

SUPREME COURT OF OHIO

State ex rel. Magsig v. Toledo

2020-Ohio-3416 (Ohio 2020) · No. 2019-1526 · Decided June 24, 2020

SUMMARY

The Supreme Court of Ohio held that R.C. 1901.20(A)(1) grants municipal courts exclusive jurisdiction over civil actions involving violations of state traffic laws or municipal traffic ordinances. Accordingly, the City of Toledo lacked jurisdiction to conduct its own quasi-judicial administrative proceedings concerning red-light and speeding-camera violations. The court granted Susan Magsig's writ of prohibition.

CASE DETAILS

COURT	Supreme Court of Ohio
WRITING FOR THE COURT	French, J.; O'Connor, C.J.; Kennedy, J.; Fischer, J.; DeWine, J.; Donnelly, J.; Stewart, J.
JURISDICTION	Ohio
DECIDED	June 24, 2020
DOCKET	2019-1526
DISPOSITION	writ_granted
PROCEDURAL POSTURE	Original action in prohibition seeking to prevent Toledo from conducting an administrative hearing to adjudicate relator's liability for an alleged municipal speeding-camera violation.
STANDARD OF REVIEW	For a writ of prohibition, the relator must establish that the respondent is exercising judicial or quasi-judicial power, that the respondent lacks authority to exercise that power, and that there is no adequate remedy in the ordinary course of law. The adequate-remedy element is unnecessary when the lack of jurisdiction is patent and unambiguous.
PRECEDENTIAL VALUE	published
PARTIES	Susan Magsig, relator v. The City of Toledo, respondent

TOPICS

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PRACTICE AREAS

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QUESTIONS PRESENTED

1. Whether R.C. 1901.20(A)(1), as amended by H.B. 62, gives municipal courts exclusive jurisdiction over civil adjudications of municipal traffic-law violations.
2. Whether Toledo may use its home-rule authority to conduct quasi-judicial administrative proceedings adjudicating liability for red-light and speeding-camera violations.
3. Whether the alleged unconstitutionality of other H.B. 62 provisions prevents enforcement of the exclusive-jurisdiction provision in R.C. 1901.20(A)(1).
4. Whether Magsig was entitled to a writ of prohibition.

HOLDINGS

1. R.C. 1901.20(A)(1) expressly grants municipal courts exclusive jurisdiction over every civil action concerning a violation of a state traffic law or municipal traffic ordinance, including noncriminal traffic-law adjudications.
2. Toledo lacks jurisdiction to conduct its own quasi-judicial administrative proceedings adjudicating a person's liability for violating a municipal traffic ordinance.
3. A constitutional challenge to other H.B. 62 provisions did not prevent enforcement of R.C. 1901.20(A)(1), because the exclusive-jurisdiction provision was severable from the challenged provisions.
4. A writ of prohibition should issue because Toledo was exercising quasi-judicial power without jurisdiction, and its lack of jurisdiction was patent and unambiguous on the face of R.C. 1901.20(A)(1).

KEY QUOTATIONS

“The express language of the statute confers exclusive jurisdiction on the municipal courts to adjudicate civil actions for a municipal traffic-law violation.” (§ 8)

“Toledo’s preferred construction of the statute requires us to add words to the text, which we are not permitted to do.” (§ 13)

“R.C. 1901.20(A)(1) expressly vests exclusive jurisdiction over noncriminal traffic-law adjudications in the municipal courts. Toledo therefore has no jurisdiction to conduct its own quasi-judicial proceedings.” (§ 20)

FACTUAL BACKGROUND

Toledo maintained a civil-enforcement system for red-light and speeding-camera violations under which a vehicle owner could be assessed a civil penalty and could appeal to a city administrative hearing officer. Toledo's automated system issued Susan Magsig a notice of liability for an alleged speeding violation, and she requested an administrative hearing. Before the hearing occurred, Magsig sought a writ of prohibition, arguing that amended R.C. 1901.20(A)(1) vested municipal courts with exclusive jurisdiction over every civil action concerning a municipal traffic-ordinance violation.

PROCEDURAL HISTORY

Toledo issued Magsig a notice of liability for an alleged speeding offense and scheduled an administrative hearing before a city hearing officer. Magsig filed an original action for a writ of prohibition in the Supreme Court of Ohio. The court denied Toledo's motion to dismiss, granted an alternative writ, received stipulated facts and briefs, and granted the writ.

DISPOSITION

writ_granted

CASES CITED

- State ex rel. Elder v. Camplese, 144 Ohio St. 3d 89, 2015-Ohio-3628, 40 N.E.3d 1138, ¶ 13
- State ex rel. Sapp v. Franklin Cty. Court of Appeals, 118 Ohio St. 3d 368, 2008-Ohio-2637, 889 N.E.2d 500, ¶ 15
- Dept. of Adm. Servs., Office of Collective Bargaining v. State Emp. Relations Bd., 54 Ohio St. 3d 48, 562 N.E.2d 125 (1990)
- State ex rel. Wright v. Ohio Bur. of Motor Vehicles, 87 Ohio St. 3d 184, 718 N.E.2d 908 (1999)
- Walker v. Toledo, 143 Ohio St. 3d 420, 2014-Ohio-5461, 39 N.E.3d 474
- Cupps v. Toledo, 170 Ohio St. 144, 163 N.E.2d 384 (1959)
- In re Adoption of P.L.H., 151 Ohio St. 3d 554, 2017-Ohio-5824, 91 N.E.3d 698, ¶ 27
- State v. Romage, 138 Ohio St. 3d 390, 2014-Ohio-783, 7 N.E.3d 1156, ¶ 15
- Geiger v. Geiger, 117 Ohio St. 451, 160 N.E. 28 (1927)
- State ex rel. Magsig v. Toledo, 157 Ohio St. 3d 1489, 2019-Ohio-4696, 134 N.E.3d 1199