No. 20-7900

IN THE SUPREME COURT OF THE UNITED STATES

MONIQUE A. LOZOYA, PETITIONER

v.

UNITED STATES OF AMERICA

ON PETITION FOR A WRIT OF CERTIORARI
TO THE UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT

BRIEF FOR THE UNITED STATES IN OPPOSITION

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QUESTIONS PRESENTED

1. Whether Congress constitutionally authorized prosecution of petitioner's misdemeanor assault, at an indeterminate point during a commercial airplane flight, in the judicial district in which the plane landed and petitioner resided, as opposed to the unknown judicial district over which the plane was passing at the moment the crime occurred.

2. Whether, assuming venue was improper, petitioner would be entitled to a judgment of acquittal.

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OPINIONS BELOW

The opinion of the court of appeals (Pet. App. 2a-42a) is reported at 982 F.3d 648. A prior order and opinion of the court of appeals (Pet. App. 44a, 46a-75a) are reported at 920 F.3d 1231 and 944 F.3d 1229. The orders of the district court (Pet. App. 77a-94a) and magistrate judge (Pet. App. 96a-108a) are unreported.

JURISDICTION

The judgment of the court of appeals was entered on December 3, 2020. The petition for a writ of certiorari was filed on April 28, 2021. The jurisdiction of this Court is invoked under 28 U.S.C. 1254(1).

STATEMENT

Following a bench trial in the United States District Court for the Central District of California, petitioner was convicted on one misdemeanor count of simple assault aboard an airplane within the special aircraft jurisdiction of the United States, in violation of 18 U.S.C. 113(a)(5) and 49 U.S.C. 46506. Pet. App. 5a. She was ordered to pay a $750 fine. Ibid. A divided panel of the court of appeals reversed petitioner's conviction, id. at 46a-75a, but the en banc court granted rehearing and affirmed, id. at 2a-42a.

1. On July 19, 2015, petitioner and her boyfriend were traveling aboard a Delta Airlines flight from Minneapolis to Los Angeles. Pet. App. 4a. During the flight, the passenger sitting behind petitioner allegedly jostled her seat on multiple occasions. Id. at 5a. After petitioner confronted him, an argument ensued, and petitioner slapped him in the face. Ibid. Petitioner, her boyfriend, and a flight attendant provided different estimates -- one hour, 90 minutes, or two hours before landing -- of when the slap occurred. Ibid. The plane subsequently landed in Los Angeles, in the Central District of California, where petitioner resided. Id. at 5a, 33a n.12.

Petitioner was subsequently charged in that district with one misdemeanor count of simple assault, in violation of 18 U.S.C. 113(a)(5) and 49 U.S.C. 46506. Pet. App. 5a. Section 46506(1)

makes it a crime for "[a]n individual on an aircraft in the special aircraft jurisdiction of the United States" to commit certain offenses, including simple assault under 18 U.S.C. 113(a)(5). 49 U.S.C. 46506(1). A domestic commercial aircraft falls within the special aircraft jurisdiction of the United States "from the moment all external doors are closed following boarding" "through the moment when one external door is opened to allow passengers to leave the aircraft." 49 U.S.C. 46501(1)(A).

2. Petitioner was tried before a magistrate judge. After the government rested, she moved to dismiss for improper venue, arguing that the crime occurred before the plane entered the airspace of the Central District of California and that the government was instead required to bring charges in the judicial district over which the plane was passing at the time the assault occurred. Pet. App. 5a, 98a-99a. The magistrate judge found that petitioner had forfeited her venue challenge by failing to seek relief before the government completed its case, because any such error had been obvious on the face of the charging instrument. Id. at 102a-104a; see Fed. R. Crim. P. 12(b)(3). The judge further determined that, regardless of the plane's precise location in the air at whatever time the assault occurred, venue was proper where the plane landed, under 18 U.S.C. 3237(a). Pet. App. 104a-108a. The second paragraph of Section 3237(a) provides that

> [a]ny offense involving * * * transportation in interstate or foreign commerce * * * is a continuing offense

> and, except as otherwise expressly provided by enactment of Congress, may be inquired of and prosecuted in any district from, through, or into which such commerce * * * moves.

