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*In memory of Robert Martin*  
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A loving friend, an exceptional student athlete and a remarkable creative mind.

The Binghamton Law Quarterly would like to dedicate this edition in loving memory of Robert Martin. A student athlete and friend of the Binghamton University community, Rob was a beautiful bright light in this world who will always be remembered.

The Binghamton Law Quarterly proudly recognizes the qualities that Rob has demonstrated throughout his life as we continuously strive to exemplify the integrity and creativity that is Rob.

If you're in crisis, there are resources available. Students in need of counseling services or support can contact the University Counseling Center at 607-777-2772 and the Office of the Dean of Students at 607-777-2804. Faculty and staff in need of support can contact the Employee Assistance Program any time of day at 1-800-822-0244.

Additionally, you can call the National Suicide Prevention Lifeline at any time to speak to someone and get support. For confidential support available 24/7 for everyone in the United States, call 1-800-273-8255.

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Dear Readers,

Thank you to all readers for picking up this copy and contributing to the Binghamton Law Quarterly's success! Having been a member of this organization since my first year at Binghamton, I am extremely grateful to be a part of the Quarterly's growth throughout the years.

Our mission is to serve as a welcoming outlet for all students to explore their interests while simultaneously engaging with the law. Further, our mission extends with the hope that we provide a stepping-stone for students to enhance their legal reading and writing skills. This mission could not be fulfilled without the help of the Politics, Philosophy, and Law department, who has supported our publishing efforts since the creation of the Binghamton Law Quarterly. We would also like to thank the Pre-Law office and the Harpur Law Council for all of their help with recruitment and outreach. Without the support of the aforementioned, we would not be able to properly serve Binghamton University's community by bringing pertinent legal issues into focus. We are excited for what the coming year may bring, and we always encourage new writers, editors, and designers to join our team. If you would like to get involved, please contact [quarterly@binghamtonsa.org](mailto:quarterly@binghamtonsa.org) and let us know how you can contribute.

We must thank our dedicated writers and editors who worked tirelessly to produce the content that is before you. I would also like to thank our executive board for their hard work, dedication and professionalism. The Binghamton Law Quarterly has a continued commitment to BU's community, despite the extreme challenges COVID has placed on our publishing. Thank you to all who helped make this happen. For those pursuing a career in law and for those simply interested in legal topics, we proudly present to you this issue of the Binghamton Law Quarterly.

It has been an honor to serve as the President and Chief Editor of the Binghamton Law Quarterly throughout my time at Binghamton University.

Sincerely,  
Juliet Tomero  
President and Chief Editor, *The Binghamton Law Quarterly*

# PHASING OUT CAR SALES, THE KEY TO CLIMATE CHANGE REFORM?

Anthony Canger

Climate change currently stands as one of the most prevalent issues of the 21st century. Its catastrophic effects for the generations to come include the potential to destroy ecosystems, flood communities and cities, damage infrastructure, and drastically impede agricultural production. The sea level has already risen 8 inches since the 19th century and is expected to rise another one to four feet by 2100 (U.S. National U.S. Global Change Research Program, 2018). The amount of greenhouse gasses per capita produced in the United States (US) is 19.27 tons per year (U.S. National U.S. Global Change Research Program, 2018). This accounts for 12.47% of global greenhouse gas emissions (UN Climate Program, 2019). In the US, passenger vehicles account for 16.4% of the total amount of greenhouse gasses emitted (Cato Writers, 2021). Lawmakers are tackling this problem with the passing of laws to phase out the sale of gas and diesel powered cars and light trucks by 2035. These laws have already been passed in New York, California, and Washington. This paper will analyze the application, legality, and implications of laws enacted to eventually stop the production of gas and diesel powered cars.

