicycle" as "[a] 2 of 3-wheeled device with fully operable pedals and a gasoline motor of less than one horsepower, whose maximum speed on a paved level surface, when powered solely by such a motor while ridden by an operator who weighs 170 pounds, is less than 20 miles per hour." 625 ILCS 5/1-140.15.

The issues presented for review are:

1. Whether the statutory definition of "low-speed gas bicycle" is void-for-vagueness insofar as it fails to provide individuals of ordinary intelligence reasonable opportunity to understand what conduct is prohibited or fails to provide reasonable standards to law enforcement to prevent against arbitrary or discriminatory enforcement.

2. Whether, in the face of *Johnson v. U.S.*, 135 S. Ct. 2551 (2015), a statute must be vague in all of its applications before it can be held facially unconstitutional for vagueness.

## JURISDICTION

This is a direct appeal from a trial court ruling finding a criminal Illinois Statute to be unconstitutional, and thus the Supreme Court has jurisdiction under Supreme Court Rule 603.

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## STATUTORY PROVISION INVOLVED

Section 1-140.15 of the Illinois Vehicle Code defines "Low-speed gas bicycle" as:

> A 2 or 3-wheeled device with fully operable pedals and a gasoline motor of less than one horsepower, whose maximum speed on a paved level surface, when powered solely by such a motor while ridden by an operator who weighs 170 pounds, is less than 20 miles per hour.

625 ILCS 5/1-140.15.

## STATEMENT OF FACTS

On August 5, 2016 at approximately 5:14 pm, Officer Jud Wienke obtained a radar speed reading of the Defendant-Appellee, John W. Plank, traveling on his motorized bicycle at a speed of 26 miles per hour. R7. Officer Wienke stopped John because he knew "with motorized bikes they are only allowed to go up to 19 miles per hour. Once they hit 20, they have to have a valid driver's license, insurance, and registration." R8. Once Officer Wienke stopped John, John admitted that his license was revoked. R9-10. The People charged John with a violation of 625 ILCS 5/6-303(a), driving a motor vehicle while his license was revoked. Brief of Pl-Appellant's at 3. Due to prior convictions, John's offense was elevated to a Class 4 Felony. Brief of Pl-Appellant's at 4.

The definition of a "motor vehicle" excludes "vehicles moved solely by human power, motorized wheelchairs, low-speed electric bicycles, and low-speed gas bicycles." 625 ILCS 5/1-146. A "low-speed gas bicycle" is defined as "[a] 2 or 3-wheeled device with fully operable pedals and a gasoline motor of less than one horsepower, whose maximum speed on a paved level surface, when powered solely by such a motor while ridden by an operator who weighs 170 pounds, is less than 20 miles per hour." 625 ILCS 5/1-140.15. John's bicycle was powered by a "weed-eater motor", R9, with no evidence

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on the record as to the horsepower of the motor. Officer Wienke testified that John's revoked driver's license listed his weight as 170 pounds, however, the circuit court found that the weight listed on John's driver's license was not sufficient to establish his weight. R26.

John moved to dismiss the charge of driving a motor vehicle under a revoked license, and argued that the definition of a "low-speed gas bicycle" was unconstitutionally vague. More specifically, John argued that the statutory exception of low-speed gas bicycle does not provide a way for a person of ordinary intelligence to determine whether a bicycle falls under this exception, or put differently, what conduct is prohibited, and that it encourages arbitrary and discriminatory enforcement by police. Brief of Pl-Appellant's at 5. The circuit court ruled in John's favor and found that the statutory definition of a "low-speed gas bicycle" was unconstitutionally vague for both reasons – it did not provide adequate notice *and* it encouraged arbitrary and discriminatory enforcement. R25.

The People filed a motion to reconsider, and the circuit court denied their motion. The circuit court later entered a written order finding Section 1-140.15 facially unconstitutional. Brief of Pl.-Appellant's at 9.

**ARGUMENT**

The definition of "low-speed gas bicycle" found in 625 ILCS 5/1-140.15 (hereinafter sometimes referred to as "the Statute") violates the constitutional values underpinning the Void-for-Vagueness Doctrine, thus justifying the circuit court's judgment that it is facially unconstitutional. The Government's efforts to resist such a conclusion must be rejected, especially considering that the Government has failed to

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address the Statute's encouragement of arbitrary enforcement in three separate occasions, including its latest brief to this Court.

