

HEART OF ATLANTA MOTEL v UNITED STATES (1964)

[Home](#)

[Question](#)

[Facts / Issues](#)

[Conclusions](#)

[Images](#)

[Map](#)

[Relating  
Cases /  
Appeals](#)

[Links /  
Bibliography](#)

[Chronology](#)

[Full Case /  
Opinions](#)



## Heart of Atlanta Motel v. United States - Significance

*Heart of Atlanta Motel* marked a turning point in Congress' efforts to promote civil rights through use of its power to regulate interstate commerce.

The Heart of Atlanta Motel was a 216-room establishment located in downtown Atlanta, Georgia, close to several interstate highways. The motel advertised in national magazines and on billboards within Georgia. Approximately 75 percent of the motel's registered guests came from out of state.

In 1964, Congress passed a civil rights act intended to eliminate racial discrimination. Some of the act's most important provisions appeared in a section known as Title II, which insured full access to places of public accommodation to racial minorities. Prior to passage of the act, the Heart of Atlanta Motel had consistently refused to supply African Americans with rooms. Claiming that it was the motel's right as a private business to

continue this practice, the motel operator filed suit in the U.S. District Court for the Northern District of Georgia, seeking a judicial declaration that Title II was unconstitutional, as well as an injunction preventing the enforcement of the public accommodations provisions. The federal government countersued, seeking enforcement of the act against the hotel. The government prevailed in district court, and the hotel operators appealed this judgment to the U.S. Supreme Court.

[Heart of Atlanta Motel v. United States - Significance](http://law.jrank.org/pages/24309/Heart-Atlanta-Motel-v-United-States-Significance.html)

Read more: [Heart of Atlanta Motel v. United States - Significance](http://law.jrank.org/pages/24309/Heart-Atlanta-Motel-v-United-States-Significance.html#ixzz0mEgeWFSy) <http://law.jrank.org/pages/24309/Heart-Atlanta-Motel-v-United-States-Significance.html#ixzz0mEgeWFSy>

*Images Courtesy of Google.com and Oyez.org*

## The Question/ Hypothesis

Did Congress exceed its Commerce Clause powers by depriving motels the right to choose their own customers?

Commerce Clause: Congress regulates commerce which concerns more than one state

[Home](#)

[Question](#)

[Facts / Issues](#)

[Conclusions](#)

[Images](#)

[Map](#)

[Relating  
Cases /  
Appeals](#)

[Links /  
Bibliography](#)

[Chronology](#)

[Full Case /  
Opinions](#)



## 'Just The Facts' Methodology / Issues

- By refusing to accept Black Americans the Heart of Atlanta Motel violated Title II of the Civil Rights Act of 1964, which forbade racial discrimination by places of public accommodation if their operations affected commerce.

### TITLE II-- INJUNCTIVE RELIEF AGAINST DISCRIMINATION IN PLACES OF PUBLIC ACCOMMODATION

- SEC. 201. (a) All persons shall be entitled to the full and equal enjoyment of the goods, services, facilities, privileges, advantages, and accommodations of any place of public accommodation, as defined in this section, without discrimination or segregation on the ground of race, color, religion, or national origin.  
(b) Each of the following establishments which serves the public is a place of public accommodation within the meaning of this title if its operations affect commerce, or if discrimination or segregation by it is supported by State action:  
(1) any inn, hotel, motel, or other establishment which provides lodging to transient guests, other than an establishment located within a building which contains not more than five rooms for rent or hire and which is actually occupied by the proprietor of such establishment as his residence; **Heart of Atlanta Motel had 216 rooms available to transient guests, and 75% of its registered guests are from out of state**  
(2) any restaurant, cafeteria, lunchroom, lunch counter, soda fountain, or other facility principally engaged in selling food for consumption on the premises, including, but not limited to, any such facility located on the premises of any retail establishment; or any gasoline station;  
(3) any motion picture house, theater, concert hall, sports arena, stadium or other place of exhibition or entertainment; and  
(4) any establishment (A)(i) which is physically located within the premises of any establishment otherwise covered by this subsection, or (ii) within the premises of which is physically located any such covered establishment, and (B) which holds itself out as serving patrons of such covered establishment.

