

PRIVACY IN THE HOME AND CANNABIS CULTIVATION RIGHTS

*The Alaska Precedent, Its Forty-Year History, Its Limits,
and How It Translates to Connecticut*

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THE ARGUMENT IN ONE PARAGRAPH

In 1975 the Alaska Supreme Court held that the state constitution's privacy guarantee protects an adult's possession and use of cannabis inside the home. It did so on a principle that has nothing to do with cannabis policy: that the home is the place where the individual's claim to be left alone is strongest, and that government must show real harm — not speculation — before it crosses that threshold. That principle is the same one that underlies the constitutional protection of contraception, abortion, and medical decision-making generally. It is a principle conservatives and progressives both claim, for different reasons and in different contexts. Connecticut cannot import Alaska's holding, because Connecticut's constitution has no privacy clause. But Connecticut can adopt the same principle by statute — which is where the argument belongs anyway, because in Connecticut the restriction at issue was never enacted by the legislature at all.

READ THIS BEFORE USING ANY OF IT

This brief includes the parts of the argument that *do not* work, because those are the parts opposing counsel will find. Three in particular: **(1)** *Ravin* protected *possession and ingestion*, not cultivation — several popular sources describe the holding inaccurately. **(2)** *Ravin* expressly refused to protect buying, selling, or transfer, which is a direct problem for the caregiver portion of the bill. **(3)** Every other state supreme court asked to follow *Ravin* has declined. Overstating this argument will cost more credibility than the argument gains. Sections IV, V, and VII are written to keep that from happening.

I. What Alaska Did, and When

Alaska's privacy clause was not adopted with cannabis in mind. It was ratified in 1972 as a general amendment to the state's Declaration of Rights, one sentence long:

“The right of the people to privacy is recognized and shall not be infringed. The legislature shall implement this section.”

Alaska Const. art. I, § 22 (ratified 1972).

Irwin Ravin was arrested on December 11, 1972 — months after ratification — and charged under AS 17.12.010, which made possession of cannabis unlawful. He moved to dismiss on privacy and equal protection grounds. The district court denied the motion after lengthy expert hearings; the superior court affirmed; and the Alaska Supreme Court granted review.

On May 27, 1975, a unanimous five-justice court ruled in his favor.

Ravin v. State, 537 P.2d 494 (Alaska 1975) (Rabinowitz, C.J.), with Rabinowitz, Connor, Erwin, Boochever and Fitzgerald, JJ.

The Reasoning, Step by Step

The structure of the opinion is what makes it portable to other states and other subjects. The court did *not* find a right to use cannabis. It said the opposite:

“[I]f we were employing our former test, we would hold that there is no fundamental right, either under the Alaska or federal constitutions, either to possess or ingest marijuana.”

Ravin, 537 P.2d at 502.

The right the court found was not about the substance. It was about the place. The opinion's central passage is worth reading slowly, because it is the sentence the whole argument rests on:

“If there is any area of human activity to which a right to privacy pertains more than any other, it is the home. . . . The home, then, carries with it associations and meanings which make it particularly important as the situs of privacy. Privacy in the home is a fundamental right, under both the federal and Alaska constitutions.”

Ravin, 537 P.2d at 503–04.

From there the court built its holding in three moves.

First, it located the home in a long constitutional tradition rather than inventing something new. It cited the Third Amendment's bar on quartering troops, the Fourth Amendment's protection of houses, the Fifth Amendment as guarding “the sanctity of a man's home and the privacies of life,” *Griswold*'s refusal to let police “search the sacred precincts of marital bedrooms,” and *Stanley v. Georgia*, which the Supreme Court itself later described as a “reaffirmation that ‘a man's home is his castle.’”

Second, it set two express limits, and these limits are as important to quote as the holding, because they are what make the argument sound rather than absolutist:

“First, we agree with the Supreme Court of the United States, which has strictly limited the *Stanley* guarantee to possession for purely private, noncommercial use in the home. And secondly, we think this right must yield when it interferes in a serious manner with the health, safety, rights and privileges of others or with the public welfare.”

Ravin, 537 P.2d at 504.