18 U.S.C. 3237(a). The magistrate judge convicted petitioner and ordered her to pay a $750 fine. Pet. App. 5a.

The district court affirmed. Pet. App. 77a-94a. It found that venue was proper in the Central District of California under either Section 3237(a) or 18 U.S.C. 3238, which provides that

> [t]he trial of all offenses begun or committed upon the high seas, or elsewhere out of the jurisdiction of any particular State or district, shall be in the district in which the offender, or any one of two or more joint offenders, is arrested or is first brought * * * *

See Pet. App. 90a.

3. A divided panel of the court of appeals reversed. Pet. App. 46a-75a.

The panel majority deemed petitioner's claim timely. Pet. App. 60a-61a. It reaffirmed circuit precedent establishing that, when a defect in venue is clear on the face of the charging instrument, the defendant must raise his or her objection before the government completes its case. Id. at 60a. But it took the view that any venue defect in this case was not apparent, reading the information's allegation that the crime occurred "in Los Angeles County, within the Central District of California and elsewhere," to suggest that at least part of the offense occurred in that district. Ibid. And the court considered it "immaterial"

that petitioner "might have known that venue was incorrect." Id. at 60a-61a.

Proceeding to the merits of petitioner's objection, the panel majority concluded that venue was improper in the Central District of California, where the plane landed, and that the government should have brought the charge in "the district in whose airspace the assault occurred." Pet. App. 71a. It noted undisputed trial evidence showing that the assault occurred before the plane entered the airspace of the Central District of California. Id. at 62a. And it rejected application of either Section 3237(a), on the theory that "although the assault occurred on a plane, the offense itself did not implicate interstate or foreign commerce," id. at 64a, or Section 3238, on the theory that it "does not apply unless the offense was committed entirely on the high seas or outside the United States (unless, of course, the offense was 'begun' there)," id. at 67a (citation omitted).

As to remedy, the panel majority believed that circuit precedent required "transfer[ring] the case to the correct venue upon the defendant's request, or, in the absence of such a request, dismiss[ing] the indictment without prejudice." Pet. App. 67a (quoting United States v. Ruelas-Arreguin, 219 F.3d 1056, 1060 n.1 (9th Cir.), cert. denied, 531 U.S. 1024 (2000)); see id. at 67a n.5. It accordingly directed the "district court, on remand, to

dismiss the charge without prejudice, unless [petitioner] consents to transfer the case to the proper district." Id. at 68a.

Judge Owens dissented on the ground that venue was proper under the second paragraph of Section 3237(a). Pet. App. 71a-75a (Owens, J., concurring in part and dissenting in part). He observed that "[u]ntil now, no court has disturbed the ability to prosecute federal offenders in the district where the airplane landed." Id. at 73a. And he expressed concern that "prosecutions of violent crimes on board aircraft could be impossible" if the government were required to "prove which district -- not merely which state -- an airplane was flying over when the crime was committed." Id. at 74a.

4. The court of appeals granted the government's petition for rehearing en banc, Pet. App. 44a, and affirmed petitioner's conviction, id. at 2a-42a. The court unanimously found that venue in the Central District of California was proper, with eight judges relying on Section 3237(a) and three relying on Section 3238. See id. at 2a-3a.

The en banc majority first reasoned that "[n]either Article III nor the Sixth Amendment says that a state or district includes airspace," such that it might be the sole permissible venue for a crime on a domestic U.S. flight, and found "no indication that the Framers intended as such." Pet. App. 9a. It observed that "the very purpose of the Constitution's venue provisions -- to protect

the criminal defendant from 'the unfairness and hardship to which trial in an environment alien to the accused exposes him' -- is thwarted by limiting venue to a flyover district in which the defendant never set foot." Ibid. (quoting United States v. Johnson, 323 U.S. 273, 275 (1944)).

The en banc majority then reasoned that the second paragraph of Section 3237(a) "applies to federal crimes committed on commercial aircraft within the special aircraft jurisdiction of the United States." Pet. App. 11a. It explained that petitioner's "crime 'involved' transportation in interstate commerce" both because it "t[ook] place on a form of interstate transportation" and because the offense's "very definition," which refers to the special aircraft jurisdiction of the United States, "requires interstate transportation." Ibid.

