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Via E-Mail

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Office of the Governor
116 West Jones Street
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RE: Advisory Letter Regarding Authority of Municipalities to Enforce COVID-19 Executive Orders Through Civil Ordinances

Dear Mr. McKinney:

A common-law doctrine prohibits local ordinances that cover exactly the same conduct as state statutes. You have asked whether this doctrine prevents local governments from using civil penalties as a tool for flexible enforcement of the Governor's COVID-19 orders.

For the reasons discussed below, I conclude that local governments may enforce local ordinances that establish civil penalties for violations of COVID-19 executive orders. The Emergency Management Act ("EMA") expressly states that it supplements, rather than restricts, the ordinary power of local governments to make ordinances. The express and specific words of the EMA indicate that the common-law preemption doctrine does not apply to local emergency ordinances.

Moreover, even if the common-law preemption doctrine were to apply, cities and counties may unquestionably enforce ordinances that are *more restrictive* than state law. Thus, local governments concerned about the validity of ordinances that simply mirror the Governor's orders can enact ordinances that are more restrictive than the Governor's orders, and enforce them either civilly or criminally.

Background

The EMA authorizes the Governor to "make, amend, or rescind . . . necessary orders, rules, and regulations" during an emergency. N.C. Gen. Stat. § 166A-19.10(b)(2). Likewise, the

EMA authorizes municipalities and counties to enact ordinances that "permit prohibitions and restrictions" to maintain order and protect lives or property during the state of emergency. *Id.* § 166A-19.31(b).[1] If the Governor determines that "local control of the emergency is insufficient to assure adequate protection for lives and property," he or she is then authorized to make and enforce any order that municipalities or counties are authorized to make. *Id.* § 166A-19.30(c). The EMA criminalizes the violation of both gubernatorial and local emergency orders as Class 2 misdemeanors. *Id.* § 166A-19.30(d), -19.31(h).

On March 10, 2020, Governor Roy Cooper declared a state of emergency due to the spread of the COVID-19 virus. *See* Executive Order 116. As of December 10, 2020, there have been more than 416,000 cases of COVID-19 in North Carolina, with at least 5,714 deaths. Pursuant to the authority granted to him by the EMA, Governor Cooper has issued several executive orders to reduce the spread of COVID-19. These orders require, subject to certain exceptions, that face coverings must be worn indoors if sharing a space with another person who is not a member of the same household, and must be worn outdoors if it is not possible to consistently remain at least six feet physically distant from non-household members. Executive Order 181, § 2. The Governor's orders also prohibit gatherings of at least ten people indoors and fifty people outdoors. *Id.*, §§ 3, 5. Additionally, many cities and counties have issued their own ordinances or orders requiring the use of face coverings or restricting mass gatherings. *See, e.g.*, *Proclamation to Require Face Coverings*, City of Raleigh (June 17, 2020); *Continuation of Wake Cty. State of Emergency & Termination of Cty. Emergency Restrictions in Favor of State Restrictions*, Wake Cty. (Apr. 29, 2020).

Cities and counties, when considering how to enforce state or local orders, may conclude that it is desirable to use civil penalties rather than relying exclusively on criminal prosecution. State law empowers local governments to make this choice by authorizing ordinances to be criminalized or to be enforced by civil means. *See* N.C. Gen. Stat. §§ 153A-123(b)-(c), 160A-175(b)-(c) (providing that violation of a municipal ordinance is a Class 3 misdemeanor under N.C. Gen. Stat. § 14-4 "unless" the municipality has provided otherwise, and authorizing the imposition of civil penalties as an alternative). The COVID-19 emergency has had the effect of the Governor temporarily prohibiting or restricting many activities that were commonplace before the pandemic, and all North Carolinians are still adjusting to the new reality. The perceived harshness of criminal prosecution for violations of COVID emergency orders may, in some circumstances, reduce enforcement, and therefore have the undesired effect of reducing compliance. In practice, the civil penalty process may result in less time spent in the courtroom

[1] Technically, section 166A-19.31 of the EMA empowers counties and cities to enact an ordinance, and then under the authority of that ordinance, a local official may impose emergency prohibitions and restrictions. *See* N.C. Gen. Stat. § 166A-19.31(a).

and in corrections facilities, and therefore, civil enforcement may carry with it fewer risks of transmitting COVID-19.

