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On a spring morning ninety years ago, the Supreme Court of the United States handed down its decision on a landmark trial, *Buck v Bell*, declaring that forcible sterilization of so-called “degenerates” was not only permissible but imperative. Writing for the Court, Chief Justice Oliver Wendell Holmes Jr. justified the decision: “It is better for all the world, if instead of waiting to execute degenerate offspring for crime, or to let them starve for their own imbecility, society can prevent those who are manifestly unfit from continuing their kind.... Three generations of imbeciles are enough.” But who were these so-called “imbeciles,” how did they come to the attention of the Supreme Court, and what happened to them afterwards?

Carrie Buck, the plaintiff in the case, was born in July 1906 to Emma Buck, a “fallen woman” in Charlottesville, Virginia. Emma had been married as a teenager; her husband abandoned her shortly after their marriage, and she may have been working as a prostitute at the time of Carrie’s birth. Two half-siblings followed; their fathers are unknown. By the time Carrie was four years old, her mother had been institutionalized for “wanton behavior,” and the children had been placed with an influential local couple, John and Alice Dobbs. Carrie attended local schools and by all accounts was a good student until she was pulled out of school in the 6th grade to become a full-time maid for the Dobbs. She remained at the Dobbs’ until late 1923 when she became pregnant, reportedly as a result of rape by Alice Dobbs’ nephew. Her foster family moved swiftly to have her institutionalized at the Virginia Colony for Epileptics and Feeble-Minded, where her daughter Vivian was born in March 1924.

Carrie Buck, 1920s

The year Carrie was institutionalized, the year her daughter was born, was a year of tremendous social upheaval. The eugenics movement, started by Francis Galton in the 1880s as a way to promote social Darwinism, had entered American cultural consciousness. Towns and cities held “beautiful baby” contests (often with monetary rewards) to promote high birth rates among the “socially fit”—which often meant white, upper middle class families. Conversely, misfits and outcasts, such as the Jukes of New York, were sensationalized nationwide as carrying hereditary taint. The intense focus on selective breeding and social engineering culminated in Virginia’s Sterilization Act, passed just a week before Carrie Buck delivered her child. The Sterilization Act provided for the compulsory sterilization of Virginia’s “feeble-minded and imbeciles.” A few months later, the supervisors of the Virginia Colony, Albert Priddy and John Bell, recommended that all female members of the Buck family, from 52-year-old Emma to infant Vivian, be sterilized.

Carrie appealed the sterilization order through the judiciary, arguing that the Sterilization Act violated the due process clause of the Constitution as well as the Equal Protection clause of the 14th Amendment. She lost, appealed, and lost again, until the case came before the Supreme Court of the United States. There, she was represented by Irving Whitehead, a vocal eugenicist who had personally authorized the institution’s petition to sterilize Carrie. Perhaps not surprisingly, she lost her case for the final time, and was sterilized shortly thereafter. Other family members, including Emma, who was likely post-menopausal, and toddler Vivian, also underwent the operation. Carrie’s sister Doris was sterilized without her knowledge (she was told she was to have an “appendectomy”); she tried for years to have children but was not told of the reason for her infertility until the 1980s. Carrie herself was released from the Virginia Colony shortly after her sterilization. She married, lived locally, and was an avid reader until her death in 1983.

The Sterilization Act remained on the books from 1924 until 1974. In those fifty years, thousands of Virginians were forcibly sterilized, often after cursory examinations declaring them mentally incompetent. The Sterilization Act also had global reach as a model for a similar German law in 1933, one of the first acts of the Nazi regime. Once those horrors came to light at the end of the Second World War, eugenics rapidly lost its cultural cachet; when Hitler’s personal physician cited *Buck v. Bell* in his defense at Nurnberg, Americans must have been shocked. The cultural narrative around mental illness rapidly shifted from nature to nurture, from heredity to therapy. With recent advances in genetic testing, including consumer-driven genetic testing on demand, the ethics of genetic engineering and trait selection, along with larger questions about reproductive decision-making, are once again in the public consciousness. As we debate reproductive autonomy, we cannot forget the stories of Emma, Carrie, Doris, and Vivian Buck, and thousands of other women and men, whose bodies were altered against their consent in the service of society.

Carrie Buck, 1980s

Despite the national shift away from eugenics, forced sterilization still occurs in the United States, primarily targeting vulnerable women, such as prison inmates. Buck v. Bell has never been overturned. For further reading, turn to Paul Lombardo's Three Generations, No Imbeciles, available from JHU Press. The transcript of the trial is accessible at the Reading Room of the Georgia State University College of Law.