U.S. case law: Licence v Freedom of travel

I have read quite a few comments from people online in Australia, that there exists in the U.S. a legal method that allows Americans to drive without a license. As you will see, there is no "common law right" to "travel" in the U.S. (as in the OPCA concept of driving unlicenced, by "automobile") nor any "contractual" aspects involved. Identically to here in Australia, the privilege of driving is governed entirely by statute, and the obligation to the road rules is statutory, not contractual. Before I lay this myth to rest with two appeal cases in the Federal Courts, I will elaborate on the right to freedom of travel in U.S. law.

The U.S. Supreme Court has recognized a protected right to interstate travel, (*Saenz v. Roe*) and the Sixth Circuit has recognized a protected right to intrastate travel, i.e., *"a right to travel locally through public spaces and roadways,"* (*Johnson v. City of Cincinnati*). Yet, the District Court held the protected right to travel does not embody a right to a driver license or a right to a particular mode of transportation, citing *Duncan v. Cone, 2000 WL* holding:

> *"there is no fundamental right to drive a motor vehicle."*

John Doe No. 1 v. Georgia Department of Public Safety, observed that

> *"the Circuit Courts have uniformly held that burdens on a single mode of transportation do not implicate the right to interstate travel"*

Further, the District Court held that the right to travel, whatever its contours, is not infringed by Chapter 778 because a person who receives a certificate for driving is able to operate a motor vehicle just like a person who receives a driver license. (*Lulac, 2004*) Potential difficulties that may be experienced by one who does not have a driver license to use for identification purposes, were held not to implicate the right to travel. In *Saenz*, the Supreme Court identified three components of the right to travel:

> *"It protects the right of a citizen of one State to enter and to leave another State, the right to be treated as a welcome visitor rather than an unfriendly alien when temporarily present in the*

second State, and, for those travelers who elect to become permanent residents, the right to be treated like other citizens in that State."

"A state law implicates the right to travel when it actually deters travel, when impeding travel is its primary objective, or when it uses a classification that serves to penalize the exercise of the right." ~ Attorney General of New York v. Soto-Lopez

"Tennessee's issuance of certificates for driving, which confer all the same driving privileges as driver licenses, is clearly not designed primarily to impede travel and can hardly be said to deter or penalize travel. The state's denial of state-issued photograph identification to temporary resident aliens may arguably result in inconvenience, requiring the bearer of a certificate for driving to carry other personal identification papers, but this inconvenience can hardly be said to deter or penalize travel. To the extent this inconvenience burdens exercise of the right to travel at all, the burden is incidental and negligible, insufficient to implicate denial of the right to travel." ~ Town of Southold v. Town of East Hampton

U.S. case law recognises that *"citizens do not have a constitutional right to the most convenient form of travel. Something more than a negligible or minimal impact on the right to travel is required before strict scrutiny is applied." ~ State of Kansas v. United States*

The two following cases confirm that U.S. Federal Court will uphold a states legislative authority to issue citations for unlicensed driving regardless of the defense of the right to freedom of travel among other things...

GEORGE TAYLOR DUNCAN; CHRISTINE JOSEE NELLY DUNCAN, Plaintiffs-Appellants, v. LINDA CONE, Branch Supervisor, TN Department of Safety, Issuance Division; TIM STRINGFIELD, Issuance Division Manager, TN Department of Safety, Issuance Division; TENNESSEE DEPARTMENT OF SAFETY, Issuance Division, Defendants-Appellees. No. 00-5705 UNITED STATES COURT OF APPEALS FOR THE SIXTH CIRCUIT 2000 U.S. App. LEXIS 33221 December 7, 2000, Filed PRIOR HISTORY: Western District of Tennessee. 00-01110. Todd. 4-27-00. DISPOSITION: Affirmed.