## I. The Vagueness of the Statutory Definition of "Low-Speed Gas Bicycle" Violates Fundamental Constitutionally Protected Values

The lack of clarity inherent in the statutory definition of "low-speed gas bicycle" violates two of the fundamental values of the Rule of Law underpinning the Void-for-Vagueness Doctrine: the right to fair notice; and the prevention of arbitrary enforcement.

Under the Due Process Clauses of the United States and Illinois Constitutions, a statute may found to be impermissibly vague and thus unconstitutional for two *separate* and *independent* reasons: (1) it fails to provide individuals of ordinary intelligence reasonable opportunity to understand what conduct the law prohibits so that they may act accordingly; OR (2) it fails to provide reasonable standards to law enforcement to prevent against authorizing or even encouraging arbitrary or discriminatory enforcement. *City of Chicago v. Morales*, 527 U.S. 41, 119 S.Ct. 1849 (1999); *Martin v. Lloyd*, 700 F.3d 132, 135 (4th Cir. 2012); *Bartlow v. Costigan*, 2014 IL 115152, ¶ 40 (citing *City of Chicago v. Pooh Bah Enterprises, Inc.*, 224 Ill.2d 390, 441 (2006)). Because the statutory definition of "low-speed gas bicycle" violates *both* of these independent reasons, the Void-for-Vagueness Doctrine unavoidably renders the statutory definition unconstitutional.

### A. The Definition of "Low-Speed Gas Bicycle" Deprives Citizens of Fair Notice

A vagueness challenge arises from the notice requirement of the Due Process Clause. *Wilson v. County of Cook*, 2012 IL 112026, ¶ 21. As stated above, under the Due Process Clause of the United States and Illinois Constitutions, a statute is impermissibly vague and thus unconstitutional if it fails to provide individuals of ordinary intelligence reasonable opportunity to understand what conduct the law prohibits so that they may act

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accordingly. *Kolender v. Lawson*, 461 U.S. 352, 357-58 (1983). In other words, the law must be such that average individuals will be able to guide their conduct by it, which is why the prohibition against vagueness in criminal statutes is a well-recognized requirement. *Connally v. General Constr. Co*., 269 U.S. 385, 391 (1926). Further, the degree of vagueness tolerated by the United States Constitution depends on the nature of the enactment. *Village of Hoffman Estates v. The Flipside, Hoffman Estates, Inc.*, 455 U.S. 489, 498 (1982). The United States Constitution tolerates a "lesser degree of vagueness in enactments with criminal rather than civil penalties and specifically those without a scienter requirement because the consequences of imprecision are more severe." *Wilson*, 2012 IL 112026 at ¶ 23.

The inherent vagueness of the Statute deprives citizens of this basic and necessary guidance because it fails to establish a clear standard that citizens, such as John, can use to determine whether their motorized bicycles fall under the "low-speed gas bicycle" exception to the statutory definition of "motor vehicle", as set forth in 625 ILCS 5/1-146. Due Process ensures that each statute must give adequate notice of prohibited conduct so that ordinary people do not have to "guess at a law's meaning but, rather can know what conduct is forbidden and act accordingly." *The Flipside, Hoffman Estates, Inc.*, 455 U.S at 498.

The unconstitutionality of the Statute is highlighted by the fact that the sole reason John purchased the vehicle at issue in this case is because, as someone whose license was revoked, he knows he may not operate motor vehicles. John bought his motorized bicycle to comply with the law by operating a vehicle that fell under one of the prescribed exceptions to a "motor vehicle". *See* 625 ILCS 5/1-146 (definition of motor

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vehicle). As such, the vagueness of the Statute violates John's constitutional rights in two distinct ways: first, insofar as the statute fails to provide a clear and objective standard that is easily applicable to determine whether a motorized bicycle qualifies as a low-speed gas bicycle, the law does not enable individuals like John to form expectations about how they may act, and effectively removes their Fifth Amendment right to liberty; individuals are no longer capable of purchasing motorized low-speed gas bicycles for fear that these vehicles will be treated as motor vehicles. A clearer standard would cure this problem.

