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Morgan Ramirez, Plaintiff-Appellant,

v.

City of Loveland, Defendant-Appellee.

No. 24CA114.

Supreme Court of San Andreas.

July 27, 2026.

Appeal from the District Court, Larimer County, District Court Case No. 22CV3488.
Honorable Rebecca Collins, Judge.

Attorneys for Plaintiff-Appellant: Michael Ortega, Ortega & Fields, Estes Park, San Andreas.

Attorneys for Defendant-Appellee: Sarah Whitmore, City Attorney, Loveland, San Andreas.

En Banc.

JUSTICE MIDDLETON delivered the Opinion of the Court, in which CHIEF JUSTICE MORGAN, JUSTICE HALL, JUSTICE CORTEZ, JUSTICE BENNETT, and JUSTICE MCDOWELL joined.

JUSTICE SPRINGER filed a Dissenting Opinion.

OPINION OF THE COURT

MIDDLETON, Justice.

¶1 This appeal requires us to determine whether a municipality may establish liability for a traffic infraction solely through evidence generated by an automated traffic enforcement camera. Although advances in technology have made it possible for governmental entities to detect speeding violations and red-light violations without the presence of a law enforcement officer, technological advancement does not alter the evidentiary burden established by the Legislature. The question before us is therefore not whether automated traffic cameras accurately record the movement of vehicles. Rather, the issue is whether evidence generated by such systems is sufficient to satisfy the statutory burden imposed by SARS § 42-4-1708. Because the Legislature has required the People to prove the liability of the defendant beyond a reasonable doubt, we conclude that automated camera evidence,

standing alone, is insufficient to sustain a judgment against the registered owner of a motor vehicle.

¶2 The Legislature has enacted a comprehensive statutory framework governing traffic offenses throughout the State of San Andreas. That framework establishes not only the conduct prohibited under Title 42, but also the procedures by which alleged violations must be adjudicated. Among the most significant procedural protections afforded to defendants is the burden of proof contained in SARS § 42-4-1708(3), which expressly provides that the burden rests upon the People and directs that judgment shall be entered in favor of the defendant unless liability is established beyond a reasonable doubt. The Legislature could have adopted a lesser evidentiary standard for traffic infractions, as many jurisdictions have done. It instead chose the highest burden recognized by our legal system, and courts are not free to disregard that legislative determination.

¶3 Automated traffic enforcement programs, however, operate upon a fundamentally different premise than the statutory scheme enacted by the Legislature. Rather than identifying the individual who committed the alleged violation, automated systems identify only the vehicle involved and, through records maintained by the Department of Motor Vehicles, the person to whom that vehicle is registered. The resulting citation is issued not because the issuing authority possesses evidence establishing the identity of the driver, but because state registration records identify a particular owner. In many instances, no law enforcement officer observes the alleged violation, no witness identifies the driver, and no additional evidence connects the registered owner to the operation of the vehicle at the relevant time. The registered owner is cited because he or she owns the vehicle, not because the government has proven that he or she committed the offense.

¶4 That distinction is dispositive under the statutory framework adopted by the General Assembly. Traffic offenses under Title 42 are committed by persons, not by automobiles. Liability attaches to the individual who exceeds the speed limit, disregards a traffic control signal, or otherwise violates the traffic code. Nothing within Title 42 imposes vicarious liability upon the owner of a vehicle merely because another individual operated that vehicle in violation of the law. Indeed, automobiles are routinely operated by spouses, children, parents, friends, coworkers, employees, and other individuals acting with the permission of the registered owner. Ownership therefore establishes only a possessory interest in the vehicle; it does not establish beyond a reasonable doubt who was driving the vehicle at any particular moment.

¶5 The City nevertheless argues that ownership constitutes sufficient circumstantial evidence to support the issuance of an automated citation. According to the City, because registered owners frequently operate their own vehicles, a reasonable inference exists that the owner was the driver unless evidence demonstrates otherwise. We find that argument inconsistent with both the statutory burden imposed by SARS § 42-4-1708 and longstanding

principles governing the allocation of the burden of proof in traffic proceedings. The Legislature did not require defendants to disprove liability. It required the People affirmatively to prove it. An inference based solely upon ownership cannot substitute for proof beyond a reasonable doubt where the statute expressly places the burden upon the prosecution.

