WISCONSIN COURT OF APPEALS
DISTRICT IV

VILLAGE OF DEFOREST,

Plaintiff-Respondent,

Appeal No.: 2016 AP 1814

ALEXEI STRELCHENKO,

Defendant-Appellant.

PLAINTIFF-RESPONDENT'S RESPONSIVE BRIEF

Appeal from the Circuit Court for Dane County, the Honorable Nicholas J. McNamara, Judge.

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STATEMENT OF ISSUES

Issue: Did the Circuit Court have subject matter jurisdiction over violations of the Village of DeForest's ordinance adopting §947.01, *Wis. Stats.* (2013-14)[1], Disorderly Conduct?

Circuit Court's Answer: Yes.

STATEMENT ON ORAL ARGUMENT AND PUBLICATION

Strelchenko's appeal addresses the disposition of a municipal ordinance violation case: therefore, pursuant to §752.31(2) and (3), *Wis. Stats.*, it should be decided by one court of appeals judge; and publication is not

[1] All references to the Wisconsin Statutes are to 2013-14, unless otherwise indicated.

warranted, pursuant to §809.23(1)(a)4., *Wis. Stats.* Oral argument is also not warranted, as it would be of such marginal value that it does not justify the additional expenditure of court time or cost to the litigants.

STATEMENT OF THE CASE

A. Procedural Posture.

The Defendant-Appellant, Alexei Strelchenko ("Strelchenko") was found guilty by the DeForest/Windsor Municipal Court on September 30, 2015, of four violations of the Village of DeForest's ("Village") disorderly conduct ordinance adopting §947.01, *Wis. Stats.*, and one violation of the Village's drone use ordinance adopting §942.10, *Wis. Stats.*, due to incidents that occurred on May 10, 2015 (R.1:9).

Strelchenko appealed his conviction and requested a *de novo* six-person jury trial in the circuit court for Dane County. (R.1:10). On January 4, 2016, Strelchenko filed a motion to dismiss to which the Village timely responded, and for which Strelchenko timely replied. (R.3,4,5). On May 17, 2016, the circuit court denied Strelchenko's motion to dismiss. (R.15).

A jury trial was held on August 4, 2016. The circuit court announced its judgment on the verdict, to which neither party objected. (R.24:2). Strelchenko was found

guilty of two violations of the Village's disorderly conduct ordinance, and acquitted of the other charges. (R.24:2; 25:12). On September 14, 2016, Strelchenko filed a Notice of Appeal stating that he was appealing the final judgment in favor of the Village of DeForest and against him. (Notice of Appeal). The Village has not cross-appealed.

B. Statement of Facts.

Strelchenko chose not to supply a transcript of the circuit court proceedings; nor did he provide any appendix. (Strelchenko's Br. 2). Therefore, the scope of this court's review is confined to the record before it. *Herro, McAndrews and Porter, S.C. v. Gerhardt*, 62 Wis. 2d 179, 180, 214 N.W.2d 401, 402 (1974).

ARGUMENT

I. STRELCHENKO HAS NO BASIS TO APPEAL HIS ACQUITTAL ON THE "USE OF DRONE" CITATION.

Strelchenko's acquittal on the "Use of Drone" citation is not ripe for review. In addition to appealing his disorderly conduct convictions, Strelchenko seems to be mistakenly appealing his acquittal on the "Use of Drone" citation. (Strelchenko's Br. 7). "A party may not appeal from a judgment in his favor." *MacIntyre v. Frank*, 48 Wis. 2d 550, 553, 180 N.W.2d 538, 540 (1970). Strelchenko's

acquittal on "Use of Drone" was a ruling favorable to the appellant. Since the Village is not cross-appealing that acquittal, the "Use of Drone" citation is not justiciable before this court.