Second, the vagueness of the statute effectively allows for the punishment of individuals who, for all intended purposes, were in compliance with or were attempting to comply with the law. Individuals, like John, rely on the statutory definition of "low-speed gas bicycle" to obtain a mode of transportation that does not require a driver's license, only to have these expectations shattered.[1] This type of injustice resulting from the vagueness of the Statute is even greater than the frustration of expectations and removal of liberty described in the previous paragraph, because the Statute insults the dignity of individuals by encouraging them to guide their conduct by it – to obtain a low-speed motorized bicycle – only to frustrate such autonomy and punish individuals for

[1] John has not been the only individual to have his expectations shattered. There have been many other individuals who believed they were complying with the law, only to be arrested and charged with the exact same offense as John. It is apparent that other individuals, in addition to John, have been unable to determine what conduct is legally prohibited by the Statute. *See* http://herald-review.com/news/local/motorized-bicycles-sometimes-cross-moped-line-police-say/article_2504c8b0-2956-599a-b44c-4fc4fef2a6a6.html, detailing the story of Chas Burns who was also ticketed for driving while his license was revoked. Mr. Burns weighed 140 pounds, was pedaling in addition to using his motor, and stated that the police never bothered to test the power of his engine to determine if it was over one horsepower before he was convicted.

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purchasing and operating such vehicles. In other words, individuals are punished for following the law. Again, a clearer standard would cure this problem.

The Government contends the Statute provides sufficient notice by what they refer to as the "maximum-speed component" of the statute, however, this interpretation is erroneous for two reasons: it violates basic canons of statutory constructions, and more importantly, it highlights how the Statute encourages arbitrary enforcement.

Effectively, the Government would ask this Court to disregard the weight component of the statutory definition, and focus solely on the maximum-speed component. In other words, the Government asks this Court to read the Statute in the following way: "A 2 or 3-wheeled device with fully operable pedals and a gasoline motor of less than a one horsepower, whose maximum speed on a paved level surface… is less than 20 miles per hour." 625 ILCS 5/1-140.15 (omitting portions of the statute). Comparatively, this is how about forty other states have enacted their "low-speed gas bicycle" or similar exception, in that they do not appeal to the weight of any particular rider.[2] However, the Illinois Statute *does* concern the weight of the rider, particularly

[2] *See for comparison*: Ala. Code 1975 § 32-12-20; Alaska Stat. Ann. § 28.90.990 (West); Ariz. Rev. Stat. Ann. § 28-2516; Ark. Code Ann. § 27-20-101 (West); Cal. Veh. Code § 406 (West); Colo. Rev. Stat. Ann. § 42-1-102 (West); Conn. Gen. Stat. Ann. § 14-1 (West); Fla. Stat. Ann. § 316.003 (West); Ga. Code Ann. § 40-1-1 (West); Haw. Rev. Stat. Ann. § 291C-1 (West); Idaho Code Ann. § 63-3622HH (West); Ind. Code Ann. § 9-13-2-25.8 (West); Ind. Code Ann. § 9-13-2-26.5 (West); Iowa Code Ann. § 321.1 (West); Kan. Stat. Ann. § 8-1439a (West); Ky. Rev. Stat. Ann. § 186.010 (West); La. Stat. Ann. § 32:1; Me. Rev. Stat. tit. 29-A, § 101; Md. Code Ann., Transp. § 11-134.1 (West); Md. Code Ann., Transp. § 11-117.1 (West); Md. Code Ann., Transp. § 11-104 (West); Mass. Gen. Laws Ann. ch. 90, § 1 (West); Mich. Comp. Laws Ann. § 257.31 (West); Mich. Comp. Laws Ann. § 257.32b (West); Minn. Stat. Ann. § 169.011 (West); Miss. Code. Ann. § 63-3-103 (West); Mo. Ann. Stat. § 307.180 (West); Neb. Rev. Stat. Ann. § 60-611 (West); Neb. Rev. Stat. Ann. § 60-640 (West); N.H. Rev. Stat. Ann. § 259:65; N.H. Rev. Stat. Ann. § 259:77-a; N.J. Stat. Ann. § 39:1-1 (West); N.M. Stat. Ann. § 66-1-4.11 (West); N.C. Gen. Stat. Ann. § 20-4.01; N.D. Cent. Code Ann. § 39-01-01 (West); Ohio

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taking into consideration basic canons of statutory construction, and therefore interpreting the Statute as the Government suggests is erroneous and subverts the intention of the Legislature. "[A] statute should be construed so that effect is given to all its provisions, so that no part will be inoperative or superfluous, void or insignificant…." *Corley v. United States*, 556 U.S. 303, 314 (2009).

For comparison, Illinois' statute concerning the definition of a moped defines it as "a motor-driven cycle, with or without optional power derived from manually operated pedals, whose speed attainable in one mile is at least 20 mph but not greater than 30 mph, and is equipped with a motor that produces 2 brake horsepower or less...."625 ILCS 5/1-148.2. In this definition, the Legislature opted not to mention the weight of the rider as relevant to the determination of whether a vehicle is a moped, but considers only the speed that can be attained in one mile and the power of the engine. The fact that the Legislature does mention a rider's weight in the definition of a low-speed gas bicycle indicates that the definition is required to be read as it is written, to include the weight of the rider.

