Buck v. Bell:
Unveiling the Shadows of Eugenics

Ava Sharma
Senior Division
Individual Exhibit
Process Paper: 489 Words

When trying to decide on a topic for my NHD project, I identified two main areas of interest. First, I decided I wanted my project to have a medical aspect because science is a strong interest of mine and I'm interested in working in the medical field someday. I also knew that I desired to learn more about the exploitation of women throughout history. With this in mind, I started by reading about the medical exploitation of women, and eventually, I came across the case, *Buck v. Bell.* Although this case wasn't a positive turning point, I liked the complexity of the story and the fact that it had a psychological aspect to it as well. Ultimately, I thought it was the perfect topic for me as it checked off almost all areas of my interests and topics I yearned to learn more about.

Once I decided on my topic, I began my research using the database "U.S. History in Context", where I found a majority of my secondary sources. I started with general research, reading overviews of the case and about Carrie Buck's background and family life. Then, I moved on to primary sources where I came across the real case file, which allowed me to see the language of the case as well as the justifications for and against Carrie's sterilization. Lastly, I went back to analyzing more primary sources, including many photographs from Carrie's time. After collecting a majority of my sources, I created notecards from them and organized the notecards into specific categories. As I began working on the draft of my project, I also continued to gather more primary and secondary sources, when coming across gaps in my research.

Choosing my presentation category was a simple task for me. I knew that I wasn't super comfortable with technology, so I quickly decided against creating a documentary or website. I also knew that I wanted to express my creativity and artistic abilities. Therefore, I figured a handmade exhibit board would be my best option and would allow me to display my topic to its

fullest potential. To prepare for the creation of my exhibit, I created a draft that included the headings, the informational text, and the photographs.

Ultimately, *Buck v. Bell* represented a turning point as it provided the justification for the forced sterilization of thousands of individuals in the United States and resulted in an increase in inhumane eugenic laws and practices. This case set a precedent for involuntary sterilization and thus led to the sterilization of over 65,000 people in the United States. *Buck v. Bell i*s a prime historical example of how legal decisions can be heavily influenced by prevailing ideologies such as eugenics. In the long term, the abandonment of forced sterilization programs in the U.S. took place, and more legal and social movements that aimed to protect individual rights and reproductive freedom were on the rise.

Bibliography

Primary Sources

"An Act to Provide Compensation to the Persons Sterilized through the State's Eugenic Sterilization." In *Human and Civil Rights: Essential Primary Sources*, edited by Adrienne Wilmoth Lerner, Brenda Wilmoth Lerner, and K. Lee Lerner, 240-43. Detroit, MI: Gale, 2006. Gale in Context: U.S. History.

This primary source from the General Assembly of North Carolina informed me of the first legislative act to make reparations for the forced sterilization programs. This source's insightful statistics will be used in my exhibit as it provided me with what type of people were being sterilized the most from the 1920s to the 1970s.

"Buck Family Pedigree:: CSHL DNA Learning Center." n.d. Dnalc.cshl.edu. Accessed January 20, 2024. https://dnalc.cshl.edu/view/15732-Buck-Family-pedigree.html.

This primary source is an image of the Buck Family pedigree. It was used by a geneticist to display the genetic strain of "feeblemindedness" that ran through Carrie's family, and it will be used in my exhibit as a form of visual representation that depicts how eugenics and Buck v. Bell are closely connected.

"Carrie Buck Revisited and Virginia's Expression of Regret for Eugenics." n.d. Eugenics: Three Generations, No Imbeciles: Virginia, Eugenics & Buck v. Bell. http://exhibits.hsl.virginia.edu/eugenics/5-epilogue/.

This primary source is an image of Carrie Buck with her first husband, William Eagle. It will be used in my project as a way to provide some insight into Carrie's family life after her involuntary sterilization.

Fuller, Edmund. 2019. "Oliver Wendell Holmes, Jr. | United States Jurist." In *Encyclopædia Britannica*. https://www.britannica.com/biography/Oliver-Wendell-Holmes-Jr.

This primary source is an image of Justice Oliver Wendell Holmes. It will be used in my exhibit as a visual, which I will place near a quote from his written opinion regarding *Buck v. Bell.*

Holmes, Oliver Wendell, and Supreme Court of United States. "U.S. Reports: Buck V. Bell, 274 U.S. 200. 1926." In *Library of Congress*. https://www.loc.gov/item/usrep274200/.

This primary source is the real United States report of the case *Buck v. Bell* from the Library of Congress. It provided me with the authentic language of the case, as it is a document directly from the Supreme Court.

Priddy, A.S. "Petition of A.S. Priddy, M.D. to the Special Board of Directors of State Colony for Epileptics and Feeble-Minded." In *DocsTeach*. N.p., 1924. https://docsteach.org/documents/document/petition-to-the-special-board-of-directors-buck-v-bell.

This primary source is A.S. Priddy's petition to the Board of Directors of the State Colony for Epileptics and Feeble-Minded. This source is being used to see the evidence and justification given for the sterilization of Carrie.

