SUPREME COURT OF THE STATE OF MISSOURI

ALVIN BROOKS, et al.	)	
	)	
Plaintiffs/Respondents	)	
	)	
v.	)	**No. SC85674**
	)	
STATE OF MISSOURI, a state government, et al.	)	
	)	
	)	
Defendants/Appellants	)	

and

BULL'S EYE, LLC, GERI STEPHENS, President of Bull's Eye, LLC, and Jim Stephens, co-owner of Bull's Eye, LLC.

Intervenors/Appellants

APPEAL FROM THE CIRCUIT COURT OF THE CITY OF ST. LOUIS

HON. STEVEN R. OHMER

APPELLANTS BULL'S EYE, LLC'S REPLY BRIEF TO RESPONDENTS' BRIEF

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SUPPLEMENTAL JURISDICTIONAL STATEMENT

Respondents have filed a combined brief, responding to issues raised by appellants on appeal and purportedly raising issues on cross-appeal. However, respondents failed to file a timely Notice of Appeal. Therefore, this Court lacks jurisdiction to consider the cross-appeal, and it must be dismissed. Goldberg v. Mos, 631 S.W.2d 342, 345 (Mo. 1982); Fagan v. Hamilton Bank, 327 S.W.2d 201, 202 (Mo. 1959). Portions of respondents' brief not directly concerned with responding to appellants' points on appeal should be stricken. Should this Court choose to consider these additional arguments in support of respondents' response, replies are included herein. However, respondents' prayers for a reversal of the Trial Court's order are not properly before this Court.

POINTS RELIED UPON

INTRODUCTION

Respondents' brief is a policy plea. They offer policy arguments on gun control rejected by the General Assembly and irrelevant to this appeal. The propriety of the legislature's decision is not at issue. No legitimate legal reason exists to strike down the new concealed carry law (hereinafter referred to as "the Act").

I. GENERAL STATEMENTS OF ERROR IN RESPONDENTS' BRIEF.

Respondents filed a combined brief, responding to appellants appeal and purportedly raising certain other issues on cross-appeal. In both portions of that brief, respondents couple their policy-based arguments with misstatements of law. The numerous misrepresentations put an onerous burden on appellants because they infect each section of respondents' brief. In order to clarify the frame of discussion, the most basic mistakes are addressed herein, prior to argument.

A. Respondents are Wrong About Missouri's Past Concealed Carry Laws.

Respondents state, "[p]rior to this Act, only government officials or others empowered to act as such were authorized to carry concealed weapons pursuant to the State's police power." (Respondents' Brief, p. 31). This is false. Respondents cite pages A51- A53 of their appendix, which contains § 571.030 RSMo (2000). Subsection 2 of that section authorizes corporate security advisors to carry concealed weapons and has done so for more than twenty years. (Respondents' Appendix, A52). Further, subsection 3, also longstanding, authorizes any person twenty-one years of age or older to possess a concealed weapon "in his or her dwelling unit or upon premises over which the actor has

possession, authority or control, or is traveling in a continuous journey peaceably through this state." Id. This is not new law. Respondents have been repeatedly confronted with this history and encouraged to read the statute. They have either failed to do so, or made the tactical decision to try and hide its existence.

Respondents' brief can only be accepted if § 571.030.3 RSMo (2000) and its precursors are excised from the law. Also in their statement of facts, respondents state, "[t]he new part of Section 571.030.3 invalidates the current criminal prohibition in Section 571.030.1(1) thereby allowing anyone, of any age, to possess a concealed weapon upon any premises over which they have possession, authority or control." (Respondents' Brief, p. 20). Again, this portion of subsection 3 is not new.

B. Respondents' Are Wrong About Missouri's New Concealed Carry Law.

Respondents make various arguments related to the consequences of this Act and its impact on society. Again, these are irrelevant policy arguments. But many of them also misrepresent the language of the Act itself.