II. THE CIRCUIT COURT PROPERLY DISMISSED STRELCHENKO'S MOTION ON CONSTITUTIONALITY.

A. The Court Does Not Have Jurisdiction to Consider Strelchenko's Constitutional Argument Because He Failed to Serve the Attorney General with Notice of the Motion Challenging the Constitutionality of the Village's Ordinances and §§942.10 and 947.01, *Wis. Stats.*

In addition to his preemption argument, Strelchenko contends that the laws as applied to him in this case are unconstitutional (Strelchenko's Br. 8); however, neither this court nor the circuit court has jurisdiction to consider the issue of constitutionality because Strelchenko failed to notify the Wisconsin Attorney General of his claim. Under §806.04 (11), *Wis. Stats.*, if a statute or ordinance is alleged to be unconstitutional, the attorney general shall also be served with a copy of the proceedings and shall be entitled to be heard. Service on the attorney general is a jurisdictional prerequisite for the court to determine the constitutionality of a law. *O'Connell v. Blasius*, 82 Wis. 2d 728, 735, 264 N.W.2d 561, 564 (1978).

Because Strelchenko provided no proof that the attorney general was served in this case, the circuit court

did not have jurisdiction to hear his motion, and properly dismissed his motion on constitutionality for lack of jurisdiction.

B. The Village's Disorderly Conduct Ordinance as Applied to Strelchenko is Constitutional.

Even if Strelchenko had served the attorney general, his constitutional rights argument fails. Strelchenko's contention that the application of the Village's ordinance to him violates his constitutional rights is undeveloped. Strelchenko fails to establish beyond a reasonable doubt that the Village's disorderly conduct ordinance is invalid.

The constitutionality of an ordinance or statute is a question of law. *See State v. Cole,* 2003 WI 112, ¶10, 264 Wis. 2d 520, 529, 665 N.W.2d 328, 332. A party attacking the constitutionality of an ordinance has the burden of proving beyond a reasonable doubt that the ordinance is invalid. "[A]n ordinance is presumed to be constitutional and ... the attacking party must ***establish its invalidity beyond a reasonable doubt.***" *State ex rel. Baer v. Milwaukee,* 33 Wis. 2d 624, 630, 148 N.W.2d 21 (1967) (*emphasis added*). Both ordinances and statutes "receive the same treatment of constitutional presumption." *Peppies Courtesy Cab Co. v. City of Kenosha*, 165 Wis. 2d 397, 401, 475 N.W.2d 156, 158 (1991). "An ordinance . . . must be

sustained if at all possible. Should any doubt exist, it must be resolved ***in favor of the ordinance's constitutionality.***" *Walworth County v. Tronshaw*, 165 Wis. 2d 521, 525-526, 478 N.W.2d 294, 296 (Ct. App., 1991) *(emphasis added)*.

The disorderly conduct statute has been upheld under circumstances when a disturbance "affects the overall safety and order in the community." *State v. Schwebke*, 2002 WI 55, ¶31, 253 Wis. 2d 1, 644 N.W.2d 666. Strelchenko has failed to present any cogent argument as to how the application of the Village's disorderly conduct ordinance to his conduct is unconstitutional, let alone proof establishing its invalidity beyond a reasonable doubt.

The sole authority Strelchenko cites regarding the issue of constitutionality does not apply to the facts of this case. He cites §49 U.S.C. §40103(a)(2) for the general proposition that a citizen has the public right of transit through navigable airspace. (Strelchenko's Br. 8). He contends that his rights to fly in "navigable airspace" are infringed. *Id.* That statute refers to the right of a citizen to personally travel through navigable airspace. Strelchenko provides no proof that he personally travelled through navigable airspace during the incidents for which

he was cited for disorderly conduct, nor does he even claim to have done so. *See Id.* at 8-9.

Strelchenko seems to argue that the disorderly conduct ordinance is vague as applied to him. *Id.* at 8. In this case, as in *Schwebke*, "concerns with respect to vagueness are without merit" because the disorderly conduct ordinance provided "sufficient notice that his conduct would be deemed unlawful if it fell within the categories of the" ordinance. 2002 WI 55, ¶39.

