

Decisions of the Gilded Age Supreme Court

Case	Facts	Questions	Decision and Reasoning
<i>Slaughterhouse Cases</i> (1873)	Louisiana gave a monopoly to one slaughterhouse in the city of New Orleans. Private and smaller slaughterhouses sued the state, because they believed their “equal protection under the law” rights of the 14 th Amendment were being violated.	Did the state of Louisiana violate the 14 th Amendment by giving a monopoly to one company?	No, the law was constitutional and did not violate the 14 th amendment. The law was passed for the “public good” (i.e. limit the waste disposal of slaughterhouses). This case opens the door for future legal violations of the 14 th Amendment in southern states (they limit the rights of African-Americans).
<i>Minor v. Happersett</i> (1875)	Virginia Minor was denied the right to vote in the state of Missouri. She claimed her citizenship rights (granted in the 14 th Amendment) were violated and sued.	Does citizenship guarantee voting rights?	No, citizenship does not necessarily guarantee the right to vote. Voting restrictions are left up to the states. Laws against women’s suffrage get overturned in 1920 with the 19 th Amendment. Some western states in the 1800’s start allowing women’s suffrage (Wyoming is the first).
<i>Munn v. Illinois</i> (1877)	The Grange in Illinois was able to take control of the Illinois state legislature. They pushed through a law which set a maximum rate for how much private grain elevator and warehouses could charge farmers. This became known as one of the Granger Laws. Munn brought suit against the state claiming the law violated private property/ownership of business and the 14 th Amendment’s Equal Protection Clause.	Does a state have the power to regulate private business?	Yes, the state has the power to regulate private business within the state boundaries when the “public interest” or “public good” is at stake.
<i>Wabash, St. Louis, & Pacific Railway Co. v. Illinois</i> (1886)	Following the Munn decision, the state of Illinois was emboldened and decided to take on the railroad trusts (monopolies). The state passed a law setting the maximum rates that could be charged by the railroads (another Granger Law). The railroad companies sued the state of Illinois on the grounds that the state did not have the power to regulate rail business, which was involved in interstate commerce (interstate trade).	Does a state have the power to regulate a private business if it is involved in interstate trade?	No, only the federal government (Congress) has the power to regulate interstate commerce. <i>Gibbons v. Ogden</i> in 1824 (Marshall Court Ruling) set the precedent for this case. Since railroads conduct business through multiple states, their business relies on interstate commerce. The Court’s decision led to public outcry against the railroad industry. As a result, Congress passed the Interstate Commerce Act in 1886, creating the Interstate Commerce Commission (ICC), the first federal regulatory agency to regulate business (i.e. the railroads).
<i>Civil Rights Cases</i> (1883)	Congress passed the Civil Rights Act of 1875, outlawing racial discrimination in “inns, public conveyances, and places of public amusement.” Several state and local segregation laws throughout the South violated this federal law. Many African-Americans brought suit against these segregation laws on grounds that their 14 th Amendment rights to “equal protection under the law” were violated and that the Civil Rights Act of 1875 was also being violated.	Is the Civil Rights Act of 1875 in violation of the 10 th Amendment (Reserved rights to the states and the people)?	Yes, the Civil Rights Amendment does violate the 10 th Amendment therefore that federal law is unconstitutional. According to the Supreme Court at that time, the 14 th Amendment only applied to the federal and state governments not individuals. Individuals could discriminate all they wanted regardless of the 14 th Amendment. This decision further weakened the power of the 14 th amendment and the federal government’s ability to enforce it.