Respondents argue that "the legislation removes criminal prohibitions for carrying 'exposed' weapons, provided a permit has been obtained." (Respondents' Brief, p.67). There are no "criminal prohibitions" to be removed. Exposed weapons are not illegal in Missouri. Local ordinances may speak to that issue, but the General Assembly has not.

Respondents argue that this Act authorizes citizens to carry hand grenades and pipe bombs. (Respondents' Brief, pp. 18, 65, 66). This ignores § 571.020 RSMo (2000),

the section immediately preceding § 571.030 RSMo (2000) which makes it a crime to possess such a device.

Respondents argue that guns can now be carried into schools without recourse. First, laws related to exposed weapons remain unchanged. Second, laws related to trespass will still prevent guns from entering posted buildings. Third, Federal law already prohibits virtually any gun from entering a school. U.S. v. Danks, 221 F.3d 1037, 1038-39 (8th Cir. 1999).

These misrepresentations improperly color the discussion. But, even if taken as true, they are irrelevant because they would not form a legal basis for striking down the Act. They address the propriety of the general assembly's judgment, not the constitutionality of the Act.

C. Respondents Are Wrong About the Missouri Constitution.

Respondents make multiple arguments based upon misstatements or misunderstandings of Constitutional law. As with the foregoing misrepresentations, these presumptions are pervasive and taint the various arguments made.

1. Respondents Misunderstand the Concept of Plenary Power.

The General Assembly exercises plenary power, subject to restraint by the Constitution. Respondents acknowledge this at various points in their brief. (Respondents' Brief, p. 47, et seq.). However, they do not apply the premise to their argument. If the General Assembly maintains plenary power, it requires no specific authorization from the Constitution in order to act. The Assembly must respect prohibitions against acting, but it otherwise requires no affirmative authorization.

Respondents argue for multiple pages that "Article I, Section 23 is Devoid of Language Conferring Authority on the General Assembly." (Respondents' Brief, p. 44). Respondents argue "If the people of Missouri had wanted to authorize the General Assembly to legislate in this area, they would have said so like other states did, rather than enacting a prohibition that does not even mention the General Assembly." (Respondents' Brief, p. 46, n. 5). It is precisely the absence of any mention of the General Assembly that prevents this from being a "prohibition." Silence leaves the issue in the Assembly's discretion.

Akin to this confusion is respondents' position with regard to past legislative action in this area. Respondents state, "[t]he General Assembly has enacted numerous laws banning concealed weapons." (Respondents' Brief, p. 52). Respondents interpretation of Article I, Section 23 as a constitutional ban would render all such laws superfluous. There is no need for a statutory prohibition of a constitutionally prohibited practice. The only reasonable explanation for the existence of these former laws is that the legislature was exercising its plenary power in a field not pre-empted by the Constitution.

2. Respondents' Private Citizen v. State Agent Distinction Regarding the Bill of Rights is Misguided.

Respondents argue that peace officers and other state agents have been granted a license to carry concealed weapons in contravention to Article I, Section 23 because of the police powers of the state. (Respondents' Brief, p. 40, n. 4). As noted, this explanation requires that § 571.030.3 RSMo (2000) be excised from Missouri law.

Because private citizens have always retained certain abilities to carry concealed weapons, this private citizen versus state agent distinction makes no sense.

Section 571.030.3 RSMo (2000) is only the latest in a long line of Missouri statutes governing concealed carry. Appellants have begged for an explanation from respondents for the contradiction of a Constitutional ban existing in harmony with statutes defying the "ban." Respondents' solution is an Orwellian attempt to rewrite history. The existence of § 571.030.3 RSMo (2000) proves that the private citizen versus state agent distinction is inadequate. Article I, Section 23 must either prohibit all concealed carry, or leave the issue open for legislation. The language and history demonstrate respondents' error.