Third, it put the burden on the State and held that speculation does not carry it. This is the operative rule:

“The privacy of the individual's home cannot be breached absent a persuasive showing of a close and substantial relationship of the intrusion to a legitimate governmental interest. Here, mere scientific doubts will not suffice. The state must demonstrate a need based on proof that the public health or welfare will in fact suffer if the controls are not applied.”

Ravin, 537 P.2d at 511.

The court found the State had two legitimate concerns — impaired driving and access by adolescents — and held both insufficient to reach inside the home: “Yet these interests are insufficient to justify intrusions into the rights of adults in the privacy of their own homes.” *Id.*

Two Things the Court Went Out of Its Way to Say

The opinion closes with a disclaimer that is genuinely useful to a legislator worried about appearing permissive:

“[W]e wish to make clear that we do not mean to condone the use of marijuana. The experts who testified below, including petitioner's witnesses, were unanimously opposed to the use of any psychoactive drugs. We agree completely.”

Ravin, 537 P.2d at 511.

And the court withheld protection from commerce entirely:

“Further, neither the federal or Alaska constitution affords protection for the buying or selling of marijuana, nor absolute protection for its use or possession in public. Possession at home of amounts of marijuana indicative of intent to sell rather than possession for personal use is likewise unprotected.”

Ravin, 537 P.2d at 511. **This sentence matters enormously for the caregiver provisions. See Section VII.**

II. The Forty Years After *Ravin*

The useful part of the Alaska story is not that a court ruled once. It is that the ruling survived a direct popular repeal, a legislative override, and four decades of hostile attorneys general. That durability is the argument for putting a rule in law rather than leaving it to an agency.

Year	Event	Effect
1972	Alaska Const. art. I, § 22 ratified	Express privacy right added to Declaration of Rights.
1975	<i>Ravin v. State</i> , 537 P.2d 494	In-home adult possession and ingestion protected. First and only such holding in the country.
1975–82	Legislative decriminalization	Penalties reduced, then the \$100 fine removed in 1982; up to four ounces in the home treated as lawful.
1990	Ballot Measure 2 (voter initiative)	Purported to re-criminalize all possession, including in the home. Removed the four-ounce ceiling.
1998	Measure 8	Medical cannabis approved by voters.
2003	<i>Noy v. State</i> , 83 P.3d 538 (Alaska App.)	Held the 1990 initiative unconstitutional as applied to in-home possession under four ounces. Ballot initiatives are subject to the same constitutional limits as statutes.
2003	<i>Noy v. State (II)</i> , 83 P.3d 545	Rehearing denied; the court rejected the State's argument that <i>Ravin</i> created only an affirmative defense rather than a limit on legislative power.
2006	Legislature acts again; Superior Court responds	The legislature limited possession to one ounce. Juneau Superior Court Judge Patricia Collins struck it down.
2009	<i>State v. ACLU of Alaska</i> , 204 P.3d 364	Alaska Supreme Court vacated on standing grounds — not on the merits. <i>Ravin</i> left intact.
2014	Ballot Measure 2 — full legalization	Regulated adult-use market created, with an express clause providing the Act shall not be construed to diminish the privacy right as interpreted in <i>Ravin</i> .
Today	AS 17.38	Adults 21+ may cultivate up to six plants (three mature); twelve per dwelling. Site must not be visible to the public and must be on property the grower owns or has consent to use.

THE POINT FOR A CONNECTICUT LEGISLATOR

In 1990 Alaska's voters repealed the rule. It did not stay repealed, because it had a constitutional foundation and the courts enforced it. Connecticut has no such foundation — which means in Connecticut the rule has to come from the legislature, and it is the legislature's to defend. That is not a weakness in the argument. It is the reason the argument is addressed to the General Assembly rather than to a court.

A Detail Worth Knowing: Alaska Wrote *Ravin* Into the Legalization Statute

When Alaska legalized by ballot measure in 2014, the drafters did not treat *Ravin* as superseded. They included language providing that nothing in the Act is to be construed to diminish the right to privacy as interpreted by the Alaska Supreme Court in *Ravin v. State*. A regulated commercial market and a constitutional floor for private conduct in the home were treated as compatible — not as substitutes. That is precisely the relationship Connecticut has failed to strike.