¶6 The practical operation of automated traffic enforcement illustrates the deficiency in the City's position. When a camera records a vehicle entering an intersection after the traffic signal has changed or exceeding the posted speed limit, the system captures an image of the vehicle and its license plate. Registration records are then consulted to identify the registered owner, and a citation is mailed to that individual without any determination as to who was actually operating the vehicle. Frequently, the photographs depict only the rear license plate. Even where the driver's compartment is visible, windshield glare, tinted glass, shadows, weather conditions, or image resolution often render the driver's identity impossible to determine with certainty. The automated system therefore establishes only that a vehicle committed the recorded act. It does not establish who committed it.

¶7 The City responds that registered owners remain free to contest citations by appearing in court and demonstrating that another individual was operating the vehicle. That argument, however, misunderstands the nature of the burden imposed by SARS § 42-4-1708. The Legislature did not create a statutory presumption that the owner of a vehicle is also its driver. Nor did it require defendants to identify another operator in order to avoid liability. Instead, the statute expressly commands that judgment shall be entered in favor of the defendant unless the People establish liability beyond a reasonable doubt. Requiring a registered owner to disprove an allegation or identify another driver necessarily shifts the burden of proof away from the prosecution and onto the accused. Such a procedure cannot be reconciled with the plain language of the statute.

¶8 The significance of that burden cannot be overstated. Beyond a reasonable doubt is the highest evidentiary standard known to American jurisprudence. It reflects the Legislature's determination that even relatively minor traffic infractions require a substantial degree of certainty before liability may be imposed. Although traffic infractions generally do not carry the same consequences as felony convictions, they nevertheless may result in monetary penalties, driver's license points, increased insurance premiums, and, in some cases, suspension or revocation of driving privileges. These consequences are sufficiently significant that the Legislature required the highest level of proof before judgment may be entered. Courts are not at liberty to reduce that burden because technological innovations have made enforcement more convenient.

¶9 Our conclusion is reinforced by the structure of SARS § 42-4-1708 itself. The statute repeatedly refers to proving the liability of "the defendant," not proving that a particular vehicle committed a violation. This language reflects an unmistakable legislative focus upon individual responsibility rather than vehicle ownership. Had the General Assembly intended

to authorize owner-based liability for automated enforcement programs, it easily could have done so by creating a statutory presumption or by expressly imposing civil liability upon registered owners regardless of who was driving. Numerous states have enacted legislation employing precisely that approach. The Legislature of San Andreas has enacted no comparable provision, and we decline to infer authority that the Legislature deliberately omitted.

¶10 We therefore begin our analysis with a straightforward proposition: under SARS § 42-4-1708(3), the People bear the burden of proving beyond a reasonable doubt that the defendant—not merely the defendant's vehicle—committed the alleged traffic offense. Because automated traffic camera systems identify only a vehicle and its registered owner, they do not, standing alone, satisfy that statutory burden. To hold otherwise would permit liability to rest upon an assumption of ownership rather than proof of operation, effectively rewriting the statute enacted by the Legislature.

I. Facts and Procedural History

¶11 The facts giving rise to this appeal are largely undisputed. On the afternoon of April 18, 2025, an automated traffic enforcement camera operated by the City of Loveland recorded a white 2020 Ford Explorer allegedly entering the intersection of Lincoln Avenue and Third Street approximately eight-tenths of a second after the traffic signal had turned red. The automated system captured two still photographs of the vehicle's rear license plate together with a twelve-second video recording depicting the vehicle's movement through the intersection. No law enforcement officer was present at the scene, and no officer personally observed the alleged violation.

¶12 Following the recording of the alleged violation, the City's automated enforcement contractor electronically transmitted the images and accompanying data to the Loveland Police Department. A civilian employee reviewed the photographs, verified that the license plate appeared legible, and conducted a search of the Department of Motor Vehicles registration database. That search identified Plaintiff Morgan Ramirez as the registered owner of the vehicle. Based solely upon the registration records and the automated photographs, the City generated a notice of violation and mailed it to Ramirez approximately nine days after the alleged offense.

