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IN THE
INDIANA SUPREME COURT

No. 22A-CR-578

STATE OF INDIANA,
*Appellant-Plaintiff*,

v.

$2,435 IN UNITED STATES CURRENCY AND ALUCIOUS KIZER,
*Appellee-Respondent*.

Interlocutory Appeal from the Allen Circuit Court,

No. 02C01-2109-MI-825,

The Honorable Wendy W. Davis, Judge.

**RESPONSE IN OPPOSITION TO TRANSFER**

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The Court of Appeals correctly decided this question and no further review is necessary. This Court has previously found that there is no right to a jury trial under a prior forfeiture statute, and Indiana courts have long followed that practice in applying Indiana's current forfeiture statutes. The special statutory scheme allowing forfeiture of instruments of crime affords a judicial determination of whether property used to facilitate or derived from a crime is subject to seizure and forfeiture. The law does not violate the state constitution's jury right because the provisions came after the constitutional enactment and did not merely codify a common-law action. But even if such an action existed at common law, there was no entitlement to a jury because the forfeiture action at issue here is equitable. There is no need for this Court to revisit this issue; the Court should deny transfer.

## BACKGROUND AND PRIOR TREATMENT

While running from police following a traffic stop, Kizer dropped $1,025 in U.S. currency and a green bag continuing 67.4 grams of fentanyl, 74.6 grams of methamphetamine, 22.7 grams of cocaine, and a small amount of an apparent synthetic cannabinoid (App. 9). When apprehended, officers found an additional $1,410 in U.S. currency on Kizer's person (App. 9). The State brought this present action for forfeiture under the provisions of Indiana Code chapter 34-24-1 based on the contention that the $2,435 was proceeds of or facilitated a criminal drug dealing act (App. 14-15). The sole issue in this interlocutory appeal is whether the trial court erred by finding Kizer has a state law right for a jury trial in this proceeding (App. 37-39).

The Court of Appeals applied the "well-settled" precedent "that a complaint by the State for the forfeiture of illegal property is 'not a civil case under the common law'" and does not entitle a respondent to a jury trial. *State v. $2,435 and Kizer*, 194 N.E.3d 1227, 1229, No. 22A-CR-578, slip op. at 3-4 (Ind. Ct. App. Sept. 19, 2022) (*quoting Campbell v. State*, 171 Ind. 702, 87 N.E. 212, 214-15 (Ind. 1909)). The court further noted that its own precedent recognizes that because a forfeiture denies "'individuals the ability to profit from ill-gotten gain, an action for forfeiture resembles an equitable action for disgorgement or restitution.'" *Id*. (quoting *Caudill v. State*, 613 N.E.2d 433, 437 (Ind. Ct. App. 1993)). Kizer now seeks review on transfer.

## ARGUMENT

### The Court of Appeals properly applied this Court's precedent in rejecting Kizer's request for a jury trial.

The Court of Appeals' opinion should stand because it upholds this Court's precedent, the statutory language, and Indiana's long-established practice by denying Kizer's request for a jury trial in this forfeiture action for money used as an instrument of drug dealing or derived from that crime. The Indiana Constitution provides that "[i]n all civil cases, the right of trial by jury shall remain inviolate." Ind. Const. art. 1, § 20. The Court has implemented that right through Trial Rule 38(A) which provides, in relevant part, that "Issues of law and issues of fact in causes that prior to the eighteenth day of June, 1852, were of exclusive equitable jurisdiction shall be tried by the court; issues of fact in all other causes shall be triable as the same are now triable." *See Songer v. Civitas Bank*, 771 N.E.2d 61, 63

(Ind. 2002) (explaining state constitutional basis of the trial rule). Kizer is not entitled to a jury trial under these provisions.

In applying Art. 1, § 20, this Court has found that special statute-created judicial proceedings do not create a right to a jury trial. *State ex rel. Boeldt v. Criminal Court of Marion Cnty.*, 236 Ind. 290, 139 N.E.2d 891, 893 (1957) (finding proceeding for restoration of sanity to be "a statutory proceeding, which is civil in nature, and it is not triable by a jury"); *State ex rel. Newkirk v. Sullivan Circuit Court*, 227 Ind. 633, 88 N.E.2d 326, 328 (1949) (finding no right to a jury trial for "special statutory proceedings"); *Campbell*, 87 N.E. at 214-15 (finding "it has been uniformly held in this state that in statutory proceedings parties are not entitled to trial by jury as a constitutional right"); *Anderson v. Caldwell*, 91 Ind. 451, 454 (1883) ("We think it is a special statutory proceeding, in which it is competent for the Legislature to dispense with a jury."). Kizer argues this principle does not apply here based on language from *Puterbaugh v. Puterbaugh*, 131 Ind. 288, 30 N.E. 519, 521 (1892) (Trans. Pet. 16). But *Puterbaugh* only recognizes that some statutory actions are a codification of common-law. *See id.* The basis of the *Puterbaugh* holding finding a right to a jury trial is that the statutory quiet title provisions were "substantially the same a[s] the common–law action of ejectment …." *Id.* But special statuary proceedings, such as the one at issue here, do no create a jury right.