"CASE SUMMARY PROCEDURAL POSTURE: Plaintiffs appealed from judgment of the Western District of Tennessee, which dismissed their civil rights suit purportedly filed pursuant to 18 U.S.C.S. § 242, 42 U.S.C.S. § 408(a)(8), § 7(a) of the Privacy Act of 1974, U.S. Const. amend. I, and state law.

OVERVIEW: Plaintiffs applied for driver's licenses, but were denied by defendant agency and defendant employees for plaintiffs' failure, due to religious reasons, to list their social security numbers on the applications. Plaintiffs claimed that defendants' actions violated their right to free exercise of their religion. Plaintiff brought suit pursuant to 18 U.S.C.S. § 242, 42 U.S.C.S. § 408(a)(8), § 7(a) of the Privacy Act of 1974, U.S. Const. amend. I, and state law. The district court dismissed their claims as frivolous, and plaintiffs appealed. Upon review, judgment was affirmed. The district court properly dismissed plaintiffs' claims as frivolous. Neither § 242 nor § 408(a)(8) provided for a private cause of action. While a fundamental right to travel existed, the denial of driver's licenses did not infringe on plaintiffs' right to travel by other modes of transportation. It only prevented them from driving a vehicle. Consequently, plaintiffs' right to freely exercise their religion and their right to travel had not been impermissibly infringed.

OUTCOME: Judgment affirmed. The district court properly dismissed plaintiffs' claims as frivolous. Neither criminal statute sued under provided for a private cause of action.

> *"While a fundamental right to travel existed, denial of driver's licenses did not infringe on plaintiffs' right to travel by other modes of transportation."*

WILLIE C. McGHEE, Plaintiff, v. LT. MICHAEL McCALL, et al., Defendants.
Case No. 1:10-cv-333UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF MICHIGAN, SOUTHERN DIVISION 2010 U.S. Dist. LEXIS 52362 April 19, 2010
*SUBSEQUENT HISTORY: Adopted by, Complaint dismissed at McGhee v. McCall, 2010 U.S. Dist. LEXIS 52356 (W.D. Mich., May 27, 2010) COUNSEL: [*1] Willie C. McGhee, plaintiff, Pro se, Kalamazoo, MI.*
JUDGES: Joseph G. Scoville , United States Magistrate Judge. Honorable Paul L. Maloney.

"This is a civil action brought by a pro se plaintiff against a lieutenant and other unnamed officers of the Kalamazoo Department of Public Safety. Plaintiff's complaint alleges that officers of the City of Kalamazoo have insisted that plaintiff have a driver's license and current license plate tags as a prerequisite to driving on the streets of the State of Michigan, in violation of plaintiff's federal constitutional right to travel. Plaintiff alleges that a driver's license and license plate tags are only necessary when a person is using the roads for purposes of commerce and that, as a "national citizen" of the United States, plaintiff has the right to travel on the roads of the state unencumbered by state licensing laws. Plaintiff seeks an award of damages for relief.

The court has granted plaintiff leave to proceed in forma pauperis, in light of his indigence. Under the provisions of federal law, PUB. L. No. 104-134, 110 STAT. 1321 (1996), the court is required to dismiss any action brought under federal law in [*2] forma pauperis if the complaint is frivolous, malicious, fails to state a claim upon which relief can be granted, or seeks monetary relief from a defendant immune from such relief. 28 U.S.C. § 1915(e)(2). An action may be dismissed as frivolous if "it lacks an arguable basis either in law or in fact." See Neitzke v. Williams, 490 U.S. 319, 325, 109 S. Ct. 1827, 104 L. Ed. 2d 338 (1989). Accordingly, an action is frivolous within the meaning of section 1915(e)(2) when it is based on either an inarguable legal conclusion or fanciful factual allegations. 490 U.S. at 325

In deciding whether the complaint states a claim, the court applies the standards applicable to Rule 12(b)(6) motions. The complaint must provide "a short and plain statement of the claim showing that the pleader is entitled to relief" in order to give the defendant fair notice of what the claim is and the grounds upon which it rests. Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 555, 127 S. Ct. 1955, 167 L. Ed. 2d 929 (2007) (citing FED. R. CIV. P. 8(a)(2)).