"Sloan Science & Film." n.d. https://scienceandfilm.org/articles/3165/the-eugenics-crusade-in-america.

This primary source is an image of the American Eugenics Society advertising the Eugenics movement to the public. This source will be used as an additional visual representation for my exhibit, as it provides me with the core beliefs of the Eugenics movement

Supreme Court of the United States. 2/2/1790. Buck v. Bell (Case File #31681). Retrieved from the Digital Public Library of America, http://catalog.archives.gov/id/45637229. (Accessed January 4, 2024.)

This primary source is the case file of Buck v. Bell, a real record of the Supreme Court case from the Jurisdiction Case Files. This is significant for my project because this shows the side fighting for Carrie Buck, what evidence they used for their appeal, and why they deemed the Virginia sterilization law unconstitutional.

Burrus, Trevor. 2021. "The United States Once Sterilized Tens of Thousands–Here's How the Supreme Court Allowed It." Cato.org. 2021. https://www.cato.org/commentary/united-states-once-sterilized-tens-thousands-heres-how-supreme-court-allowed-it.

This primary source is an image of the Virginia State Colony for Epileptics and the Feeble Minded. This will be used on my exhibit board, as it displays exactly where Carrie Buck and her mother were institutionalized.

Wolfe, Contributor: Brendan. "Buck v. Bell (1927)." Encyclopedia Virginia, July 17, 2023. https://encyclopediavirginia.org/entries/buck-v-bell-1927/.

This primary source is an image of Carrie Buck and her mother Emma Buck. This will be used as a visual on my exhibit board, as it displays the two most significant women in the case sitting together.

"Albert S. Priddy." n.d. Encyclopedia Virginia. https://encyclopediavirginia.org/8368hpr-034b495d5a64fff/.

This primary source is an image of Albert S. Priddy, the first superintendent of the Virginia Colony for Epileptics and Feeble-Minded. This image will be used on my exhibit board to represent the side in favor of Carrie's forced sterilization.

"Carrie Buck's Baby." n.d. Encyclopedia Virginia. Accessed January 21, 2024. https://encyclopediavirginia.org/8319hpr-93689bd8140a714/.

This source is an image of Alice Dobbs, Carrie's foster mother, with Buck's daughter, Vivian. This image will be used on my exhibit board to display that Vivian was also mentally examined, and it was decided that she was "below the average".

Secondary Sources

Gerow, Jennifer. Paul Lombardo with Buck v. Bell sign. 2002. Retrieved from the Digital Public Library of America, http://search.lib.virginia.edu/catalog/uva-lib:2165338. (Accessed January 3, 2024.)

This source is an image of Paul Lombardo, a bioethicist, next to the road marker that describes Buck v. Bell. This image will be used as a form of visual representation in my exhibit, as it gives a brief explanation of the case and its effects.

"Against Their Will: North Carolina's Eugenics Program & In Re Moore | Understanding the American South." n.d. https://amsouth.unc.edu/against-their-will-north-carolina%E2%80%99s-eugenics-program-re-moore.

This secondary source is an image of a Eugenics Board sign describing the state action that led to the sterilization of over 7,600 people. It will be used as a visual on my exhibit board because it displays the connection between the Eugenics movement and sterilizations.

Allen, Garland E. "Genetics: Contemporary." In *New Dictionary of the History of Ideas*, edited by Maryanne Cline Horowitz, 901-07. Vol. 3. Detroit, MI: Charles Scribner's Sons, 2005. Gale in Context: U.S. History.

This source provided me with information regarding individuals beginning to question the morality of sterilization. This source was useful to me because it also allowed me to understand how the concept of "protecting" the public's health was used to justify the cruelty of forced sterilization

"Buck V. Bell." In *West's Encyclopedia of American Law*, 2nd ed., edited by Shirelle Phelps and Jeffrey Lehman, 159-61. Vol. 2. Detroit, MI: Gale, 2005. https://link.gale.com/apps/doc/CX3437700648/UHIC?u=bullischl&sid=bookmark-UHIC&xid=660814fb.

This secondary source provided me with information about the various reasons Justice Oliver Wendell Holmes supported Carrie's sterilization. It also provided me with useful information about what amendments and clauses Carrie's attorney claimed the Virginia sterilization law violated, which helped me comprehend both sides of the case.

Ko, Lisa. 2016. "Unwanted Sterilization and Eugenics Programs in the United States." Independent Lens. PBS. January 29, 2016. https://www.pbs.org/independentlens/blog/unwanted-sterilization-and-eugenics-programs-in-the-united-states/.

This secondary source is a website that provided me with two images. These images will be used on my exhibit boars as they represent both the short and long-term effects, that followed *Buck v. Bell.* One image is a a map of the legislative status of sterilizations in the U.S. and the other is from an anti-sterilization protest in 2010.

Buck v. Bell 1927, 3 672 (UXL 2001). https://link.gale.com/apps/doc/CX3457000138/UHIC?u=bullischl&sid=bookmark-UHIC&xid=e2740875.
This secondary source is an article that describes how Carrie was brought up and what caused her to be sent to the Virginia Colony of Epileptics and Feebleminded. This source provided me with vital background information on Carrie's life, which will be used on the left wing of my exhibit board as a way to introduce her.

