WISCONSIN COURT OF APPEALS
DISTRICT: III

Appeal No.: 2015AP000140

Somerset Municipal Court,

Plaintiff-Respondent,

-v-

Mark J. Hoffman,

Defendant-Appellant.

BRIEF OF RESPONDENT

Appeal from Judgment of the St. Croix County Circuit Court, The Honorable Scott R. Needham, Presiding

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STATEMENT OF THE ISSUES

I. Whether a municipal ordinance prohibiting "loitering" is preempted by state law, specifically Wis. Stat. § 66.0409, when it is applied to someone who is carrying a firearm and by doing so causing alarm.

Circuit Court answer: No.

II. Whether a municipal ordinance prohibiting loitering is unconstitutional on its face or as applied to a person when it punishes a person for strolling in an aimless manner not usual for law abiding individuals under circumstances that warrant alarm for the safety of persons or property in the vicinity and the person refuses to identify himself to the police when given the opportunity to dispel the alarm.

Circuit Court answer: No.

III. Whether a circuit court errs when it denies a motion for summary judgment and for directed verdict on grounds that there is a genuine issue of material fact and/or errs when it states that an ordinance is not preempted because the ordinance does not prohibit carrying a firearm thus refusing to present an instruction to the jury on the issue as preemption is an issue of law.

Circuit Court answer: No.

STATEMENT ON ORAL ARGUMENT AND PUBLICATION

Respondent Village of Somerset does not believe oral argument is necessary in this case. The issues are straightforward and it is not likely that oral argument would assist the Court in deciding the case.

Respondent believes that the opinion in the case does not need to be published. The issue regarding constitutionality of the ordinance is not one of first impression as the Wisconsin Supreme Court already decided an identical loitering ordinance was constitutional.

STATEMENT OF THE CASE

On July 23, 2013 Hoffman was walking down the street with a rifle on his back in front of the Somerset Schools where the school crossing guards were assisting children. R 37:pages 95-96. Numerous individuals contacted the police department upon seeing Hoffman. R 37:pages 82, 89, 118. Numerous individuals, including crossing guards, also contacted the school upon seeing Hoffman. R 37:pages 96-97, 104. Numerous individuals observed Hoffman's actions to be unusual or uncommon and were concerned. R 37:pages 83, 89, 98, 104.

Sergeant Thomas Sirovatka responded to investigate. R 37:pages 115-119. Sergeant Sirovatka asked Hoffman his name. R 37:pages 119-121. Sergeant Sirovatka asked Hoffman what he was doing. *Id.* Hoffman refused to provide his name or purpose. *Id.*

Sergeant Thomas Sirovatka testified at the Municipal Court trial that he charged Hoffman because he wandered or strolled in an aimless manner. R 16:page 9. According to Sergeant Sirovatka's testimony Hoffman acknowledged that residents in town would possibly be worried and that his behavior was not what society would view as normal. R 37:pages 122-123. The residents were in fact worried by Hoffman's actions as was testified to by two Village employees as well as a crossing guard and a paraprofessional from the Somerset Schools. R 37:pages 83, 89, 98, 104.

At trial the individuals who saw Hoffman strolling through Somerset with the weapons attached to his person, Chief Briggs, Officer Sirovatka, and Hoffman testified. Hoffman testified he walked around, heavily armed, with a tape recorder. R 37:page 155. Hoffman testified he took a tape recorder because he knew there was a possibility he would be confronted by police. R 37:page 156. Hoffman testified that he knew his actions would be concerning to citizens. R 37:page 157. When Hoffman was confronted by police, he refused to provide his name or purpose by his own account to protect his own privacy. R 37:page 157.