While this notice pleading standard does not require "detailed" factual allegations, it does require more than the bare assertion of legal conclusions. Twombly, 550 U.S. at 555. The court must construe the complaint in the light most favorable [*3] to plaintiff, accept the plaintiff's factual allegations as true, and draw all reasonable factual inferences in plaintiff's favor. See DirecTV, Inc. v. Treesh, 487 F.3d 471, 476 (6th Cir. 2007). The court need not accept as true legal conclusions or unwarranted factual inferences. DirecTV, 487 F.3d at 476. Pro se pleadings are held to a less stringent standard than formal pleadings drafted by licensed attorneys. See Erickson v. Pardus, 551 U.S. 89, 94, 127 S. Ct. 2197, 167 L. Ed. 2d 1081 (2007); Haines v. Kerner, 404 U.S. 519, 520, 92 S. Ct. 594, 30 L. Ed. 2d 652 (1972). However, even the lenient treatment generally given pro se pleadings has its limits. See Jourdan v. Jabe, 951 F.2d 108, 110 (6th Cir. 1991). "[T]o survive a motion to dismiss, the complaint must contain either direct or inferential

allegations respecting all the material elements to sustain recovery under some viable legal theory." Bishop v. Lucent Techs., Inc., 520 F.3d 516, 519 (6th Cir. 2008).

Plaintiff challenges the laws of the State of Michigan requiring a driver's license and valid license plate tags as an abridgement of his constitutional right to travel. The Supreme Court has identified the right to interstate travel as a fundamental right of United States citizenship, [*4] protected from abridgement by the states. See Saenz v. Roe, 526 U.S. 489, 500-01, 119 S. Ct. 1518, 143 L. Ed. 2d 689 (1999).

The Supreme Court has long held, however, that the states have the power to regulate the use of motor vehicles on their highways. See, e.g., Kane v. New Jersey, 242 U.S. 160, 37 S. Ct. 30, 61 L. Ed. 222 (1916). Therefore, state-created burdens placed on travel generally and in a nondiscriminatory fashion, such as gasoline taxes, licensing requirements, and tolls do not constitute a violation of the right to travel, as they only place a negligible burden on commerce. See Miller v. Reed, 176 F.3d 1202, 1205 (9th Cir. 1999); Kansas v. United States, 16 F.3d 436, 442, 305 U.S. App. D.C. 14 (D.C. Cir. 1994). Furthermore, the federal courts unanimously hold that there is no fundamental right to drive a motor vehicle. See Duncan v. Cone, No. 00-5705, 2000 U.S. App. LEXIS 33221, 2000 WL 1828089 at * 2 (6th Cir. Dec. 7, 2000) ("While a fundamental right to travel exists, there is no fundamental right to drive a motor vehicle.") (citing Miller, 176 F.3d at 1205-06).