Nonetheless, the question has arisen whether cities and counties have the authority to enforce civil penalties for violations of the COVID-19 emergency orders, in light of a longstanding North Carolina common-law doctrine that prohibits localities from punishing conduct that is already punishable under state law.[2] The common law states that where state statutes make certain conduct into a criminal offense, "a city may not adopt an ordinance dealing with the same conduct," unless the legislature authorizes the locality to do so. *State v. Furio*, 267 N.C. 353, 357, 148 S.E.2d 275, 278 (1966). *See also State v. Tenore*, 280 N.C. 238, 248-49, 185 S.E.2d 644, 651 (1972) ("It may be that the legislature has the power to authorize a town to make an offence against the state a separate offence against the town, but this could be done only by an express grant of authority."); John Dillon, *Commentaries on the Law of Mun. Corp.* § 302 (1st ed. 1872) (noting that the legislature may authorize the local government to punish an act which also constitutes a crime against the state).[3] In addition to this common-law doctrine, if "[t]he elements of an offense defined by a city ordinance are identical to the elements of an offense defined by State or federal law," the ordinance is void under N.C. Gen. Stat. § 160A-174(b)(6). Thus, the argument goes, because the EMA criminalizes violation of the Governor's executive orders, a city or county government cannot enforce ordinances (civil or criminal) directed at the same conduct.

For the reasons detailed below, it is my opinion that this local preemption theory is incorrect because it overlooks the express language of the EMA and established doctrines of North Carolina law. Cities and counties may use civil penalties or equitable relief to enforce ordinances aimed at the same conduct as the Governor's COVID-19 executive orders.

Analysis

I conclude that local ordinances that use civil remedies for violations of the Governor's COVID-19 orders are valid and enforceable. The EMA is best read to enhance, not to restrict, the ordinary powers of city and county governments. Moreover, even if criminal prosecution were the exclusive remedy for violation of the Governor's COVID-19 orders, municipalities

[2] *See* Trey Allen, *Civil Penalties for Violations of State Emergency Orders?*, Coates' Canons: NC Local Gov't Law, UNC Sch. of Gov't (Nov. 30, 2020), https://canons.sog.unc.edu/civil-penalties-for-violations-of-state-emergency-orders/ ("This blog post concludes that cities and counties probably lack statutory authority to implement that proposal, thanks largely to a legal doctrine that generally prevents them from forbidding conduct that's already illegal under state law.").

[3] *Dillon on Municipal Corporations* was relied upon by an early North Carolina Supreme Court case applying this doctrine. *See State v. Langston*, 88 N.C. 692, 694 (1883).

could easily avoid any preclusion by enforcing ordinances that are more restrictive than the Governor's orders.

I. The Emergency Management Act Authorizes Civil Enforcement of COVID-19 Restrictions by Municipalities.

A. The EMA expressly demonstrates an intent to expand, rather than contract, the powers of local governments.

"The primary objective of statutory interpretation is to ascertain and effectuate the intent of the legislature." *Lunsford v. Mills*, 367 N.C. 618, 623, 766 S.E.2d 297, 301 (2014). When "ascertaining this intent, a court must consider … the language of the statute, its spirit, and that which the statute seeks to accomplish." *North Carolina Ins. Guar. Ass'n v. Bd. of Trustees of Guilford Technical Cmty. Coll.*, 364 N.C. 102, 110, 691 S.E.2d 694, 699 (2010). Here, the EMA's express language, spirit, and function demonstrate that it supplements, rather than restricts, the enforcement options of local governments.

1. The EMA expressly provides that it is "intended to supplement" the powers of local governments, not diminish them.

Any analysis of a statute begins with its words. *Duggins v. N.C. State Bd. of Certified Pub. Accountant Exam'rs*, 294 N.C. 120, 126, 240 S.E.2d 406, 411 (1978). The words of the EMA speak expressly about whether the statute diminishes local power. The EMA reads,

> Intent to Supplement Other Authority. - This section is intended to supplement and confirm the powers conferred by G.S. 153A-121(a), G.S. 160A-174(a), and all other general and local laws authorizing municipalities and counties to enact ordinances for the protection of the public health and safety in times of riot or other grave civil disturbance or emergency.

