

V-19. *HEART OF ATLANTA MOTEL V. UNITED STATES* (1964)

In 1964 Congress passed the Civil Rights Act, the most comprehensive civil rights legislation since 1875. Title II of this law prohibited discrimination on the grounds of race, color, religion, or national origin in public accommodations involved in any way in interstate commerce. Title II thus sought to end discrimination in facilities including hotels, motels, restaurants, concert halls, theaters, and sports arenas.

Congress based its power to regulate such businesses on the commerce clause in Article I (Section 8) of the Constitution. The commerce clause gives Congress the power to regulate commerce among the states. A case challenging the use of the commerce power by Congress to prevent racial discrimination reached the Supreme Court only a few months after the passage of the 1964 Civil Rights law.

The Heart of Atlanta motel in downtown Atlanta, Georgia defied the new law by refusing to serve blacks. The motel owner claimed that Congress had exceeded its authority under the commerce clause by enacting Title II to regulate local businesses such as hotels open to the public.

The owner also argued that Title II violated his Fifth Amendment rights. The Fifth Amendment says that no person shall be “deprived of life, liberty, or property, without due process of law.” The motel owner claimed the new Civil Rights Act regulated his private property “without due process of law.”

The Constitutional Issue

The case represented a major test of a key part of the new Civil Rights Act. Clearly the Constitution gave Congress the right to regulate interstate commerce. But did this commerce power permit Congress to prohibit dis-

crimination in privately owned accommodations open to the public such as hotels and restaurants?

The Decision

The Supreme Court unanimously upheld Title II of the Civil Rights Act as a legitimate exercise of the commerce power. Justice Tom Clark, a former Senator from Texas, wrote that the motel did engage in interstate commerce since it sought out-of-state customers by advertising in national publications and that 75 percent of its guests were interstate travelers. Citing testimony from the congressional hearing on the act, Justice Clark pointed out the difficulty blacks encountered in obtaining accommodations frequently discouraged them from traveling. The motel’s discrimination obstructed interstate commerce.

Next Clark defined the meaning of the commerce power of Congress. He declared that Congress’ power to regulate interstate commerce also gave it the authority to regulate local business that “might have a substantial and harmful effect” on interstate commerce.

Clark added that the fact that Congress had used its powers under the commerce clause to achieve a moral goal—stopping discrimination—had no bearing on the decision. “Congress was not restricted by the fact that the particular obstruction to interstate commerce with which it was dealing was also deemed a moral and social wrong,” he wrote.

Finally, the Court rejected the charge that Title II violated the motel owner’s Fifth Amendment rights to private property. “In a long line of cases this Court has rejected the claim that the prohibition of racial discrimination in public accommodations interferes with personal liberty,” declared the opinion.

The Supreme Court’s decision affirmed that Congress has the constitutional power to promote equality of opportunity and to prevent discrimination. The case aided the cause of the civil rights movement of the 1960s. It put a solid constitutional foundation under legislative and political efforts to promote equal rights for blacks.

WORKSHEET: HEART OF ATLANTA MOTEL V. UNITED STATES (1964)

1. What did Title II of the Civil Rights Act prohibit?

2. What did the commerce clause of the Constitution (Article I, Section 8) have to do with the issue in this case? Select correct answers from among the following statements. Be prepared to explain your answers.

- a. Congress based Title II on its power to regulate interstate commerce.
- b. The motel owner claimed the Supreme Court had no authority to rule on the commerce clause.
- c. The motel owner argued that the commerce clause did not allow Congress to regulate local businesses.

3. Did the Court's decision favor:

- a. The motel owner.
- b. The national government.

4. How did the Court use the Constitution to support the decision in this case? (Hint: what meaning did the Court give to the **commerce power**?)

5. Which of the following statements about the effects of this decision on America are correct? Be prepared to explain your selections.

- a. It increased the power of the national government over local affairs.
- b. It greatly limited the ability of Congress to deal with racial discrimination.
- c. It strengthened the civil rights movement of the 1960s.

6. Why should the Court allow Congress to consider motels and restaurants part of interstate commerce?

7. If there were no Civil Rights Act, what do you think it would be like for minorities who traveled?