The application of these environmental laws are complex and involve a multi-step plan and process. One core part is getting

auto manufacturers on board with only selling electric vehicles by the year 2035. General Motors stated that it also shares a goal of only selling electric vehicles by the year 2035, while Ford committed \$50 billion to the development of new electric vehicles and electric vehicle batteries, and pledged to offer 25 new electric vehicle models by the year 2030 (New York Times Writers, 2022). The timeline for the phasing out of gas car sales will have its first deadline in the year 2026, where the share of electric vehicles sold by car manufacturers must be 35%. It will then increase to 68% by vehicle model year 2030, and 100% by year 2035 (Colias, Duc-Mai, 2022). Despite this clear plan and its enactment in several states, there is still a question of the legal implications of these laws.

There is much opposition to the passing of these specific laws. A group of attorney generals from Republican-led states have already filed a lawsuit to challenge California's ability to enact its own pollution rules. Further, former US President Donald Trump also tried to fight California's authority to phase out gas and diesel powered cars and light trucks under the Clean Air Act (New York Times Writers, 2022). The Clean Air Act is a federal law that limits greenhouse gas emissions from stationary and mobile sources. It was initially passed in 1970, with amendments being made in

1977 and 1990. Its status as a federal law might have allowed the Trump administration to halt any efforts made in passing this law (Environmental Protection Agency, 2022). In addition, California has to send its final waiver to the Environmental Protection Agency (EPA) before the law can take effect.

With more environmentally-concerned political leaders in office, such as current US President Joseph Biden, most EPA waivers will be signed, and more laws looking to eventually eliminate gas car sale laws can be reviewed and passed. Many states will successfully pass these laws due to the support of the Biden administration and the new expansive federal climate law passed in August (New York Times Writers, 2022). There are a variety of past laws and cases that provide legal precedent to support why future gas car sale laws should be passed. One example is the 1990 Pollution Prevention Act. The purpose of this act was to implement different ways to manage waste and pollution, preemptively disposing of them before reaching recycling centers (Environmental Protection Agency, 2022). The Pollution Prevention Act has a very similar purpose to current gas car sale laws as they both try to address pollution threats with preemptive measures. A second example is the act discussed earlier, the Clean Air Act. This act aims to reduce greenhouse gas emissions, which is one of the main overarching goals of the gas car sale laws being passed. The successful passing of these two 1990 laws prove there is legal precedent to support the legality of current

gas car sale laws.

In addition to debates about the legality of laws aimed at phasing out the selling of gas cars are debates about the laws' potential impacts and effects. One intended effect is to slow the rate of climate change and reduce air pollution. State regulators have predicted that greenhouse gas emissions from cars will be cut by more than 50% in the year 2040, compared to the predicted greenhouse gas levels if gas cars continued to be produced (New York Times Writers, 2022). Secondly, this legislation is predicted to decrease greenhouse gas emissions by 40%, bringing them down to 2005 emission levels. (New York Times, 2022) Conversely, many argue that the passing of these laws will carry some negative effects. For one, the increase of the use of all-electric vehicles could put a strain on the US power grid. Moreover, many auto-manufacturers will have to increase their supply chain in order to produce so many electric vehicles, which could negatively affect the economy (New York Times Writers, 2022).

The phasing out of gas car sales has already been approved in New York, California, and Washington with a high probability of more states to follow. The threat of climate change and air pollution carries catastrophic and deadly effects in the decades to come and the passing of gas car sale laws aims to address these threats. The application of these laws involves agreement and planning on multiple levels of state, federal government, and the automobile industry. Still, the legality of

the law remains in question. Certain past laws, like the Pollution Prevention Act and Clean Air Act, hold similarities to the laws trying to be passed and could possibly be used to demonstrate precedence. Finally, the potential effects of this law have the ability to address and remedy some of the main problems that are advancing climate change. Enacted gas car sale laws might well pave the way for future legislation and hold the key to reducing global emissions.

