SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

In the Matter of a Proceeding under Article 70
of the CPLR for a Writ of Habeas Corpus

Index No. 152 736/15

THE NONHUMAN RIGHTS PROJECT, INC.,
on behalf of HERCULES and LEO

Petitioner,

v.

SAMUEL L. STANLEY JR., M.D., as President
of State University of New York at Stoney Brook
a/k/a Stoney Brook University and STATE
UNIVERSITY OF NEW YORK AT STONEY
BROOK a/k/a/ STONEY BROOK UNIVERSITY,

Respondents.

AMICUS CURIAE BRIEF
BY THE CENTER FOR THE STUDY OF THE GREAT IDEAS
IN OPPOSITION TO PETITION FOR WRIT OF HABEAS CORPUS

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INTRODUCTION

The Nonhuman Rights Project, Inc. (NhRP) has petitioned the Supreme Court of the State of New York for the release of chimpanzees named Hercules and Leo, who are allegedly being "unlawfully detained"—not under existing New York law governing the mistreatment of animals (*see, e.g.*, Agricultural & Markets Law § 373, regarding confinement in "crowded or unhealthy conditions"), but on the novel basis that the chimps are "persons" under the law entitling them to deliverance via *habeas corpus*. Amicus curiae would have no objection to an order of this Court for the immediate transfer of any improperly confined chimps to a qualified organization dedicated to the prevention of cruelty to animals, under Section 373 of New York's Agricultural & Markets Law.

However, this Court should refuse to issue a writ of habeas corpus to achieve that end, because the chimps are not persons entitled to the rights and protections afforded by the writ. *See* Opinion and Order in *People ex rel. Nonhuman Rights Project, Inc. v. Lavery*, 124 A.D.3d 148, 998 N.Y.S.2d 248 (3d Dep't 2014) (holding that "a chimpanzee is not a 'person' entitled to the rights and protections afforded by the writ of habeas corpus").[1] The holding of the Appellate Division is correct.

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[1] Petitioner in that case, also the NhRP, has since filed, directly with the Court of Appeals of the State of New York, a motion for leave to appeal that decision, which is currently pending. A copy of such motion may be found here: http://www.nonhumanrightsproject.org/wp-

INTEREST OF AMICUS CURIAE

The Center for the Study of the Great Ideas, Inc., (the "Center") a not-for-profit 501(c)(3) educational corporation, was co-founded in 1990 by Mortimer J. Adler and Max Weismann. Mortimer J. Adler (1902-2001) was an American philosopher, educator and author of over fifty books. He served as Chairman of the Board of Editors of the Encyclopedia Britannica, Editor in Chief of the *Great Books of the Western World* and *The Syntopicon: An Index to the Great Ideas*, Founder and Director of the Institute for Philosophical Research, and Instructor the Aspen Institute for Humanistic Studies, University of Chicago, and Columbia University. The Center derives its funding from membership donations, seminar and lecture tuitions and private gifts.

With hundreds of adult and student members from diverse intellectual, cultural and educational backgrounds, the Center is dedicated to Dr. Adler's belief that Philosophy is Everybody's Business, that a cogent understanding of practical philosophy, through the study of the Great Ideas inherent in the great literature of our Western Tradition, is essential for responsible citizenship and the individual pursuit of happiness. The Center's mission is to promulgate the insights and ideals

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content/uploads/2015/02/6.-Motion-for-Leave-to-Appeal-and-Affirmation-in-Support.pdf. Proposed amicus curiae has filed an amicus curiae brief with the Court of Appeals in opposition to Petitioner's motion. A copy of such amicus brief may be found here: http://media.wix.com/ugd/c526cc_1deb2960d3ff46ef92f8568e6a24fab8.pdf.

embedded in Dr. Adler's lifelong intellectual work in the fields of Philosophy, Liberal Education, Ethics and Politics while functioning as a central resource for, access to, and the on-going interpretation of his work. To advance this mission, Dr. Adler donated a vast collection of his works and manuscripts to the Center and the Center makes available these materials through live and on-line seminars, the Internet, public discourse, and access to the Center's library collection of books, essays, articles, journals and audio/video programs.