The en banc majority observed that its reasoning and result were consistent with decisions from both the Tenth and Eleventh Circuits, as well as "the near-universal practice of landing district prosecution" for "offenses committed in the air." Pet. App. 12a; see id. at 10a (citing United States v. Breitweiser, 357 F.3d 1249, 1253 (11th Cir.), cert. denied, 541 U.S. 1091 (2004); United States v. Cope, 676 F.3d 1219, 1225 (10th Cir. 2012)). And it explained that a contrary rule, limiting venue to flyover districts, "would unreasonably burden the victims of in-flight crimes and the interests of justice." Id. at 14a. It pointed out

that witnesses in this very case offered differing estimates on the timing of petitioner's in-flight assault; that "[s]ometimes there are no witnesses," as in many sexual assault cases; and that, as a result, "[p]roving the precise time of an assault could be impossible, and a flyover venue rule could mean no prosecution at all." Ibid.

Although the en banc majority disagreed with their reasoning, see Pet. App. 15a, two judges joined a separate opinion by Judge Ikuta that would likewise have found venue here proper, but based on Section 3238 instead. See id. at 20a-42a (Ikuta, J., dissenting in part and concurring in the judgment). Like the en banc majority, the separate opinion explained that for constitutional purposes, "when criminal conduct occurs in navigable airspace, the crime is 'not committed within any State,' and Congress may designate the venue for such a crime." Id. at 21a-22a (quoting U.S. Const. Art. III, § 2, Cl. 3). But it would have premised venue on Section 3238's application to crimes committed "out of the jurisdiction of any particular State," 18 U.S.C. 3238, rather than Section 3237(a)'s application to crimes "involving * * * interstate or foreign commerce," 18 U.S.C. 3237(a). See Pet. App. 26a.

ARGUMENT

Petitioner renews (Pet. 17-38) her claim that venue for her offense was improper in the Central District of California. The

court of appeals correctly rejected that contention, and its decision does not conflict with any decision of this Court or another court of appeals. Petitioner separately contends (Pet. 38) that the appropriate remedy for a venue defect is acquittal, but that argument is not properly presented here. In addition, this case is a poor vehicle for addressing the questions presented. This Court should deny the petition.

1. The lower courts correctly recognized that the district where the plane landed and petitioner resided was an appropriate venue for prosecuting her for her mid-flight assault. That result does not warrant this Court's review.

a. The Sixth Amendment's Vicinage Clause affords defendants the right to "an impartial jury of the State and district wherein the crime shall have been committed." U.S. Const. Amend. VI. Article III similarly requires that a criminal trial "be held in the State where the said Crimes shall have been committed; but when not committed within any State, the Trial shall be at such Place or Places as the Congress may by Law have directed." U.S. Const. Art. III, § 2, Cl. 3. Under 18 U.S.C. 3237(a), "[a]ny offense involving * * * transportation in interstate or foreign commerce * * * is a continuing offense and * * * may be inquired of and prosecuted in any district from, through, or into which such commerce * * * moves." And 18 U.S.C. 3238 provides that "[t]he trial of all offenses begun or committed * * * out of the

jurisdiction of any particular State or district, shall be in the district in which the offender, or any one of two or more joint offenders, is arrested or is first brought."

Both the en banc majority and the concurring judges agreed that venue in the Central District of California was consistent with the Constitution's venue requirements, and rejected the contention that the Constitution "limit[s] venue to the district directly below the airspace where the crime was committed." Pet. App. 9a; see id. at 24a (Ikuta, J., dissenting in part and concurring in the judgment) (rejecting interpretation under which "defendants would have to be tried in flyover states"). Nothing in the text of the Constitution indicates that petitioner's assault of another passenger at an indeterminate time "on an airplane flying almost 600 miles an hour, five miles above the earth," id. at 8a, was "within" a state, so as to limit venue only to that single state with no discernible connection to the crime. Ibid. (citation omitted); id. at 24a (Ikuta, J., dissenting in part and concurring in the judgment) (explaining that "a crime is 'not committed within any State' when the criminal conduct occurs in navigable airspace"). Indeed, "limiting venue to a flyover district in which the defendant never set foot" would "thwart[] "the very purpose of the Constitution's venue provisions -- to protect the criminal defendant from 'the unfairness and hardship to which trial in an environment alien to the accused exposes

him.'" Id. at 9a (quoting United States v. Johnson, 323 U.S. 273, 275 (1944)).