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## BRITTNEY GRINER VS. RUSSIA

Juliana Flores

Brittney Griner is a thirty-one year old American basketball player for the Phoenix Mercury of the Women's National Basketball Association. In February of 2022, she gained immense public attention regarding her detainment in Russia. Griner was arrested in a Russian airport near Moscow after a sniffer dog had provoked the Russian Federal Customs Services to search the basketball player's carry-on luggage (Ganguli, 2022). As a result of the search, vape cartridges were found in her luggage that contained hashish oil, a marijuana concentrate with a very high THC content. Upon her arrest, Griner was charged with the large-scale transportation of drugs, which could be punishable by up to ten years in prison (Ganguli, 2022). As soon as the basketball player's case reached social media, it had become instantly politicized as there was a large number of supporters who backed her and felt these charges were invalid for the crime that had been committed. Those who supported Brittney Griner argued that she had been wrongfully detained by Russian authorities. On the other hand, there was also a large volume of people who felt that her situation was justifiable and took their feelings regarding the case to social media platforms.

On May 3rd, the United States State Department stated that Griner had in fact been wrongfully detained and explained

that American government officials who dealt with the hostage affairs pertaining to her case would work to secure her release. Following this announcement, Griner's family, friends, teammates and supporters urged the Biden Administration to put in their best efforts to free Brittney Griner and bring her home (Ganguli, 2022). This case and trial have been followed very closely by the media and the public eye, and has raised questions of whether or not this detainment was politically motivated by Russian officials, considering the long history of tensions between Russia and the United States (Ganguli, 2022). The Biden Administration has attempted to negotiate with Russia to free her. Within these negotiations is a rumored prisoner swap that would result in the United States releasing the well known Russian arms dealer Viktor Bout. Despite this proposition, Russia has said that any potential deal would have to wait for consideration until after her sentencing (Mayne, 2022). Griner's trial began on July 1st, where she plead guilty and admitted she had made an "honest mistake" (Mayne, 2022). The charges that she faced were punishable up to ten years in prison and the Russian prosecution requested a sentence of nine years and six months in a penal colony. Ultimately the judge sentenced Griner to nine years in prison, which her attorneys stated they would attempt to appeal (Mayne, 2022).

This case had unfolded in the midst of the Russian invasion of Ukraine in late February, which is arguably the most persuasive reason that Griner was a political target, and that this case is merely about obtaining political leverage.

On October 25th, Griner appeared in Russian court, where her appeal of her nine year sentence was rejected. A few weeks later in early November her lawyers confirmed that she was transferred to a Russian penal colony in Mordovia where she began serving her sentence (ESPN, 2022). Although there have been rumors regarding the status of the negotiated prisoner swap, the United States Department of State has rejected these claims in a statement that read the following: “U.S. Government has continued to follow up on that offer and propose alternative potential ways forward with the Russian government. The Russian government’s failure to seriously negotiate on these issues in the established channel, or any other channel for that matter runs counter to its public statements” (ESPN, 2022). Following these public statements, the Department of State has also called on Russia to fulfill their legal obligations to the United States regarding Brittney Griner’s case and her whereabouts (ESPN, 2022).

As of today, Brittney Griner still remains detained in a Russian detention center and her friends, teammates, family, and supporters continue to fight for her release. Her loved ones have openly stated their confidence in the Biden Administration’s

attempts to bring her home, while utilizing social media platforms to share her story and spread awareness, and continue to remain optimistic during the process of achieving her freedom.

Update 12/08/2022: Brittany Griner has been released in exchange for arms dealer Viktor Bout after a negotiation with Russia and the Biden Administration.