3. Respondents' Public Policy Arguments Violate Constitutional Principles.

A significant portion of respondents' brief is spent undermining their proposition that this is not a gun control case. They state that "this is not a pro-gun or an anti-gun case, but instead the case turns solely on Missouri constitutional issues." (Respondents' Brief, p.32). But under the guise of explaining changes to existing law, respondents argue that the consequences of this law are too terrible to bear.[1] The result is a diatribe

[1] Respondents use the word "evil" no fewer than twelve (12) times in their brief to describe the practice of carrying a concealed weapon, and devote five (5) pages to a discourse on the lack of civility in Missouri around the end of the nineteenth century, a condition they apparently attribute to this "evil" practice.

on why the law should not have been passed. Such arguments have no bearing on the question of constitutionality.

Respondents couch their policy arguments in various forms, most notably as *faux* constitutional rights now endangered. According to respondents:

> The Act denies to citizens their constitutional rights protected by Section 23 because it:
>
> (1) makes sweeping changes to the gun laws of this state;
>
> (2) decriminalizes existing criminal conduct;
>
> (3) authorizes untrained persons without a permit to conceal weapons;
>
> (4) expands the use of deadly force to anyone, permit holder or not.

(Respondents' Brief, p. 64).

Respondents argue that these changes are "ill-conceived," a judgment that does not bear on the Act's constitutionality. Id.

There is nothing unconstitutional about sweeping changes being made to any law. Ours is not a static system of government. Similarly, the fact that formerly prohibited conduct is now decriminalized does not bear on the question of constitutionality.

Respondents' claim that the Act newly "authorizes untrained persons without a permit to conceal weapons" is, again, a misrepresentation, apparently due to the excision of § 571.030.3 RSMo (2000). (Respondents' Brief, p. 64). Respondents' brief is especially confusing, as it lists long-standing exceptions to the § 571.030.1 RSMo (2000)

prohibition, but describes them as new.[2] (Respondents' Brief, p.68). Respondents' conclusion that "the Act authorizes anyone, permit holder or not, to carry a concealed weapon in a number of locations never before contemplated" is just wrong. Id. But even if correct, it would not bear on the act's constitutionality.

Respondents' final claim that the Act "expands the use of deadly force to anyone, permit holder or not," is likewise an irrelevant argument and untrue. (Respondents' Brief, p. 64). Even if this Court were authorized to usurp the General Assembly's judgment, respondents' argument is faulty. Respondents argue that "a claim of 'defense' allows anyone to 'discharge or shoot a firearm into a dwelling house, railroad, train, boat, aircraft or motor vehicle" or any "building or structure used for the assembling of people." (Respondents' Brief, p. 70)(emphasis added). But a "claim" of a defense allows nothing. Nothing in this Act changes the requirements of § 563.031 RSMo (2000) or the fact that a jury would judge the actor's reasonable belief of danger. The Act will not force a jury to accept that a drive-by shooting is done in self-defense, as respondents suggest. (Respondents' Brief, p. 70).

[2] Respondents also inject a vagueness argument into this section of the brief, but it likewise attacks old rather than new law. (Respondents' Brief, p. 68). Respondents complain about the phrase "possession, authority or control" in defining an actor's premises. This language is part of the old statute, § 571.030.3 RSMo (2000), and has apparently not suffered because of its alleged vagueness.

None of these policy concerns involve a constitutional right. Respondents apparently mean to argue that citizens' ability to defend themselves is diminished by the Act, but there is no record to support this. Any such record, if it can be made, should be brought before the next legislative session, where respondents' can exercise their actual constitutional rights. This Court is not a legislative subcommittee.

APPELLANTS' REPLY TO RESPONDENTS' BRIEF ON APPEAL[3]

II. THE TRIAL COURT ERRED IN RULING THE CONCEALED CARRY LAW UNCONSTITUTIONAL BECAUSE THE PLAIN LANGUAGE OF THE CONSTITUTION CONTAINS NO PROHIBITION ON CONCEALED CARRY LEGISLATION AND A PLAIN MEANING INTERPRETATION IS REQUIRED IN THAT THE LANGUAGE IS NOT VAGUE.

(Respondents' Point I)

Respondents are correct, that if the few lines of Section 23 so plainly state what appellants claim, linguistic ingenuity is not necessary. (Respondents' Brief, p. 46). The clause says what it says:

> **That the right of every citizen to keep and bear arms in defense of his home, person and property, or when lawfully summoned in aid of the civil power, shall not be questioned; but this shall not justify the wearing of concealed weapons.**

MO Const. Art. I § 23.