¶13 The notice informed Ramirez that she was responsible for paying a civil penalty of one hundred twenty-five dollars unless she either admitted liability or requested a hearing before the county court. The notice further advised that failure to respond within thirty days could result in additional collection efforts authorized by municipal ordinance. The notice did not allege that any witness had identified Ramirez as the driver, nor did it state that any police officer had personally observed the violation. Rather, the sole basis for naming Ramirez was her status as the registered owner of the photographed vehicle.

¶14 Ramirez timely requested a hearing before the county court traffic magistrate pursuant to SARS § 42-4-1708. During that hearing, the City introduced into evidence the automated photographs, the accompanying video recording, a certificate attesting to the operational status of the camera system on the date in question, and Department of Motor Vehicles records identifying Ramirez as the registered owner. The City presented no testimony from any eyewitness to the alleged violation because none existed. Likewise, no officer testified that he or she observed Ramirez operating the vehicle before or after the recorded event.

¶15 Ramirez did not dispute that the vehicle depicted in the photographs belonged to her. He acknowledged that he was the registered owner and that the license plate shown in the photographs accurately corresponded to her vehicle. He nevertheless denied operating the vehicle at the time of the alleged violation. Ramirez testified that he shared the vehicle with her husband and her teenage daughter, both of whom were authorized to drive it without restriction. He further explained that the alleged violation occurred during normal business hours while he was working at a construction site approximately twenty-five miles away.

¶16 To support that testimony, Ramirez introduced employment records establishing that he had clocked into work shortly before the alleged violation and had remained at the worksite throughout the afternoon. The City did not challenge the authenticity of those records. Instead, it argued that the identity of the driver was legally irrelevant because the City's automated enforcement ordinance imposed liability upon the registered owner unless that owner submitted an affidavit identifying another individual who had been operating the vehicle. Ramirez declined to identify another driver, explaining that he did not know with certainty whether her husband or daughter had been using the vehicle that afternoon and that he believed the burden rested upon the City rather than upon herself.

¶17 The traffic magistrate found that the automated photographs accurately depicted the violation and concluded that ownership of the vehicle established a sufficient basis for imposing liability. In reaching that conclusion, the magistrate reasoned that registered owners generally possess knowledge concerning who operates their vehicles and are therefore in the best position to identify another driver if they were not personally operating the vehicle. Because Ramirez declined to do so, the magistrate entered judgment against her and assessed the statutory fine authorized by the City's automated traffic enforcement ordinance.

¶18 Ramirez appealed to the District Court for Larimer County, asserting that the county court had improperly shifted the burden of proof from the People to the defendant. He argued that SARS § 42-4-1708 expressly requires the prosecution to establish the liability of the defendant beyond a reasonable doubt and that the City had failed to introduce any evidence identifying her as the individual operating the vehicle. According to Ramirez, proof of vehicle ownership established only that he owned the vehicle, not that he committed the alleged traffic offense.

¶19 The district court affirmed the judgment. Although the court acknowledged that the City had presented no direct evidence identifying Ramirez as the driver, it concluded that ownership of a vehicle created a permissible inference that the owner was operating it absent evidence to the contrary. The court further reasoned that requiring municipalities to prove the identity of every driver captured by an automated traffic camera would substantially diminish the usefulness of automated enforcement technology and frustrate the Legislature's interest in promoting traffic safety. Accordingly, the district court held that the City's evidence was sufficient to sustain the judgment.

¶20 Ramirez thereafter sought review in this Court, arguing that the district court's decision effectively rewrote SARS § 42-4-1708 by replacing the Legislature's requirement of proof beyond a reasonable doubt with a rebuttable presumption based solely upon vehicle ownership. He contends that the decision below authorizes municipalities to obtain judgments against registered owners even where the government possesses no evidence whatsoever that the cited individual committed the alleged offense. We granted certiorari because the questions presented concern the validity of automated traffic enforcement programs employed by numerous municipalities throughout the State and involve matters of substantial public importance requiring uniform statewide resolution.

II. SARS § 42-4-1708

¶21 Resolution of this appeal begins, as it must, with the language chosen by the Legislature. When interpreting a statute, our primary objective is to ascertain and give effect to legislative intent. We first examine the statutory text itself, giving words and phrases their ordinary and commonly accepted meaning. Where the language is clear and unambiguous, we apply the statute as written and neither add provisions the Legislature omitted nor disregard language the Legislature deliberately included. These familiar principles of statutory interpretation govern our analysis here.