**A. Indiana's forfeiture law for proceeds and instruments of crime is a recent statutory action which does not support a right to a jury trial.**

The plain language of the statute providing judicial review for seizures of proceeds and instruments of certain crimes including drug crimes and for *in rem*

forfeiture of those items creates an action which is tried to a court. I.C. § 34-24-1-4. The statute provides for a judicial "hearing" where a prosecutor must show that the seizure was proper, does not mention any role of a jury, and explicitly empowers a court—not a jury—to enter findings awarding forfeiture based on whether the State meets its evidentiary burden. *Id*. As the legislature has created the *in rem* forfeiture cause of action and provided for a hearing without a right to jury, "a jury may not be demanded." *Graham v. Plotner*, 87 Ind. App. 462, 151 N.E. 735, 738 (1926).

This Court reached the same conclusion in *Campbell*, interpreting a prior forfeiture statute, when it held that an action for the civil forfeiture of liquor did not entitle a party to a trial by jury. *Campbell*, 87 N.E. at 214-15. The Court reasoned that this "is a statutory proceeding, and not a civil case under the common law when the Constitution was adopted, providing that the right to a jury trial shall remain inviolate, and so it has been uniformly held in this state that in statutory proceedings parties are not entitled to trial by jury as a constitutional right." *Id*. The Indiana Court of Appeals properly relied on *Campbell* and reached the same result here. *$2,435 and Kizer*, 194 N.E.3d at 1229, slip op. at 3-4.

On transfer, Kizer claims that *Campbell* only applies to the forfeiture of contraband. But Kizer is incorrect because *Campbell* did not involve property that could not be legally owned. That case involved the illegal possession of alcohol for sale without a "license authorizing him to sell intoxicating liquors in less quantities than five gallons at a time to be used as a beverage" and occurred a full decade

before the ratification of the Eighteenth Amendment in 1919 and even further before Indiana generally prohibited the mere possession of any alcohol in 1925. *Campbell*, 87 N.E. at 213; *Branam v. State*, 200 Ind. 575, 165 N.E. 314, 314 (1929) (interpreting 1925 ban on possession of alcohol). While *Campbell* did occur during the era of temperance alcohol restrictions that led up to the ban of alcohol, alcohol was not contraband *per se* at that time. If the property at issue had been illegal to possess there would have been no case because illegal goods are subject to confiscation without forfeiture as "one cannot have a property right in that which is not subject to legal possession." *Cooper v. City of Greenwood, Miss.*, 904 F.2d 302, 305 (5th Cir. 1990); *see also Branam v. State*, 200 Ind. 575, 165 N.E. 314, 314 (1929) ("it must be remembered that there is no property right in contraband liquor"). Like in *Campbell*, this Court should find that the special statutory cause of action for forfeiture at issue here creates no right to a jury trial.

**B. Other States have found no state constitutional right to jury trial in similar forfeiture cases.**

Other state supreme courts applying similar constitutional provisions have also found no right to a jury trial for *in rem* forfeiture of money used in drug dealing because such laws did not exist at common law. *In State v. $17,515 in cash*, 670 N.W.2d 826, 828 (N.D. 2003), the North Dakota Supreme Court found that "because there was no available action in [that] state for forfeiture of proceeds from illegal drug transactions at the time the constitution was adopted, there was no right to a jury trial in such an action." *Id.* at 828. The Georgia Supreme Court similarly found "the right to jury trial in drug forfeiture proceedings did not exist in 1798"

and "the General Assembly was authorized to provide for a bench trial in that proceeding …." *Swails v. State*, 431 S.E.2d 101, 103 (Ga. 1993); *see also State v. Morris*, 405 S.E.2d 351, 353 (N.C. 1991) (finding no constitutional or statutory right for a jury trial under North Carolina's drug forfeiture statute); *Helms v. Tennessee Dep't of Safety*, 987 S.W.2d 545, 549 (Tenn. 1999) (finding no right to jury trial for money traceable to illegal drug trade because the state had no history of forfeiture proceedings prior to the adoption of state constitution).[1]