ARGUMENT

I

NONHUMAN ANIMALS ARE NOT PERSONS UNDER THE LAWS OF NEW YORK STATE

NhRP's faulty position, to summarize it briefly, begins with the uncontroversial observation that a *person,* as that term is used under the law, is not a synonym for *human being;* the former term may encompass something nonhuman just as it may include a corporation or other entity which the law has recognized as a person. Then, they say, a chimpanzee—for a variety of alleged scientific reasons, largely subsumed under a characteristic common to humans and chimps which the NhRP calls "autonomy"—is a "person" under both New York's statutory law and the common law doctrine of habeas corpus. Being a *person*, the chimp is therefore entitled to its "bodily liberty," and such other rights as the courts may recognize on a "case by case basis."

These arguments are unpersuasive. First, chimpanzees and other nonhuman animals are not "persons" under the laws of New York, nor should they ever be accorded the rights of persons, as they do not have the capacity to apprehend legal responsibilities and be held legally accountable for their actions. Second, the writ of *habeas corpus,* under the common law, has never been applied to *persons,* only to *human beings*. The rest of petitioner's position is academic. Since the chimpanzees are not human beings, the writ should not issue.

A. CHIMPANZEES ARE NOT "PERSONS" BECAUSE UNLIKE HUMAN BEINGS THEY CANNOT BEAR ANY LEGAL DUTIES

The Appellate Division (Third Department) recently held that chimpanzees are not "persons" because "unlike human beings, chimpanzees cannot bear any legal duties, submit to societal responsibilities or be held legally accountable for their actions." . *Lavery, supra,* 124 A.D.3d at 152, 998 N.Y.S.2d at 251 (3d Dep't 2014). That incapability "renders it inappropriate to confer upon chimpanzees legal rights –such as the fundamental right to liberty protected by the writ of habeas corpus –that have been afforded to human beings." *Id.*

To reach this conclusion, one need not accept the "social contract" theory referred to by the Appellate Division.[2] An alternative, and perhaps more

[2] *See*, Richard L. Cupp, Jr., *Children, Chimps, and Rights: Arguments from 'Marginal Cases,'* 45 Ariz. St. L. J. 1 (2013); Richard L. Cupp, Jr., *Moving Beyond Animal Rights: A Legal Contractualist Critque*, 46 San Diego L. Rev. 27 (2009).

comprehensive analysis, was posited by the American philosopher Mortimer J. Adler. *See* Mortimer J. Adler, *The Difference of Man and The Difference It Makes* (1969) and *Intellect* (1990). In a nutshell, non-human animals, having only an instinct to survive rather than a free will to choose otherwise, can neither understand nor carry out moral or legal obligations, such as respecting the life, liberty, and property of others.

Petitioners have submitted over 100 pages of affidavits that purport to point out the *similarities* between chimpanzees and human beings—including the fact that all primates, including humans, exhibit varying degrees of "autonomy." But the record does nothing to refute the significant *differences* between human from nonhuman animals, including the solid scientific evidence that human beings have something that other animals do not.

Professor V.S. Ramachandran, Director for Brain and Cognition at the University of California, San Diego, has called the human brain "unique and distinct from that of the ape by a huge gap." *See* V.S. Ramachandran, *The Tell-Tale Brain: A Neuroscientist's Quest for What Makes Us Human* (2011). The difference, he says, boils down to language: Our "unique competence" in producing language, "seems to be absent in all other animals." This competence, he adds, "comes from our language acquisition device or LAD. Humans have LAD; apes and all other animals lack it."