Hoffman was charged with and found guilty at both the municipal trial and at the Circuit Court jury trial of violating Somerset Ordinances § 11-2-6(c)(1) which states:

> No person shall loiter or prowl in a place, at a time or in a manner not usual for law abiding individuals under circumstances that warrant alarm for the safety of persons or property in the vicinity. Among the circumstances which may be considered in determining whether such alarm is warranted is the fact that the person takes flight upon appearance of a law enforcement officer, refuses to identify himself/herself or manifestly endeavors to conceal himself/herself or any object. Unless flight by the person or other circumstances makes it impracticable, a law enforcement officer shall, prior to any arrest for an offense under this Section, afford the person an opportunity to dispel any alarm which would otherwise be warranted, by requesting him/her to identify himself/herself and explain his/her presence and conduct. No person shall be convicted of an offense under this Subsection if the law enforcement officer did not comply with the preceding sentence, or if it appears at trial that the explanation given by the person was true and, if believed by the law enforcement officer at the time, would have dispelled the alarm.

Loitering is defined as "To sit, stand, loaf, lounge, wander or stroll in an aimless manner or to stop, pause or remain in an area for no obvious reason." Somerset Ordinances § 11-2-6(e)(1).

The procedural history of the case as reported by Hoffman in his brief is accurate and needs no further recitation.

ARGUMENT

I. STATE LAW DOES NOT PREEMPT THE LOITERING ORDINANCE BECAUSE THE ORDINANCE DOES NOT REGULATE FIREARMS IN ANY WAY AND HOFFMAN WAS NOT ARRESTED FOR CARRYING A FIREARM.

The loitering ordinance does not regulate anything to do with firearms. The entire argument about preemption is completely irrelevant because the loitering ordinance says nothing about firearms therefore the ordinance does not regulate firearms in violation of state law, specifically Wis. Stat. § 66.0409(2), which Hoffman relies on in large part for his argument.

The loitering ordinance does not mention firearms, disorderly conduct or blanket inappropriate behavior, thus Hoffman's preemption argument is also irrelevant in regards to statutory prohibitions on disorderly conduct charges for carrying a firearm. Hoffman argues that the state statute on Disorderly Conduct is "quite similar" to the loitering ordinance. However, as Hoffman concedes, he was not charged with Disorderly Conduct. Hoffman cites Wis. Stat. § 66.0409(6) which reads:

> Unless other facts and circumstances that indicate a criminal or malicious intent on the part of the person apply, no person may be in violation of, or be charged with a violation of, an ordinance of a political subdivision relating to disorderly conduct or other inappropriate behavior for loading, carrying, or going armed with a firearm, without regard to whether the firearm is loaded or is concealed or openly carried. Any ordinance in violation of this subsection does not apply and may not be enforced.

Wis. Stat. § 66.0409(6) (2011-12).

Hoffman states that the above statute prohibits the Village from enforcing an ordinance that has the effect of punishing a person for "inappropriate behavior" relating to carrying or going armed with a firearm. Hoffman was not arrested for carrying a firearm. He was arrested for wandering aimlessly in an unusual manner warranting alarm. The firearm was merely the stimulus for the unusualness and alarm. The stimulus could just as easily have been a big dog, knife or sword.

The loitering ordinance does not violate public policy but rather protects the public.[1] The loitering ordinance does not mention or contemplate one's right to bear firearms in violation of public policy. The loitering ordinance prohibits "wandering aimlessly in an unusual manner warranting alarm." The only relationship to firearms in this case, is that the firearm caused the alarm—the alarm could similarly have been caused by someone walking a big dog, or carrying a knife or a sword.

Finally, Hoffman argues that there is no evidence of malicious intent which according to him would properly allow him to be charged with a law violation for carrying a firearm. While none of the Village's witnesses testified that Hoffman appeared to have a malicious intent, Hoffman's own testimony showed he had malicious intent. Synonyms for malicious include, spiteful, vindictive and vengeful. By his own testimony Hoffman walked around, heavily armed, with a tape recorder. R 37:page 155. He took a tape recorder with him because he knew

[1] See infra section II.B.

there was a possibility he would be confronted by police. R 37:page 156. He also knew his actions would be concerning to citizens. R 37:page 157. His actions were aimed at bothering the public and thus provoking contact with the police—such actions are certainly spiteful, vindictive, vengeful and synonymously, malicious. Thus, Hoffman's actions by his own reasoning can be prohibited due to his own demonstrated malicious intent, regardless of any preemption arguments.