Respondents cite case law, holding "crucial words must be viewed in context, and courts must assume that words were used purposefully." (Respondents' Brief, p. 49, citations omitted). That is an invaluable point. Words such as "this," referring to the preceding clause in Section 23, must be presumed to be purposeful. The Court must

[3] Appellant will not address Points raised by Appellant State, addressed in Respondents' Brief.

presume that when the word "this" was used to replace "nothing herein contained" in 1945, it was a purposeful decision. And when respondents note that these two clauses, one from 1875 and one from 1945, are the same, they acknowledge that "this" purposefully limits the modifying clause to its grammatical antecedent, just as the word "herein" explicitly did the same. These purposeful words establish that the clause in question is a clarification only, not a prohibition. The clause says what it says.[4]

[4] Respondents' deification of Mr. Gantt aside, note that his championed clause used the phrase "nothing herein contained," which is more explicitly limiting than the later adopted "this."

APPELLANT'S RESPONSE TO RESPONDENTS' CROSS APPEAL

III. THE TRIAL COURT DID NOT ERR IN REFUSING TO ENJOIN THE CURRENT ACT BECAUSE OF ALLEGED VIOLATIONS OF ARTICLE X IN ANY OF ITS SECTIONS, IN THAT THE "HANCOCK AMENDMENT" HAS NOT BEEN VIOLATED BECAUSE THERE HAS BEEN NO DEMONSTRABLE DAMAGE BY AN APPROPRIATE PARTY AS REQUIRED THEREIN.

(Respondents' Points IV and V)

Intervenor-Appellant joins in the comments and arguments of Appellant State in regard to the alleged violations of the Hancock Amendment, and wholly adopts said arguments as if fully set forth herein.

IV. THE TRIAL COURT DID NOT ERR IN REFUSING TO ENJOIN THE CURRENT ACT BECAUSE OF ALLEGED VAGUENESS, IN THAT THE TRIAL COURT RECOGNIZED THAT THE ACT IS NOT VAGUE BECAUSE IT IS SUSCEPTIBLE TO A REASONABLE AND PRACTICAL CONSTRUCTION WHICH WILL SUPPORT IT.

(Respondents' Point VI)

Respondents basically state the test for vagueness accurately, although the concomitant warnings to the courts are omitted. "Neither absolute certainty nor impossible standards of specificity are required in determining whether terms are impermissibly vague." Harjoe v. Herz Financial, 108 S.W.3d 653, 655 (Mo. banc 2003)(citing State v. Duggar, 806 S.W.2d 407, 408 (Mo. banc 1991)). "Moreover, it is well established that 'if the law is susceptible of any reasonable and practical construction which will support it, it will be held valid, and . . . the courts must endeavor, by every rule of construction, to give it effect.'" Id. (citations omitted). Respondents' arguments for a contrary approach are exhausting.

Respondents state that there is no scienter requirement in the Act. First, the Act only applies to persons educated and familiar with the requirements of this very law. See New § 571.094.23(7). Second, in order to violate the law, this educated person must

be asked to leave the premises as described in the law, and refuse to do so.[5] Recognizing these two steps, respondents conclude "[t]here is simply no requirement that the person knowingly violate the provisions of the law." (Respondents' Brief, p.103). In fact, this law would be completely inapplicable to anyone unfamiliar with the law and therefore capable of violating its provisions unknowingly.

Respondents next protest that permit holders could be subject to "the whim of an owner or occupier" of property. (Respondents' Brief, p. 105). This is true with or without weapons. It is an issue of trespass. Respondent's failure to appreciate property rights cannot increase the relevance of their case law. City of Chicago v. Morales, 527 U.S. 41 (1999) dealt with peace officers and loiterers on public property. The Court held the statute vague because it required speculation by the peace officers on the subject's intent. Id. at 60-64. Here, intent is irrelevant. A business owner may eject any member of the public for any non-discriminatory reason.