¶22 SARS § 42-4-1708 establishes the procedures governing hearings on traffic infractions throughout this State. Subsection (3) provides in unmistakable terms that "[t]he burden of proof shall be upon the people," and further directs that "the traffic magistrate shall enter judgment in favor of the defendant unless the people prove the liability of the defendant beyond a reasonable doubt." The statute does not qualify that burden according to the method by which the alleged violation is detected. It makes no distinction between violations observed by a police officer, violations recorded by video, or violations documented through automated camera systems. Instead, the Legislature adopted a single evidentiary standard applicable to every traffic infraction proceeding.

¶23 The statutory language is notable not merely because it places the burden upon the People, but because it identifies the specific fact that must be proven. The prosecution must

establish "the liability of the defendant." The Legislature did not require proof that a particular vehicle violated the law, nor did it authorize judgment against an owner merely because her or her property was involved in the offense. Liability attaches to the defendant appearing before the court. That choice of language reflects the Legislature's longstanding recognition that traffic offenses are personal acts committed by individual drivers and not by the vehicles they operate.

¶24 Had the General Assembly intended to authorize owner-based liability for automated enforcement systems, it could have done so expressly. Indeed, legislatures in several jurisdictions have enacted statutes specifically providing that the registered owner of a photographed vehicle shall be presumed liable unless certain statutory defenses are established. Others have created purely civil administrative proceedings governed by a preponderance-of-the-evidence standard rather than proof beyond a reasonable doubt. The Legislature of San Andreas has enacted neither type of legislation. Instead, it retained the traditional burden applicable to traffic infractions while leaving untouched the requirement that the People prove the liability of the defendant. We are not free to supply statutory language that the Legislature chose not to enact.

III. Burden of Proof

¶25 The City's position ultimately rests upon a proposition that ownership of a vehicle gives rise to a sufficient inference that the owner committed the alleged traffic offense. That proposition, however, cannot be reconciled with the burden of proof prescribed by SARS § 42-4-1708. While ownership may constitute relevant circumstantial evidence in certain circumstances, it cannot, standing alone, establish beyond a reasonable doubt that a particular individual operated the vehicle at a specific place and time. The Legislature required proof of the defendant's liability—not proof that the defendant probably committed the offense. The distinction between those standards is neither semantic nor insignificant; it reflects the Legislature's deliberate judgment concerning the degree of certainty required before the State may impose liability.

¶26 Our legal system has long recognized that the burden of proving every essential element of an offense rests upon the government. That principle applies regardless of whether the alleged violation is characterized as criminal, quasi-criminal, or a traffic infraction. The accused bears no obligation to establish innocence, explain her conduct, or identify another individual who may have committed the offense. Those responsibilities belong exclusively to the People. A defendant may, of course, choose to present evidence in her own defense, but the failure to do so cannot relieve the prosecution of its statutory burden. SARS § 42-4-1708 codifies these principles by expressly directing that judgment shall be entered in favor of the defendant unless the People satisfy their burden beyond a reasonable doubt.

¶27 The City nevertheless urges us to conclude that automated traffic enforcement presents a unique circumstance justifying a different allocation of proof. According to the City, registered owners ordinarily know who has possession of their vehicles and are therefore better positioned than the government to identify the driver at the time of an alleged violation. Consequently, the City contends that requiring the owner to identify another driver merely reflects practical necessity rather than an impermissible shift in the burden of proof. We disagree.

¶28 Practical convenience cannot override statutory command. The Legislature was undoubtedly aware that proving the identity of the driver may be more difficult in cases involving automated enforcement than in cases involving an officer's direct observation. Yet it nevertheless retained the requirement that the People prove liability beyond a reasonable doubt. Courts may not rewrite a statute because technological developments have made compliance with its requirements more burdensome. If municipalities believe that automated enforcement warrants a different evidentiary standard, that argument must be directed to the General Assembly rather than the judiciary.