II. THE ORDINANCE IS CONSTITUTIONAL ON ITS FACE AS THE WISCONSIN SUPREME COURT ALREADY DECIDED AND THE ORDINANCE IS CONSTITUTIONAL AS APPLIED TO HOFFMAN.

A. The ordinance is constitutional as the Wisconsin Supreme Court already decided.

First, the issue of constitutionality of the loitering ordinance at issue has already been settled. The Supreme Court of Wisconsin rejected the argument of unconstitutionality and the exact ordinance Hoffman was convicted under in this case was upheld as constitutional by the Wisconsin Supreme Court in *City of Milwaukee v. Nelson, 149 Wis. 2d 434, 439 N.W.2d 562 (Wis. 1989).*[2]

[2] Milwaukee City Ordinance 106-31. Loitering or Prowling. (1) Whoever does any of the following within the limits of the city of Milwaukee may be fined not more than five hundred dollars ($500) or upon default of payment thereof, shall be imprisoned in the house of correction of Milwaukee county for not more than 90 days.

As the Wisconsin Supreme Court stated in *Nelson*,

> It is elementary that an ordinance is presumed to be constitutional and that the attacking party must establish its validity beyond a reasonable doubt. *J & N Corp. v. Green Bay, 28 Wis. 2d 583, 585, 137 N.W.2d 434 (1965).* [Courts] will not interfere with a municipality's exercise of police power unless it is clearly illegal. *Id.* Every presumption must be indulged to sustain an ordinance's constitutionally if at all possible. Where doubts exist as to the constitutionality, it must be resolved by finding the legislative enactment constitutional. *See Racine Steel Castings v. Hardy,* 144 Wis. 2d 553, 559 426 N.W.2d 33 (1988).

Nelson, 149 Wis. 2d at 446.

In *Nelson*, officers arrested Nelson for loitering after he was seen shaking hands of motorists and pedestrians on a street corner. *Nelson*, 149 Wis. 2d at 440. Police officers did not see any drugs or items exchanged during these handshakes. *Id.* Only the officers viewed this activity (no complaints were reported from any citizens or witnesses). *Id.* Officers arrested Nelson inside a bar which Nelson retreated into after he saw officers approaching. *Id.* Nelson pled guilty to violating the municipal ordinance for loitering. *Id.* at 441. The Circuit Court found the ordinance unconstitutional, in violation of the Fourth Amendment, and that the officer's lacked probable cause when arresting Nelson. *Id.* at 442. The Court of Appeals reversed on all issues. *Id.* at 443. The Wisconsin Supreme Court accepted

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(a) LOITERING. Loiters or prowls in a place, at a time, or in a manner not usual for law-abiding individuals under circumstances that warrant alarm for the safety of persons or property in the vicinity. Among the circumstances which may be considered in determining whether such alarm is warranted is the fact that the actor takes flight upon appearance of a peace officer, refuses to identify himself, or manifestly endeavors to conceal himself or any object. Unless flight by the actor or other circumstances makes it impracticable, a peace officer shall prior to any arrest for an offense under this section, afford the actor an opportunity to dispel any alarm which would otherwise be warranted, by requesting him to identify himself and explain his presence and conduct. No person shall be convicted of an offense under this section if the peace officer did not comply with the preceding sentence, or if it appears at trial that the explanation given by the actor was true and, if believed by the peace officer at the time, would have dispelled the alarm.

Nelson's petition to review the Court of Appeals decision. *Id.* The Wisconsin Supreme Court upheld the ordinance and arrest of Nelson. *Id.* at 463.

B. The ordinance is constitutional as applied to Hoffman because the ordinance does not punish someone for nor was Hoffman found guilty of "going for a walk."

The ordinance does not criminalize going for a walk. There is more to the ordinance than simply wandering aimlessly. The first sentence clearly states that "No person shall loiter or prowl in a place, at a time or *in a manner not usual for law abiding individuals under circumstances that warrant alarm for the safety of persons or property in the vicinity.*" Somerset Ordinances § 11-2-6(c)(1) [emphasis added]. Further, in *Nelson*, the officers investigated even more mundane activity than going for a walk; Nelson was merely shaking hands with and greeting passerby motorists and pedestrians. If the Wisconsin Supreme Court found using the loitering ordinance to investigate and prohibit Nelson's conduct appropriate, Hoffman's conduct here of walking close to a school in the manner he was, is certainly able to be prohibited.