Respondents conclude that the Missouri law is even more offensive than the statute in Morales because it leaves discretion in the hands of private citizens rather than an arm of the state. (Respondents' Brief, p.105). This is both creative and disturbing in that it requires a supposition that the government is a more appropriate authority in a home than the homeowner, a proposition that defies the very idea of a bill of rights.

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[5] Note that respondents repeatedly refer to these violations as "crimes," although the Act itself explicitly states that a transgression of the type contemplated by respondents "shall not be a criminal act." § 571.094.21.

Respondents further argue that the government should instruct the homeowner on the manner in which a request to leave should be structured. (Respondents' Brief, p. 106). Surely the government can trust the average citizen's ability to rule his/her home, as it has for more than two hundred years.

The remaining arguments by respondents are not complaints that the act itself is vague. Rather, they are objections to the wisdom of the act itself. Respondents raise policy objections throughout their brief, arguing that it is evil and unsafe to carry concealed weapons. But, in this section they complain that the act "requires an unbelievable level of inquiry by the public before they enter such an establishment with a concealed firearm." (Respondents' Brief, p. 108). There are allegedly too few guidelines and too many instructions.

Respondents ignore, purposefully or through ignorance of the law, the fact that the permit holders, the only citizens subject to the "quasi-prohibited concealed carry locations," must demonstrate knowledge of the law and its restrictions. New § 571.094.23(7) requires such an education prior to the issuance of a permit. That provision guarantees that a person faced with the hypothetical situations described by respondents will either comply with the rules or knowingly defy them.

Moreover, this Court has ruled on this same challenge to a concealed carry law and denied the standing respondents now assert. In State v. Horne, 622 S.W.2d 956 (Mo. 1981), this Court ruled that the legislature could appropriately authorize private citizens to carry concealed weapons by carving out exceptions to the general prohibition. Horne complained that § 571.115, the precursor to § 571.030 RSMo (2000), was vague in that it

failed to adequately define the class to which the exception applied. Id. at 958. But Horne was admittedly not within that class. Id. at 959.

In denying Horne's challenge, this Court held:

> Appellant is not entitled to challenge for vagueness a provision of the statute which constitutes only an exception to those persons subject to the penal provisions when appellant does not contend he is or should be included in the class to which the exception applies. Id.

Here, respondents are likewise not in the excepted class, nor do they claim to be. The Act in question carves out a class of people who may be exempt from the general prohibition against concealed carry, which remains in effect through new § 571.030. By their argument, respondents disavow membership in this exempted class. Therefore, respondents are not entitled to challenge the provision itself for vagueness.

In truth, this is a complex and thorough law, but that does not make it vague. Respondents are not truly concerned that the law will not be understood, they simply dislike their own understanding of it. Respondents' theorized consequences do not speak to constitutionality, however. Policy issues are addressed in the voting booths, not courts. This point should be denied because the law is susceptible to a reasonable and practical construction rendering it understandable, workable, and valid.

V. THE TRIAL COURT DID NOT ERR IN REFUSING TO ENJOIN THE CURRENT ACT BECAUSE OF AN ALLEGED VIOLATION OF ARTICLE I, SECTION I OF THE MISSOURI CONSTITUTION, IN THAT THE GENERAL ASSEMBLY EXERCISED ITS AUTHORITY PURSUANT TO THE CONSTITUTION IN PASSING THIS ACT.

(Respondents' Point VII)

Respondents state that this legislative enactment violates Article I, Section 1 of the Missouri Constitution, according the argument an appropriately truncated space. Essentially, respondents argue that the failed referendum on concealed carry, known as Proposition B, was a mandate to the General Assembly, prohibiting countermanding legislation.[6] The citizenry possesses no such power, short of constitutional amendment.

Missouri, like the nation as a whole, is not a pure democracy. Rather, it is a Republic, governed by representatives vested with complete authority to vote in their constituents' stead. In this way, all political power is not only *vested in* the people, it is *derived from* the people, as noted in Article I, Section 1. The General Assembly exercises the authority it derives from the people, subject to review on Election Day. No prior acts by the people or other assemblies prevent the General Assembly's exercise of that authority.

