REVIEWED BY HEATHER ZEIGER, MS, MA CBHD RESEARCH ANALYST

he Supreme Court Case *Buck v. Bell* allowed the state of Virginia to sterilize Carrie Buck who was classified as a "Middle grade Moron" based on test scores and who the court determined was feebleminded. Carrie Buck's mother was also deemed feebleminded and was a resident with Carrie at the Virginia Colony for Epileptics and Feeble-Minded. Carrie birthed a child out of wedlock as a result of her foster family's nephew raping her. The child was also considered feebleminded even though she was barely three years old at the time of the trial.

Buck v. Bell set the precedent for state enforced sterilization for eugenic purposes. As Oliver Wendell Holmes, Jr., author of the opinion for this case, stated "three generations of imbeciles is enough." The case was decided by an 8–1 vote. In 2002, the governor of Virginia made a formal apology for the state's participation in eugenics on the seventy-fifth anniversary of the ruling of Buck v. Bell, but the case itself has never been formally overruled.

Journalist Adam Cohen in his book Imbeciles: The Supreme Court, American Eugenics, and the Sterilization of Carrie Buck takes a look at the major players during the time of the American eugenics movement who worked to get the case through state courts and eventually before the U.S. Supreme Court. Cohen explores how eugenics, which was birthed in the late nineteenth century and continued in some form until the 1970s, became a popular movement in the 1920s.

This book is well researched and provides a detailed and fair look at key factors contributing to the mindset at the time. While Cohen's distaste for people like Oliver Wendell Holmes, Jr. is evident in his tone, he is fair in his treatment of the personal and cultural factors that influenced people like Holmes to sympathize with eugenics.

Cohen points out that state institutions for mentally ill people were started with

Im-be-ciles (i. The Supreme Court, American Eugenics, and the Sterilization of Carrie Buck

Adam Cohen

*Imbedies leaves you wondering whether it can happen here—again."—Minneapolis Star Tribune

good intentions. The institutions were originally meant to provide compassionate care for the mentally ill as well as an alternative to jail or the slums. However, these noble motivations changed along with the prevailing worldview of the time. The moral landscape shifted from one that believed in the inherent moral worth of people to one that explained people in terms of heredity and the problems of society in terms of the proliferation of the mentally deficient and feebleminded.

Prejudice and social control were dressed in scientific trappings, providing an air of legitimacy to their efforts.

Furthermore, from a medical standpoint, while castration, marriage restrictions, and isolation seemed inhuman and harsh, sterilization was a new medical technique that was safer and cheaper. Albert Priddy was a medical doctor who was on the front lines of caring for the mentally ill. After Virginia passed a law allowing for sterilization in state institutions, Priddy, who had sterilized many of the women at the colony where Carrie Buck and her mother lived, wanted a test case to show that the state sterilization laws were indeed constitutional. Carrie Buck was just the example that he needed to demonstrate the hereditary nature of feeblemindedness.

The book's structure centers on the four characters that led to the *Buck v. Bell* decision: Albert Priddy, Harry Laughlin, Aubrey Strode, and Oliver Wendell Holmes, Jr., with Carrie Buck portrayed as their political pawn. Each of these four men represented the pillar of their respective fields of medicine, academia, law, and the judiciary. As outlined in the book, each helped to get the test case through the courts so that eugenic sterilization was deemed constitutional.

The book has two chapters on each of these men. The first discusses the context of their field of practice and how they eventually landed in their position of authority, including interesting insights into their backgrounds, schooling, and motivations. The second chapter outlines how each worked the political system to

12

BIOENGAGEMENT:

he promise and perils of advances in technology, science, and medicine have long been fertile fodder for creative works in literature and cinema. Consequently, a variety of resources exist exploring the realm of medical humanities as well as those providing in-depth analysis of a given cultural medium or particular artifact. This column seeks to offer a more expansive listing of contemporary expressions of bioethical issues in the popular media (fiction, film, and television)—with minimal commentary—to encompass a wider

spectrum of popular culture. It will be of value to educators and others for conversations in the classroom, over a cup of coffee, at a book club, or around the dinner table. Readers are cautioned that these resources represent a wide spectrum of genres and content, and may not be appropriate for all audiences. For more comprehensive databases of the various cultural media, please visit our website at cbhd.org/resources/reviews. If you have a suggestion for us to include in the future, send us a note at msleasman@cbhd.org.

BIOFICTION:



Isaac Asimov, The Robot Series

The Naked Sun (Spectra Books, 1991).
The Robots of Dawn (Spectra, 1994).



Artificial Intelligence, Ectogenesis, Emerging Technologies, Human Enhancement, Human-Machine Interaction, Personhood, Reproductive Technology Ethics, Robotics, Robot Ethics.



Iain M. Banks, *The Hydrogen Sonata* (Orbit, 2012). *Human Enhancement, Transhumanism/ Posthumanism, Artificial Intelligence, Radical Life Extension, Personhood.*



Ian Douglas, *Deep Space* (Harper Voyager, 2013). Human Enhancement, Cognitive Enhancement, Neuroethics, Transhumanism, Brain-Computer Interfaces, Artificial Intelligence, Nanotechnology, Singularity.



Neal Stephenson, **Seveneves** (Willow Marrow, 2015). Designer Babies, Eugenics, Genetic Engineering, Transhuman/Posthuman.



Allen Steele, *Arkwright* (Tor Books, 2016). Embryo Cryopreservation, Genetic Engineering, Regnenerative Medicine, Transhuman/Posthuman.

"BOOK REVIEW: ADAM COHEN, IMBECILES: THE SUPREME COURT, AMERICAN EUGENICS, AND THE STERILIZATION OF CARRIE BUCK" CONTINUED

get bills passed and eventually *Buck v. Bell* before the Supreme Court.

Consequently, this non-linear structure lends itself to bit of repetition, particularly as the main characters' lives intersect at multiple points. Additionally, Cohen takes great pains to remind the reader that Carrie Buck was neither "feebleminded" nor a "moron" and that she was treated unfairly by reiterating this point several times throughout the book. While repetition for emphasis has its place, it became a bit tedious.

Cohen's didactic tone may seem overbearing at times, but this is not without merit. Carrie Buck was deprived of her liberties for no better reason than to serve as a pawn in a political game in which some people had decided that they were qualified to determine the value of other people. Cohen shows how the system promoted forced sterilization for eugenic purposes starting from the bottom up and the very Court that was supposed to uphold the liberties enumerated in the Constitution instead upheld an oligarchical agenda that used science to bully and belittle.

Overall, *Imbeciles*' greatest asset is the research that went into this book. It is an excellent resource for those who wish to understand the American eugenics

movement and how the dysfunctional collaboration of science, politics, and medicine served to rob individuals of their most basic personal liberties. Five years before Oliver Wendell Holmes wrote his biting court opinion for *Buck v. Bell*, G. K. Chesterton tells us in *Eugenics and Other Evils* that "a man is not imbecile if only a Eugenist thinks so." Cohen shows us this truth in his account of Carrie Buck.

- Adam Cohen, Imbeciles: The Supreme Court, American Eugenics, and the Sterilization of Carrie Buck (New York: Penguin Press, 2016), 30.
- 2 Ibid. 2
- 3 G. K. Chesterton, *Eugenics and Other Evils* (London: Cassell and Company, 1922), 37.

13