N.C. Gen. Stat. § 166A-19.31(f). The dictionary definition of "supplement" is "to add."[4] Merriam-Webster Dictionary, https://www.merriam-webster.com/dictionary/supplement (last visited Dec. 7, 2020).

This "supplement and confirm" provision exposes a fatal flaw in the local preemption theory. That theory suggests that local emergency ordinances are implicitly preempted because they cover the same conduct as a statute. However, the only statute that would have this

[4] Words in statutes are to be given their ordinary meaning, and dictionaries are often used to determine the ordinary meaning of the words of a statute. *See Food Town Stores, Inc. v. City of Salisbury*, 300 N.C. 21, 38-39, 265 S.E.2d 123, 134 (1980).

preemptive effect is the EMA, and the EMA provides expressly that it "is intended to supplement" local governments' powers. N.C. Gen. Stat. § 166A-19.31(f). The local preemption theory would bypass the words of the EMA and interpret the EMA to mean the opposite of what it says. Under the preemption theory, a statute that says it is "intended to supplement" local powers must actually *eliminate* local powers to enforce civil penalties whenever a Governor issues an executive order on the same conduct. That interpretation would be contrary to the statute's express words.

2. This analysis is consistent with the whole text of the EMA.

Looking at the entire EMA further demonstrates the legislative intent to give local governments broad enforcement power and flexibility. "[A]n act must be considered as a whole." *In re Brownlee*, 301 N.C. 532, 549, 272 S.E.2d 861, 871 (1981). The "supplement and confirm" clause in section 166A-19.31 is only one of several examples where the EMA emphasizes the importance of broad local enforcement power in emergencies.

The EMA states that "[t]he governing body of each county is responsible for emergency management within the geographical limits of such county." N.C. Gen. Stat. § 166A-19.15. Local governments are authorized to enact ordinances that impose a wide range of "prohibitions and restrictions within the emergency area." *Id.* § 166A-19.31(a). Those restrictions include controls on the movement of persons and the operations of offices or other places where people may congregate. § 166A-19.31(b). The list of authorized prohibitions and restrictions ends with a broad catch-all clause: restrictions are authorized on "other activities or conditions the control of which may be reasonably necessary to maintain order and protect lives or property during the state of emergency." *Id.* § 166A-19.31(b)(5).[5]

Moreover, the EMA provides flexibility for local governments about methods of enforcement. Local governments ordinarily have the discretion to impose a civil penalty, even though state law makes violating local ordinances a misdemeanor. *See* N.C. Gen. Stat. §§ 153A-123(b)-(c), 160A-175(b)-(c). *See also* N.C. Gen. Stat. § 14-4 (providing that violation of a municipal ordinance is a Class 3 misdemeanor) *and* N.C. Gen. Stat. §§ 14-288.20A, 166A-19.31(h) (providing for enforcement, as a Class 2 misdemeanor, of an ordinance or declaration issued under section 166A-19.31 of the EMA). Local governments also have the

[5] If "the Governor determines that local control of the emergency is insufficient to assure adequate protection for lives and property," the Governor may exercise the power to "impose any of the types of prohibitions and restrictions" authorized for local governments. *Id.* § 166A-19.30(c), (c)(1) (authorizing Governor to "impose any of the types of prohibitions and restrictions enumerated in G.S. 166A-19.31(b)"). The EMA also gives the Governor, in these circumstances, the power "to amend or rescind any prohibitions and restrictions imposed by local authorities." *Id.* § 166A-19.30(c)(1).

discretion to enforce ordinances through equitable remedies. N.C. Gen. Stat. §§ 153A-123(d), 160A-175(d). Nothing in the EMA suggests that these powers are not present in an emergency.[6]

A common spirit runs through the EMA provisions for local governments: counties and cities are given a broad and flexible range of choices when an emergency arises. Indeed, the EMA states that its provisions "authorize the official or officials who impose those prohibitions or restrictions to determine and impose *the prohibitions or restrictions deemed necessary or suitable* to a particular state of emergency." *Id.* § 166A-19.31(b) (emphasis added). The statute demonstrates a clear legislative intent to provide local governments with options in an emergency. This legislative intent must be the touchstone for interpretation of the EMA. *See, e.g.*, *Lunsford* and *Ins. Guar. Ass'n*, *supra,* along with *Thigpen v. Ngo*, 355 N.C. 198, 203, 558 S.E.2d 162, 166 (2002) ("Legislative intent is determined by examining . . . the spirit of the act and the objectives the statute seeks to accomplish."). The local preemption theory runs counter to the EMA's legislative intent.