As a statutory matter, petitioner's "crime 'involved' transportation in interstate commerce under a plain meaning reading of the word 'involve.'" Pet. App. 11a. The "crime t[ook] place on a form of interstate transportation," and Section 46506 requires the government to establish that the assault "was committed within the special aircraft jurisdiction of the United States," such that the "very definition" of the offense requires the use of an instrumentality of interstate commerce. Ibid. And even if that were not the case, an in-flight crime like petitioner's would be "out of the jurisdiction of any particular State" for purposes of venue under Section 3238, if it were deemed to occur solely at an indiscernible point in time, disconnecting it from any identifiable state. 18 U.S.C. 3238. The result below accords "with the near-universal practice of landing district prosecution": "flyover prosecution is virtually unheard of, for good reason," because "[p]roving the precise time of an assault could be impossible, and a flyover venue rule could mean no prosecution at all." Pet. App. 12a-14a.

b. Petitioner offers no sound basis for restricting prosecution to the single, indeterminate judicial district that the plane happened to be passing over when she slapped the passenger behind her. Her contention that the Constitution

mandates a locus delicti standard, under which venue in the Central District of California was improper on the theory that no "essential conduct element" of the crime occurred there, Pet. 18, is misplaced. To begin with, petitioner overstates the rigidity of the locus delicti test. The Constitution does not universally and categorically require venue where an essential conduct element occurs. See, e.g., Whitfield v. United States, 543 U.S. 209, 218 (2005) ("[T]his Court has long held that venue is proper in any district in which an overt act in furtherance of the conspiracy was committed, even where an overt act is not a required element of the conspiracy offense."); see also United States v. Rodriguez-Moreno, 526 U.S. 275, 279 n.2 (1999). Instead, the locus delicti test carries the most weight when Congress has not defined the place where a particular crime is committed. See Rodriguez-Moreno, 526 U.S. at 279 n.1 ("When we first announced this test * * * , we were comparing [a statute] in which Congress did 'not indicate where [it] considered the place of committing the crime to be,' with statutes where Congress was explicit with respect to venue.") (citations omitted; second set of brackets in original).

In any event, even assuming the locus delicti standard represented a categorical command, it would not answer whether an in-flight crime like petitioner's falls "within" a state for constitutional purposes. U.S. Const. Art. III, § 2, Cl. 3. And petitioner's criticisms of the court of appeals on that issue are

ill-founded. Contrary to her assertion, the en banc court did not reject her claim "because planes did not exist in the 18th century," Pet. 19 (emphasis omitted), but instead made a considered judgment about how the terms "State" and "district" in the relevant constitutional provisions should be understood in light of the Founders' understanding. Petitioner offers no evidence that might call that judgment into question, and no basis for perceiving a conflict -- even at a high level of generality -- with United States v. Auernheimer, 748 F.3d 525 (3d Cir. 2014), which assessed venue for computer fraud and identity theft and focused on the locations of the co-conspirators' actions and the breached computer servers. Id. at 533-536. Similarly, petitioner's contention (Pet. 26) that the decision below "divests the States of territory that is rightfully theirs" by undermining the jurisdiction of states over their own airspace was expressly disclaimed by the court of appeals, which recognized the constitutional geographic question to be distinct from the scope of state criminal jurisdiction. See Pet. App. 16a-18a (en banc majority) (declining to disturb "the states['] routine[] assert[ion of] jurisdiction over crimes committed in airspace" and noting that it would be "unwise to divest states of their jurisdiction"); see also id. at 31a (Ikuta, J., dissenting in part and concurring in the judgment).