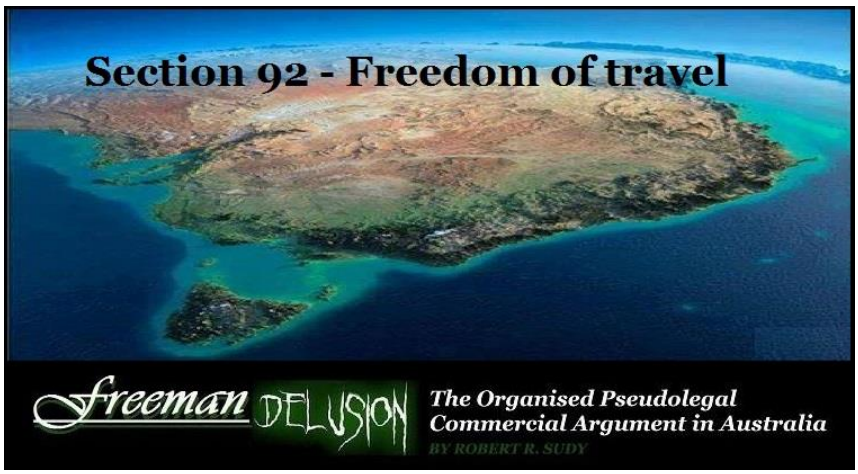
Consequently, plaintiff's civil action is premised on an inarguable legal conclusion. Plaintiff asserts that the Kalamazoo Department of Public Safety has insisted on his compliance with state driver's license and vehicle [*5] licensing laws as a condition to plaintiff's ability to operate a motor vehicle on the roads of this state. Plaintiff asserts that defendants have thereby violated his constitutional right to travel, but this contention is untenable. State driver's license laws impose only an "incidental and negligible" burden on the exercise of right to travel, a burden insufficient to implicate denial of the right. League of United Latin Am. Citizens v. Bredesen, 500 F.3d 523, 535 (6th Cir. 2007). There is simply no fundamental right to drive a motor vehicle. Id. at 534.

Consequently, the federal courts uniformly reject suits by plaintiffs who seek vindication of their nonexistent "right" to operate motor vehicles without complying with state licensing laws. See, e.g., Matthew v. Honish, 233 F. App'x 563, 564 (7th Cir. 2007); Hallstrom v. City of Garden City, 991 F.2d 1473, 1477 (9th Cir. 1993); Aziza El v. City of Southfield, No. 09-11569, 2010 U.S. Dist. LEXIS 26560, 2010 WL 1063825, at * 5 (E.D. Mich. Mar. 22, 2010); Nevada v. Matlean, No. 3:08cv505, 2009 U.S. Dist. LEXIS 53228, 2009 WL 1810759, at * 2 (D. Nev. June 24, 2009); John Doe No. 1 v. Georgia Dep't of Pub. Safety, 147 F. Supp. 2d 1369, 1375 (N.D. Ga. 2001); Kaltenbach v. Breaux, 690 F. Supp. 1551, 1553-55 (W.D. La. 1988). [*6] As the court summarized the rule in the John Doe case:

> *"A legal resident of Georgia does not have a constitutional right to a driver's license. Regulation of the driving privilege is a quintessential example of the exercise of the police power of the state, and the denial of a single mode of transportation does not rise to the level of a violation of the fundamental right to interstate travel."*

147 F. Supp. 2d at 1375. Plaintiff's complaint fails to state a claim upon which relief can be granted. I therefore recommend that it be dismissed pursuant to 28 U.S.C. § 1915(e)(2).
Dated: April 19, 2010 Joseph G. Scoville United States Magistrate Judge."

Section 92 - Freedom of travel



Section 92 of the *Commonwealth Constitution* actually has nothing to do with freedom of travel between the states, or some constitutional right to drive unregistered and unlicensed, as Australian OPCA adherents like to imply, but rather, the concept of FREE TRADE between the States.

Section 92 of the *Constitution* provides:

> *"Trade within the Commonwealth to be free: On the imposition of uniform duties of customs, trade, commerce, and intercourse among the States, whether by means of internal carriage or ocean navigation, shall be absolutely free. But notwithstanding anything in this Constitution, goods imported before the imposition of uniform duties of customs into any State, or into any Colony which, whilst the goods remain therein, becomes a State, shall, on thence passing into another State within two years after the imposition of such duties, be liable to any duty chargeable on the importation of such goods into the Commonwealth, less any duty paid in respect of the goods on their importation."*

The chapter in the *Constitution* that this provision appears in is under Chapter IV "*Finance and Trade*", and it specifically states "*TRADE within the Commonwealth to be free".*

In the case of ***Cole v Whitfield [1988] HCA 18***, in a unanimous decision, the High Court identified the full extent of section 92:

> *"The purpose of the section is clear enough: to create a free trade area throughout the Commonwealth and to deny to Commonwealth and States alike a power to prevent or obstruct the free movement of people, goods and communications across State boundaries.*
>
> *The expression "free trade" commonly signified in the nineteenth century, as it does today, an absence of protectionism, that is, the protection of domestic industries against foreign competition. Accordingly, s. 92 prohibits the Commonwealth and the States from imposing burdens on interstate trade and commerce which: 1. discriminate against it by conferring an advantage on intrastate trade or commerce of the same kind, and 2. are protectionist in character."*

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A great summary of the preceding decisions regarding section 92 can be found in ***Nationwide News Pty Ltd v Wills (1992) HCA 46*** (from 33):

> *"Cases prior to Cole v. Whitfield admitted the validity of laws for the protection of a State against the introduction into the State of animal: Ex parte Nelson (No.1) (1928) 42 CLR 209, at pp 218-219) and plant: Tasmania v. Victoria (1935) 52 CLR 157, at pp 168-169) diseases, noxious drugs: The Commonwealth v. Bank of N.S.W. (1949) 79 CLR 497, at p 641; (1950) AC 235, at pp 311-312), gambling materials and pornography: R. v. Connare; Ex parte Wawn (1939) 61 CLR 596, at pp 620, 628; see also Mansell v. Beck (1956) 95 CLR 550).*
>
> *The Privy Council said that permissible regulation of trade might take the form "of excluding from passage across the frontier of a State creatures or things calculated to injure its citizens": The Commonwealth v. Bank of N.S.W.(1949) 79 CLR 497, at p 641; (1950) AC, at p 312. See also Fergusson v. Stevenson (1951) 84 CLR 421, at pp 434-435, and the views of Inglis Clark in Studies in Australian Constitutional Law, (1901), p 146 and of Harrison Moore in The Constitution of the Commonwealth of Australia, 2nd ed. (1910), p 571, and cf. Quick and Garran, op cit, pp 850-853).*
>
> *Where the true character of a law, ascertained by reference to the "grounds and design of the legislation, and the primary matter dealt with, (and) its object and scope": Ex parte Nelson (No.1) (1928) 42 CLR , at p 218), is to protect the State or its residents from injury, a law which expressly prohibits or impedes movement of the apprehended source of injury across the border into the State may yet be valid: Chapman v. Suttie (1963) 110 CLR 321, at p 341. However, the severity of and need for the prohibitory measure are relevant considerations: Tasmania v. Victoria (1935) 52 CLR , at pp 168-169).*
>
> *After Cole v. Whitfield, these cases need not be seen as exceptions to a general invalidation of laws impairing the guaranteed freedom of interstate trade and commerce, but the reasoning in these cases is material to the scope of the guaranteed freedom of interstate intercourse. Although State borders are not to be regarded "as in themselves possible barriers to intercourse between Australians", they do mark the territorial end of one area of legislative competence and the territorial beginning of another. Since State legislative competence is maintained by ss.106 and 107 of the Constitution, s.92 cannot transform a mere change in legal regime applicable to a person, thing or intangible that is moved across a State boundary into an impermissible burden on that movement. The change in the legal regime on one side of the border may impose a burden that is not imposed on the other, but that is not enough in itself to amount to an impermissible burden.*
>
> *Nor does s.92 purport to place interstate intercourse in a position where it is immune from the operation of laws of general application which are not aimed at interstate intercourse. The object of s.92 is to preclude the crossing of the border from attracting a burden which the transaction would not otherwise have to bear; its object is not to remove a burden which the transaction would otherwise have to bear if there were no border crossing. Section 92 does not invalidate laws that do not select a movement across a State border as a criterion of the imposition of the burden but do have the effect of burdening interstate intercourse provided (1) the law is enacted chiefly for a purpose other than preventing or impeding a crossing of a State border, (2) the*

imposition of the burden is appropriate and adapted to the fulfilment of the other purpose: Cf. Castlemaine Tooheys Ltd. v. South Australia (1990) 169 CLR , at pp 471-472, where a corresponding requirement in relation to freedom of interstate trade and commerce is discussed) and (3) the prevention or impediment to border crossing is an incidental and necessary consequence of the law's operation: R. v. Connare; Ex parte Wawn (1939) 61 CLR , at p 616).