Furthermore, since Strelchenko has not provided any record of his conduct, the court is unable to determine whether the ordinance was invalid as applied to him. A defendant who challenges a law "on grounds of vagueness is limited to the conduct actually charged." *State v. Courtney*, 74 Wis. 2d 705, 713, 247 N.W.2d 714, 719 (1976). Without record of the circumstances for which the disorderly conduct citations were issued, "defendant will not be heard to hypothesize other factual situations which might raise a question as to the applicability of the statute or regulation." *Courtney,* 74 Wis. 2d at 713. Strelchenko has failed to present any plausible explanation as to how application of the disorderly conduct ordinance to him in this case is unconstitutional.

III. THE STATE AND MUNICIPAL COURTS PROPERLY HAVE SUBJECT MATTER JURISDICTION OVER DISORDERLY CONDUCT CONDUCTED IN THE VILLAGE.

A. *De Novo* Is The Appropriate Standard of Review for Subject Matter Jurisdiction.

An appeal of subject matter jurisdiction is reviewed *de novo*. *Van Deurzen v. Yamaha Motor Corp. USA*, 2004 WI App 194, ¶9, 276 Wis. 2d 815, 823, 688 N.W.2d 777, 781. Strelchenko appeals two disorderly conduct citations that were issued by the Village, and claims that they are preempted by the FAA Modernization and Reform Act of 2012, Public Law 112-95, [hereinafter "FAAMRA"]. (Strelchenko's Br. 7). Strelchenko challenges whether the state and municipal courts have subject matter jurisdiction over his disorderly conduct citations. *Id.* Wisconsin courts have "subject matter jurisdiction to entertain action of any nature whatsoever" unless "otherwise provided by law." WIS. CONST. art. VII, §8; *Village of Trempealeau v. Mikrut*, 2004 WI 79, ¶8, 273 Wis. 2d 76, 681 N.W.2d 190. In the absence of federal preemption, Dane County Circuit Court properly has subject matter jurisdiction over this matter.

B. The Party Claiming Preemption Has the Burden to Prove a Clear and Manifest Intent by the Federal Government to Preempt Local Jurisdiction.

The burden to prove preemption lies with the party claiming it, who must show that the federal government has

clear and manifest intent to preempt local interests. "States are presumed to have jurisdiction over local interests, and the party claiming preemption must demonstrate a 'clear and manifest' intent to overcome this presumption." *Sohn Mfg. Inc. v. Labor & Indus. Review Comm'n*, 2013 WI App 112, ¶7, 350 Wis. 2d 469, 473, 838 N.W.2d 131, 133-34, *aff'd*, 2014 WI 112, ¶7, 358 Wis. 2d 308, 854 N.W.2d 371. Strelchenko fails to prove any intent of the federal government to preempt state and local governments from policing orderly conduct within neighborhoods.

C. An Analysis of Federal Preemption in this Matter is a Mixed Factual and Legal Question.

An analysis of federal preemption in this matter requires a mixed factual and legal analysis. At a threshold level, preemption can only be considered when a federal law applies to the facts of the case. "We look to the underlying facts of this case to determine whether there is preemption." *Hamilton v. United Airlines, Inc.*, 960 F. Supp. 2d 776, 784 (U.S.D.C., N.D. Ill. 2012). Whether preemption exists depends on the specific facts. For example, in a preemption question concerning maritime law, the court considered "the mixed factual and legal question of whether Little Lake Butte des Morts was navigable, such

that maritime law applied." *Van Deurzen*, 2004 WI App 194, ¶9.

Without facts, it is impossible to determine whether any federal law applies at all. Had the lake in *Van Deurzen* not been navigable, then maritime law would not have applied. *Id.* Similarly, if the disorderly conduct underlying the Strelchenko's disorderly citations did not occur in navigable airspace, then federal aviation law does not apply.

D. Because Strelchenko Did Not Provide a Transcript, this Court May Presume that the Factual Record Supports the Circuit Court's Decision.