[Home](#)

[Question](#)

[Facts / Issues](#)

[Conclusions](#)

[Images](#)

[Map](#)

[Relating  
Cases /  
Appeals](#)

[Links /  
Bibliography](#)

[Chronology](#)

[Full Case /  
Opinions](#)

## Issues at Hand

- Heart of Atlanta Motel v United States is the first major and glaring challenges to the Civil Rights Act of 1964
- Heart of Atlanta Motel advertises and solicits interstate; is such discrimination based on race a violation of the Interstate Commerce Act?
- Heart of Atlanta Motel argues the suit is a violation of 5th Amendment right, claiming they are not allowed to do business as they wish.
- Heart of Atlanta Motel also claims that forcing them to serve black customers is a form of servitude, a violation of the 13th Amendment
- Case is specific to the Title II portion of the Civil Rights Act - specifically equal opportunity services and facilities
- Did the Civil Rights Cases of 1883 hold any bearing on this case?

[Home](#)

[Question](#)

[Facts / Issues](#)

[Conclusions](#)

[Images](#)

[Map](#)

[Relating  
Cases /  
Appeals](#)

[Links /  
Bibliography](#)

[Chronology](#)

[Full Case /  
Opinions](#)

## Conclusions

### Conclusion:

The Court ruled that the Commerce Clause allowed Congress to regulate local incidents of commerce, and that Title II of the Civil Rights Act of 1964, "carefully limited to enterprises having a direct and substantial relation to the interstate flow of goods and people. . ." Therefore, the Court determined that places of public accommodation had no right to select guests as they saw fit, free from governmental regulation.

Further, the court said of the Civil Rights Cases of 1883 "We think that decision inapposite, and without precedential value in determining the constitutionality of the present Act. Unlike Title II of the present legislation"

### Decision:

9 votes for U.S.; 0 votes against





HEART OF ATLANTA MOTEL v UNITED STATES (1964)

[Home](#)

[Question](#)

[Facts / Issues](#)

[Conclusions](#)

[Images](#)

[Map](#)

[Relating Cases / Appeals](#)

[Links / Bibliography](#)

[Chronology](#)

[Full Case / Opinions](#)



*(Left and Below) - Pictures of the Heart of Atlanta Motel as it looked in 1964*



*(Below) - Political Cartoon offering an explanation of the verdict of Heart of Atlanta v U.S. as going against interstate commerce.*





**Moreton Rolleston Jr., owner of the Heart of Atlanta Hotel**



Warren



Black



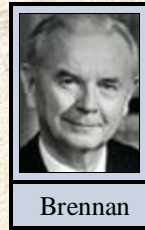
Douglas



Clark



Harlan



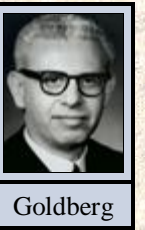
Brennan



Stewart



White



Goldberg

**Supreme Court Justices—1964—who heard the case**



Parks



*(From Left to Right) - Those who came before in their own cases or events of the Civil Rights movement that helped in establishing a precedent for the Heart of Atlanta Motel v United States ruling: Rosa Parks, Sit-ins at the Woolworth's Lunch Counter, the Little Rock Nine, Arkansas Governor Orval Faubus*

*Images Courtesy of Google.com; OYEZ.org and CNN. Com*

HEART OF ATLANTA MOTEL v UNITED STATES (1964)

Downtown Atlanta

[Home](#)

[Question](#)

[Facts / Issues](#)

[Conclusions](#)

[Images](#)

