

Bond Case Briefs

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INJUNCTIONS - OHIO

City of Toledo v. State

Supreme Court of Ohio - June 20, 2018 - N.E.3d - 2018 WL 3062477 - 2018 -Ohio- 2358

After finding statutes regulating local governments' use of traffic cameras unconstitutional, the Court of Common Pleas held state in contempt for passing provisions of budget bill withholding state funds from municipalities unless they complied with statutes and granted a city's motion for permanent injunction precluding enforcement of the provisions.

The Court of Appeals affirmed. State sought further review.

The Supreme Court of Ohio held that:

- Trial court's equitable powers did not authorize it to enter injunction against enforcement of spending provisions, and
- As matter of first impression, court's contempt power did not authorize it to enjoin enforcement of spending provisions.

Trial court's equitable powers did not authorize it to enter an injunction against enforcement of provisions of budget bill withholding state funds from municipalities unless they complied with statutes regulating the use of traffic cameras by local governments, enforcement of which statutes the trial court had previously enjoined after declaring them unconstitutional in city's action challenging the statutes, where city did not file a complaint challenging the constitutionality of the spending provisions and did not prove that the provisions were unconstitutional, as required for trial court to enjoin enforcement of the provisions.

Trial court's contempt power did not authorize it to enter an injunction against enforcement of provisions of budget bill on ground that the provisions, which withheld state funds from municipalities unless they complied with statutes regulating the use of traffic cameras by local governments, resulted in a violation of court's prior injunction against enforcement of the statutes, in city's action challenging the statutes' constitutionality; injunction against enforcement of the spending provisions did not clearly, definitely, and unambiguously prohibit the legislature from passing future legislation, and, moreover, separation-of-powers doctrine precluded a court from enjoining the legislature from exercising its legislative power to enact laws.