Likewise, the linguist, Professor Noam Chomsky, has conceded that human beings must be born with what he termed a "universal grammar." See, Noam Chomsky, *The Science of Grammar* (2012). Animals do have "communications systems," says Chomsky, "but they don't have anything like a language… [T]he human conceptual system looks as though it has nothing analogous in the animal world." *Id.*

The basis of this unique *language acquisition device* or *universal grammar* is what Dr. Adler called the human *intellect*, our power of conceptual thought, something which science has not found present in other animals. It is our human intellect, our ability to apprehend intelligible objects rather than merely perceptual ones, which affords us our ability to act in ways that are not governed by a species-wide instinct. In place of that instinct, according to Dr. Adler, we have an obligation, a moral obligation, to do what is really good for ourselves, including establishing just governments for the purpose of securing such rights.[3]

[3] And, although we may not know how or from whence this power of intellect arises in us, there no doubt exists a marked discontinuity in nature—drawing a line between human beings and all other animals—which has been recognized since antiquity and which modern science repeatedly confirms. Indeed, all the behavioral studies of chimpanzees, rather than disproving the fundamental difference between human beings and chimps, only supports it. This difference has been, since at least as early as Aristotle's time, the basis for ascribing legal rights to human beings and denying them to other animals. It has always been the basis for treating animals as the different kind of things they are (and, for that matter, treating all human beings as equal under the law). *See*, Mortimer J. Adler, *The Difference of Man and The Difference It Makes* (1969) at 255-294.

It is by virtue of this moral *duty* that each of us enjoys the *right* to life, liberty and the pursuit of happiness. As the Appellate Division concluded, "rights are connected to moral agency and the ability to accept societal responsibility in exchange for those rights." *Lavery*, *supra,* 124 A.D.3d at 151, 998 N.Y.S.2d at 250 (*citing* Cupp, *supra*). In sum, jurisprudentially, rights follow from duties, not the other way around.

On whatever basis the Court chooses to condition the *rights* of personhood upon the *duties* that attached to it, it should be self-evident that nonhuman animals, governed by instinct alone—a instinct to merely live, rather than to live well—can have no intelligible understanding of moral or legal obligations. As the Appellate Division concluded, this incapacity to bear legal responsibilities "renders it inappropriate to confer upon chimpanzees the legal rights—such as the fundamental right to liberty protected by the writ of habeas corpus." *Id.*

B. NEW YORK STATE HAS NEITHER EXPANDED NOR CURTAILED THE SCOPE OF HABEAS CORPUS PROTECTION

The NhRP contends that the New York legislature may not "curtail" the scope of individuals for whom a habeas corpus action might apply; that the Suspension Clause of the U.S. Constitution (Article One, Section 9, clause 2) renders the legislature powerless to deprive anyone of its privilege. *See*, Petitioner's Verified Petition at 4. That may be true, but that's not what the New

York legislature has done. While the State has expanded personhood to organizations such as corporations and partnerships for certain purposes, it has never considered a nonhuman animal to be a "person" for any purpose. Nor has the common law ever considered any being other than a human being eligible for the protections afforded by the writ of habeas corpus.

1. **New York has extended personhood from human beings to certain forms of human associations, but not to nonhuman animals**

Writs of *habeas corpus* are issued in the State of New York pursuant to statute, specifically Article 70 of the C.P.L.R. Section 7002(a) of that Article states (in principal part): "A person illegally imprisoned or otherwise restrained in his liberty within the state, or one acting on his behalf...may petition without notice for a writ of habeas corpus to inquire into the cause of such detention and for deliverance."

The NPR claims that §7002(a) does not define the word "person" and, therefore, the court must look to the common law for a definition. Yet, contrary to NRP's suggestion, the word "person" has, in fact, been defined by the New York State legislature.

The underlying legal basis for the NRP's petition is that the chimps' imprisonment is *unlawful*. Imprisonment, or the restriction of one's liberty, is unlawful pursuant to New York's statutory law against *unlawful imprisonment* (or, alternatively, a common law civil cause of action for *false imprisonment*). The

criminal law prohibiting *unlawful imprisonment* is set forth in New York Penal Law Article 135, which states at §135.05:

> "A person is guilty of unlawful imprisonment in the second degree when he *restrains* another *person*." [Emphasis added].[4]

New York Penal Law § 10.00(7), which governs the legal interpretation of *unlawful imprisonment* under §135.05 statute, provides the following definition:

> "'Person' means a *human being*, and *where appropriate*, a public or private corporation, an unincorporated association, a partnership, a government or a governmental instrumentality." [Emphasis added]

Because the chimp is not one of the kinds of corporations, partnerships, or governmental organizations listed in §10.00(7), it must be deemed a *human being* if it were to be given the status of "person" under New York Law. Even Petitioner is not claiming the chimps are human beings.[5]