Hoffman cites several cases (*U.S. v. Harriss,* 347 U.S. 612, 74 S. Ct. 808, 98 L.Ed. 989 (1954), *Thornhill v. Alabama,* 310 U.S. 88, 60 S. Ct. 736, 84 L.Ed. 1093 (1940) *and Herndon v. Lowry,* 301 U.S. 242, 57 S. Ct. 732, 81 L.Ed. 1066 (1937)) to argue that the loitering ordinance is unconstitutional because it fails to give a person fair notice that his contemplated conduct is forbidden and because

they encourage arbitrary and erratic arrests and convictions. However, the loitering ordinance in this case does not violate the constitutional requirement of definiteness because of the presence of the other elements of the ordinance— (1) loitering or prowling at a place and time (2) not usual for law abiding individuals, (3) under circumstances that warrant alarm for the safety of persons or property in the vicinity. R 37:page 174. The ordinance also gives individuals further notice that they can dispel the alarm by (4) identifying himself and explaining his presence and conduct. R 37:page 174

The Somerset Ordinance protects public safety (and is not contrary to public policy as Hoffman argues). All loitering ordinances are tailored at protecting the public. Hoffman cites *Papachristou v. City of Jacksonville* where the Supreme Court struck down the Florida loitering ordinance. *Papachristou v. City of Jacksonville,* 405 U.S. 156, 92 S. Ct. 839, 31 L.Ed.2d 110 (1972). However, AFTER *Papachristou,* the American Law Institute (A.L.I.) has revised the Model Penal Code to overcome the defects and infirmities of earlier laws addressing loitering and vagrancy. Otherwise, "there would be no provision to deal with the person who is obviously up to no good but whose precise intention cannot be ascertained." *Nelson*, 149 Wis. 2d at 444-45, citing Model Penal Code § 250.6, Commentary at 396-97 (Official Draft 1962). The Somerset ordinance mirrors the revised Model Penal Code as did the ordinance in *Nelson* and thus does not contain the defects of the ordinance in *Papachristou.*

C. The ordinance is constitutional as applied to Hoffman because the ordinance is not a "detain and demand identification" ordinance.

Hoffman also contends that the Somerset Loitering Ordinance is unconstitutional because it is a "detain and demand identification" ordinance. Hoffman cites *Brown v. Texas* where a man was arrested for refusing to identify himself. *Brown v. Texas,* 443 U.S. 47 (1979). The United States Supreme Court overturned his conviction because there were no objective criteria on which to base the officer's stop and demand of identification from the defendant. *Id. at* 52.

The distinction between a blanket "detain and demand identification" ordinance (as was the case in *Brown*) and the Somerset Loitering Ordinance is that with the Somerset ordinance officers "afford the person an opportunity to dispel any alarm which would otherwise be warranted, by requesting him/her to identify himself/herself and explain his/her presence and conduct." Somerset Ordinances § 11-2-6(c)(1). The statute in *Brown* simply made it a crime to not identify yourself to officers ("§ 38.02 Failure to Identify as Witness (a) A person commits an offense if he intentionally refuses to report or gives a false report of his name and residence address to a peace officer who has lawfully stopped him and requested the information."). *Brown,* 443 U.S. at 49.

The Somerset Loitering Ordinance does not simply make it a crime to not identify oneself. The ordinance prohibits wandering in a manner not usual for law

abiding citizens under circumstances that warrant alarm AND when being given the opportunity to dispel the alarm then refusing to identify themselves or their purpose or conduct. The loitering ordinance affords the individual the opportunity to identify and explain his presence and provides that the individual may not be convicted of the offense if the officer does not afford him that opportunity. That portion of the statute is present for the benefit of the individual. And again as was the case with the court's consideration of the loitering ordinance in Florida in *Papachristou v. City of Jacksonville*, *Brown v. Texas* was decided before the Model Penal Code revisions which repaired constitutional infirmities of prior loitering ordinances.