Of course, many transactions which constitute interstate trade and commerce equally constitute interstate intercourse, but it does not follow that the protection with which s.92 clothes a single interstate movement requires the transaction to be classified exclusively as either trade and commerce or as intercourse. The protection which s.92 gives to a particular interstate movement is indirect: it invalidates a law which would otherwise apply to an interstate movement where the law imposes an impermissible burden on transactions of the kind in which the particular movement occurs.

This view of the operation of s.92 found some support even before Cole v. Whitfield: See North Eastern Dairy Co. Ltd. v. Dairy Industry Authority of N.S.W. (1975) 134 CLR , at pp 614-615; Clark King and Co. Pty. Ltd. v. Australian Wheat Board (1978) 140 CLR 120, per Mason and Jacobs JJ. at p 188; Australian Coarse Grains Pool Pty. Ltd. v. Barley Marketing Board (1985) 157 CLR 605, at pp 649-650; Miller v. TCN Channel Nine Pty. Ltd. (1986) 161 CLR , at pp 570-571,609-610) and, since Cole v. Whitfield, replaces the "individual rights" theory of s.92 which had prevailed at one time: Barley Marketing Board (N.S.W.) v. Norman (1990) 171 CLR 182, at p 201). In accordance with this view, the validity of a law affecting interstate trade and commerce is now tested by reference to its discriminatory and protectionist effect: See Castlemaine Tooheys Ltd. v. South Australia (1990) 169 CLR , at pp 471ff). A law which imposes a burden on interstate trade or commerce must satisfy the test propounded in Cole v. Whitfield if it is to escape invalidity; a law which imposes a burden on a category of interstate intercourse (whether or not it is also a category of interstate trade or commerce) must satisfy a test stated in the terms discussed in this judgment. If one law applies to a movement because the movement occurs in a transaction of interstate trade and commerce and another law applies to the same movement because it is an instance of interstate intercourse, it is necessary to determine the validity of each law in order to decide whether any burden legislatively imposed on the movement has been validly imposed."

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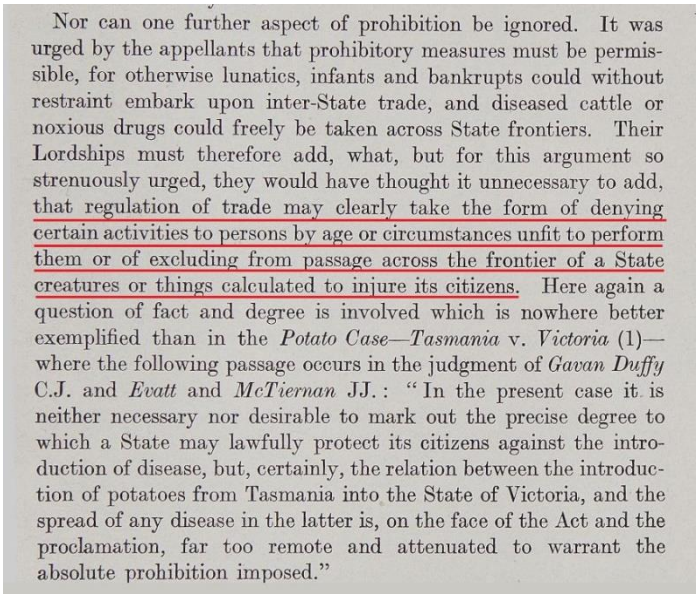
It is important to note that the provision does not imply a blanket prohibition over any laws that restrict access into a State, as seen during the COVID-19 pandemic. As stated by the Privy Council in ***Commonwealth v Bank of New South Wales [1949] UKPCHCA 1; [1949] 79 CLR 497*** (on page 461) permissible regulation of trade might take the form *"of excluding from passage across the frontier of a State creatures or things calculated to injure its citizens":*