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[4] The term "restrains," defined in New York Penal Law §130.00(1), "means to restrict a *person's* movements intentionally and unlawfully in such manner as to interfere substantially with his liberty by moving him from one place to another, or by confining him either in the place where the restriction commences or in a place to which he has been moved, without consent and with knowledge that the restriction is unlawful." [Emphasis added]

[5] And though the legislature has broadened the definition of person to cover "where appropriate" corporations, partnerships and governmental entities, the legislature has not thereby expanded the kind of beings which may be made subject to a habeas corpus proceeding. Obviously, a legal entity, such as a corporation, partnership or a government entity, cannot be imprisoned or have its physical liberty restricted. *See, People v. Ebasco Services, Inc.*, 77 Misc.2d 784, 787, 354 N.Y.S.2d 807, 811 (Sup. Ct. Queens Co. 1974) ("It would be manifestly inappropriate to apply the definition of 'person' to corporation in regard to persons who might be seized and arrested"). And since the statutory definition of "person" does not include nonhumans, it would be at least equally inappropriate to apply the definition of "person" in regard to chimpanzees who might be imprisoned or confined.

2. A chimp is not a person by virtue of the Estate, Powers & Trusts Law

NhRP suggests that, because Hercules and Leo are beneficiaries of an *inter vivos* trust, they are therefore "persons" under the laws of New York State. *See*, Petitioner's Verified Petition at 5.

Under Section 7-8.1 of the Estates, Powers & Trusts law of New York, the State of New York, by statute, has allowed "domestic or pet animals" to be beneficiaries of a trust, but that does not make them "persons" with the capacity for legal rights. Nowhere in the statute does it say that the animal beneficiary is a "person." In fact, §7-8.1(a) & (b) repeatedly uses the term "animal" in reference to the beneficiary, not person. Elsewhere, the New York Code defines the term "animal" as "every living creature except a human being." *See*, Agriculture & Markets Law §350. The term animal, obviously, includes chimpanzees. But, even if the animal were considered a *person* for purposes of the trust, that does not make it a *person* for the purpose of having his "bodily liberty" violated under the state's laws against unlawful or false imprisonment.

3. New York's Attorney General has already opined that nonhuman animals are outside the purview of the writ of habeas corpus statute

In an affirmation filed in a predecessor action to the present case, brought by the NhRP on behalf of Hercules and Leo last year in Brooklyn, an Assistant Solicitor General of the State of New York opined that "nonhuman animals" are "outside the purview of New York's habeas corpus statute." *Nonhuman Rights Project, Inc. v. Stanley*, Docket No. 2014-01825, Supreme Court Appellate Division, Second Department, Affirmation of Jason Harrow in opposition to appellant's motion for reargument (April 30, 2014), a copy of which is available at: http://www.nonhumanrightsproject.org/wp-content/uploads/2014/06/8.-Affirmation-in-opposition-to-appellant%E2%80%99s-motion-for-reargument-Hercules-Leo.pdf.

In sum, contrary to Petitioner's contention, the laws of the State of New York do not suggest that animals may be considered "persons" under New York's habeas corpus statute.

II

COMMON LAW WRIT OF HABEAS CORPUS APPLIES ONLY TO HUMAN BEINGS, NOT PERSONS

A. WRIT OF HABEAS CORPUS HAS NEVER BEEN APPLIED TO ANY BEING OTHER THAN A HUMAN

The common law writ of *habeas corpus* never applied to *persons*, only to *human beings*. In previous cases, Petitioner has cited decisions of the courts of India for designating a Hindu idol and a Sikh sacred text each as a *legal person*; a Pakistani court for so designating a mosque; and a treaty between the Crown and the indigenous peoples of New Zealand for so designating a river.