Hoffman also cites *Kolender v. Lawson,* 461 U.S. 352, 103 S. Ct. 1855, 75 L.Ed.2d 903 (1983) in his argument for the unconstitutionality of the Somerset Loitering Ordinance due to the "demand for identification." However, in *Nelson* the Wisconsin Supreme Court specifically distinguished the ordinance in *Kolender* from the Milwaukee ordinance (identical to Somerset's ordinance)[3]. Thus, Hoffman's argument has already been considered by the highest court of this state and has been rejected.

Hoffman also relies on *Henes v. Morrisey,* 194 Wis. 2d 338, 533 N.W.2d 802 (1995) to attempt to make the point that Wisconsin law does not support arresting a person who refuses to identify himself to law enforcement. Regardless, the fact still remains that the Somerset Loitering Ordinance does not require the

[3] *See* supra Note 2.

officers to arrest someone for not identifying themselves; all of the elements of the offense must be met for one to be in violation of the ordinance. The cases Hoffman cites all deal with statutes and ordinances that mandate arrest for ONLY refusing to identify oneself.

The Somerset Loitering Ordinance is constitutional as already decided by the Wisconsin Supreme Court in *Nelson*. The ordinance does not punish someone merely for going for a walk. The ordinance protects public safety and does not violate Wisconsin public policy. The ordinance is not a "detain and demand identification" ordinance. The ordinance has specific and objective considerations for officers to use and make before asking for identification.

III. THE CIRCUIT COURT PROPERLY DENIED HOFFMAN'S MOTION FOR SUMMARY JUDGMENT, MOTION FOR DIRECTED VERDICT, AND MOTION FOR THE JURY TO BE INSTRUCTED ON PREEMPTION.

Summary Judgment is proper when there are no genuine issues of material fact and one party is entitled to Judgment as a matter of law. Wis. Stat. § 802.08(2) (2011-12). Summary Judgment is proper when the pleadings, answers, admissions and affidavits show no genuine issues of material fact and the moving party is entitled to judgment as a matter of law. *See Maynard v. Port Publ'ns, Inc.* 98 Wis. 2d 555, 558, 297 N.W.2d 500 (1980). The mere existence of *some* alleged factual dispute between the parties will not defeat an otherwise properly supported motion

for summary judgment; the requirement is that there be no *genuine* issue of *material* fact." *Baxter v. DNR,* 165 Wis. 2d 298, 312, 477 N.W.2d 648 (Ct. App. 1991). An issue is genuine "if the evidence is such that a reasonable jury could return a verdict for the nonmoving party." *Id.* A fact is material if it is "of consequence to the merits of the litigation." *Michael R.B. v. State,* 175 Wis. 2d 713, 724, 499 N.W.2d 641 (1993).

A. The Circuit Court properly denied Hoffman's Summary Judgment Motion because the Circuit Court found that there were issues of material fact for the jury to decide.

Even if all of the facts as Hoffman has alleged are true, he still is not entitled to Summary Judgment as a matter of law. Even if there were no disputed facts, the jury is the appropriate finder of fact here to determine whether Hoffman's actions satisfy the elements of the constitutional, un-preempted loitering ordinance.

Hoffman argues that he presented all of the facts in the light most favorable to the Village. In doing so, he is conceding that the Village's facts (as stated in Respondent's Statement of the Case) are accurate. The Village posited and the Circuit Court ruled that Hoffman's actions based on the totality of the circumstances were properly an issue for the jury. If there were truly no issues of fact, Hoffman is conceding he wandered in the Village of Somerset, causing alarm to individuals, he was afforded the opportunity to dispel the alarm and did not.

Thus, he concedes he is guilty of violating the ordinance. It is doubtful that is what Hoffman wanted to concede in his Motion for Summary Judgment, otherwise he would have been afforded no jury trial, would not have presented any evidence or cross examined the Village's witnesses.

There were clearly issues of fact for the jury to decide as was evidenced from the trial. The Circuit Court properly denied Hoffman's motion for Summary Judgment.

B. The Circuit Court properly denied Hoffman's Summary Judgment Motion because the Circuit Court did decide the issue of law—whether the ordinance was preempted by state law.