III. What *Ravin* Actually Held — and What It Did Not

CORRECTION TO A WIDELY REPEATED CLAIM

Numerous sources — including the *Washington Post* and several industry publications — state that *Ravin* protected the right to “possess, cultivate and consume” cannabis in the home. **The opinion does not say that.** The word “cultivate” appears nowhere in the holding. The court repeatedly framed the protected conduct as *possession and ingestion*: “possession of marijuana by adults at home for personal use is constitutionally protected.” 537 P.2d at 511.

If you tell a committee that an Alaska court recognized a constitutional right to grow cannabis at home, and someone reads the case, you lose the room. Say what the case says.

How Cultivation Protection Actually Arose in Alaska

Cultivation came to be protected in Alaska through the interaction of the holding with the statutory scheme, not through a separate constitutional ruling. Because the protected quantity was measured by weight possessed in the home, cannabis a person grew there counted within the same ceiling. *Noy* shows the courts working through exactly this problem — how to weigh live plants, and what the “commonly used form” of cannabis means when a person is charged with possessing live plants rather than harvested material. Alaska's current plant limits come from the 2014 statute, not from *Ravin*.

The honest formulation for testimony is this: *Ravin* established that the State needs a real, demonstrated harm before it can regulate what an adult does privately at home, and Alaska's law developed over the following forty years to include growing within that protected sphere. That is accurate, and it is still a strong statement.

The Four Limits Built Into the Holding

Limit	What it means for a Connecticut bill
Non-commercial only	Protection extends to “purely private, non-commercial” conduct. Any provision that looks like a sales channel falls outside the rationale.
No protection for buying or selling	Expressly stated at 511. Transfer between people is the weak point of a caregiver model under this reasoning.

Limit	What it means for a Connecticut bill
Yields to serious harm to others	The right “must yield when it interferes in a serious manner with the health, safety, rights and privileges of others.” Odor, child access, and neighbor effects are legitimate subjects of regulation — the bill should regulate them rather than ignore them.
Diminishes outside the home	Public possession and driving were expressly unprotected. The argument is about the dwelling and its grounds, and should never be stated more broadly.

IV. Where This Argument Has Failed

Alaska is alone. Any brief that does not say so plainly will be discredited by the first person who checks. The Hawaii Supreme Court — construing a constitution that, unlike Connecticut’s, contains an express privacy clause — put it directly:

“We reject Mallan’s suggestion to adopt the *Ravin* analysis. . . . Moreover, as far as we can determine, Alaska stands alone in extending the right to privacy to include possession and use of marijuana.”

State v. Mallan, 86 Hawaiꞌi 440, 950 P.2d 178 (1998).

The *Mallan* court gave two reasons that will be quoted against you: that *Ravin* is not binding elsewhere, and that it rested “at least in part, on social and cultural factors unique to Alaska.” *Ravin* itself invites that reading — the opinion describes Alaska as “traditionally . . . the home of people who prize their individuality and who have chosen to settle or to continue living here in order to achieve a measure of control over their own lifestyles which is now virtually unattainable in many of our sister states.” 537 P.2d at 503–04.

Rejections predate and postdate Alaska. *Ravin* itself catalogued them — Massachusetts (*Commonwealth v. Leis*), Hawaii (*State v. Kantner*), Texas, California, Florida. The Michigan decision *Ravin* cited approvingly, *People v. Sinclair*, was a fractured opinion in which the privacy rationale commanded only one justice.

The Montana Problem — and Why You Should Raise It First

Montana is the sharpest test of this argument, and it cuts both ways.

Montana has an express constitutional privacy clause. Its Supreme Court has used that clause aggressively to protect medical autonomy: *Armstrong v. State*, 1999 MT 261, 296 Mont. 361, 989 P.2d 364, held that the privacy clause protects the right to obtain a pre-viability abortion — a holding reaffirmed in *Weems v. State*, 2023 MT 82, and in *Planned Parenthood of Montana v. State* (2024), which struck down a parental consent law as violating “the fundamental right of a minor to control their body and destiny.” The same clause supported *Gryczan v. State*, 283 Mont. 433 (1997), which struck down Montana’s sodomy statute.