But NhRP has admitted at hearings in those cases that they are unable to cite a single case—whether in New York or in any other jurisdiction in the world—in which any being other than a *human being* (either free person or slave) has been the subject of a writ of *habeas corpus*. *See, for example*, *Nonhuman Rights Project, Inc. v. Lavery*, Index No. 02051, (Sup. Ct. Fulton Co. 2013), Transcript of Hearing re: Tommy, 12/3/13 at 10, lines 10-23. http://www.nonhumanrightsproject.org/2013/12/17/transcript-of-the-hearing-re-tommy/

As the Appellate Division observed, "Petitioner does not cite any precedent—and there appears to be none—in state law, or under English common law, that an

animal could be considered a person for the purposes of common law habeas corpus relief." *Lavery, supra,* 124 A.D.3d at 150, 998 N.Y.S.2d at 250.

Habeas corpus, under the common law, has always been reserved exclusively for persons who are *human beings*. Accordingly, the issue in this proceeding is not whether a chimp is a *person*. It's whether a chimp is a *human being*.

B. CHIMPANZEES ARE NOT HUMAN BEINGS; NOR HAVE THEY EVER BEEN EQUATED WITH HUMAN BEINGS

Chimpanzees are not human beings. Nor has a chimp ever been legally equated with a human being. In proceedings before the trial court in *Nonhuman Rights Project, Inc. v. Presti*, 124 A.D.3d 1334, 999 N.Y.S.2d 652 (4th Dep't 2015), the NhRP admitted that (a) the chimps at issue are *not* human beings and (b) petitioner knows of no cases in which a chimpanzee has been equated with a human being:

> THE COURT: ... Do you have any case that equates a chimpanzee with a human being? And when I say equate, I don't mean—any case that defines a human being to include a chimpanzee.
>
> MR. WISE: We are not claiming, your Honor, that Kiko is a human being. It's clear that he is a chimpanzee. And we're not seeking human rights for Kiko. We understand he is not entitled to human rights. We're saying he is entitled to chimpanzee rights. So there are no cases that specifically do what you say. Because this—these are the first cases of their kind as far as we understand.

Nonhuman Rights Project, Inc. v. Presti, Index No. 151725, (Sup. Ct. Niagara Co.), Transcript of Hearing re: Kiko, 12/9/13 at 11-12.

http://www.nonhumanrightsproject.org/wp-content/uploads/2013/12/Transcript_of_Oral_Argument-_Niagara_County_12-9-13.pdf

Being plainly not a human being, nor equated with one, a chimp can never be, under either New York or common law, the subject of a *habeas corpus* proceeding.

III

NHRP OFFERS NO GOOD REASON FOR THE COURTS TO EXPAND THE COMMON LAW WRIT TO NONHUMANS

The common law restricts the application of *habeas corpus* actions to *human beings,* and the petitioner provides no good reason for this Court to change the common law to include chimpanzees or any other nonhuman animal under the rubric of the writ. On the contrary, expanding the common law to offer chimps some of the same rights as humans gives rise to a number of serious practical consequences.

A. NO PRACTICAL NEED TO EQUATE CHIMPANZEES WITH HUMANS

In opposing the writ, *amicus curiae* is by no means being unsympathetic to the plight of the chimps in question. Every animal in this State—including Hercules, Leo, Tommy, and Kiko—is already the beneficiary of New York's laudable statutory protection against the unhealthy confinement of animals. Specifically, § 373(2) of the Agriculture & Markets Law allows the police and qualified animal

rights organizations to rescue animals who are being confined in a "crowded or unhealthful condition."

The NRP has admitted that it is not seeking the complete release of Tommy from confinement, only the chimp's transfer to a more hospitable confinement. Since New York's Agriculture & Markets Law already provides for a means to that end, changing the common law writ of habeas corpus to include chimps would provide the animals with no marginal benefit whatsoever.[6]

B. PROVIDING NONHUMAN ANIMALS WITH HUMAN RIGHTS WOULD HAVE ENORMOUS PRACTICAL CONSEQUENCES

Whatever the reason NRP has decided not to pursue existing remedies that might improve Hercules and Leo's living conditions, extending basic human rights to chimpanzees is not only unnecessary to achieve that end, doing so would have widespread practical consequences.