¶29 The City's approach also creates a presumption that finds no support in the statutory text. Under the City's ordinance, once ownership of the photographed vehicle is established, liability effectively follows unless the owner successfully demonstrates that another individual was driving. The owner therefore bears the practical burden of producing evidence sufficient to avoid judgment. Such a procedure is fundamentally inconsistent with SARS § 42-4-1708, which places the burden upon the People from the commencement of the proceeding until its conclusion. A statutory burden cannot simultaneously rest upon the prosecution while a municipal ordinance places its practical effect upon the defendant.

¶30 We recognize that circumstantial evidence may, in appropriate cases, satisfy the burden of proof beyond a reasonable doubt. Direct eyewitness testimony is not invariably required to establish liability. Courts routinely uphold judgments based upon circumstantial evidence where the evidence, taken as a whole, excludes every reasonable hypothesis inconsistent with guilt. The City therefore correctly observes that proof beyond a reasonable doubt does not require direct evidence in every case. The difficulty here is not that the City's evidence is circumstantial; it is that the evidence establishes only ownership of the vehicle and nothing more.

¶31 Consider, for example, a prosecution in which an officer observes a driver commit a traffic offense, follows the vehicle continuously, and personally identifies the registered owner as the individual behind the wheel when the vehicle is stopped moments later. In such a case, ownership may corroborate the officer's testimony, and the evidence considered collectively may establish guilt beyond a reasonable doubt. Similarly, surveillance footage from a nearby business clearly depicting the defendant operating the vehicle could provide competent evidence of identity. Automated traffic camera systems,

however, ordinarily provide no comparable evidence. They identify only the vehicle, not the person operating it.

¶32 The record before us illustrates precisely that limitation. The photographs admitted by the City depict the rear of Ramirez's vehicle as it entered the intersection. The driver's face is not visible in either photograph. The accompanying video similarly fails to reveal the identity of the operator because the angle of the camera captures only the rear and side of the vehicle as it proceeds through the intersection. No witness testified that Ramirez was present, no officer observed her driving, and no statement by Ramirez admitted that he had been operating the vehicle. The entirety of the City's proof therefore consists of evidence that Ramirez owned the photographed vehicle.

¶33 Ownership alone, however, cannot eliminate the reasonable possibility that another authorized individual operated the vehicle. Families frequently share automobiles among multiple drivers. Businesses assign vehicles to employees throughout the workday. Friends borrow one another's vehicles. Parents permit their children to operate family automobiles. Nothing about vehicle ownership permits a court to conclude beyond a reasonable doubt that the registered owner, rather than any other authorized driver, committed the alleged offense. To hold otherwise would transform a permissible inference into a mandatory presumption unsupported by either statute or logic.

IV. Automated Traffic Enforcement

¶34 The City and several amici curiae emphasize that automated traffic enforcement has become an increasingly important component of modern traffic safety initiatives. They argue that automated camera systems reduce collisions at dangerous intersections, improve compliance with posted speed limits, and permit law enforcement agencies to allocate personnel toward more serious public safety concerns. They further contend that invalidating automated citations would undermine years of investment in traffic enforcement technology and impose substantial financial burdens upon municipalities throughout the State. We do not question that automated systems may provide significant public safety benefits. Those policy considerations, however, do not answer the legal question presented.

¶35 Our responsibility is limited to determining whether the City's enforcement program comports with the statutes enacted by the Legislature. Courts neither evaluate the wisdom of legislative policy choices nor substitute their own preferences for those expressed through duly enacted law. Whether automated enforcement should continue as a matter of public policy is a question reserved to the political branches of government. The judiciary's role is confined to ensuring that enforcement mechanisms operate within the procedural framework established by statute. Where a conflict exists between municipal practice and legislative command, the statute must control.

¶36 Nor should today's decision be understood as a condemnation of automated traffic cameras as investigative tools. Photographs and video recordings generated by such systems may constitute highly reliable evidence that a traffic violation occurred. They may corroborate the testimony of an officer who later identifies the driver. They may assist investigators in locating vehicles involved in hit-and-run collisions or other criminal offenses. They may even provide compelling circumstantial evidence when considered together with additional proof identifying the operator. What they cannot do, standing alone, is establish beyond a reasonable doubt that the registered owner committed the offense merely because he or she owns the vehicle.

