

# Federal and State Jurisdiction over Commerce in U.S.----Gibbons v. Ogden (1824)

Group 17

Speakers:黄禹锡, 杨雯雅, 朱子炫

Slide makers:张普宁, 王博雯

Case analysis: 熊桐菲, 胡曦文, 苗健恺, 陈冠州, 郑轶夫



# TABLE OF CONTENTS

**01**

**Introduction**

**02**

**Legal Reasoning**

**03**

**Further Discussion**

**04**

**Conclusion**



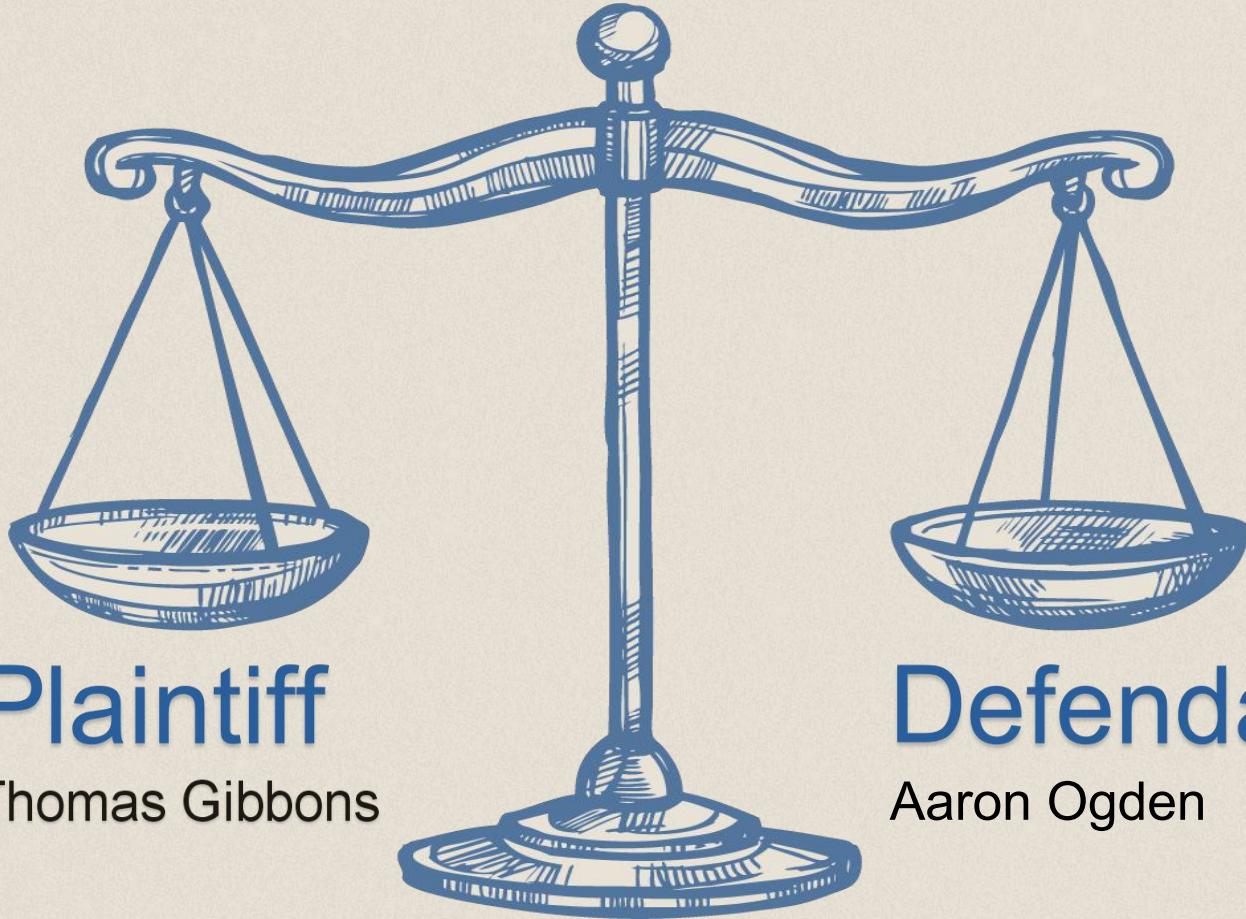




01

# Introduction

by:杨雯雅



**Plaintiff**

Thomas Gibbons

**Defendant**

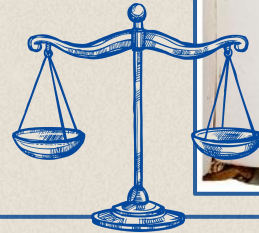
Aaron Ogden



# Background of the Dispute

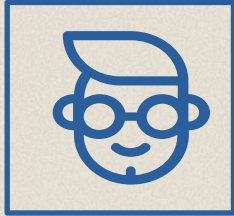
The conflict in *Gibbons v. Ogden* arose from overlapping state and federal authority over interstate commerce.

New York granted (30<sup>y</sup>) an exclusive license to Robert Livingston and Robert Fulton for New York waters. They purchased this franchise from Aaron Ogden. Aaron Ogden sued in New York State Court. Congress granted federal license to Thomas Gibbons. The dispute was between New York and New Jersey.



1897. -  
Tuesday Morning March 23<sup>d</sup> 1824 -  
Pursuant to adjournment the Court met this morning at the Capitol.  
Present  
The Honorable John Marshall Chief Justice  
Bushrod Washington  
William Johnson  
The Honorable Thomas Todd Associate Justice  
Gabriel Duvall  
Joseph Story & Smith Thompson  
Proclamations being made the Court is opened  
Thomas Gibbons vs Aaron Ogden  