Because Strelchenko did not provide the court with any transcript, this court may presume that the circuit court's decision is supported by the factual record. Strelchenko has the responsibility to provide the court "with a record that is sufficient to review the issue [he] raise[s]." *Butcher v. Ameritech Corp.*, 2007 WI App 5, ¶35, 298 Wis. 2d 468, 489-90, 727 N.W.2d 546, 557. In the absence of facts to the contrary, this court should "presume that every fact essential to sustain the circuit court's decision is supported by the record." *Butcher*, 2007 WI App 5, ¶35.

An appellate court usually does not disturb a circuit court's factual basis for its decision unless clear error exists. *Van Deurzen*, 2004 WI App 194, ¶9. Strelchenko

cannot prove clear error, because he has not provided any transcript from either the motion hearing or the jury trial to support his contention that his disorderly conduct occurred in navigable airspace, nor has he provided any written decision explaining the court's reasoning. (Strelchenko's Br. 2). Since Strelchenko has not provided an evidentiary record, the circuit court's factual basis for its decision should be left undisturbed.

E. The Doctrine of Preemption Does Not Apply.

No form of federal preemption applies to this case. Assuming, arguendo, that we are able to address the merits of Strelchenko's argument, he has failed to meet his burden to prove clear and manifest intent by the Federal government to preempt local interests in regulating orderly conduct. An "analysis of preemption claims begins with the presumption that 'Congress does not intend to supplant state law.'" *Miezin v. Midwest Exp. Airlines, Inc.*, 2005 WI App 120, ¶9, 284 Wis. 2d 428, 434, 701 N.W.2d 626, 629 (quoting *New York State Conference of Blue Cross & Blue Shield Plans v. Travelers Ins. Co.*, 514 U.S. 645, 654, 115 S. Ct. 1671, 131 L.Ed.2d 695 [1995]).

There are three ways that Congress may "exercise its preemptive power: express preemption, implied field preemption, and implied conflict preemption." *Miezin,* 2005

WI App 120, ¶10. For the reasons stated below, Strelchenko has not proved any form of preemption.

1. Strelchenko Fails to Prove Field Preemption.

To the extent that we can follow Strelchenko's argument on appeal, he seems to argue that the FAAMRA created field preemption against any state or local laws regulating drones, including ordinances regulating disorderly conduct by a drone's operator. (Strelchenko's Br. 7). Strelchenko's argument for field preemption fails because it starts with a faulty premise.

a. Congress Never Asserted an Intent to Solely Occupy the Field of Unmanned Flight.

Contrary to Strelchenko's assertion, the FAAMRA does not at any point assert an intent to solely occupy the field of civil unmanned flight. Field preemption occurs when a "federal law so occupies the field that it is impossible even to frame a claim under state law." *Vorhees v. Naper Aero Club, Inc.*, 272 F.3d 398, 402 (7th Cir. 2001) (quoting *Ceres Terminals, Inc. v. Indus. Comm'n of Ill.*, 53 F.3d 183, 185 [7th Cir. 1995]). The sovereignty of the United States over its air space "does not completely extinguish all rights based on state law." *Id.*, 272 F.3d at 404. Federal aviation law does not preempt the entire field of state law claims related to flight:

> The Federal Aviation Act has no civil enforcement provision or any provision allowing a private resident to sue for the property torts of an airline pilot or airport operator. This is seemingly fatal to a claim of complete preemption.

Id. "Some state law claims relating to airflight may still have merit, notwithstanding the broad scope of the Federal Aviation Act." *Id.*

The FAAMRA creates rule-making authority, not field preemption. With respect to unmanned aircraft such as drones, the FAAMRA provides authority for the Secretary of Transportation to develop "recommendations or projections" for "rulemaking" that will phase-in an eventual "approach to the integration of civil unmanned aircraft into the national airspace system." FAAMRA, §332(a), 126 Stat. 73. It does not limit state authority to regulate illegal activity by the operators of unmanned aircraft. *Id.*

The FAA relies on local enforcement of state and local law for the policing of acts by unmanned aircraft operators that are not regulated by the FAA. The FAA acknowledges state and local subject matter jurisdiction over many aspects of unmanned aircraft system ("UAS") operation:

> States and local governments are enacting their own laws regarding the operation of UAS, which may mean that UAS operations may also violate state and local laws specific to UAS operations, as well as broadly applicable laws such as assault, criminal trespass, or injury to persons or property.