In his petition for transfer, Kizer claims that two federal circuit courts and "at least fourteen state supreme courts" have found a "common-law right to jury trials" in forfeiture actions (Trans. Pet. 14-15). But none of the cases he cites are addressing anything like *in rem* forfeiture of money used as an instrument of a drug crime or forfeiture of money derived from such a crime, but instead every case addresses punitive forfeitures of vehicles and real property. *See United States v. One 1976 Mercedes Benz*, 618 F.2d 453, 458-59 (7th Cir. 1980) (vehicle); *United States v. One Lincoln Navigator*, 328 F.3d 1011, 1014 n.2 (8th Cir. 2003) (vehicle); *People v. One 1941 Chevrolet Coupe*, 231 P.2d 832, 844 (Cal. 1951) (vehicle); *In re Forfeiture of 1978 Chevrolet Van*, 493 So. 2d 433, 436 (Fla. 1986) (vehicle); *Idaho Dep't of Law Enforcement v. Free*, 885 P.2d 381, 386 (Idaho 1994) (real property); *People ex rel. O'Malley v. 6323 N. LaCrosse Ave.*, 634 N.E.2d 743, 746 (Ill. 1994)

[1] Alabama, Michigan, Minnesota, and North Carolina have also found no state constitutional right to a jury trial for certain forfeiture actions. *In re One Chevrolet Auto.*, 87 So. 592, 592–93 (Ala. 1921); *In re Forfeiture of $ 1,159,420*, 486 N.W.2d 326, 337 (Mich. Ct. App. 1992); *State v. One 1921 Cadillac Touring Car*, 195 N.W. 778, 780 (Minn. 1923); *State v. Morris*, 405 S.E.2d 351, 352–53 (N.C. 1991).

(real property); *State v. One 1981 Chevrolet Monte Carlo*, 728 A.2d 1259, 1261 (Me. 1999) (vehicle); *Commonwealth v. One 1972 Chevrolet Van*, 431 N.E.2d 209, 212 (Mass. 1982) (vehicle); *State v. Items of Real Prop.*, 383 P.3d 236, 245 (Mont. 2016) (real property); *State v. One 1990 Honda Accord*, 712 A.2d 1148, 1157 (N.J. 1998) (vehicle); *Vergari v. Marcus*, 257 N.E.2d 652, 652 (N.Y. 1970) (vehicle); *Keeter v. State*, 198 P. 866, 868 (Okla. 1921) (vehicle); *State v. 1920 Studebaker Touring Car*, 251 P. 701, 704 (Or. 1926) (vehicle); *Commonwealth v. One 1984 Z-28 Camaro Coupe*, 610 A.2d 36, 41 (Pa. 1992) (vehicle); *Medlock v. 1985 Ford F-150*, 417 S.E.2d 85, 87 (S.C. 1992) (vehicle); *State v. One 1969 Blue Pontiac Firebird*, 737 N.W.2d 271, 276-77 (S.D. 2007) (vehicle). Those cases focus on the forfeiture of significant assets and are rooted in common-law actions; the cases do not answer the question of whether a statutory scheme like Indiana's provision for *in rem* forfeiture of money used in and derived from drug dealing supports a jury trial.[2]

Instead, the forfeiture actions addressed by the North Dakota and Georgia supreme courts as well this Court's precedent from *Campbell* are analogous to the

[2] As recognized in *State v. Timbs*, 134 N.E.3d 12 (Ind. 2019), Indiana's forfeiture statutes do authorize forfeiture in some instances which have a stronger punitive basis, and this Court found the provision therein allowing forfeiture of vehicles "is punitive by design." *Id.* at 24. But in this case the money is alleged to be from drug dealing and subject to forfeiture on a solely remedial basis (App. 9-10). Even if a respondent might be entitled to a jury trial in a largely-punitive action, Kizer can only challenge the statutory procedure as it applies to him. *See Price v. State*, 622 N.E.2d 954, 958 (Ind. 1993) ("Once an Indiana constitutional challenge is properly raised, a court should focus on the actual operation of the statute at issue and refrain from speculating about hypothetical applications.").

situation here. *In rem* civil forfeitures pursuant to Indiana's drug forfeiture laws are a special statutory procedure and not based on a common law legal action, so a jury trial is not required. Kizer has not shown any civil forfeiture actions like the one in this case—an action seeking forfeiture of funds illegally obtained from criminal activity or intended for future use in criminal activity—existed at common law in Indiana in 1852. Instead, the legislature enacted the predecessor to the present forfeiture statutes in 1981, *see Katner v. State*, 655 N.E.2d 345, 347 (Ind. 1995) (discussing history of the statutes), for certain items—including currency—related to crimes and did not provide a right to a jury trial. Ind. Code §§ 34-24-1-3, -4. Because this is a purely statutory action which empowers a court to make the forfeiture determination and there was no legal action in this State for forfeiture of proceeds from illegal drug transactions at the time the constitution was adopted, there is no right to a jury trial in this action.