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# DOBBS V. JACKSON - BACKGROUND AND DECISION

Jason Glinski

On June 24th, 2022, the Supreme Court presented a landmark 6-3 decision in *Dobbs v. Jackson Women's Health Organization*. The decision, crafted by Justice Samuel Alito, overturned the precedent set in *Roe v. Wade* (1973) and *Planned Parenthood v. Casey* (1992), which provided a constitutional right to abortion. The court voted on ideological lines, with all six conservative justices in the majority and the three liberal justices in the minority. Justices John Roberts, Brett Kavanaugh, and Clarence Thomas wrote concurring opinions, while Justice Elena Kagan wrote the dissenting opinion on behalf of the minority (Oyez, n.d.a.) The decision has been both praised and condemned and will undoubtedly have significant effects on the future of reproductive healthcare in America.

The Supreme Court first recognized the constitutional right to an abortion in *Roe v. Wade*, where the Supreme Court stated that women have a right to privacy, which in turn protects their right to abortion, but also that the state has an interest in protecting "the potentiality of human life" (Oyez, n.d.a.). In other words, women have the right to an abortion, but the state can also make restrictions to protect the unborn. The court created a trimester system where states could make more restrictions as the pregnancy went on (Oyez, n.d.a.). *Planned*

*Parenthood v. Casey*, decided in 1992, supported this decision, upholding the right to an abortion but changing the trimester system to an "undue burden test", where a law regarding abortion access would be struck down if it created an undue burden on a woman seeking an abortion (Oyez, n.d.a.). An "undue burden" exists when a law places a restriction on an individual right, in this case, the right to an abortion, that is too severe or lacks a rational basis. This meant that states could make more restrictions on abortion, but the Court preserved it as a constitutional right.

In 2018, a law called the "Gestational Age Act" was passed in Mississippi. The law prohibited abortions after 15 weeks of pregnancy, with a few exceptions (Klein, 2018). The only remaining abortion clinic in Mississippi, Jackson Women's Health Organization, filed suit and obtained an injunction from the District Court for the Southern District of Mississippi, which the Fifth Circuit court of appeals upheld. The Fifth Circuit ruled that because fetuses are not viable at 15 weeks, Mississippi cannot ban abortion at that time (Oyez, n.d.a.). Following this decision, Mississippi petitioned the Supreme Court for a writ of certiorari in June 2020, and the Court granted the petition on May 17th, 2021. The court heard oral arguments on December 1st, 2021, with Mississippi Solicitor General

Scott Stewart representing Mississippi, Julie Rinkleman representing Jackson Women’s Health Organization, and United States Solicitor General Elizabeth Prolegar supporting Jackson Women’s Health Organization on behalf of the United States (Oyez, n.d.a.).

Scott Stewart went first in oral arguments, stating that “Roe v. Wade and Planned Parenthood v. Casey haunt our country”, going on to add that the decisions “have no basis in the Constitution” and “no home in our history or traditions.” He later said that for the Court to avoid the appearance of a political decision, the decision needed to be “well grounded in the Constitution, in text, structure, history, and tradition” (Walsh and Barlow, 2022). After Stewart, Julie Rinkleman argued, saying, “Mississippi’s ban on abortion two months before viability is flatly unconstitutional under decades of precedent.” In responding to a question from Justice Alito about the philosophical justification for the viability deadline, Rinkleman argued that “the court had to set a line between conception and birth.” Finally, Elizabeth Prolegar, representing the United States in support of Jackson Women’s Health Organization, told the court, “The real-world effects of overruling Roe and Casey would be severe and swift.”

After the draft opinion was leaked over a month early, the Court handed down its final decision on June 24th, 2022. The majority opinion, written by Justice Alito, stated that the decision in Roe v. Wade was “egregiously wrong” and that the Court

erred in Planned Parenthood v. Casey when it upheld the Roe decision using stare decisis. He went on to explain that the majority believed that the Roe decision was an abuse of judicial authority, and the reasoning of the Court was “exceptionally weak” (National Constitution Center, 2022).

When describing the Court’s reasoning in Dobbs, Alito first said that the equal protection clause of the 14th Amendment did not apply to abortion because of previous decisions which established that regulation of abortion is not “a sex-based classification.” Alito then said the Constitution made no specific mention of abortion and that those who believe it protects the right to abortion must show how it is implicit in the Constitution.