Burt, Robert A. "Mental Retardation and the Constitution." In *Encyclopedia of the American Constitution*, 2nd ed., edited by Leonard W. Levy and Kenneth L. Karst, 1720-22. Vol. 4. Detroit, MI: Macmillan Reference USA, 2000. Gale in Context: U.S. History.
This secondary source is an article that challenges the fear hidden behind the sterilization laws. This also further informed me on the exclusion of mentally disabled people from public facilities and will be used as additional background information about the Eugenics movement.

"Eugenics." In *International Encyclopedia of the Social Sciences*, 2nd ed., edited by William A. Darity, Jr., 21-22. Vol. 3. Detroit, MI: Macmillan Reference USA, 2008. Gale in Context: U.S. History.
This secondary source is an article about the American Eugenics Movement. This information is significant for my project because it provides me with the societies and associations created by eugenicists, as well as the names of the men who wrote the Virginia sterilization law.

"Forced Sterilization, Imprisonment, and American Eugenics | The Leonard Lopate Show | WNYC." n.d. WNYC. https://www.wnyc.org/story/american-eugenics-movement-and-its-troubling-legacy/.
This secondary source is an image of a Eugenics tree describing what Eugenics was with short phrases and words. This image will be used on my exhibit board in the background information section for the American Eugenics movement.

Greenberg, Ginny. 2017. "Buck v. Bell – Discussing a History of Injustice | News | Hofstra University, New York." News | Hofstra University, New York. October 11, 2017. https://news.hofstra.edu/2017/10/11/buck-v-bell-discussing-a-history-of-injustice/.
This is an image of the Buck v. Bell case sign which describes what occurred and the effects of the case. This image will be used in the center of my exhibit poster where I will describe the context of *Buck v. Bell.*

"Involuntary Sterilization: Eugenics and Public Policy." In *American Decades*, edited by Judith S. Baughman, Victor Bondi, Richard Layman, Tandy McConnell, and Vincent Tompkins. Vol. 3. Detroit, MI: Gale, 2001. Gale in Context: U.S. History.
This secondary source is an article written about Eugenics and public policy. It provided me with information on the justification for the court ruling against Carrie, and this will be used to help me describe the Supreme Court's decision in great detail.

Karst, Kenneth L. "Buck V. Bell 274 U.S. 200 (1927)." In *Encyclopedia of the American Constitution*, 2nd ed., edited by Leonard W. Levy and Kenneth L. Karst, 259-60. Vol. 1.

Detroit, MI: Macmillan Reference USA, 2000. https://link.gale.com/apps/doc/CX3425000323/UHIC?u=bullischl&sid=bookmark-UHIC&xid=cc32c56d.
This secondary source provided me with a concise overview of the case, Buck v. Bell. It provided significant information on the opinion written by Justice Oliver Wendell Holmes, and a quote from this opinion will be used on my exhibit board.

"Philosophy of Eugenics Led to Forced Sterilization." In *All Things Considered*. N.p., 2002. https://link.gale.com/apps/doc/A596557020/UHIC?u=bullischl&sid=bookmark-UHIC&xid=0b33e0f2.
This secondary source is a broadcast transcript where Steven Shelden, the author of "Inheriting Shame: The Story of Eugenics and Racism in America is being interviewed. This information is useful to me as it provides me with background information on the Eugenics movement and how it eventually led to forced sterilizations.

"Sterilization, Human." In *International Encyclopedia of the Social Sciences*, 2nd ed., edited by William A. Darity, Jr., 140-42. Vol. 8. Detroit, MI: Macmillan Reference USA, 2008. Gale in Context: U.S. History.
This is an article on human sterilization that enlightened me on the history of salpingectomies, how they are performed, and why they were introduced. This is useful to me because it provided me with information that allows me to explain how the Eugenics movement turned salpingectomies became known for being used in forced sterilizations.

"Sterilization, Involuntary." In *Violence in America*, edited by Ronald Gottesman and Richard Maxwell Brown. New York, NY: Charles Scribner's Sons, 1999. https://link.gale.com/apps/doc/BT2350011399/UHIC?u=bullischl&sid=bookmark-UHIC&xid=fad9023c.
This article provided me with background information regarding the Eugenics movement and where it began. I will use this information in my project to show the rise of the movement and the connection between Eugenics and forced sterilizations.

Woiak, Joanne. "Imbeciles: The Supreme Court, American Eugenics, and the Sterilization of Carrie Buck." *Journal of American Ethnic History* 37, no. 4 (2018): 92+. https://link.gale.com/apps/doc/A552305571/UHIC?u=bullischl&sid=bookmark-UHIC&xid=2fbda324.
This secondary source provided me with background information on Carrie Buck's life and why she got instituted into the Virginia Colony. It also showed the rise in Social Darwinism and the American Eugenic Movement, which will be useful in my project for describing why forced sterilizations became popular so quickly.