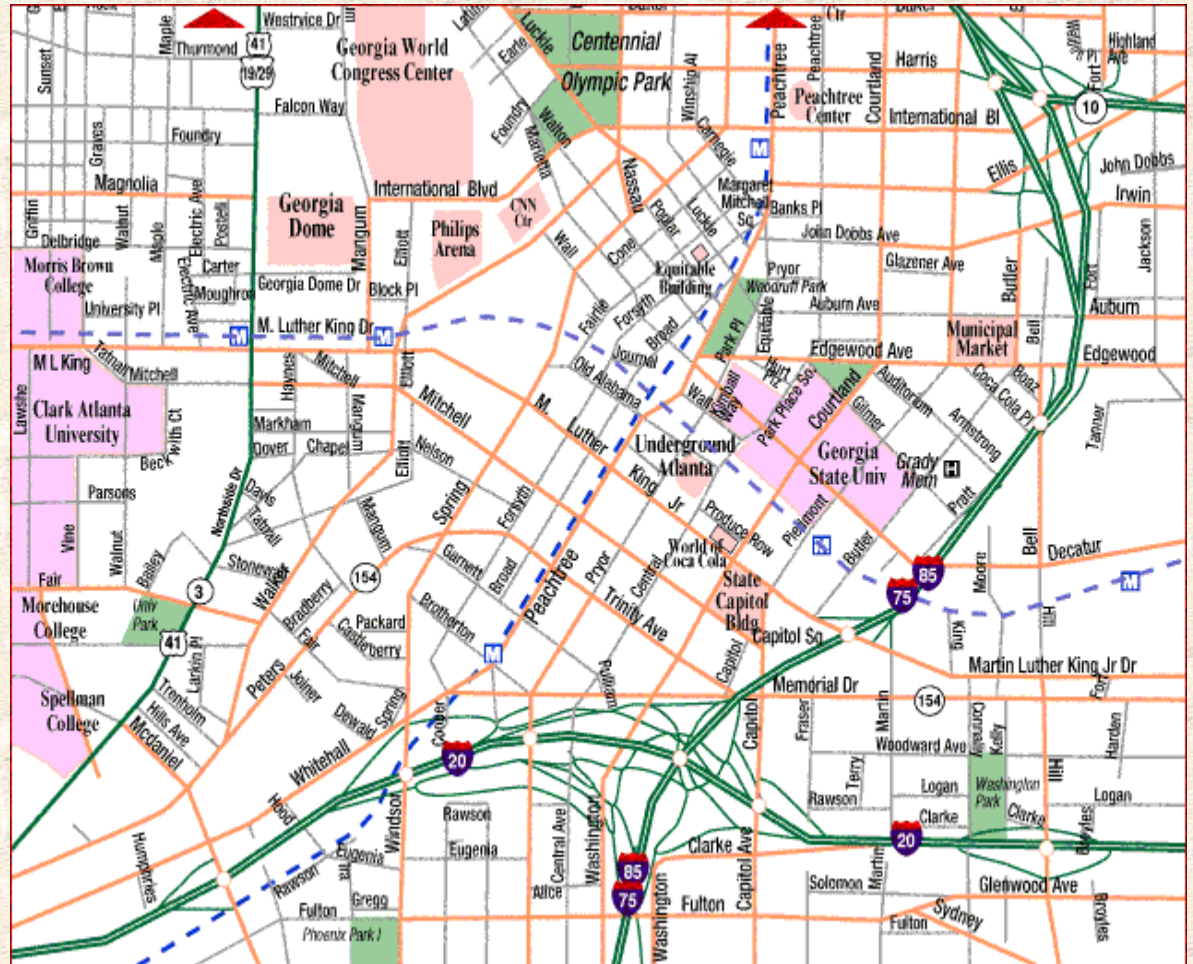
[Map](#)

[Relating Cases / Appeals](#)

[Links / Bibliography](#)

[Chronology](#)

[Full Case / Opinions](#)



*Images Courtesy of Google.com and Oyez.org*

[Home](#)

[Question](#)

[Facts / Issues](#)

[Conclusions](#)

[Images](#)

[Map](#)

[Relating  
Cases /  
Appeals](#)

[Links /  
Bibliography](#)

[Chronology](#)

[Full Case /  
Opinions](#)

## Relating Cases / Appeals

### **Bell vs Maryland**

Argued October 14-15, 1963

Decided June 22, 1964

#### Background Info

In 1960 twelve African American students were part of a group which conducted a sit-in at Hooper's restaurant in downtown Baltimore, Maryland, where they had been refused service. When they refused to leave, they were arrested, convicted of criminal trespass in the Circuit Court of Baltimore City, and fined \$10. They appealed their convictions to the highest court in Maryland, the Court of Appeals, which upheld their conviction. They then appealed to the Supreme Court, which granted certiorari.