Essential to the reasoning in Roe v. Wade was substantive due process. Substantive due process is the principle in American law that allows courts to recognize an implicit right that isn’t directly mentioned in the constitution. In the past, abortion was one of the rights protected under substantive due process. In the Court’s view, an implicit constitutional right must have a basis in America’s tradition and history (National Constitution Center, 2020). Alito writes that “there was no support in American law for a constitutional right to obtain an abortion” before the Roe decision. Prior to Roe, abortion was illegal in the vast majority of states, and at the time the 14th Amendment was ratified, three-quarters of states had laws directly outlawing abortion. Therefore, in Alito’s view, “a right to abortion is not deeply rooted in the Nation’s

history and traditions.” Because of this, the majority believed that substantive due process does not apply to abortion (National Constitution Center, 2022). In his concurrence, Justice Thomas went further, arguing that the court should review all substantive due process rights, although Alito’s majority opinion states that abortion is the only due process right the court will review.

Based on this reasoning, the Court decided that abortion was not a constitutional right. The court believed that the decisions in Roe and Casey were so incorrect that they warranted bypassing stare decisis and overturning a long-standing precedent set nearly 50 years ago. Justices Alito, Barrett, Kavanaugh, Gorsuch, and Thomas formed the Majority, with Chief Justice Roberts concurring on the decision to uphold the law but not to remove the right to abortion entirely. Justice Kagan wrote the dissenting opinion, joined in the minority by Justices Sotomayor and Breyer. Kagan argued that the majority was abandoning stare decisis and was taking away a right that protects women’s health without sufficient basis (Oyez n.d.a.). Ultimately, this decision will have long-lasting and far-reaching effects on the future of reproductive health in America. Eighteen states have already banned abortion, with a further ten states passing bans that are currently blocked by courts. This leaves millions of women without access to abortion and jeopardizes access for millions more if bans are upheld.

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# THE OVERTURNING OF ROE V. WADE AND ITS EFFECTS ON NEW YORK

Kevin McGarvey

On Friday, June 24th, 2022, the United States Supreme Court overturned Roe v. Wade, a polarizing decision that reversed the constitutional right to receive an abortion. This monumental decision shocked the nation, leaving millions of Americans' reproductive rights under the scrutiny of their individual states. This caused states to rush to either protect or restrict abortion rights within their borders, solidifying and clearly conveying to the rest of the nation their stance on abortion. While many other states began to make changes to their laws about abortion, New York, a historically "blue" state, had already provided progressive laws and defenses in support of the right to receive an abortion. This article will provide a summary of the existing abortion laws in place within the New York State legislature, making use of their language to provide an accurate report on how New York protects those seeking an abortion within its borders and conclude with remarks from New York's leaders on their promises about the future of the right to an abortion.

Currently, the right to an abortion is clearly protected in N.Y. Pub. Health Law 2599-BB which states that "A health care practitioner licensed... may perform an abortion when...the patient is within twenty-four weeks from... pregnancy, or there is an absence of fetal viability, or the abortion

is necessary to protect the patient's life or health" ("Legislation" n.d.).<sup>1</sup> The law uses general language that allows for those who seek an abortion in New York State to have a broad spectrum of defenses for their abortion, specifically "to protect the patient's life or health" ("Legislation" n.d.).<sup>1</sup> This allows for the person carrying the baby to receive an abortion procedure if they are in danger both physically and mentally which allows for a greater number of people to receive abortions for their personal safety.