B. Precluding local emergency ordinances would contradict well-settled legal principles on the interaction between specific statutes and the common law or less specific statutes.

It has been suggested that there are two sources that support the local preemption theory: a common law doctrine, *see Furio* and *Tenore, supra*, and a statute in cities' chapter of the General Statutes, N.C. Gen. Stat. § 160A-174(b)(6). Neither overrides the legislative intent expressed in the EMA.

1. Applying state-law preclusion to a local emergency ordinance would allow a common-law principle to override an express statute, N.C. Gen. Stat. § 166A-19.31(f).

When a statute is enacted "in respect to the subject matter of any common law rule, the statute supplants the common law rule and becomes the public policy of the State in respect to that particular matter." *Rhyne v. K-Mart Corp.*, 358 N.C. 160, 169, 594 S.E.2d 1, 8 (2004) (quoting *McMichael v. Proctor*, 243 N.C. 479, 483, 91 S.E.2d 231, 234 (1956)). Statutes that

[6] Consequently, it is incorrect to suggest, as some have, that the EMA identifies criminal prosecution as the exclusive remedy for violations of emergency directives. As discussed above, local governments have the statutory authority to decide between enforcing ordinances through civil penalties, injunctive relief, or as Class 3 misdemeanors. N.C. Gen. Stat. §§ 153A-123(b)-(d), 160A-175(b)-(d). The EMA "supplement[s]" that authority by allowing local governments to charge violators with Class 2, rather than Class 3, misdemeanors. N.C. Gen. Stat. §§ 166A-19.31(f), 19.31(h). But, in stating that it "confirm[s] and supplement[s]" the power of local governments, the EMA disavows any intent to remove civil penalties or injunctive relief as enforcement options. See N.C. Gen. Stat. § 19.31(f).

modify the common law are ordinarily subject to strict construction, *Swift & Co. v. Tempelos*, 178 N.C. 487, 101 S.E. 8 (1919), but here, the EMA expressly provides how it is to be read in connection with common-law rules and other statutes. It is "intended to supplement and confirm" local governments' powers "to enact ordinances ... in times of riot or other grave civil disturbance or emergency." N.C. Gen. Stat. § 166A-19.31(f). A common-law principle cannot override this express instruction in the statute.[7]

2. Applying state-law preclusion to a local emergency ordinance would allow a less specific statute to override a more specific statute.

The courts have repeatedly held that "when two statutes arguably address the same issue, one in specific terms and the other generally, the specific statute controls." *High Rock Lake Partners, LLC v. N.C. Dep't of Transp.*, 366 N.C. 315, 322, 735 S.E.2d 300, 305 (2012). When the General Assembly enacts a specific statutory provision on a particular issue, that specificity provides strong evidence that the legislature intended the provision to control over any general, overlapping statute. *See LexisNexis Risk Data Mgmt. Inc. v. N.C. Admin. Office of the Courts*, 368 N.C. 180, 187, 775 S.E.2d 651, 656 (2015).

Here, this principle indicates that the general statute on overlap between city ordinances and state laws, N.C. Gen. Stat. § 160A-174(b)(6), does not control.[8] Instead, the specific statute on powers of local governments in emergencies, section 166A-19.31(f), applies. For example, in *Hughey v. Cloninger*, the Supreme Court considered a statute that empowered the State Board of Education to make grants to "severely learning disabled" children. 297 N.C. 86, 89-92, 253 S.E.2d 898, 900-02 (1979). The Court held that this specific statute prevailed over a statute that empowered county commissioners to generally make grants for "the physically or mentally handicapped." *Id.*

When the more specific statute was enacted after the general one, the specific-over-general canon applies "*a fortiori*." *Nat'l Food Stores v. N.C. Bd. of Alcoholic Control*, 268 N.C. 624, 629, 151 S.E.2d 582, 586 (1966). This principle applies here: the general statute on city

[7] Common law cannot be repealed to the extent that it is "incorporated in our Constitution." *Rhyne*, 358 N.C. at 169, 594 S.E.2d at 8. A local government's emergency ordinances could raise constitutional concerns if they caused an offender to be guilty of two criminal sanctions — one local, one state — for the same exact act. But there has been no suggestion that the Constitution grants an offender a right to have a criminal — rather than civil — penalty where the local government chooses only civil enforcement.