[6] Respondents rely upon the false premise that Proposition B and the current Act are identical.

As respondents point out, the citizenry retains a limited right to legislate directly, through referendum. But respondents fail to point out that the citizenry opted not to exercise the right of referendum following passage of this act. Article III, Section 52(a) of the Constitution allows for a review of the type respondents now seek in the Courts. That section reserves to the citizenry the right to file a referendum petition with the Secretary of State within ninety (90) days of the legislative session closing, seeking a *de facto* review by the citizenry of a legislative enactment. Here, that was not done.

Respondents close their argument on this point by asking, "The State argues at length that great deference must be given to legislative enactments, but should not more be given to the people whom the General Assembly is supposed to represent." (Respondents' Brief, p. 112). The simple answer is no. Deference to the citizenry is the responsibility of the legislature. But when the General Assembly acts within its Constitutional authority, the Courts cannot and must not engage in public polling to review the merits of those actions. Respondents' claim of error invites a wholesale modification of the Constitution they claim to protect. This point should be denied.

VI. THE TRIAL COURT DID NOT ERR IN DENYING RESPONDENTS' PRE- AND POST-JUDGMENT MOTIONS BECAUSE THE COURT APPROPRIATELY DENIED SAID MOTIONS IN THAT IT ENTERTAINED ALL SUCH MOTIONS, DENYING THEM PURSUANT TO ITS DISCRETION.

(Respondents' Point VIII)

In their final point on appeal, respondents argue that the Trial Court erred by denying them leave to amend their pleadings pre- and post-judgment. They cite no case law in support, nor is there a standard of review provided to this Court. Respondents simply cite to Rule 55.33(b), which allows for liberal amendments. However, the Rule and the case law clearly leave such decisions in the discretion of the Trial Court.

"Whether to allow the amendment of a pleading is at the discretion of the trial court and this court will not disturb its decision absent an obvious and palpable abuse of discretion." Kenley v. J.E. Jones Constr. Co., 870 S.W.2d 494, 498 (Mo. App. E.D. 1994), (citing Osborn v. Boatmen's Nat'l Bank, 811 S.W.2d 431, 437 (Mo. App. E.D. 1991)); see also, Arnold v. Ingersoll-Rand Co., 908 S.W.2d 757, 760-61 (Mo.App. E.D. 1995).

Here, the Trial Court entertained respondents' various motions, even noticing them for hearing *sua sponte* after respondents failed to do so. A hearing was held on December 18, 2003, and the Trial Court judged it unnecessary to grant the motions. The Trial Court has the discretion to do that, and respondents present nothing in their current brief to demonstrate "an obvious and palpable abuse of discretion." Nor have

respondents demonstrated any prejudice from the Trial Court's decision. This point should be denied.

CONCLUSION

Respondents' points on cross-appeal are not properly before this Court. Even so, the arguments, like those offered in response to appellants' points on appeal, do not justify striking down this Act. Respondents argue policy and judgment rather than constitutionality. Under constitutional review, this Act represents a proper exercise of the legislative authority. The Act does not violate any prohibition of the Constitution. Nor does it infringe upon any constitutional right. It is susceptible to a reasonable and practical construction, and is therefore not vague. Because it passes Constitutional muster, the Trial Court erred in enjoining its enforcement. Appellants respectfully request that the Trial Court's order be reversed, that this Court dissolve the injunction against the Act's enforcement, and that an order issue allowing for the immediate implementation of this Act.

Rule 84.06(b) Certification

Counsel hereby certifies that this Brief, submitted on behalf of Appellants Bulls Eye, LLC, Geri Stephens and Jim Stephens, intervenors below, complies with Rule 84.06(b). The word count is 4,187.

Certification of Virus-Free Disk

The enclosed disk, provided to the Court pursuant to Rule 84.06(g), has been scanned and is virus-free.

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