

SUPREME COURT OF THE UNITED STATES

Maine v. Taylor

477 U.S. 131 (1986) · No. No. 85-62 · Decided June 23, 1986

SUMMARY

The Supreme Court upheld Maine's ban on importing live baitfish against a Commerce Clause challenge. The Court held that the Lacey Act Amendments did not unmistakably authorize otherwise unconstitutional state legislation and concluded that Maine's facially discriminatory law was valid because it served legitimate environmental purposes and no adequate nondiscriminatory alternatives were available. The Court also addressed Maine's appellate jurisdiction and standing to appeal.

CASE DETAILS

COURT	Supreme Court of the United States
WRITING FOR THE COURT	Justice Blackmun
JURISDICTION	Federal
DECIDED	June 23, 1986
DOCKET	No. 85-62
DISPOSITION	reversed
PROCEDURAL POSTURE	Maine appealed as of right under 28 U.S.C. § 1254(2) from the First Circuit's reversal of a federal conviction based on the alleged violation of Maine's live-baitfish importation statute. The Supreme Court also considered Taylor's challenges to appellate jurisdiction.
STANDARD OF REVIEW	The Supreme Court applied the clearly erroneous standard to the District Court's nonguilt factual findings concerning the scientific risks posed by imported baitfish and the availability of nondiscriminatory alternatives. Constitutional characterization and legal conclusions were reviewed independently.
PARTIES	Maine v. Robert J. Taylor

QUESTIONS PRESENTED

- Whether Maine could appeal under 28 U.S.C. § 1254(2) from the First Circuit's invalidation of a Maine statute in a criminal case.
- Whether Maine, as an intervenor defending the constitutionality of its statute, had standing to appeal after the United States abandoned its own appeal.

3. Whether the Lacey Act Amendments of 1981 unmistakably authorized Maine to impose an otherwise unconstitutional burden on interstate commerce or reduced the level of Commerce Clause scrutiny.
4. Whether Maine's facially discriminatory ban on importing live baitfish satisfied the dormant Commerce Clause requirements that it serve a legitimate local purpose and that the purpose could not be served as well by available nondiscriminatory means.
5. Whether the First Circuit improperly rejected the District Court's factual findings instead of reviewing them under the clearly erroneous standard.

HOLDINGS

1. Section 1254(2) authorizes an appeal as of right in a criminal case when a party relying on a state statute appeals from a court of appeals decision holding that statute invalid under federal law.
2. Maine had standing and could seek review independently because it intervened with all the rights of a party and had a substantial stake in preserving the enforceability of its own statute.
3. The Lacey Act Amendments did not authorize state wildlife laws that would otherwise violate the Commerce Clause and did not reduce the level of Commerce Clause scrutiny absent an unmistakably clear congressional statement.
4. Maine's facially discriminatory ban on importing live baitfish was constitutional because it served legitimate local environmental purposes and those purposes could not adequately be served by available nondiscriminatory alternatives.
5. The First Circuit was required to review the District Court's nonguilt factual findings under the clearly erroneous standard and could not reweigh the evidence de novo merely because the case involved constitutional issues.

KEY QUOTATIONS

“A State must make reasonable efforts to avoid restraining the free flow of commerce across its borders, but it is not required to develop new and unproven means of” (477 U.S. at 147)

FACTUAL BACKGROUND

Robert J. Taylor operated a bait business in Maine and arranged for 158,000 live golden shiners to be shipped into the State despite Maine's statutory prohibition on importing live baitfish. The shipment was intercepted, and expert testimony indicated that out-of-state baitfish could introduce parasites and nonnative species threatening Maine's unusually fragile fisheries. The District Court found that Maine had a legitimate environmental purpose and that no scientifically accepted, nondiscriminatory inspection method for baitfish was then available.

PROCEDURAL HISTORY

Taylor was indicted in the District of Maine for violating and conspiring to violate the Lacey Act Amendments of 1981 after arranging for 158,000 live golden shiners to be shipped into Maine in violation of the State's import ban. The District Court upheld the Maine statute and denied Taylor's motion to dismiss the indictment. Taylor

entered a conditional guilty plea, and the First Circuit reversed, holding that the state import ban impermissibly restricted interstate trade. Maine appealed, and the Supreme Court reversed the First Circuit.

DISPOSITION

reversed