Petitioner further disputes (Pet. 27-38) the en banc majority's holding that Section 3237(a) authorized her trial in the Central District of California. The en banc majority rightly observed that its determination -- that petitioner's crime was a continuing offense within the meaning of Section 3237(a) because it "involv[ed] * * * transportation in interstate or foreign commerce," 18 U.S.C. 3237(a) -- "is literally what the statute says." Pet. App. 11a n.5. Notably, petitioner does not contest that her offense "involv[ed] * * * interstate or foreign commerce" under a plain-language interpretation of that phrase. 18 U.S.C. 3237(a); see Allied-Bruce Terminix Cos. v. Dobson, 513 U.S. 265, 273 (1995) (noting breadth of phrase "involving commerce").

Petitioner's critique (Pet. 27-35) of the court of appeals' rejection of her statutory argument, in turn, relies heavily on Judge Ikuta's separate opinion, which found venue appropriate under Section 3238. See Pet. App. 32a-33a. Petitioner makes no effort to rebut Judge Ikuta's affirmative analysis, which provides an alternative basis for affirming the judgment below. See Chevron U.S.A. Inc. v. NRDC, Inc., 467 U.S. 837, 842 (1984) ("[T]his Court reviews judgments, not opinions.").

Petitioner errs in contending (Pet. 30-33) that the en banc majority's interpretation of Section 3237(a) is in tension with Travis v. United States, 364 U.S. 631 (1961). There, the Court

held that the submission of false affidavits could not be prosecuted in the district of mailing because the applicable federal statute did not punish "the whole process of filing, including the use of the mails," id. at 635, but instead focused on the receipt of the false statement by a government agency, see id. at 636. Indeed, the crime did not require the use of the mails at all; the Court accordingly concluded that "[v]enue should not be made to depend on the chance use of the mails." Ibid. Here, in contrast, the statute of conviction requires the use of an instrumentality of interstate commerce, see 49 U.S.C. 46506, and is thus encompassed by Travis's observation that the "use of agencies of interstate commerce enables Congress to place venue in any district where the particular agency was used," 364 U.S. at 634. Likewise, Congress's definition of petitioner's crime as "a continuing offense" that "may be inquired of and prosecuted in any district from, through, or into which [the interstate] commerce * * * moves," 18 U.S.C. 3237(a), comports with Travis, which explained that "[w]here the language of the Act defining venue has been construed to mean that Congress created a continuing offense, it is held, for venue purposes, to have been committed wherever the wrongdoer roamed," 364 U.S. at 634.

c. Petitioner's assertion of a conflict in the circuits is misplaced. The decision below is instead in accord with the only two circuits to have addressed similar issues. In United States

v. Cope, 676 F.3d 1219 (10th Cir. 2012), the government prosecuted a commercial pilot in the landing district for operating a plane while intoxicated. Id. at 1221-1222. The Tenth Circuit recognized that venue was appropriate under the second paragraph of Section 3237(a), finding it "immaterial whether [the pilot] was 'under the influence of alcohol'" in the landing district because he "was operating a common carrier in interstate commerce." Id. at 1225. Similarly, in United States v. Breitweiser, 357 F.3d 1249 (11th Cir.), cert. denied, 541 U.S. 1091 (2004), the government prosecuted an airline passenger for groping a minor child during the flight. Id. at 1251-1252. The Eleventh Circuit recognized that the fact that "transportation in interstate commerce was involved is sufficient" in itself to establish venue in the landing district under the second paragraph of Section 3237(a). Id. at 1253.

The purportedly contrary circuit decisions cited by petitioner (Pet. 31-33) are inapposite. In United States v. Morgan, 393 F.3d 192 (D.C. Cir. 2004), the court of appeals concluded that "an 'offense involves' transportation in interstate commerce" under the second paragraph of Section 3237(a) "only when such transportation is an element of the offense." Id. at 198 (brackets omitted). That reasoning is at odds with Section 3237(a)'s first sentence, which uses the term "offense" in a way that requires an inquiry into the actual circumstances of the

defendant's offense, not just the elements. See 18 U.S.C. 3237(a) (referring to "any offense against the United States begun in one district and completed in another, or committed in more than one district"); see also United States v. Davis, 139 S. Ct. 2319, 2328 (2019) ("[A]bsent evidence to the contrary, we presume the term is being used consistently."). And regardless, as discussed, the requirements to establish guilt of petitioner's offense do require a connection to an instrumentality of interstate commerce. See 49 U.S.C. 46506. Notably, Morgan distinguished the cases applying Section 3237(a) to crimes committed aboard an aircraft, noting that such crimes occurred "on a form of interstate transportation" and thus involved "a tight connection between the offense and the interstate transportation." 393 F.3d at 200.