And yet in *Montana Cannabis Industry Association v. State*, 2016 MT 44, the same court declined to hold that the privacy clause protects access to medical marijuana.

WHAT MONTANA PROVES

A state can read its privacy clause broadly enough to protect abortion, contraception, and private consensual conduct, and still decline to extend it to cannabis. Courts treat medical autonomy and drug policy as different categories, whatever the logical similarity. **Anticipate this.** If you present the medical-privacy parallel as though it decides the cannabis question, a prepared opponent will hand the committee Montana and you will have nothing to say.

The correct response is that Montana proves the point about *who decides*. Courts have been unwilling to extend privacy doctrine to cannabis. That is an argument for legislatures acting, not for the question being settled.

V. The Medical Privacy Parallel

The reason this argument reaches both parties is that *Ravin* is built out of the same materials as the medical autonomy cases. The Alaska court did not analogize to drug policy. It analogized to *Griswold*, *Eisenstadt*, *Stanley*, and *Roe*, and it discussed all four at length.

The Shared Root

Griswold v. Connecticut, 381 U.S. 479 (1965) — a Connecticut case — held that specific guarantees in the Bill of Rights have “penumbras, formed by emanations from those guarantees that help give them life and substance,” and that these create zones of privacy. The decisive image was the intolerability of police searching “the sacred precincts of marital bedrooms.”

Eisenstadt v. Baird, 405 U.S. 438 (1972), moved the right from the place to the person: “If the right of privacy means anything, it is the right of the individual, married or single, to be free from unwarranted governmental intrusion into matters so fundamentally affecting a person as the decision whether to bear or beget a child.”

Justice Boochever's concurrence in *Ravin* traced exactly this line and drew the conclusion the whole brief depends on — that privacy operates both as protection of a *place* and as protection of *personal decisions*, and that the medical relationship is one of the protected contexts:

“Similar considerations would apply to certain relationships, without reference to situs, i.e. attorney-client, doctor-patient, priest-parishioner, marital relationship, parent-child.”

Ravin, 537 P.2d at 515 (Boochever, J., concurring).

Why This Frame Reaches Republicans

The conservative version of this argument does not depend on *Roe* and does not require anyone to endorse it. It rests on three propositions that are standard on the right:

- **The home is the last redoubt of the private citizen.** The Third and Fourth Amendments exist because the founders regarded government entry into the dwelling as the characteristic abuse of state power. *Ravin* is a Fourth Amendment-adjacent opinion more than a drug case.

- **Government must prove harm before it regulates private conduct.** “[M]ere scientific doubts will not suffice” is a limited-government proposition, not a libertine one.
- **Elected legislatures make these calls, not agencies.** In Connecticut this is not abstract. The indoor-only cultivation rule appears in Department of Consumer Protection policies and procedures, not in the statute the General Assembly passed. See Section VI.

Why This Frame Reaches Democrats

- **Connecticut has already adopted the principle by statute in the medical context.** Public Act 22-19 (2022) — the first shield law in the nation — protects patients and providers of reproductive health care from out-of-state investigation and liability, and Connecticut extended equivalent protection to gender-affirming care. Conn. Gen. Stat. § 19a-602(a) vests the abortion decision solely in the patient in consultation with the patient's clinician.
- **The post-Dobbs logic is state-level medical privacy.** When *Dobbs v. Jackson Women's Health Organization* (2022) withdrew the federal right, the response in Connecticut and elsewhere was to secure medical autonomy through state statute. That is the same instrument being asked for here.
- **The burden falls on the least powerful patients.** The Office of the Cannabis Ombudsman reported that the patients contacting her office were predominantly veterans and senior citizens with debilitating conditions. An indoor-only rule is, in practical effect, an electricity-cost test for who may grow their own medicine.