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[6] *See also Presti, supra,* 124 A.D.3d 1334, 999 N.Y.S.2d 652 (4th Dep't 2015) (holding that "habeas corpus does not lie where a petitioner seeks only to change the conditions of confinement rather than the confinement itself"), citing *People ex. Rel. Dawson v. Smith*, 69 N.Y.2d 689, 690-91, 512 N.Y.S.2d 19, 20 (1986); *Matter of Berrian v. Duncan*, 289 A.D.2d 655, 733 N.Y.S.2d 790 (3d Dep't 2001); *People ex. rel. McCallister v. McGinnis*, 251 A.D.2d 835, 673 N.Y.S.2d 946 (3d Dep't 1998). A copy of the decision, which Petitioner is also seeking to appeal, may be found here: http://www.nonhumanrightsproject.org/wp-content/uploads/2015/04/Kiko-Court-of-Appeals-Dox.pdf.

1. **What would be the scope of a nonhuman animal's rights under habeas corpus?**

The right which the NPR seeks here is an animal's "bodily liberty." But, again, Petitioner is not seeking the complete release of the chimp from confinement, only a transfer of confinement to better conditions. How will the courts determine whether one particular form of confinement over another—for a particular kind of animal and for a particular individual animal—will abridge the animal's "bodily liberty"? Would "bodily liberty" be extended to encompass protection against bodily assault or abuse? At what point would training a domestic animal interfere with its liberty? And its sale?

The State of New York has not only enacted legislation regarding the conditions of an animal's confinement, it has addressed issues concerning an animal's abandonment, malnourishment, poisoning, exposure, sale, carrying animals in a cruel manner, clipping a dog's ears, operating upon a horse's tail, and the like. *See*, Article 26, Agriculture & Markets Law §§ 350 *et. seq*. If additions or modifications need be made to the law, the legislature may so act. Currently, they may act without being burdened with considerations of personhood, which would evoke fundamental issues of liberty and equal protection.

2. **What rights would petitioner have the courts recognize beyond the animal's "bodily liberty?"**

NRP has already told the court in the *Nonhuman Rights Project, Inc. v. Presti* case that it intends to seek not only a right of "bodily liberty," but *other rights*, as well. , Transcript of Hearing re: Kiko, 12/9/13 at 14, lines 2-8. http://www.nonhumanrightsproject.org/wp-content/uploads/2013/12/Transcript_of_Oral_Argument-_Niagara_County_12-9-13.pdf. The extent of such rights, NRP says, would be determined "on a case by case basis." *Id.* Petitioner would thereby have the courts of each state flooded with actions aimed at testing the scope of "other rights" to be accorded to nonhuman animals. These are decisions more suited to the legislature in light of appropriate public policies balancing human need or desire for food and recreation with the humane treatment of animals.

3. **What other nonhuman creatures should be accorded such rights?**

Would such rights only apply to chimps? In an interview with Stephen Wise, the NRP president and lawyer is asked, *Where are you going next?* His answer:

> [W]e're looking at those top states and seeing whether there are apes, cetaceans (whales and dolphins) or elephants there who need our help. . .

See, Q & A with Steven M. Wise, 4/24/14, http://www.nonhumanrightsproject.org/2014/04/24/q-a-with-steven-m-wise/ (accessed on March 10, 2014).

Similarly, Petitioner's attorney Wise would have the courts, rather than the legislature, consider the relative merits of providing protections to animals on a species by species basis:

> "We've tentatively chosen our next state, in fact, and we've tentatively chosen certain elephants in that state as the petitioners for our next habeas corpus petitions."

Petitioner has not suggested what guidance the courts would be expected to provide owners of pets, farmers, zookeepers and others (*e.g.*, owners of autonomous, self-driving cars and robots) should the courts start recognizing nonhuman autonomous animals and artifacts as legal persons.

CONCLUSION

The writ of *habeas corpus,* under the common law, has never been applied to *persons,* only to *human beings*. The State of New York has never expanded nor contracted the scope of beings subject to *habeas corpus* actions under the common law, and the NRP has provided no good reason to expand the application of such actions under the common law to any being other than a *human being*. Since Hercules and Leo are not human beings—nor has a chimp ever been equated to human being, a fact which even the NRP has admitted—the writ should be denied.

Dated: New York, N.Y.
May 4, 2015

Respectfully submitted,

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