

# Supreme Court Case Summaries

*The following case summaries explain the significance of major Supreme Court cases mentioned in the text.*

**Abington School District v. Schempp (1963)** struck down a Pennsylvania statute requiring public schools in the state to begin each school day with Bible readings and a recitation of the Lord's Prayer. The Court held that the Constitution's establishment clause leaves religious beliefs and religious practices to each individual's choice and expressly commands that government not intrude into this decision-making process.

**Abrams v. United States (1919)** upheld a conviction under the Sedition Act and Espionage Act of 1917. The Court ruled that freedom of speech could be limited if there was a threat to the country.

**Baker v. Carr (1962)** established that federal courts can hear suits seeking to force state authorities to redraw electoral districts. In this case, the plaintiff wanted the population of each district to be roughly equal to the population in all other districts. The plaintiff claimed that the votes of voters in the least populous districts counted as much as the votes of voters in the most populous districts.

**Brown v. Board of Education (1954)** overruled *Plessy v. Ferguson* (1896) and abandoned the separate-but-equal doctrine in the context of public schools. In deciding this case, the Supreme Court rejected the idea that equivalent but separate schools for African Americans

and white students would be constitutional. The Court stated that the Fourteenth Amendment's command that all persons be accorded the equal protection of the law (U.S. Const. amend. XIV, sec. 1) is not satisfied by ensuring that African American and white schools "have been equalized, or are being equalized, with respect to buildings, curricula, qualifications, and salaries, and other tangible factors."

The Court then held that racial segregation in public schools violates the equal protection clause because it is inherently unequal. In other words, the separation of schools by race marks the separate race as inferior. The ruling in this case has been extended beyond public education to virtually all public accommodations and activities.

**Bush v. Gore (2000)** found that a manual recount of disputed presidential ballots in Florida lacked a uniform standard of judging a voter's intent, thus violating the equal protection clause of the Constitution. The Court also ruled that there was not enough time to conduct a new manual recount that would meet constitutional standards. The case arose when Republican candidate George W. Bush asked the Court to stop a hand recount. This decision ensured that Bush would receive Florida's electoral votes and win the election.

**Chisholm v. Georgia (1793)** stripped the immunity of the states to lawsuits in federal court. The Supreme Court held that a citizen of one state could sue another state in federal court without that state consenting to the suit. The Court's decision created a furor and led to the adoption of the Eleventh Amendment, which protects states from federal court suits by citizens of other states.

**Dred Scott v. Sandford (1857)** was decided before the Fourteenth Amendment. The Fourteenth Amendment provides that anyone born or naturalized in the United States is a citizen of the nation and of his or her state. In this case, the Supreme Court held that a slave was property, not a citizen, and thus had no rights under the Constitution. The decision was a prime factor leading to the Civil War.

**Engel v. Vitale (1962)** held that the establishment clause (U.S. Const. amend. I, cl. 1) was violated by a public school district's practice of starting each school day with a prayer which began, "Almighty God, we acknowledge our dependence upon Thee." The Supreme Court ruled that religion is a personal matter and that government should not align itself with a particular religion in order to prevent religious persecution.



**Escobedo v. Illinois (1964)** held that Danny Escobedo's right to counsel, as provided by the Sixth Amendment, had been violated. Throughout police questioning, Escobedo asked repeatedly, but unsuccessfully, to see his attorney. The Supreme Court reversed Escobedo's murder conviction, holding that an attorney could have assisted Escobedo in invoking his Fifth Amendment right against self-incrimination. This case served as a forerunner to *Miranda v. Arizona*.

**Gibbons v. Ogden (1824)** made it clear that the authority of Congress to regulate interstate commerce (U.S. Const. art. I, sec. 8, cl. 3) includes the authority to regulate intrastate commercial activity that relates to interstate commerce. Before this case, it was thought that the Constitution would allow a state to close its borders to interstate commercial activity. This ruling says that a state can only regulate internal commercial activity, but Congress can regulate commercial activity that has both intrastate and interstate dimensions.

**Gideon v. Wainwright (1963)** ruled that poor defendants in criminal cases have the right to a state-paid attorney under the Sixth Amendment. The ruling in this case has been refined to apply only when the defendant, if convicted, can be sentenced to more than six months in jail.

**Griswold v. Connecticut (1965)** overturned the conviction of two Planned Parenthood employees charged with violating an 1879 state law banning the use of contraceptives. In deciding this case, the Court went beyond the actual words of the Constitution to protect a right—the right to privacy—which is not listed in the Constitution. The case also served as a forerunner to the *Roe v. Wade* decision that legalized abortion on the same basis.

**Heart of Atlanta Motel, Inc. v. United States (1964)** upheld the Civil Rights Act of 1964, which prohibits racial discrimination by those who provide goods, services, and facilities to the public. The Georgia motel in the case drew its business from other states but refused to rent rooms to African Americans. The Supreme Court explained that Congress had the authority to prohibit such discrimination under both the equal protection clause (U.S. Const. amend. XIV, sec. 1) and the commerce clause (art. I, sec. 8, cl. 3). With respect to the commerce clause, the Court explained that Congress had ample evidence to conclude that racial discrimination by hotels and motels impedes interstate commerce.