THE SENTENCE THAT DOES THE WORK IN BOTH DIRECTIONS

The question is not whether you approve of cannabis. The question is what the State must show before it reaches past your front door to tell you which wall your medicine may grow behind.

VI. Translating This to Connecticut

The Bad News, Stated First

Connecticut has no constitutional privacy clause. The Office of Legislative Research has said so directly:

“The word ‘privacy’ does not appear in the state constitution but its guarantees against unreasonable search and seizure, compulsory testimony, and self-incrimination and its guarantees of freedom of association and religion are modeled after the federal constitution, which has been construed as protecting privacy.”

OLR Report 98-R-1389, *Sufficiency of Connecticut's Privacy Laws*.

Roughly eleven states have express constitutional privacy rights — Alaska, Arizona, California, Florida, Hawaii, Illinois, Louisiana, Montana, New Hampshire, South Carolina, and Washington. Connecticut is not among them. **A Connecticut court will not do what the Alaska court did.**

The Better News

Connecticut courts have nonetheless found an implicit privacy right in the state constitution. In *Doe v. Maher*, 40 Conn. Supp. 394, 515 A.2d 134 (Conn. Super. Ct. 1986), the court struck down a Medicaid regulation limiting abortion funding, holding it violated the state constitution's due process and equal protection provisions and the Equal Rights Amendment. On the privacy question the court reasoned from Connecticut's 1818 constitution that “the right of privacy is also implicitly guaranteed under our state charter of liberty.” 40 Conn. Supp. at 421. The Attorney General adopted that reasoning in Formal Opinion 1998-022.

THE LIMIT ON DOE v. MAHER

Doe v. Maher is a **Superior Court** decision. It is not binding statewide precedent and the Connecticut Supreme Court has not adopted its privacy holding. Cite it for the proposition that Connecticut courts have recognized implicit privacy protection in the state constitution — never as settled law.

Connecticut also has a formal method for arguing that its constitution protects more than the federal floor. *State v. Geisler*, 222 Conn. 672, 684–86, 610 A.2d 1225 (1992), sets out six factors:

Geisler factor	How it runs here
1. Persuasive relevant federal precedents	Mixed. <i>Stanley</i> and <i>Griswold</i> support home privacy; <i>Dobbs</i> narrowed federal substantive due process generally.
2. Text of the operative provisions	Weak. Art. first, § 7 tracks the Fourth Amendment. Connecticut courts have held that textual similarity alone gives no reason to depart from federal doctrine.
3. Historical insight into framers' intent	Possible. <i>Doe v. Maher</i> reasoned from the 1818 charter. Requires real historical work.
4. Related Connecticut precedents	Thin but real. <i>Doe v. Maher</i> ; Connecticut's recognition that its due process clause “shares but is not limited by” the federal counterpart.
5. Persuasive precedents of other states	Weak. Alaska stands alone; Hawaii and Montana rejected the extension.
6. Contemporary norms and public policy	Strongest. Adult home cultivation is already lawful in Connecticut. The only question is which wall the plant stands behind.

Honest conclusion: a *Geisler* claim on these facts would probably lose. Factors 2 and 5 run against it and factor 1 has weakened since *Dobbs*. **Do not build a litigation strategy on this.** Build a legislative one.

Why the Legislative Route Is Actually Stronger Here

CONNECTICUT'S SITUATION IS BETTER THAN ALASKA'S WAS IN 1972

Ravin had to overcome a criminal statute duly enacted by the Alaska legislature. Connecticut's indoor-only rule was never enacted by anyone.

Conn. Gen. Stat. § 21a-278c authorizes an adult to cultivate three mature and three immature plants “in the consumer's primary residence,” secured against access by others, capped at twelve per household. Conn. Gen. Stat. § 21a-408d(b) does the same for qualifying patients. **Neither section contains the word ‘indoors.’ Neither contains a visibility requirement.** Those rules appear in the Department of Consumer Protection's policies and procedures.

Alaska needed a constitutional privacy clause to override a legislative choice. Connecticut needs only the General Assembly to make a choice it has not yet made.