Hoffman takes issue with the Circuit Court not granting his Motion for Summary Judgment because he argues the issue of preemption is a matter of law for the judge rather than the jury to determine. Hoffman goes on to argue that the Circuit Court never made a substantive ruling on the legal issues Hoffman raised in his Summary Judgement decision in ruling on his Motion for Directed Verdict either.

To the contrary, while the Circuit Court never expressly stated in the Summary Judgment Decision (or in his ruling on the directed verdict) that the ordinance was not preempted, the Court's ruling found the ordinance to be constitutional and implicitly not preempted. The court simply did not buy Hoffman's argument that the ordinance was not constitutional. The Circuit Court

stated, "Hoffman's constitutional argument is just that, argument, and is premised on his subjective application of the facts to the ordinance. The Village's interpretation is just as reasonable..." R 21:page 3. The Circuit Court also did decide the issue of preemption when the Court specifically stated in the written ruling "The firearms, in proximity to the schools, certainly raised the alarm but were not the reason that Hoffman was charged with a violation of the ordinance...While the guns were what warranted the concern, Hoffman was not charged or arrested for carrying a firearm." R 21:page 3. Thus the court effectively rejected the legal issue of preemption.

C. <u>The Circuit Court properly denied Hoffman's request to have the jury instructed on preemption and Wis. Stat. § 66.0409 because those are issues of law which the Circuit Court decided.</u>

Finally, Hoffman argues that the trial court should have instructed the jury on when a person can under state law be convicted for violating a municipal ordinance that allegedly punishes carrying a firearm. This is a circular argument. First, Hoffman argues that preemption by state law is a legal issue the judge must decide (but didn't). Second, Hoffman argues that the jury (the fact finder) should decide whether this ordinance and his conduct are preempted because of the state law. The issue of preemption is a legal issue which the judge as the ruler of law decided against Hoffman. The issue is not appropriate for the jury as finder of

fact. The judge refusing to instruct the jury regarding preemption was thus appropriate.

The Court rejected the issue of preemption in both his summary judgment decision and in his ruling on the directed verdict. The court also appropriately did not instruct the jury on preemption as it is a legal issue.

CONCLUSION

The Somerset loitering ordinance is constitutional. The Somerset loitering ordinance is not preempted by state law. The ordinance does not prohibit any actions related to firearms. The Wisconsin Supreme Court already upheld the ordinance's constitutionality on its face. The ordinance is not unconstitutional as applied as the ordinance does not punish simply going for a walk and the ordinance is not a "detain and demand identification" ordinance. The ordinance prohibits wandering aimlessly in an unusual manner warranting alarm AND refusing to identify oneself and their purpose in order to dispel the alarm. The Circuit Court properly denied Hoffman's Motion for Summary Judgment and his Motion for Directed Verdict as there were genuine issues of material fact for the jury to decide. The Circuit Court properly refused to give an instruction on preemption to the jury as that is an issue of law which the judge decided at Summary Judgment and on Hoffman's directed verdict motion. The Village respectfully requests that Hoffman's Appeal be denied.

Dated: 5/29/15

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CERTIFICATION OF MAILING

I certify that this brief was deposited into the United States mail for delivery to the Clerk of the Court of Appeals by first-class mail, or other class of mail that is at least as expeditious, on May 29, 2015.

I further certify that on May 29, 2015, I served three copies of this brief via United States Mail upon all opposing parties.

I further certify that the brief was correctly addressed and postage was pre-paid.

Dated: 5/29/15

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FORM AND LENGTH CERTIFICATION

I certify that this brief conforms to the rules contained in § 809.19 (8) (b) and (c) for a brief and appendix produced with proportional serif font.

The length of this brief is 3,915 words.

Dated: 5/29/15

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CERTIFICATE OF COMPLIANCE WITH RULE 809.19(12)

I certify that I have submitted an electronic copy of this brief, excluding the appendix, if any, which complies with the requirements of s. 809.19(12). I further certify that:

This electronic brief is identical in content and format to the printed form of the brief filed as of this date.

A copy of this certificate has been served with the paper copies of this brief filed with the court and served on all opposing parties.

Dated: 5/29/15

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