

Eugenics in Michigan
Haynes v. Lapeer Circuit Judge (1918)
201 Mich. 138

Haynes v. Lapeer Circuit Judge reached the Michigan Supreme Court through a writ of mandamus filed by H. A. Haynes, medical superintendent of the Michigan Home and Training School. Haynes sought to compel William B. Williams, circuit judge of Lapeer County, to vacate an order sustaining an order of the probate court, which denied a petition to test the sanity of Nora Reynolds in order to determine the necessity of her sterilization.

The sterilization of “mentally defective” people held in state custody was provided for by Act No. 34 of the Public Acts of 1913. When Haynes attempted to use the provisions of this act on Reynolds, he was forced to go through the Lapeer Probate Court, as the act provides for when there is a complaint from a family member. The probate judge denied Haynes’ request on the basis of the unconstitutionality of the act, a ruling that was upheld by circuit judge Williams.

The Michigan Supreme Court, in a unanimous opinion written by Justice Steere, upheld the two lower court decisions and found the act to be unconstitutional on the ground that it was a form of class legislation.

As Steere explains in the decision, legislation was not necessarily unconstitutional if it only applied to a certain class. “It is elementary that legislation which, in carrying out a public purpose for the common good, is limited by reasonable and justifiable differentiation to a distinct type or class of persons is not for that reason unconstitutional because class legislation, if germane to the object of the enactment and made uniform in its operation upon all persons of the class to which it naturally applies; but if it fails to include and affect alike all persons of the same class, and extends immunities or privileges to one portion and denies them to others of like kind, by unreasonable or arbitrary sub-classification, it comes within the constitutional prohibition against class legislation.”

Hence, the legislation was not found unconstitutional because it applied only to “mentally defective” people; rather the fact that it only applied to said people who were in public institutions, and not all members of the class, is what made it so. It was found to be the arbitrary discrimination within a class that creates an unconstitutional act.