**C. The relief sought is in the nature of equitable relief.**

As addressed more fully in the State's Brief of the Appellant, if this Court were to find that Indiana's forfeiture statutes are a codification of previously existing common-law and not a special statutory procedure it should still not find a right to a jury trial because the essential features of this *in rem* forfeiture action are equitable. Under Indiana's jury right provisions, claims which historically arose in equity "are to be tried to the court." *Midwest Fertilizer Co. v. Ag-Chem Equip. Co.*, 510 N.E.2d 232, 233 (Ind. Ct. App. 1987). When a specific cause of action did not exist at common law in 1852, "[t]he appropriate question is whether the essential

features of the suit are equitable." *Songer v. Civitas Bank*, 771 N.E.2d 61, 68 (Ind. 2002).

*In rem* forfeiture—sometimes described as forfeiture of guilty property—is in the nature of the relief from the equitable actions for disgorgement and restitution more than any legal actions such as replevin or conversion. *See United States v. Bajakajian*, 524 U.S. 321, 331 (1998) (observing "[t]raditional *in rem* forfeitures" were remedial); *see also State v. Timbs*, 134 N.E.3d 12, 28 n.7 (Ind. 2019) (recognizing that in some instances *in rem* forfeiture is entirely remedial such as to disgorge illegally obtained profits). In most cases, including the present one, forfeitures under Indiana Code chapter 34-24-1 seek to remove illegally obtained profits from the defendant and deter the defendant's future illegal acts by removing funds intended to facilitate those acts. *See Katner*, 655 N.E.2d at 347 (describing forfeiture's substantial "non-punitive, remedial legislative goals"); *see also Caudill v. State*, 613 N.E.2d 433, 437 (Ind. Ct. App. 1993) (finding that "by denying individuals the ability to profit from ill-gotten gain, an action for forfeiture resembles an equitable action for disgorgement or restitution."). Based on the relief sought, the action here is essentially equitable and no right to a jury attaches.

Kizer's contrary argument on transfer relies on the existence of some forfeiture actions at common-law (Transfer Pet. 13-14). While some actions for forfeiture did exist that were tried to a jury, such as the seizure of illegally imported wine in *The Sarah*, 21 U.S. 391, 394 (1823), Kizer has made no showing that actions like the one here—aimed at disgorgement of tools and profits from drug dealing—

existed or were treated as a civil action. *See also One 1976 Mercedes Benz 280S*, 618 F.2d at 461-68 (describing history of forfeiture in federal courts generally and identifying no cases involving local drug trade). In *One 1976 Mercedes Benz 280S* the appellate court recognized that "Congress is free to fashion new types of remedy, such as a special equity court or an administrative tribunal, where jury trial may validly be withheld." *Id*. at 458. Kizer is not entitled to a jury trial because our legislature has enacted this drug forfeiture law which is equitable in nature.

**D. Kizer cannot raise a new Seventh Amendment claim on transfer.**

Finally, Kizer asks this Court to "confirm that the Seventh Amendment argument is foreclosed by precedent of the U.S. Supreme Court, so that they may seek relief in that forum" (Trans. Pet. 20). But a party cannot raise a new issue for the first time in a petition to transfer.[3] *See Bunch v. State*, 778 N.E.2d 1285, 1286 n.3 (Ind. 2002) (finding issue waived because it was not raised in party's principal brief). Additionally, interlocutory appeals are limited to the issues raised in the appealed order. *DuSablon v. Jackson Cnty. Bank*, 132 N.E.3d 69, 76 (Ind. Ct. App. 2019); *see also Tom-Wat, Inc. v. Fink*, 741 N.E.2d 343, 346 (Ind. 2001) ("an interlocutory appeal raises every issue presented by the order that is the subject of the appeal."). Here, the order under appeal specifically stated it was not addressing the Seventh Amendment—or at least the precedent addressing the Seventh Amendment—because it is "not binding on the states" (App. 39). This Court should

[3] This is especially true when the party does not file a Brief of Appellee.

deny Kiser's request to interject a new issue at this late stage of an interlocutory appeal.

## CONCLUSION

For the foregoing reasons, this Court should deny transfer and allow the case to be remanded for a bench trial.

Respectfully submitted:

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## WORD COUNT CERTIFICATE

I verify that this response to transfer contains no more than 4,200 words.

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**CERTIFICATE OF SERVICE**

I certify that on November 23, 2022, I electronically filed the foregoing document using the Indiana E-Filing System (IEFS). I also certify that on November 23, 2022, the foregoing document was electronically served upon the following person(s) via IEFS:

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