VII. Using This Argument Without Losing the Room

The Caregiver Problem — Address It Before Someone Else Does

RAVIN DOES NOT SUPPORT THE CAREGIVER PROVISIONS

Ravin protected “purely private, non-commercial” conduct in the home and expressly refused protection for “the buying or selling of marijuana” or for “possession at home of amounts . . . indicative of intent to sell.” A caregiver cultivating on behalf of other households, receiving reimbursement, and transferring product sits outside that rationale — not marginally, but categorically.

Practical consequence: the privacy argument is powerful for the outdoor personal cultivation provisions and close to useless for the caregiver provisions. Those need a different justification — patient access, product safety, the CannaScope testing data, and the Ombudsman's documented patient complaints. Using privacy to carry both invites an opponent to defeat the strong half with the weak half.

What to Say

Do	Do not
“Alaska's Supreme Court held in 1975 that the state must show real harm before regulating what an adult does privately in the home. That principle is why I'm here.”	“Alaska legalized cannabis in 1975.” It did not. It protected in-home possession from prosecution.
“ <i>Ravin</i> protected possession and use in the home. Alaska's law developed over forty years to include cultivation.”	“ <i>Ravin</i> recognized a right to grow cannabis at home.” The opinion does not say that.
“Connecticut has no privacy clause, so this is the legislature's decision, not a court's. That's why I'm asking you and not a judge.”	“The Connecticut Constitution protects this.” It does not, and asserting it forfeits your credibility on everything else.

Do	Do not
“Alaska is the only state whose courts went this far. Every other court has said this is a legislative question. I agree — that's the point.”	Implying the case law is broadly favorable. It is not, and the record is one search away.
“The indoor-only rule isn't in § 21a-278c or § 21a-408d. It's in agency policies and procedures. This bill returns the decision to you.”	Framing this as an expansion of cannabis access. It is a relocation of an existing, already-lawful activity.

The Two-Minute Version

In 1975 the Alaska Supreme Court decided a case called *Ravin*. It did not find a right to use cannabis — it said plainly there was no such right. What it found was that the home is where a person's claim to be left alone is strongest, and that the State must show actual harm, not speculation, before it crosses that line. The court's words were: “mere scientific doubts will not suffice.”

Alaskan voters repealed that protection in 1990. The courts restored it, because the principle had a foundation. Alaska's legalization law in 2014 expressly preserved it.

Connecticut has no privacy clause in its constitution, so no Connecticut court is going to do what Alaska's did. That decision belongs to this committee. And here it is easier than it was in Alaska, because Connecticut's legislature never voted for the rule at issue. Section 21a-278c lets an adult grow three plants in their primary residence. It says nothing about indoors. The indoor requirement is in a Department policy document.

So the ask is narrow. Same plant counts. Same security requirements. Same prohibition on sale. The only change is that a patient may grow behind a locked fence in their own yard instead of paying Connecticut electricity rates to grow in a closet. And the decision about which wall the plant stands behind gets made by the people who were elected to make it.

VIII. Sources and Verification Status

Every claim in this brief traces to an entry below. Judicial opinions are public domain and may be quoted at length. Items marked **Verify** should be confirmed before public use.

Primary — Cases

Authority	Proposition	Status
<i>Ravin v. State</i> , 537 P.2d 494 (Alaska 1975)	In-home adult possession and ingestion protected; “privacy in the home is a fundamental right”; “mere scientific doubts will not suffice”; no protection for buying or selling.	Full opinion retrieved and read
<i>Noy v. State</i> , 83 P.3d 538 (Alaska App. 2003)	1990 initiative unconstitutional as applied to in-home possession under four ounces; initiatives bound by same constitutional limits as statutes.	Verified