Law Enforcement Guidance for Suspected Unauthorized UAS Operations, FAA, U.S. Dep't of Trans. 4 (August 11, 2016). The FAA regulates technical and licensing aspects of drone operation, but leaves to the states and local governments broad police power, including the ability to regulate disorderly conduct in superadjacent airspace.

b. Wisconsin has Jurisdiction of Matters in its Superadjacent Airspace.

Wisconsin has jurisdiction over the airspace superadjacent to residential buildings. Wisconsin shares jurisdiction of its sky with the United States. Pursuant to the Uniform Aeronautics Act, Wisconsin has sovereignty of the sky over Wisconsin, except where the United States has sovereignty:

> Sovereignty in the space above the lands and waters of this state is declared to rest in the state, except where granted to and assumed by the United States.

Wis. Stat. §114.02. Wisconsin law protects property rights skyward. "The ownership of the space above the lands and waters of this state is declared to be vested in the several owners of the surface beneath subject to the right of flight described in s. 114.04." §114.03, *Wis. Stats.*

The "air space of the United States" does not include non-navigable, superadjacent air space. 49

U.S.C. §40103(a)(1); *United States v. Causby*, 328 U.S. 256, 265, 264 66 S. Ct. 1062, 1068 (1946). Congress limits the authority of the FAA to the regulation of "navigable airspace." 49 U.S.C. §40103(b)(1). Navigable air space does not include "'superadjacent airspace' below the altitude that Congress appropriately determines to be a public highway." *Brenner v. New Richmond Regional Airport Com'n*, 2012 WI 98, ¶54 343 Wis. 2d 320, 341, 816 N.W.2d 291, 302 (quoting *Causby*, 328 U.S. at 265).

While flight performed in accordance with federal laws and regulations may be lawful, certain types of flight are unlawful in Wisconsin, such as flight "at such a low altitude as to interfere with the then existing use to which the land . . . , or the space over the land, is put by the owner, or unless so conducted as to be imminently dangerous or damaging to persons or property lawfully on the land." §114.04, *Wis. Stats.*

Wisconsin has a policy of policing crimes that occur during flight that fall under its police power. *See* Ch. 114, *Wis. Stats.* For example, Wisconsin has jurisdiction of "all crimes, torts and other wrongs committed by or against

an aeronaut . . . while in flight over this state." *Wis. Stat.* §114.07.[2]

Disorderly conduct that occurred in non-navigable, superadjacent airspace is similarly within the jurisdiction of State and municipal courts. Strelchenko has not presented any record to establish that the circuit court was mistaken in determining he was operating in non-navigable, superadjacent airspace at the times and locations for which he received the disorderly conduct citations.

2. Strelchenko Fails to Prove Express Preemption.

Federal aviation law does not expressly preempt Wisconsin's disorderly conduct statute. Express preemption occurs when a law expressly prohibits state or local government from regulating a certain matter.

Strelchenko does not provide any express language from the Federal Aviation Act or the FAAMRA preventing state or local government from regulating disorderly conduct, because no such language exists. "There is no such broad language in the Federal Aviation Act specifically

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[2]An "aeronaut" is a person who practices the "science and art of aircraft flight," which includes the operation of aircraft. *See* 49 U.S.C. §40102(a)(1); *see also Wis. Stat.* §114.002(1).

prohibiting state and local governments from regulating airflight in any way whatsoever." *Vorhees*, 272 F.3d at 404.

Express preemption language does not exist, precisely because the FAA encourages local control of policing issues best addressed at the local level. For example, the FAA intentionally rejected including a preemption provision when it finalized its rule for unmanned aircraft:

> The FAA is not persuaded that including a preemption provision in the final rule is warranted at this time. Preemption issues involving small UAS necessitate a case-specific analysis that is not appropriate in a rule of general applicability. Additionally, **certain legal aspects concerning small UAS use may be best addressed at the State or local level.** For example, State law and other legal protections for individual privacy may provide recourse for a person whose privacy may be affected through another person's use of a UAS.