**Korematsu v. United States (1944)** allowed the federal government's authority to exclude Japanese Americans, many of whom were citizens, from

designated military areas that included almost the entire West Coast. The government defended the orders as a necessary response to Japan's attack on Pearl Harbor. Yet, in upholding the orders, the Court established that government actions that discriminate on the basis of race would be subject to strict scrutiny.

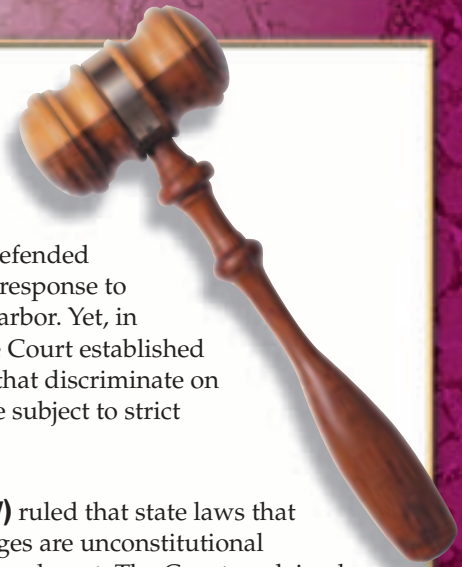
**Loving v. Virginia (1967)** ruled that state laws that outlaw interracial marriages are unconstitutional under the Fourteenth Amendment. The Court explained that such laws violated the equal protection clause and deprived "citizens of liberty without due process of law." The Court went on to say, "Marriage is one of the basic civil rights of man, fundamental to our very existence and survival."

**Mapp v. Ohio (1961)** established that evidence seized in violation of the Fourth Amendment could not be used by the prosecution as evidence of a defendant's guilt at the federal, state, or local level.

**Marbury v. Madison (1803)** established one of the most important principles of American constitutional law. The Supreme Court held that the Court itself has the final say on what the Constitution means. It is also the Supreme Court that has the final say whether or not an act of government—legislative or executive at the federal, state, or local level—violates the Constitution.

**Martin v. Hunter's Lessee (1816)** affirmed that the Supreme Court has the authority to review state court decisions and is the nation's final court of appeal. The Supreme Court ruled that section 25 of the Judiciary Act of 1789 was constitutional. This section granted the Supreme Court appellate jurisdiction over state courts in certain situations, such as a state court denying the authority of federal law.

**McCulloch v. Maryland (1819)** established the basis for the expansive authority of Congress. The Supreme Court held that the necessary and proper clause (U.S. Const. art. I, sec. 8, cl. 18) allows Congress to do more than the Constitution specifically authorizes it to do. This case holds that Congress can enact almost any law that will help it achieve the ends established by Article I, Section 8 of the Constitution. For example, Congress has the power to regulate interstate commerce; the necessary and proper clause permits Congress to do so in ways not specified in the Constitution.



**Miranda v. Arizona (1966)** held that a person in police custody may not be held unless reminded of his or her rights. These rights include: 1) the right to remain silent, 2) the right to an attorney (at government expense if the person is unable to pay), and 3) that anything the person says after acknowledging that he or she understands these rights can be used as evidence of guilt at a trial.

The Supreme Court explained that a person alone in police custody may not understand, even if told, that he or she can remain silent and thus might be misled into answering questions. The presence of an attorney is essential.

**Morgan v. Virginia (1946)** challenged racial segregation in the South. Irene Morgan was convicted for refusing to give up her seat on an interstate bus bound from Virginia to Maryland. The Court ruled that the Virginia law posed an undue burden on interstate commerce and struck down the statute. However, segregation on southern buses continued on an informal basis.

**National Labor Relations Board v. Jones and Laughlin Steel Corp. (1937)** upheld President Franklin Roosevelt's New Deal legislation, the National Labor Relations Act, which allowed workers to organize unions in businesses operating or affecting interstate commerce. Employers were prohibited from discriminating against their employees because of union membership. Prior to this case, the Supreme Court had ruled much New Deal legislation unconstitutional. This ruling came less than a week after Roosevelt's proposed court-packing plan. The president intended on "packing" the Supreme Court with additional justices in order to obtain a pro-New Deal majority on the Court.

**New York Times Co. v. Sullivan (1964)** extended the protections afforded to the press by the free press clause (U.S. Const. amend. I). In this case, the Supreme Court held that a public official or public figure suing a publisher for libel (i.e., defamation) must prove that the publisher published a story that he or she knew was false or published the story in "reckless disregard of its truth or falsity," which means that the publisher did not take professionally adequate steps to determine the story's truth or falsity.

**Norris v. Alabama (1935)** overturned the conviction of Clarence Norris, an African American sentenced to death for a crime in Alabama. The Supreme Court held that the grand jury and trial jury had systematically eliminated African American jurors. Thus, the Court reversed the conviction because it violated the equal protection clause of the Fourteenth Amendment.

