

SUPREME COURT OF OHIO

Walker v. Toledo, 143 Ohio St. 3d 420, 2014-Ohio-5461

39 N.E.3d 474 (2014) · No. 2013-1277 · Decided December 18, 2014

SUMMARY

The Supreme Court of Ohio held that municipalities have home-rule authority to impose civil liability for traffic violations through administrative enforcement systems. It concluded that Ohio Constitution, Article IV, Section 1, and R.C. 1901.20 do not give municipal courts exclusive authority over civil administrative traffic violations. The court reversed the Sixth District Court of Appeals and remanded the case for further proceedings, holding that administrative proceedings must be exhausted before judicial remedies may be pursued.

CASE DETAILS

COURT	Supreme Court of Ohio
WRITING FOR THE COURT	Kennedy, J.; O'Connor, C.J.; Gwin, J.; Lanzinger, J.; Pfeifer, J.; French, J.; O'Neill, J.
JURISDICTION	Ohio
DECIDED	December 18, 2014
DOCKET	2013-1277
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Discretionary appeal from the Sixth District Court of Appeals after that court reversed the trial court's dismissal of Walker's complaint under Civ.R. 12(B)(6).
STANDARD OF REVIEW	On a Civ.R. 12(B)(6) motion, the court must presume the complaint's factual allegations are true and draw all reasonable inferences in favor of the nonmoving party; dismissal is proper only when the plaintiff can prove no set of facts entitling relief.
PRECEDENTIAL VALUE	Published, precedential Supreme Court of Ohio decision.
PARTIES	The City of Toledo, Redflex Traffic Systems, Inc. v. Bradley Walker

TOPICS

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PRACTICE AREAS

municipal law

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statutory interpretation

QUESTIONS PRESENTED

1. Whether Toledo's ordinance creating a civil administrative system for automated enforcement of speeding and red-light violations violates Ohio Constitution Article IV, Section 1 or R.C. 1901.20.
2. Whether R.C. 1901.20 gives municipal courts exclusive jurisdiction over civil administrative enforcement of municipal traffic ordinances.
3. Whether Ohio municipalities have home-rule authority to establish presuit administrative proceedings and hearings for civil traffic-law violations that must be exhausted before judicial remedies are pursued.

HOLDINGS

1. Under Ohio Constitution Article XVIII, Sections 3 and 7, municipalities have home-rule authority to impose civil liability on traffic violators through automated administrative enforcement systems.
2. R.C. 1901.20 does not confer exclusive jurisdiction over civil administrative traffic-law violations on municipal courts.
3. Ohio municipalities have home-rule authority to establish presuit administrative proceedings, including administrative hearings, for civil enforcement of traffic ordinances, and those proceedings must be exhausted before offenders or the municipality may pursue judicial remedies.

KEY QUOTATIONS

“We reaffirm our holding in Mendenhall v. Akron, 117 Ohio St. 3d 33, 2008-Ohio-270, 881 N.E.2d 255, that municipalities have home-rule authority under Article XVIII of the Ohio Constitution to impose civil liability on traffic violators through an administrative enforcement system.” (at 421)

“Finally, we hold that Ohio municipalities have home-rule authority to establish administrative proceedings, including administrative hearings, in furtherance of these ordinances, that must be exhausted before offenders or the municipality can pursue judicial remedies.” (at 427)

FACTUAL BACKGROUND

Toledo enacted TMC 313.12, creating an automated traffic-enforcement system that imposed civil penalties on vehicle owners for speeding and red-light violations recorded by cameras and sensors. Redflex supplied the equipment and shared revenue with Toledo. Vehicle owners received a notice of civil liability and had 21 days to pay or appeal through an administrative process. Walker paid a \$120 penalty without appealing and then sued Toledo and Redflex for unjust enrichment, asserting that the ordinance usurped municipal-court jurisdiction, was vague, and violated due process.

PROCEDURAL HISTORY

Walker received a civil traffic-liability notice under Toledo Municipal Code 313.12, paid the \$120 penalty without pursuing an administrative appeal, and then filed a class-action unjust-enrichment complaint against

Toledo and Redflex. The trial court dismissed the complaint under Civ.R. 12(B)(6). The Sixth District reversed, holding that the ordinance unconstitutionally intruded on the municipal court's jurisdiction and allowing Walker's due-process claim to proceed. The Supreme Court of Ohio reversed the appellate judgment and remanded to the trial court.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

Remand to the trial court for further proceedings consistent with the opinion.

CASES CITED

- Mendenhall v. Akron, 117 Ohio St. 3d 33, 2008-Ohio-270, 881 N.E.2d 255
- Mitchell v. Lawson Milk Co., 40 Ohio St. 3d 190, 192, 532 N.E.2d 753 (1988)
- Bazell v. Cincinnati, 13 Ohio St. 2d 63, 233 N.E.2d 864 (1968)
- Cupps v. Toledo, 170 Ohio St. 144, 163 N.E.2d 384 (1959)
- State ex rel. Scott v. Cleveland, 112 Ohio St. 3d 324, 2006-Ohio-6573, 859 N.E.2d 923
- State ex rel. Banc One Corp. v. Walker, 86 Ohio St. 3d 169, 171-172, 712 N.E.2d 742 (1999)
- Thomas v. Freeman, 79 Ohio St. 3d 221, 224-225, 680 N.E.2d 997 (1997)

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