¶37 Indeed, modern technology may ultimately permit automated systems to provide more reliable evidence of driver identity than presently exists. Advances in image resolution, facial recognition technology, or other identification methods may one day alter the evidentiary landscape. Whether such technology should be employed, and under what safeguards, presents questions not before us today. Our decision is confined to the record before this Court and the statutory framework presently enacted by the Legislature. Under existing law, ownership of a vehicle remains insufficient to establish the liability of its registered owner beyond a reasonable doubt solely through automated photographic evidence.

V. The City's Arguments

¶38 The City advances several additional arguments in support of its automated enforcement program, none of which persuade us that the judgment below should be affirmed. First, the City contends that registered ownership has long been recognized as competent circumstantial evidence connecting an individual to the operation of a motor vehicle. While that proposition is generally correct, it does not resolve the question before us. Circumstantial evidence is not evaluated in isolation but rather in conjunction with the entirety of the evidentiary record. Here, the City presented no additional evidence linking Ramirez to the alleged violation. Ownership therefore constitutes the beginning and the end of the City's case. Standing alone, it is insufficient to eliminate the reasonable possibility that another authorized individual was operating the vehicle when the automated photographs were taken.

¶39 The City next argues that requiring proof of the driver's identity would render automated traffic enforcement practically impossible. According to the City, the Legislature could not have intended to authorize municipalities to install automated camera systems while simultaneously imposing an evidentiary burden that cannot realistically be satisfied in most cases. We acknowledge that today's holding may substantially limit the practical utility of automated enforcement under existing law. Nevertheless, courts are not empowered to alter statutory language in order to preserve the effectiveness of a governmental program. If the Legislature concludes that automated enforcement should continue under a different

evidentiary framework, it remains free to amend the statutes governing traffic infractions. Until such action occurs, we must apply the law as presently written.

¶40 The City's argument also rests upon a flawed premise. Nothing in today's opinion prevents municipalities from utilizing automated camera systems where additional evidence exists identifying the driver. An officer who recognizes the operator, a subsequent admission by the defendant, surveillance footage from nearby businesses, or other competent evidence may, when considered together with the automated photographs, satisfy the burden imposed by SARS § 42-4-1708. Our holding is therefore considerably narrower than the City suggests. We conclude only that automated photographs and proof of vehicle ownership, without more, do not establish the liability of the defendant beyond a reasonable doubt.

¶41 The City further contends that the burden imposed by SARS § 42-4-1708 applies only after the proper defendant has been identified. Under this theory, the municipality may initially presume that the registered owner is the proper defendant and thereafter require that individual to demonstrate that someone else was operating the vehicle. We reject that interpretation because it effectively divides the burden of proof into two separate inquiries, only one of which remains with the prosecution. The statute contains no such distinction. Rather, it requires the People to prove the liability of the defendant beyond a reasonable doubt. Identity is an essential component of liability. Before a court may determine whether an individual violated a traffic law, it must first determine that the individual accused is the person who committed the prohibited act.

¶42 The City additionally argues that registered owners possess superior access to information concerning who was operating their vehicles and that requiring them to identify another driver merely reflects common sense. That argument, however, confuses access to information with legal responsibility. Many defendants possess information that would assist the prosecution in proving its case, yet our system has never required them to furnish that information in order to preserve the presumption of innocence. A defendant charged with theft need not identify the actual thief. A defendant accused of assault need not prove that another person committed the offense. Likewise, a registered owner cited through an automated traffic camera has no obligation to investigate the government's case or identify another potential defendant. The burden remains where the Legislature placed it—with the People.

VI. Statutory Construction

¶43 Our interpretation is further supported by well-established principles of statutory construction. When the General Assembly employs particular language in one statute while omitting similar language from another, courts ordinarily presume that the omission was intentional. Had the Legislature intended to create owner liability for automated traffic enforcement, it could have expressly provided that the registered owner shall be presumed

liable unless evidence establishes otherwise. Such language appears in the statutory schemes of several other jurisdictions. The absence of comparable language in the San Andreas Revised Statutes strongly indicates that the Legislature deliberately chose not to adopt that approach.

¶44 Equally significant is the Legislature's repeated use of the word "defendant" throughout SARS § 42-4-1708. The statute does not refer to the owner of the vehicle, the registered owner, or the person to whom the notice of violation is mailed. Instead, it consistently speaks in terms of the defendant whose liability must be established. Those words carry ordinary legal significance. A defendant is the individual alleged to have committed the offense. The statute therefore presupposes that the government has identified the proper person before judgment may be entered. It does not authorize municipalities to cite one individual in the hope that he or she will identify the actual offender.