Furthermore, the law also allows minors to receive treatment without the consent of their parents and prohibits discrimination and harassment for those seeking an abortion. The right of protections for minors is stated as: "A subject over the age of twelve years may be notified of any request... to review his/her patient information, and.... may deny the request" ("Legislation" n.d.).<sup>1</sup> This allows for minors to receive a safe medical abortion procedure without negative emotions like fear as a result of backlash from their guardians or care takers due to confidentiality. It also allows for those seeking an abortion protection from their employers. N.Y. Pub Health Law 203-e(1) states "An employer shall be prohibited from accessing an employee's personal information regarding... reproductive health decision making..." ("Leg-

isolation” n.d.).<sup>1</sup> This prohibits employers from acting in a discriminatory manner against their employees, allowing those who seek an abortion to do so without fear of being fired.

Furthermore, New York State’s official website provides a full list of protective rights for those seeking medical treatment and even presents the option to find the nearest abortion provider (“Abortion in New York State: Know Your Rights” n.d.).<sup>2</sup> They also list other organizations to help with medical payments and for expenses for those seeking treatment out of state (“Safe Abortion Access for All” n.d.).<sup>3</sup> Moreover, New York State provides public funding for abortion access through Medicaid that allows for “free and confidential access to: all types of birth control... emergency contraception... abortion” (“Medicaid Family Planning Services--10 Most Common Questions & Answers” n.d.).<sup>4</sup> This allows for those who do not have the fiscal means to obtain abortion procedure an outlet to receive a safe abortion from a licensed physician, re-affirming the right to an abortion. Additionally, on May 10th, 2022, Governor Kathy Hochul declared a future health budget that, beginning on January 1st, 2023, will require that all private insurance companies’ maternity care coverage to include abortion (“Medicaid Family Planning Services--10 Most Common Questions & Answers” n.d.).<sup>4</sup> This future law will force insurance companies to provide protection and resources for their clients to receive a safe abortion in New York State.

On the day Roe v. Wade was overturned, Letitia James, the New York Attorney General, issued a statement saying “Even with today’s Supreme Court decision overturning Roe, abortion remains legal in New York... The people of New York — and all those who may come here seeking care — have my word that New York state has been and will continue to be a safe haven for abortion access” (“Attorney General James Issues Advisory Reminding New Yorkers Abortion Is Legal and Protected in New York State” n.d.).<sup>5</sup> This comment was then solidified by New York Governor Kathy Hochul who claimed “Not here. Not Now. Not Ever.” in response to the threat posed against reproductive rights that were lost in Roe v. Wade (“Abortion in New York State: Know Your Rights” n.d.).<sup>2</sup> Although there are many Americans across the nation who are unclear about the future of their reproductive rights, or currently face criminal repercussions for receiving an abortion in their state, New York has made their statement clear: abortion rights have been, are, and will continue to be protected.

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## WHERE THE BIDEN PRESIDENCY STANDS

Annette Resk

The death of Queen Elizabeth marks the loss of the longest-reigning British monarch and has raised questions about what comes next following such a major change. Her son, now King Charles III, is the new reigning monarch of the United Kingdom and the leader of the Commonwealth. This marks the first shift in the line of succession since Queen Elizabeth first became Queen in 1952. Immediately after her death, “Operation London Bridge” – a complex protocol that had been planned by not only the Queen herself but news outlets, the government, and law enforcement as well – began. This plan dictated the details of the important events after the Queen’s death, such as the traditional mourning period throughout the Commonwealth (Specia, 2022).<sup>1</sup> The funeral took place in Westminster Abbey on September 19th, 2022, followed by her burial at St. George’s Chapel at Windsor Castle. The first change in the head of state in 70 years, Queen Elizabeth’s death, has implications for the United Kingdom and the Commonwealth moving forward, bringing not only a localized change but a turning point for many countries as well.