The Government's interpretation of the Statute by emphasizing the "maximum speed component" encourages arbitrary enforcement as evidenced by Officer Wienke's own testimony. Officer Wienke testified, "I know with motorized bikes they are only allowed to go up to 19 miles per hour. Once they hit 20, they have to have a valid

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Rev. Code Ann. § 4511.01 (West); Okla. Stat. Ann. tit. 47, § 1-104 (West); Or. Rev. Stat. Ann. § 801.345 (West); 75 Pa. Stat. and Cons. Stat. Ann. § 102 (West); 31 R.I. Gen. Laws Ann. § 31-1-3 (West); S.D. Codified Laws § 32-3-1; Tenn. Code Ann. § 55-8-101 (West); Tex. Transp. Code Ann. § 541.201 (West); Utah Code Ann. § 41-6a-102 (West); Va. Code Ann. § 46.2-100 (West); Wash. Rev. Code Ann. § 46.04.304 (West); W. Va. Code Ann. § 17C-1-5a (West); Wyo. Stat. Ann. § 31-5-102 (West).

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driver's license, insurance, and registration." R8. This categorical misstatement of the law conflates 625 ILCS 1-140.15, the definition of a low-speed gas bicycle, with 625 ILCS 11-1516, which is the statute that dictates that no one may ride a low-speed gas bicycle greater than twenty miles per hour. If someone is riding a low-speed gas bicycle faster than twenty miles per hour, it does not mean that the low-speed gas bicycle is no longer a low-speed gas bicycle and instead is now a motor vehicle and thus requires a license, insurance, and registration – it merely means that someone may be speeding on their low-speed gas bicycle. Thus, instead of charging John with a speeding violation under 625 ILCS 11-1516, Officer Wienke arbitrarily determined that, because John was operating his low-speed gas bicycle over 19 miles per hour, his low-speed gas bicycle was a motor vehicle. Officer Wienke pulled John over based solely on his speed and without first attempting to determine John's weight, whether or not John had been pedaling his bicycle, whether or not the pedals on John's bicycle were operable, or the horsepower of his engine. In this instance, and potentially many others, the maximum-speed component of the Statute led to the arbitrary enforcement of the Statute because Officer Wienke never considered the capabilities of the motor, as prescribed by the Statute, to determine whether John's bicycle was in fact above the guidelines.

### B. The Inherent Vagueness of the Definition of "Low-Speed Gas Bicycle" Encourages Arbitrary Enforcement

The Void-for-Vagueness Doctrine also serves to prevent arbitrary and discriminatory enforcement of laws, something the Government appears to have forgotten insofar as they have failed to address this fact on three separate occasions, including their brief to this Court. Thus, even if this Court finds the Statute provides

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adequate notice, it should nonetheless find it to be unconstitutional because it blatantly encourages arbitrary and discriminatory enforcement.

The Statute encourages arbitrary and discriminatory enforcement because it requires law enforcement agents to ascertain from a superficial inspection of riders and their bicycles whether the motor's capabilities meet the statutory definition. That is, law enforcement agents must ascertain: (1) whether the motor is less than one horsepower; (2) whether its maximum speed on a paved level surface when ridden by an operator who weighs 170 pounds is less than 20 miles per hour; (3) whether the pedals are operable; and (3) whether that speed is being generated solely by the motor or increased by human power produced through pedaling. See *People v. Grandadam*, 2015 IL App (3d) 150111; *People v. Burns*, 2012 IL App (4th) 110593-U. The impossibility of readily making such determinations violates "the requirement that a legislature establish minimal guidelines to govern law enforcement." *Morales*, 527 U.S at 60 (citing *Kolender v. Lawson*, 461 U.S. 352, 358 (1983)). A statute must provide "sufficiently definite standards for law-enforcement officers and triers of fact that its applications does not depend merely on their private conceptions." *People v. Fabring*, 143 Ill. 2d 48, 53 (1991).