[8] It is not clear that section 160A-174(b)(6) applies at all. That statute provides that it applies only to "an offense defined by a city ordinance." Under the EMA, cities generally pass an ordinance that delegates power to a city official, and that city official issues orders or declarations. *See* footnote 1 of this letter *supra*. For emergency restrictions, the offense is not "defined by a city ordinance," but instead is defined by a city emergency order or declaration.

ordinance overlap was enacted in 1971, while the "supplement and confirm" provision of the EMA was enacted in 2012. *See* N.C. Sess. Laws 1971-698 and 2012-12.

C. Precluding local emergency orders when the Governor takes action is inconsistent with the EMA provision that allows the Governor to amend local emergency orders.

If a gubernatorial executive order precluded local civil enforcement, a key provision of the EMA would create unexpected results. The Governor is authorized to issue an order that "amend[s] . . . any prohibitions or restrictions imposed by local authorities." N.C. Gen. Stat. § 166A-19.30(c)(1). When a local government issues a restriction and chooses to have it be enforced only through civil means, the Governor has the power under section 19.30(c)(1) to amend or adjust that restriction. But under the preemption theory, any amendment that the Governor might issue would automatically void the ordinance that the Governor sought to amend, because there would be a state order and a local order on the same conduct. This would make the amendment provision in section 19.30(c)(1) meaningless.

This curious result is another reason to disfavor any theory that would preempt civil enforcement of local emergency ordinances. "It is a well settled principle of statutory construction that words of a statute are not to be deemed merely redundant if they can reasonably be construed so as to add something to the statute which is in harmony with its purpose." *In re Watson*, 273 N.C. 629, 634, 161 S.E.2d 1, 6-7 (1968). *See also King v. Baldwin*, 276 N.C. 316, 325, 172 S.E.2d 12, 18 (1970) ("It is presumed that the legislature . . . did not intend an unjust or absurd result").

D. The EMA implies that local and state emergency orders may overlap because it does not include a state order among the events that terminate a local order.

The EMA expressly states the expiration date for a local-government restriction that was issued under EMA authority. N.C. Gen. Stat. § 166A-19.31(e). That subsection reads:

> Prohibitions and restrictions imposed pursuant to this section shall expire upon the earliest occurrence of any of the following:
> (1) The prohibition or restriction is terminated by the official or entity that imposed the prohibition or restriction.
> (2) The state of emergency terminates.

Id. The General Assembly could have easily mandated — as it has in other contexts — that a local ordinance also expires upon the execution of a gubernatorial order that duplicates the

ordinance's restrictions or prohibitions.[9] It did not do so.

A basic principle of statutory interpretation, *expressio unius*, therefore suggests that the legislature intended that local emergency ordinances and state emergency orders may overlap. "Under the doctrine of *expressio unius est exclusio alterius*, when a statute lists the situations to which it applies, it implies the exclusion of situations not contained in the list." *Cooper v. Berger*, 371 N.C. 799, 810, 822 S.E.2d 286, 296 (2018) (quoting *Evans v. Diaz*, 333 N.C. 774, 779-80, 430 S.E.2d 244, 247 (1993)).

The distinction drawn by the General Assembly and reflected in the EMA makes good sense. In an emergency, a local government will frequently need to stop residents from taking actions that are completely appropriate in normal times. After a hurricane, people may need to be prohibited from going to the beach. In a pandemic, people may need to be restricted from forming mass gatherings. Local governments may need flexible tools — including a sanction short of criminalization — to help promote and ensure compliance. The EMA provides these tools and expressly provides that they will "supplement" a local government's existing authority.

* * *

Based on the EMA's language and structure, I conclude that the best reading of the EMA reflects the statute's explicit mandate that it be read to "supplement and confirm" — not to indirectly and implicitly restrict — the powers of local governments to respond to emergencies. N.C. Gen. Stat. § 166A-19.31(f). The EMA plainly allows municipalities to enforce ordinances with civil penalties or injunctive relief in the first instance. Numerous statutory features suggest that such enforcement may continue even after the execution of a gubernatorial order that covers the same conduct as the ordinance. This flexibility in enforcement gives local governments a tool to manage emergency situations in the manner the local officials "deem[] necessary or suitable." *Id.* § 166A-19.31(b).