King Charles III assumed the role of monarch immediately after the Queen’s death, but his coronation might not occur for weeks or months, and it is unknown what degree of celebration the event will

have. Camilla Rosemary, King Charles’ wife, now holds the title of Queen Consort. She holds no sovereign power, and her title is mainly given out of respect (Nugroho, 2022).<sup>2</sup> The royal family’s powers, including the monarch, remain mostly ceremonial, with their position as head of state functioning more as a figurehead, though they can advise Parliament. Despite the limited role of the monarch, there are many traditions that are closely associated with the head of state, such as the national anthem, which has the lyrics “God Save the Queen.” Upon Queen Elizabeth’s death, the lyrics were changed to “God Save the King,” as well as similar phrases used for passports and the monarch’s likeness on currencies (Lakritz, 2022).<sup>3</sup> These changes are not limited to the United Kingdom alone, but 56 independent states included in the Commonwealth realms.

With the Queen’s death, it is very likely many countries will remove the British monarch as their head of state, as many may have been waiting to do so out of respect for the Queen. In November of 2021, Barbados became one of the first states in the Commonwealth to declare itself a republic (Mackinnon, 2022).<sup>4</sup> So far, the Bahamas, Australia, and Canada have taken steps moving in that direction. Bahamas’ Prime Minister Phillip Davis has stated he is planning on holding a referendum to

remove King Charles III as their head of state and have the Bahamas become a republic. Likewise, Australian Prime Minister Anthony Albanese and his government have stated the likelihood of holding their own referendum and becoming a republic as well (NBC, 2022).<sup>5</sup> In Canada, public support for a British monarch as their head of state has also declined considerably (NBC, 2022).<sup>5</sup>

The Commonwealth has been an important diplomatic tool since its inception in 1931. Its imperialist origins, however, have plagued the perception of the Commonwealth and motivated such countries to push for their independence from the British monarchy. In a similar vein, there has been a large public demand for the return of crown jewels and other valuables that are considered stolen by their countries of origin. They include the Kohinoor diamond, the Great Star of Africa, and the Second Star of Africa diamonds. The Kohinoor diamond, at 105 carats, is one of the world's largest and was mined in India over a millennium ago (Daniel, 2022).<sup>6</sup> It is currently inlaid in a coronation crown. The Great Star of Africa, at more than 530 carats, is the world's largest clear-cut diamond and was used for the Sovereign's Sceptre with a Cross, which is on display at the Tower of London. The Second Star of Africa, also one of the largest diamonds in the world, is used for the Imperial State Crown. The monetary value of these jewels is not known. However, they can be expected to be worth nearly 2.4 billion US dollars collectively (Daniel, 2022).<sup>6</sup>

Previous calls for their return, through both social media and activists, as well as the nations of their origin, have been left unanswered by the British monarchy. With the Queen's death provoking many changes throughout the Commonwealth, the issue has been reignited by the public.

Within the UK, Queen Elizabeth's death has come at a very precarious time, as multiple shifts within the government have weakened the economy and structure. A few days before Queen Elizabeth's death, Liz Truss was sworn in as the new Prime Minister. However, she resigned after only six weeks in office, following a failed tax-cutting budget which caused a market failure and backlash from her own Conservative Party (Reid, Ward-Glenton 2022).<sup>7</sup> The economy's suffering during this time cannot all be attributed to Truss since the beginning of her term was marked by an economic pause taken during the ten-day mourning period. She is the fourth prime minister to resign since the vote to leave the European Union in 2016, which initiated Brexit in January 2020 (Reid, Ward-Glenton 2022).<sup>7</sup> The current prime minister, Rishi Sunak, assumes the pressure of dealing with an economy reeling not only from the COVID-19 pandemic and Brexit but the lack of stability that comes with the passing of a monarch and major figure like Queen Elizabeth.

Along with the procedural shifts that came along with the passing of the monarch, recent changes such as a new prime minister, as well as the ongoing rippling effects

of Brexit, there is an expectation that only more change is to come. The scope of the role King Charles III will take as the new reigning monarch is unbeknownst to most. While Queen Elizabeth held a fairly apolitical position, King Charles III could do the same or, instead, address many of the social issues that have been reintroduced to the public eye regarding the history of imperialism and colonialism in the British Empire.

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