This cause came on to be heard on the Transcript of the Record of the Court for the trial of Impeachments and correction of errors of the State of New York and was argued by counsel on consideration whereof this Court is of opinion that the several licenses to the Steam Boats the Flounders and the Bellows to carry on the coasting trade which are set up by the appellants Thomas Gibbons in his answer to the Bill of the appellee Aaron Ogden filed in the Court of Chancery for the State of New York, which were granted under an act of Congress passed in pursuance of the Constitution of the United States give full authority to these vessels to navigate the waters of the United States.

# Plaintiff V. Defendant



New York's state license granted exclusive rights to operate steamboats within its waters, and the federal license obtained by Gibbons should not override state regulations.

## —Ogden's Claim



The Commerce Clause of the U.S. Constitution empowers Congress to regulate interstate commerce, including navigation between states, which supersedes conflicting state laws.

## —Gibbons' Claim





# Judgment Procedural

## Trial Court

New York state court,  
ruled in Ogden favor



## Appellate

Appeal to New York Supreme Court,  
uphold a judgment



## Court of Last Resort

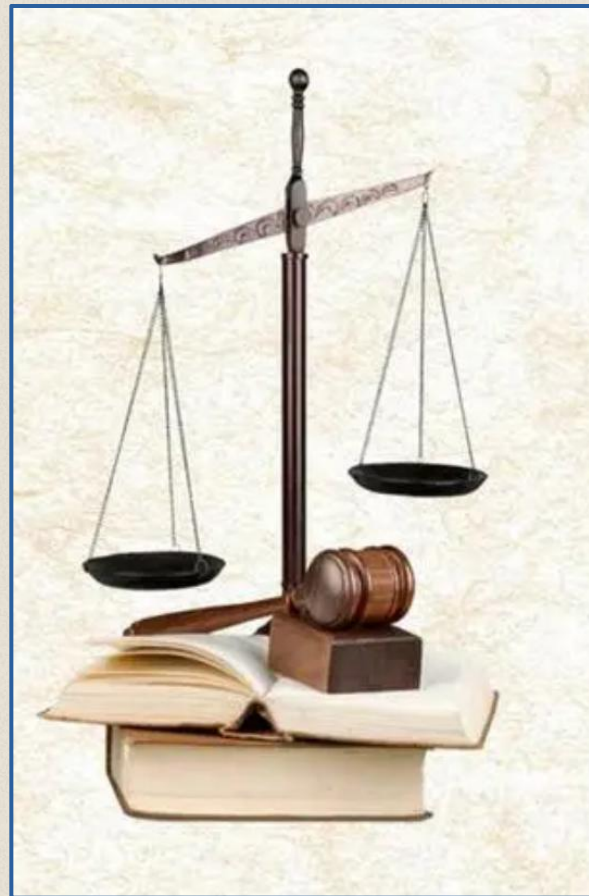
The U.S. Supreme Court  
overturned the state court's  
decision