II. Even if the EMA did not authorize municipalities to enforce restrictions identical to the Governor's COVID-19 orders through civil penalties, municipalities could unquestionably enforce *more restrictive* orders.

I also conclude that municipal governments should have relatively little to fear from the legal question analyzed above, because it is easily avoided. Municipalities are only prohibited under the *Furio/Tenore* doctrine and under N.C. Gen. Stat. § 160A-174 from punishing conduct

[9] For instance, N.C. Gen. Stat. § 143-138(e) states that "[i]f the Commissioner of Insurance or other State official with responsibility for enforcement of the [State Building] Code institutes a civil action pursuant to G.S. 143-139, a local government may not institute a civil action under G.S, 143-139, 153A-123, or 160A-175 based on the same violation."

that is *identical* to conduct already prohibited under state criminal law. They are free to go beyond the floor set by state law. *See id.* §§ 160A-174(b) ("The fact that a State or federal law, standing alone, makes a given act, omission, or condition unlawful shall not preclude city ordinances requiring a higher standard of conduct or condition.") and 160A-174(b)(6) (stating that an ordinance is inconsistent with state law if the "elements of an offense defined by a city ordinance are *identical* to the elements of an offense defined by" state law) (emphasis added); *Tenore*, 280 N.C. at 247-48, 185 S.E.2d at 649-50 ("[N]otwithstanding the existence of a general state-wide law . . . , a city may enact an ordinance prohibiting and punishing conduct not forbidden by such state-wide law.").

Similarly, Governor Cooper's COVID-19 executive orders are explicit in permitting local governments to impose greater restrictions. A section of Executive Order 169 is entitled, "Most of the Restrictions in This Executive Order Are Minimum Requirements, And Local Governments Can Impose Greater Restrictions." § 7.3(a). That provision continues, "[N]othing herein, except where specifically stated . . . , is intended to limit or prohibit counties and cities in North Carolina from enacting ordinances and issuing state of emergency declarations which impose greater restrictions or prohibitions to the extent authorized under North Carolina law." There are a few exceptions: local governments cannot restrict federal or state government operations; they may not set different capacity standards for retail businesses; and they may not prevent COVID testing or vaccine administration. Executive Order 181, § 7.3.

As a consequence, even under the local preemption theory, municipalities retain virtually their full authority under the EMA to enact emergency ordinances, and to enforce those ordinances through the mechanism they deem fit, so long as the ordinances are more restrictive than the floor set by Governor Cooper's executive orders. For example, Executive Order 181 requires the wearing of a face covering in public for anyone who is outdoors and cannot remain consistently six feet distant from people outside the same household. If a local government were to issue a similar order, but require face coverings if anyone is within double that distance, the ordinance could be enforced with civil penalties or injunctive relief even under the local preemption theory. The same would be true for a local ordinance that set a lower mass gathering limit — for example, 45 people outdoors instead of 50. Even if the local preemption theory were valid, it does not extend to a more restrictive local order.

Finally, the local preemption theory does not reach any orders issued by a local health director or local board of health. For example, a local health director may instruct individuals to isolate or quarantine. N.C. Gen. Stat. § 130A-145. A local health director may also order the abatement of an imminent hazard. *Id.* § 130A-20.

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In conclusion, municipalities seeking to enforce COVID-19 restrictions through civil penalties are authorized to do so by the EMA, even if their restrictions are identical to those ordered statewide by the Governor. Additionally, there is no question that local governments may enforce stricter requirements than those set forth in gubernatorial orders, and they may do so through civil enforcement mechanisms.

Please be aware that this is an advisory letter. It has not been reviewed and approved in accordance with the procedures for issuing a formal Attorney General's Opinion.

Sincerely,

Blake Thomas
Deputy General Counsel

cc: Swain Wood, General Counsel, N.C. Department of Justice
Alec Peters, Chief Deputy Attorney General
Shannon Cassell, Civil Bureau Chief, N.C. Department of Justice