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<i>Pollock v. Farmer's Loan and Trust Co.</i> (1895)	Congress passed the Income Tax of 1894, which was the first peacetime attempt to tax incomes. The law suit claimed that the income tax was unconstitutional on the grounds that it was a direct tax.	Does the federal government have the power to levy a direct tax on personal incomes?	No, the government does not have this power therefore the Income Tax of 1894 is unconstitutional. This decision is overturned during the Progressive Era when the 16 th Amendment (graduated income tax) is added to the Constitution in 1913.
<i>In re Debs</i> (1895)	This case originated from the 1894 Pullman Strike. Workers at the Pullman Palace Car company went on strike after owner George Pullman cut wages, but kept rent and other cost of living expenses high in his factory town that surrounded the factory. The strike stopped railway traffic through the state of Illinois, crippling interstate trade as well as the government's ability to deliver mail. President Grover Cleveland issued a court injunction to put a stop to the strike. Eugene Debs, the leader of the American Railway Union, refused defied the injunction and refused to bring an end to the strike. President Cleveland had to use the U.S. Army to break the strike. Debs was arrested for refusing the injunction.	Does the federal government have the power to issue an injunction to put down a strike?	Yes, the federal government has the power to break a strike when the strike interferes with official government business (i.e. mail delivery) or the ability of other private business to operate effectively. This decision reinforces the government's support for management over the labor movement, further weakening the ability of workers and unions to organize and go on strike.
<i>U.S. v. E.C. Knight Co.</i> (1895)	Congress passed the Sherman Anti-trust Act of 1890, which was the first federal legislation aimed at limiting the growth of trusts and monopolies. The law stated, "every...trust...in restraint of trade or commerce" is illegal. The federal government attempted to use the new law against the E.C. Knight Company, which controlled 98% of the sugar refining industry. E.C. Knight Co. claimed that the new law did not apply to them, because they were a manufacturing company and was not involved in trade or commerce.	Does the federal government have the power to regulate business and restrict the growth of monopolies? Is the Sherman Anti-trust Act constitutional?	Yes, the Sherman Anti-trust Act is constitutional. The federal government does have the power to regulate business; however, the Court agreed that the law did not apply to the E.C. Knight Co. The Court made a distinction between monopolies that manufactured and those that were involved in trade or commerce. This ruling weakened the Sherman Anti-trust Act, rendering it almost completely ineffective against business monopolies. Ironically, businesses were able to twist the law in a way that defined labor unions as monopolies. In the end, the Sherman Anti-trust Act was most effectively used in curbing the power of labor unions.
<i>Plessy v. Ferguson</i> (1896)	The state of Louisiana passed a law requiring the segregation of all railway cars. Homer Plessy, who was one 1/8 Black, was arrested for sitting in a White rail car and refusing to move. Plessy brought suit on the grounds that the state law violated his 14 th Amendment to "equal protection under the law"	Does segregation violate the equal protection clause of the 14 th Amendment?	No, the Louisiana state law did not violate the 14 th Amendment. Through this ruling, the Court established the "separate but equal" doctrine. Segregation was constitutional as long as it affirmed the idea of "separate but equal." This decision upheld Jim Crow segregation throughout the South.

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<p style="text-align: center;"><i>Williams v. Mississippi</i> (1898)</p>	<p>Williams, an African-American living in Mississippi, was tried and convicted of murder by an all-white jury. Williams sued the state on the grounds that his 14th Amendment rights to “equal protection under law” were violated, and that the Mississippi voting restrictions (i.e. poll tax and literacy tests) prevented him from receiving a fair trial. At that time, juries in Mississippi were selected from voter registration rolls, and therefore excluded African-Americans from jury service.</p>	<p>Do voting requirements, such as poll taxes and literacy tests, violate the equal protection clause of the 14th Amendment?</p>	<p>No, states have the power to set their own voting requirements. In this case, the Supreme Court found no evidence that voting requirements, such as poll taxes and literacy tests, were discriminatory. Southern states continued using voting restrictions to keep African-Americans from being able to vote.</p>
<p style="text-align: center;"><i>Cumming v. County Board of Education</i> (1899)</p>	<p>In 1879, the Augusta, Georgia School Board (Richmond County, Georgia) established the first public high school for African-Americans in the state. In 1897, the county closed the school at the suggestion of a black private school principal. Black parents sued, claiming the school closure violated the 14th Amendment “equal protection” clause, as well as the newly established “separate but equal” doctrine.</p>	<p>Did the school closure violate the 14th Amendment’s “equal protection under the law” and the “separate but equal” doctrine?</p>	<p>This was the Supreme Court’s first decision on racial discrimination in schools. The Court ruled that the school closure did not violate the 14th Amendment nor the “separate but equal” doctrine established in <i>Plessy v. Ferguson (1896)</i>. The Court ruled that the case did not present “a case of clear and unmistakable disregard of rights.” This case further enabled southern states to continue discriminatory practices against African-Americans through Jim Crow segregation.</p>