02

# Legal Reasoning

by:朱子炫





# THREE ISSUE

**Judgment**

**Judicial Legal Reasoning**

**Legal Basis**



# Judgment

The U.S. Supreme Court's decision, delivered by Chief Justice John Marshall, reversed the decision of the New York court, and allow Gibbons to continue operating in New York and New Jersey waters.





# Judicial Legal Reasoning



The Supreme Court, in a unanimous decision authored by Chief Justice John Marshall, ruled in favor of Gibbons. The Court interpreted the Commerce Clause broadly, asserting that it grants Congress extensive power to regulate all aspects of interstate commerce, including navigation. Marshall emphasized that commerce encompasses not only the exchange of goods but also the transportation of people, thereby including steamboat operations.



# Legal Basis



## Commerce Clause (Article I, Section 8)

Empowers Congress to regulate commerce among the states.



## Supremacy Clause (Article VI, Clause 2)

Establishes that federal laws take precedence over state laws when there is a conflict.





03

# Further Discussion

by:黄禹锡



**REPORTS**  
OF  
**THE DECISIONS**  
IN THE  
SUPREME COURT OF THE UNITED STATES.  
FEBRUARY TERM, 1824.

[CONSTITUTIONAL LAW.]

*GIBBONS, Appellant, v. OGDEN, Respondent.*

The acts of the Legislature of the State of New-York, granting to Robert R. Livingston and Robert Fulton the exclusive navigation of all the waters within the jurisdiction of that State, with boats moved by fire or steam, for a term of years, are repugnant to that clause of the constitution of the United States, which authorizes Congress to regulate commerce, so far as the said acts prohibit vessels licensed, according to the laws of the United States, for carrying on the coasting trade, from navigating the said waters by means of fire or steam.

**APPEAL** from the Court for the Trial of Impeachments and Correction of Errors of the State of New-York. Aaron Ogden filed his bill in the Court of Chancery, of that State, against Thomas Gibbons, setting forth the several acts of the Legislature thereof, enacted for the purpose of securing to Robert R. Livingston and Robert Fulton, the  
Vol. IX. 1



01

# Evaluation of the Judgment

The ruling significantly expanded federal power under the Commerce clause.

02

limiting the states' ability to impose protectionist measures that hindered national economic growth.





# Impact on Society

01

It dismantled state-imposed trade barriers, facilitating smoother and more efficient interstate commerce.

02

The ruling reinforced the federal government's role in creating a unified national market, which was essential for the country's expansion and industrialization.

03

Gibbons v. Ogden laid the groundwork for future legislation.



# Comparisons with Other Cases



## McCulloch v. Maryland (1819)

Federal laws hold higher authority than state laws when conflicts arise.

## Wickard v. Filburn (1942)

Expanded the Commerce Clause.





# Conclusion

by:黄禹锡



# References

- [1]李娅林. 吉本斯诉奥格登案研究[D].西华师范大学,2017.
- [2]R. N W. Gibbons v. Ogden, Law, and Society in the Early Republic[J]. American Journal of Legal History,2011,51(2).
- [3]. Gibbons v. Ogden, law, and society in the early republic[J]. Choice Reviews Online,2010,47(11).
- [4][https://www.law.cornell.edu/wex/gibbons\\_v\\_ogden\\_\(1824\)](https://www.law.cornell.edu/wex/gibbons_v_ogden_(1824))





# THANKS