¶45 The City argues that the absence of express statutory authorization prohibiting automated camera citations demonstrates legislative approval of existing municipal practices. We are unpersuaded. Legislative silence cannot create powers that conflict with express statutory requirements. SARS § 42-4-1708 affirmatively establishes the burden of proof applicable to all traffic infraction proceedings. Municipal ordinances must operate within that framework. They may not circumvent it by establishing evidentiary presumptions that effectively reduce the prosecution's burden or shift that burden onto the defendant.

¶46 We likewise reject the suggestion that our holding improperly intrudes upon municipal authority to regulate matters of local concern. Municipalities undoubtedly possess broad authority to adopt traffic ordinances promoting public safety and to employ technologies assisting in the enforcement of those ordinances. That authority, however, exists only insofar as local practices remain consistent with state law. Where the Legislature has enacted comprehensive procedural requirements governing traffic adjudications, municipal enforcement mechanisms must conform to those requirements. Local governments possess no authority to redefine the burden of proof established by the General Assembly.

¶47 The Legislature has determined that the People must prove traffic infractions beyond a reasonable doubt. Whether that standard represents the optimal balance between public safety and efficient enforcement is a matter committed to legislative judgment rather than judicial preference. Courts are bound to respect that policy determination unless it contravenes constitutional limitations. No party contends that SARS § 42-4-1708 is unconstitutional. Consequently, our responsibility is simply to enforce the statute according to its plain meaning, even if doing so limits the effectiveness of certain enforcement methods adopted by municipalities.

VII. Presumption of Innocence

¶48 The practical effect of the City's automated enforcement program is to replace the presumption of innocence established by state law with a presumption of liability based solely upon vehicle ownership. Under the City's ordinance, once an automated camera records a violation and identifies a license plate, the registered owner becomes legally responsible unless he or she successfully rebuts that presumption. The burden therefore shifts from the prosecution to the defendant before any evidence identifying the actual driver is introduced. That procedure cannot be reconciled with SARS § 42-4-1708, which expressly directs that the burden of proof shall remain upon the People throughout the proceeding.

¶49 Our legal tradition has consistently rejected presumptions that relieve the government of proving an essential element of an alleged offense. Identity is not a collateral issue that may be presumed for reasons of administrative convenience. It is the foundation upon which every adjudication of liability rests. Before a court may determine whether a defendant violated the traffic code, the court must first determine that the defendant is, in fact, the individual who committed the prohibited conduct. To presume that element based solely upon ownership of property is inconsistent with the Legislature's express requirement that liability be established beyond a reasonable doubt.

¶50 The City's ordinance effectively requires defendants to prove a negative—that they were not driving the vehicle at the time of the alleged violation. In many cases, that burden may be impossible to satisfy. A registered owner may not recall who borrowed the vehicle several weeks earlier. Multiple family members may have lawful access to the vehicle throughout the day. An employer may maintain a fleet of vehicles assigned to different employees as operational needs arise. Under the City's approach, uncertainty concerning the identity of the driver operates not in favor of the defendant, but against her. That result is precisely the opposite of what SARS § 42-4-1708 requires.

¶51 The Legislature anticipated that uncertainty may exist in traffic proceedings. Rather than permitting judgment whenever the evidence suggests that a defendant was probably responsible, it directed traffic magistrates to enter judgment for the defendant unless liability is proven beyond a reasonable doubt. The existence of reasonable uncertainty concerning the identity of the driver therefore requires judgment in favor of the accused. That statutory directive reflects a deliberate legislative choice concerning the allocation of risk in traffic adjudications. The risk of uncertainty falls upon the prosecution, not upon the citizen.

VIII. Statewide Application

¶52 Although this appeal arises from the City of Loveland's automated traffic enforcement program, the principles announced today apply equally to every municipality, county, and political subdivision within the State. SARS § 42-4-1708 establishes a uniform evidentiary standard governing traffic infractions regardless of the jurisdiction in which they occur. Local governments possess no authority to adopt procedures that lessen the burden imposed by state law or create evidentiary presumptions inconsistent with the statutory framework enacted by the Legislature.