Nor can one further aspect of prohibition be ignored. It was urged by the appellants that prohibitory measures must be permissible, for otherwise lunatics, infants and bankrupts could without restraint embark upon inter-State trade, and diseased cattle or noxious drugs could freely be taken across State frontiers. Their Lordships must therefore add, what, but for this argument so strenuously urged, they would have thought it unnecessary to add, that regulation of trade may clearly take the form of denying certain activities to persons by age or circumstances unfit to perform them or of excluding from passage across the frontier of a State creatures or things calculated to injure its citizens. Here again a question of fact and degree is involved which is nowhere better exemplified than in the *Potato Case—Tasmania* v. *Victoria* (1)—where the following passage occurs in the judgment of *Gavan Duffy* C.J. and *Evatt* and *McTiernan* JJ.: "In the present case it is neither necessary nor desirable to mark out the precise degree to which a State may lawfully protect its citizens against the introduction of disease, but, certainly, the relation between the introduction of potatoes from Tasmania into the State of Victoria, and the spread of any disease in the latter is, on the face of the Act and the proclamation, far too remote and attenuated to warrant the absolute prohibition imposed."

Hence when in ***Palmer & Anor v The State of Western Australia & Anor [2020] HCATrans 180*** the High Court was asked whether the *Quarantine (Closing the Border) Directions* (WA) and/or the authorising *Emergency Management Act 2005* (WA) were invalid because they impermissibly infringed section 92 of the *Constitution,* the court responded that on their proper construction, in their application to an emergency constituted by the occurrence of a hazard in the nature of a plague or epidemic, comply with the constitutional limitation of section 92 of the Constitution in each of its limbs.

The detailed reasons were published in ***Palmer v Western Australia [2021] HCA 5***.

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The Victorian government declared a state of emergency across the whole of Victoria in response to the COVID-19 pandemic, emergency powers became available under ss 200(1)(b) and (d) of the *Public Health and Wellbeing Act 2008 (Vic)* which include the ability to "*restrict the movement of any person or group of persons within the emergency area"* and to *"give any other direction that the authorised officer considers is reasonably necessary to protect public health"*. These Lockdown Directions restricted Victorians movement within their state, and Julian Gerner, a restaurant owner in Melbourne, had suffered significant loss of revenue due to these directions. In ***Gerner v Victoria [2020] HCA 48***, he sought to have the directions, and their supporting legislation declared constitutionally invalid, arguing that a careful reading of the text of the Constitution would reveal a necessary implication that Australians have freedom of movement, and that was being limited by the directions. The applicants position was that the freedom of movement was an implication of Federation, essential to ensuring free political communication, and that the explicit protection provided by section 92 of the Constitution implies a freedom to move within the states, as well as between them.

In a unanimous verdict (Kiefel CJ, Gageler, Keane, Gordon and Edelman JJ), the Court rejected his argument that there was an implied freedom of movement. Their Honours found the colonies prior to Federation clearly had the power to limit the common law right to free movement, and this power was preserved by section 106 of the Constitution, that the limits placed on movement by Victoria did not

serve to limit political communication in any tangible, impermissible fashion. Moreover, section 92 of the Constitution did not support the purported implied freedom at all, in fact, the very existence of section 92 was required precisely because governments can otherwise limit the common law right of free movement, citing the Constitutional Conventions where quarantine was accepted as a legitimate reason for limiting movement within a state.

News: "***Hotelier Julian Gerner's coronavirus lockdown challenge rushed to High Court***" NewsWire: "***Hotelier Julian Gerner to lodge High Court challenge against Melbourne lockdown***" The Guardian: "***High court rejects legal challenge against Victoria's Covid lockdown***" SCL: "***High Court Rules Lockdown Restrictions Are Constitutional***" Mondaq: "***Australia: COVID restrictions are legal, Australian courts rule***"

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