Similarly, in United States v. Brennan, 183 F.3d 139 (2d Cir. 1999), which involved a mail-fraud conviction, the court concluded that Section 3237(a) "is best read as not applying to statutes, like the mail fraud statute, that specify that a crime is committed by the particular acts of depositing or receiving mail, or causing it to be delivered, rather than by the more general and ongoing act of 'us[ing] the mails.'" Id. at 147 (brackets in original). To the extent the court would exclusively focus on the elements of the crime, that approach is both mistaken and irrelevant to this case, for the reasons just discussed. And Brennan's view that the "particularized and careful phrasing in the mail fraud statute

takes it outside the scope of § 3237(a)," ibid., has no application here.

2. Petitioner additionally asks (Pet. 38) this Court to determine the appropriate remedy when venue is defective if it grants review on venue. But this Court is "a court of review, not of first view," Cutter v. Wilkinson, 544 U.S. 709, 718 n.7 (2005), and the en banc court had no occasion to address the remedy issue below given its disposition of the venue objection. The panel majority applied circuit precedent recognizing that transfer to the proper venue (or dismissal without prejudice to refiling) -- rather than acquittal -- constitutes the appropriate remedy, see Pet. App. 68a & n.5 (citing United States v. Ruelas-Arreguin, 219 F.3d 1056, 1060 n.1 (9th Cir.), cert. denied, 531 U.S. 1024 (2000)), but the en banc court withdrew that portion of the panel's decision, see id. at 7a n.2. Given the contingent nature of the issue -- which could only be addressed if this Court grants review on venue and agrees with petitioner that trial where the plane landed and she resided was improper -- and the absence of a reasoned opinion below, review of the remedy for a venue claim is unwarranted. See Zivotofsky v. Clinton, 566 U.S. 189, 201 (2012) (declining to review claim "without the benefit of thorough lower court opinions to guide our analysis of the merits"). Furthermore, if the Court were to accept petitioner's position that venue was proper only in the unidentified district that the plane was flying

over at the moment of the slap, it is unlikely that she would be retried irrespective of the remedy.

Moreover, this case presents a poor vehicle to consider the questions presented because petitioner failed to preserve her venue objection. Federal Rule of Criminal Procedure 12(b)(3)(A)(i) provides that an objection of "improper venue" must, in the absence of good cause, "be raised by pretrial motion if the basis for the motion is then reasonably available and the motion can be determined without a trial on the merits." Here, petitioner failed to raise her objection until after the government's case-in-chief without good cause. See p. 3, supra.

Although the panel majority concluded otherwise, see Pet. App. 60a-61a, and the en banc court left its ruling on this point undisturbed, see id. at 7a n.2, the circumstances here indicated that the basis for the motion was not only reasonably available to petitioner prior to trial, but that she was in fact aware of the potential venue defect. Petitioner conceived a venue challenge, drafted a brief, and prepared an investigator to testify on the subject. Gov't C.A. Reh'g Pet. 20; see Pet. App. 103a n.6. And although their exact timing estimates varied, the witnesses interviewed in the government's statement of probable cause consistently testified that the assault occurred prior to the time that the plane would have entered California airspace. Gov't C.A. Reh'g Pet. 20; see C.A. E.R. 54-68. Petitioner's forfeiture of

her objection would therefore provide an alternative basis for this Court's affirmance. See Granfinanciera, S. A. v. Nordberg, 492 U.S. 33, 38 (1989) (respondent may "defend [the] judgment on any ground properly raised below whether or not that ground was relied upon, rejected, or even considered by the District Court or the Court of Appeals") (citation omitted).

CONCLUSION

The petition for a writ of certiorari should be denied.

Respectfully submitted.

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