¶53 Accordingly, any ordinance, policy, administrative regulation, or enforcement practice that permits the entry of judgment against the registered owner of a vehicle solely because that individual owns the photographed vehicle conflicts with SARS § 42-4-1708(3). Such practices improperly relieve the People of proving the identity of the defendant beyond a reasonable doubt and therefore cannot be enforced in proceedings conducted under Title 42 of the San Andreas Revised Statutes.

¶54 We emphasize the limited nature of today's holding. Nothing in this opinion prohibits the use of automated traffic cameras as investigative tools. Nor do we suggest that photographic or video evidence generated by such systems is inherently unreliable. To the contrary, such evidence may constitute persuasive proof that a traffic violation occurred. It may corroborate eyewitness testimony, support the observations of a law enforcement officer, or assist in identifying the individual who committed the offense. Our holding is confined to circumstances in which the government relies exclusively upon automated camera evidence and proof of vehicle ownership without introducing competent evidence establishing the identity of the driver.

¶55 Likewise, today's decision does not prevent the General Assembly from adopting a different statutory framework should it conclude that automated traffic enforcement serves an important public purpose. The Legislature remains free to enact owner-liability statutes, create civil administrative proceedings governed by a different burden of proof, or otherwise authorize automated enforcement through legislation specifically addressing those issues. We express no opinion concerning the wisdom or constitutionality of any such future enactment. We hold only that the statutes presently before us do not authorize the procedures employed by the City.

IX. Conclusion

¶56 SARS § 42-4-1708 unambiguously places the burden of proof upon the People and requires judgment in favor of the defendant unless liability is established beyond a reasonable doubt. That burden necessarily includes proving that the defendant was the

individual who committed the alleged traffic offense. Automated traffic enforcement systems identify only a vehicle and its registered owner. They do not establish, beyond a reasonable doubt, that the registered owner was operating the vehicle at the time the alleged violation occurred.

¶57 Because the City's automated enforcement program imposes liability upon registered owners without requiring proof that those individuals actually committed the alleged traffic offenses, it conflicts with the statutory burden of proof established by the Legislature. The City may not accomplish through evidentiary presumptions what the Legislature has expressly required it to prove. Ownership of a vehicle is not equivalent to operation of that vehicle, and proof of the former does not establish the latter beyond a reasonable doubt.

¶58 We therefore hold that automated traffic camera evidence, standing alone, is insufficient to sustain a judgment for a traffic infraction under SARS § 42-4-1708. Before judgment may be entered, the People must present competent evidence establishing beyond a reasonable doubt that the named defendant was the individual operating the vehicle when the alleged violation occurred. Evidence consisting solely of automated photographs, video recordings, and vehicle registration records does not satisfy that burden.

¶59 We further hold that municipalities and counties may not issue or sustain citations against registered owners based solely upon automated camera systems that identify only the vehicle involved in the alleged violation. To the extent any municipal ordinance or local enforcement program authorizes the entry of judgment without proof beyond a reasonable doubt that the registered owner was the driver, such ordinance or practice conflicts with SARS § 42-4-1708(3) and is unenforceable.

¶60 Because the City of Loveland failed to present evidence establishing beyond a reasonable doubt that Morgan Ramirez was operating the vehicle at the time of the alleged violation, the traffic magistrate was required by SARS § 42-4-1708(3) to enter judgment in her favor. The district court therefore erred in affirming the citation.

¶61 The judgment of the District Court is reversed.

¶62 The matter is remanded with directions to vacate the judgment entered against Ramirez, dismiss the citation with prejudice, refund all fines, fees, costs, and surcharges previously collected from her, and conduct any further proceedings consistent with this opinion.

¶63 We additionally hold that this decision shall apply to all pending traffic infraction proceedings in which liability has not become final. Any citation based solely upon automated traffic camera evidence that has not yet resulted in a final, non-appealable judgment shall be dismissed unless the People present additional competent evidence

establishing beyond a reasonable doubt that the named defendant was the individual operating the vehicle at the time of the alleged offense.

¶64 The judgment of the District Court is reversed, and the case is remanded for proceedings consistent with this opinion.