Authority	Proposition	Status
<i>Noy v. State (II)</i> , 83 P.3d 545 (Alaska App. 2003)	Rehearing; rejected State's "affirmative defense only" reading of <i>Ravin</i> .	Verified
<i>State v. ACLU of Alaska</i> , 204 P.3d 364 (Alaska 2009)	Vacated on standing; merits untouched.	Verified
<i>State v. Mallan</i> , 950 P.2d 178 (Haw. 1998)	Rejected <i>Ravin</i> ; "Alaska stands alone."	Verified
<i>Armstrong v. State</i> , 1999 MT 261, 989 P.2d 364	Montana privacy clause protects pre-viability abortion.	Verified
<i>Montana Cannabis Indus. Ass'n v. State</i> , 2016 MT 44	Same clause does not protect medical marijuana access.	Verified
<i>Gryczan v. State</i> , 283 Mont. 433 (1997)	Montana privacy clause struck down sodomy statute.	Verified
<i>Doe v. Maher</i> , 40 Conn. Supp. 394, 515 A.2d 134 (1986)	Privacy "implicitly guaranteed under our state charter of liberty." Superior Court only.	Verified
<i>State v. Geisler</i> , 222 Conn. 672 (1992)	Six-factor test for independent state constitutional claims.	Verified
<i>Griswold v. Connecticut</i> , 381 U.S. 479 (1965)	Penumbral zones of privacy; marital bedroom.	Verified
<i>Stanley v. Georgia</i> , 394 U.S. 557 (1969)	Home as situs of protected private activity.	Verified
<i>Eisenstadt v. Baird</i> , 405 U.S. 438 (1972)	Privacy attaches to the person, not only the place.	Verified

Primary — Constitutional and Statutory

Authority	Proposition	Status
Alaska Const. art. I, § 22 (1972)	Express privacy clause, quoted verbatim in <i>Ravin</i> .	Verified
Alaska Ballot Measure 2 (2014), AS 17.38	Legalization with express <i>Ravin</i> savings clause; personal cultivation limits.	Verified
Conn. Gen. Stat. § 21a-278c	Adult home cultivation. Full text contains no indoor or visibility requirement.	Full text retrieved
Conn. Gen. Stat. § 21a-408d(b)	Patient cultivation. Same — no indoor or visibility requirement.	Full text retrieved
Conn. Gen. Stat. § 21a-408m(4)	Delegates to DCP authority over requirements including "the location of such plants" for patients.	Verified
Conn. Gen. Stat. § 19a-602(a)	Abortion decision vested solely in the patient with their clinician.	Verified
Conn. P.A. 22-19 (H.B. 5414)	First-in-nation reproductive shield law; signed May 5, 2022.	Verified

Authority	Proposition	Status
Conn. P.A. 23-XX / §§ 19a-17e, 20-579a, 52-571m, 52-571n	Shield protections extended to gender-affirming care.	Verify exact P.A. numbers
OLR Report 98-R-1389	“The word ‘privacy’ does not appear in the state constitution.”	Verified
DCP Cannabis Knowledge Base, “Can I grow cannabis at home?”	States indoor and non-visibility rules; directs readers to Department policies and procedures.	Verified

Known Weak Points — Do Not Paper Over These

Weakness	Honest handling
Connecticut has no constitutional privacy clause.	State it yourself, first. It is the reason the ask goes to the legislature.
<i>Ravin</i> did not protect cultivation.	Say “possession and ingestion,” then explain how Alaska's law developed.
<i>Ravin</i> refused to protect transfer or sale.	Do not use privacy to defend the caregiver provisions. Use patient access and safety data.
Alaska stands alone among the states.	Concede it. It supports the argument that this is a legislative question.
<i>Doe v. Maher</i> is Superior Court only.	Cite as persuasive, never as binding.
Montana protects abortion but not cannabis under one clause.	Raise it yourself; it shows courts will not do this, which is why you are asking legislators.
<i>Ravin</i> rested partly on Alaska's distinctive culture.	The opinion says so. Rely on the <i>reasoning</i> about the home, not on Alaska's self-description.
<i>Dobbs</i> (2022) narrowed federal substantive due process.	Acknowledge it, and note that this is exactly why states legislated — as Connecticut did in 2022.

Prepared August 9, 2026. Statutory text current as of that date and should be reconfirmed before filing. This document is policy and legislative research, not legal advice, and its author is not an attorney. Quotations from judicial opinions are drawn from the published reports; page cites are to the Pacific Reporter pagination reflected in the retrieved text.