Operation and Certification of Small Unmanned Aircraft Systems, 81 Fed. Reg. 42064, 42194 (June 28, 2016)(emphasis added).

3. Strelchenko Fails to Prove Conflict Preemption.

Strelchenko has not provided any proof of how the Village's disorderly conduct ordinance conflicts with federal law. Air flight issues that do not conflict with the Federal Aviation Act are not preempted. *Vorhees*, 272 F.3d at 405. When "a state law . . . conflicts with a federal law," then the federal law preempts the state or

local law. *Id.* at 403. However, if no such federal scheme exists, then the state or local law applies.

The Village's disorderly conduct ordinance does not conflict with federal law, because no federal scheme exists regulating disorderly conduct, even if by drone. The FAA's only rule for small unmanned aircraft systems was finalized in June, 2016, over a year after the citations were issued. *See* 81 Fed. Reg. 42064, 42209-42214 (to be codified at 14 CFR pt. 107); R1:1,6. Furthermore, even if the final rule could be applied retroactively, it does not create any conflicts with the Village's disorderly conduct ordinance. *See id.*

The FAA intends that community policing issues such as disorderly conduct with a drone be addressed at the state and local level. See 81 Fed. Reg. 42064, 42194. Even if the FAA were prosecuting Strelchenko for licensing and other aviation violations stemming out of the same UAS flights, that does not create either express or conflict preemption. A UAS operator who buzzes a drone right next to his neighbors' bedroom windows at night and scares children trying to sleep may be prosecuted by a municipality for civil ordinance violations such as disorderly conduct, while also being assessed a civil penalty by the FAA for any applicable licensing and aviation violations. The

situation is no different than a driver who receives multiple citations stemming from a single stop for speeding, depending on status of his driver's license and vehicle registration, and whether he is intoxicated.

The purpose of the Village's disorderly conduct ordinance is "to root out conduct that unreasonably disturbs the public peace." *In re Douglas D.*, 2001 WI 47, ¶24, 243 Wis. 2d 204, 626 N.W.2d 725. The Village is not duplicating the FAA's authority. The Village is applying its police power to prosecute civil ordinance violations related to disturbances created by Strelchenko. The Village does not seek to regulate the specifics of aircraft operation, only human behaviors that disrupt Village peace and order.

CONCLUSION.

The Village's disorderly conduct ordinance is not preempted by federal law; and Strelchenko has failed to meet his burden to show that the ordinance is unconstitutional.

In addition the acquittal on the use of drone citation is not justiciable, and should not be considered by this court.

For these reasons, the Village requests that Strelchenko's appeal be denied, and the circuit court's judgment be affirmed.

Respectfully submitted this 12 day of December, 2016.

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CERTIFICATION

I hereby certify that this brief conforms to the rules contained in s. 809.19 (8) (b) and (c) for a brief and appendix produced with a monospaced font. The length of this brief is 3,603 words and 19 pages.

Dated: December 12, 2016.

REUTER, WHITISH & EVANS, S.C.

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CERTIFICATION OF COMPLIANCE WITH WIS. STAT. § 809.19(3)(b)

I hereby certify that filed with this brief, either as a separate document or as a part of this brief, is a supplemental appendix that complies with s. 809.19 (3) (b) and that contains, at a minimum: (1) a table of contents; and (2) a copy of any unpublished opinion cited under s. 809.23 (3) (a) or (b).

I further certify that if the record is required by law to be confidential, the portions of the record included in the appendix are reproduced using one or more initials or other appropriate pseudonym or designation instead of full names of persons, specifically including juveniles and parents of juveniles, with a notation that the portions of the record have been so reproduced to preserve confidentiality and with appropriate references to the record.

Dated: December 12, 2016.

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CERTIFICATION OF COMPLIANCE WITH WIS. STAT. § 809.19(12)

I hereby certify that:

I have submitted an electronic copy of this brief, excluding the appendix, if any, which complies with the requirements of Wis. Stat. § 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: December 12, 2016

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