**Northern Securities Company v. United States (1904)** dealt with the application of congressional antitrust legislation. The party involved held

three-fourths of the stock in two parallel railroad lines. By a narrow 5–4 decision, the Court upheld the application of the Sherman Antitrust Act. The Court ruled that the holding company clearly intended to eliminate competition between the two railroads, violating the constitutional right of Congress to regulate interstate commerce.



**Plessy v. Ferguson (1896)** upheld the separate-but-equal doctrine used by Southern states to perpetuate segregation after the Civil War officially ended law-mandated segregation. The decision upheld a Louisiana law requiring passenger trains to have "equal but separated accommodations for the white and colored races." The Court held that the Fourteenth Amendment's equal protection clause required only equal public facilities for the two races, not equal access. This case was overruled by *Brown v. Board of Education* (1954).

**Regents of the University of California v. Bakke (1978)** was the first Supreme Court decision to suggest that an affirmative action program could be justified on the basis of diversity. The Court explained that racial quotas were not permissible under the equal protection clause of the Fourteenth Amendment. However, the justices ruled that the diversity rationale was a legitimate interest that would allow a state medical school to consider an applicant's race in evaluating his or her application for admission. (Recent Supreme Court cases suggest that the diversity rationale is no longer enough to defend an affirmative action program.)

**Reynolds v. Sims (1964)** extended the one-person, one-vote doctrine announced in *Wesberry v. Sanders* to state legislative elections. The Court held that the inequality of representation in the Alabama legislature violated the equal protection clause of the Fourteenth Amendment.

**Roe v. Wade (1973)** held that women have the right under various provisions of the Constitution—most notably, the due process clause of the Fourteenth Amendment—to decide whether or not to terminate a pregnancy. The Court's ruling in this case was the most significant in a long line of decisions over a period of 50 years that recognized a constitutional right of privacy, even though the word *privacy* is not found in the Constitution.

**Schechter Poultry Corporation v. United States (1935)** overturned the conviction of the employers, who were charged with violating the wage and hour limitations of a law adopted under the authority of the

National Industrial Recovery Act. The Court held that because the defendants did not sell poultry in interstate commerce, they were not subject to federal regulations on wages and hours.

***Schenck v. United States (1919)*** upheld convictions under the Federal Espionage Act. The defendants were charged under the act with distributing leaflets aimed at inciting draft resistance during World War I; their defense was that antidraft speech was protected under the First Amendment.

The Supreme Court unanimously rejected the defense, explaining that whether or not speech is protected depends on the context in which it occurs. Because the defendants' antidraft rhetoric created a "clear and present danger" to the success of the war effort, it was not protected.

***Stone v. Powell (1976)*** reversed a Court of Appeals decision that evidence was seized illegally and should therefore be excluded. The Court ruled that the defendant was provided a fair and legal opportunity to claim a Fourth Amendment violation before a trial jury. The trial jury found that the search was constitutional and the evidence should not be excluded. The Court stated, "Where the state has provided an opportunity for full and fair litigation of a Fourth Amendment claim, a state prisoner may not be granted federal habeas corpus relief."

***Swann v. Charlotte-Mecklenburg Board of Education (1971)*** established a new plan to ensure that public schools were not segregated. Many school systems were slow to desegregate after *Brown v. Board of Education* and used various tactics to appear to be resolving the problem. This case ordered that busing students, reorganizing school boundaries, and racial ratios all be used as methods to obtain desegregated public school systems.

***Sweatt v. Painter (1950)*** held that it was unconstitutional for African Americans to be denied admission to the University of Texas Law School based on race. An inferior law school established for African Americans did not give the state justification to deny admission to the main school. This act was a violation of the Fourteenth Amendment.

***Wabash v. Illinois (1886)*** held that states have no authority to regulate railroad rates for interstate commerce. The Supreme Court held that the commerce clause (U.S. Const. art. I, sec. 8, cl. 3) allowed states to enforce "indirect" but not "direct" burdens on interstate commerce. State railroad rates were ruled "direct" burdens and therefore could not be enforced by states. The decision created a precedent by establishing rate regulation of interstate commerce as an exclusive federal power.

***Wickard v. Filburn (1942)*** indicated how far the Supreme Court had come in complying with President Franklin Roosevelt's economic philosophies. The Court upheld specific parts of the Second Agricultural Adjustment Act. In its ruling, the Supreme Court held that marketing quotas could be applied to wheat that never left the farm. Using the commerce clause (U.S. Const. art. I, sec. 8, cl. 3) as the basis for its decision, the Court ruled that wheat that never left the farm still had an effect on interstate commerce. Farmers growing their own grain depressed the overall demand and market price of wheat. The decision further extended the power of the commerce clause.

***Worcester v. Georgia (1832)*** overturned the conviction of Samuel A. Worcester, a missionary among the Cherokee. Worcester was imprisoned under a Georgia law forbidding whites to reside in Cherokee country without taking an oath of allegiance to the state and obtaining a permit. The Supreme Court voided the state law, ruling that the Cherokee were an independent nation based on a federal treaty and free from the jurisdiction of the state. Georgia ignored the decision, and President Jackson refused to enforce it, instead supporting the removal of the Cherokee to the Indian Territory.