Simply relying on the speed of the bicycle and rider, as the Government asks this Court to do, fails to take into consideration the fact that the speed may be generated through pedaling. The 20mph speed limit limitation in the Statute refers only to the speed the bicycle can go without the aid of the pedals. A low-speed gas bicycle is still a low-speed gas bicycle if it is going faster than 20mph, as long as the rider is also pedaling to increase the speed of the bicycle past 20mph. As mentioned above, in the instant case, Officer Wienke pulled John over because he clocked John's speed at 26mph. Before he

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pulled John over, Wienke did not ascertain John's weight, the horsepower of his engine, whether his pedals were operable or whether John was in fact pedaling to support his speed. Relying solely on John speed, and his own incorrect interpretation of the Statute, Officer Wienke determined that John's low-speed gas bicycle was a motor vehicle, again, without actually applying the statutory factors. Had the Statute been clearer and less vague about what a low-speed gas bicycle is, Officer Wienke would not have arbitrarily pulled John over. More importantly, Officer Wienke is not the only law enforcement officer to have problems understanding the Statute, many others equally confused and misguided public agents have been led to arbitrarily enforce it.[3]

Furthermore, as stated in the above section, merely relying on the speed of the low-speed gas bicycle conflates 625 ILCS 1-140.15 and 625 ILCS 11-1516, by making the rider of a low-speed gas bicycle liable simply on the basis of his speed. If it is as the government contends and the "maximum speed component" is the controlling element, then why even mention the required weight of the rider? Why not simply draft the Statute as forty-three other legislatures have done, without mentioning the weight of the rider and basing the determination on merely the attainable speed or the power of the engine?

## II. The Statutory Definition of "Low-Speed Gas Bicycle" Need Not Be "Vague in All of Its Applications" to Be Unconstitutionally Vague

Contrary to the Government's argument, a statute need not be vague in all of its applications to be found unconstitutionally vague. The Government overstated the level

[3] *See* http://www.sj-r.com/x450310760/Difficult-to-determine-which-rules-apply-to-motorized-bikes, where Jacksonville Police Chief, Tony Grootens, states, "The Illinois Vehicle Code is very, very vague. There are rules for (motorized bicycles) that go under 20 mph and other rules for ones that go 30 mph. It's very confusing."

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of analysis needed when it claimed that a statute may be declared facially vague only if it is impermissibly vague in all of its applications. This absolutist position is not supported by the court's practice. *See, e.g., Morales*, 527 U.S. 41, 64 (1999) (finding a statute facially vague without determining that it is vague in every application); *United States v. Jones*, 689 F.3d 696, 703 (7th Cir. 2012) (noting that the Supreme Court "regularly decides due-process vagueness claims without regard to the facts of the case," and identifying six examples).

Moreover, the United States Supreme Court has ruled in direct opposition to the Government's position. The Supreme Court found that their previous holdings "squarely contradict the theory that a vague provision is constitutional merely because there is some conduct that clearly falls within the provision's grasp." *Johnson v. United States*, 135 S. Ct. 2551, 2561 (2015). The Fourth Circuit has also acknowledged this Supreme Court ruling in *Doe v. Cooper*, 842 F.3d 833 (4th Cir. 2016). *Johnson* ruled that a vague criminal statute is not constitutional just because there is some conduct that could be considered as not vague.

The government argued that, because the Statute would apply to a rider who weighed 170 pounds, it is not vague in all of its applications, and is thus constitutional. This is an over-simplification of the caselaw on this topic, and an argument that was refuted by *Johnson*.

## Conclusion

In summation, this Honorable Court should uphold the circuit court's judgment that the statutory definition of "Low-Speed Gas Bicycle" found in 625 ILCS 5/1-140.15

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is facially unconstitutional insofar as it violates the fundamental constitutional values guaranteed by the Void-for-Vagueness Doctrine.

**Dated:** December 1, 2017

Respectfully submitted,

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**Certificate of Compliance**

I certify that this brief conforms to the requirements of Rules 341 (a) and (b). The length of this brief, excluding the pages or words contained in the Rule 341(d) cover, the Rule 341(h)(1) statement of points and authorities, the Rule 341(c) certificate of compliance, the certificate of service, and those matters to be appended to the brief under Rule 342(a), is 3,710 words.

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**PROOF OF FILING AND SERVICE**

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct. On December 1, 2017, the **Brief of Defendant-Appellee John W. Plank** was (1) filed with the Clerk of the Supreme Court of Illinois, using the court's electronic filing system, and (2) served by transmitting a copy from my email address to the email addresses of the persons named below:

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Additionally, upon its acceptance by the court's electronic filing system, the undersigned will mail 13 copies of the **Brief of Defendant-Appellee John W. Plank** to the Clerk of the Supreme Court of Illinois, 200 East Capitol Avenue, Springfield, Illinois 62701.

/s/ J. Steven Beckett

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