#### Supreme Court's Decision

Although the Court had been briefed regarding whether the Equal Protection and Due Process Clauses of the 14th Amendment were applicable to the restaurant, the majority opinion noted that both the City of Baltimore and Maryland had passed laws forbidding racial discrimination by an owner or operator of a place of public accommodation. The state antidiscrimination statute went further and forbade discrimination in public accommodations for sleeping or eating on the basis of race, creed, color, or national origin. The opinion, consistent with the Court's practice when a significant supervening change in law has occurred, vacated the criminal convictions of the students and remanded the case back to the Maryland Court of Appeals to allow it to consider whether the convictions should be dismissed under the current state law. The Court noted that the common law of Maryland held that when the legislature has repealed a criminal statute or otherwise makes conduct that once was a crime legal, a state court would dismiss any pending criminal proceeding charging such conduct. Lastly, the majority opinion noted that although Maryland had a savings statute, which preserves criminal convictions and penalties when criminal statutes are amended, reenacted, revised, or repealed, unless the legislation implementing the amendment, reenactment, revision, or repeal expressly provided that such convictions or penalties should be reduced or vacated. The Court did not believe that

to the new

the Maryland savings statute would be applicable to the new antidiscrimination statute.

**Justice Goldberg's Opinion on *Heart of Atlanta vs US***

I join in the opinions and judgments of the Court, since I agree "that the action of the Congress in the adoption of the Act as applied here . . . is within the power granted it by the Commerce Clause of the Constitution, as interpreted by this Court for 140 years," ante, at 261.

The primary purpose of the Civil Rights Act of 1964, however, as the Court recognizes, and as I would underscore, is the vindication of human dignity and not mere economics. The Senate Commerce Committee made this quite clear:

"The primary purpose of . . . [the Civil Rights Act], then, is to solve this problem, the deprivation of personal dignity that surely accompanies denials of equal access to public establishments. Discrimination is not simply dollars and cents, hamburgers and movies; it is the humiliation, frustration, and embarrassment that a person must surely feel when he is told that he is unacceptable as a member of the public because of his race or color. It is equally the inability to explain to a child that regardless of education, civility, courtesy, and morality he will be denied the right to enjoy equal treatment, even though he be a citizen of the United States and may well be called upon to lay down his life to assure this Nation continues." S. Rep. No. 872, 88th Cong., 2d Sess., 16.

Moreover, that this is the primary purpose of the Act is emphasized by the fact that while 201 (c) speaks only in terms of establishments which "affect commerce," it is clear that Congress based this section not only on its power under the Commerce Clause but also on 5 of the Fourteenth Amendment. The cases cited in the Court's opinions are conclusive that Congress could exercise its powers under the Commerce Clause to accomplish this purpose. As 201 (b) and (c) are undoubtedly a valid exercise of the Commerce Clause power for the reasons stated in the opinions of the Court, the Court considers that it is unnecessary to consider whether it is additionally supportable by Congress' exertion of its power under 5 of the Fourteenth Amendment.

I

n my concurring opinion in **Bell v. Maryland**, however, I expressed my conviction that 1 of the Fourteenth Amendment guarantees to all Americans the constitutional right "to be treated as equal members of the community with respect to public accommodations," and that "Congress [has] authority under 5 of the Fourteenth Amendment, or under the Commerce Clause, Art. I, 8, to implement the rights protected by 1 of the Fourteenth Amendment. In the give-and-take of the legislative process, Congress can fashion a law drawing the guidelines necessary and appropriate to facilitate practical administration and to distinguish between genuinely public and private accommodations." The challenged Act is just such a law and, in my view, Congress clearly had authority under both 5 of the Fourteenth Amendment and the Commerce Clause to enact the Civil

## **Katzenbach v. McClung**

Year- 1964

### **Background Info**

It was a case in which the Supreme Court of the United States held that Congress acted within its power under the Commerce Clause of the United States Constitution in forbidding racial discrimination in restaurants as this was a burden to interstate commerce. The ruling was a 9–0 decision in favor of the plaintiff—the United States government.

### **Supreme Court's Decision**

Justice Clark wrote the majority opinion in the 9–0 decision. Because some food served in Ollie's Barbecue originated out of state, the U.S. Supreme Court held that Congress had the power, under the Commerce Clause, to ban racial segregation in the restaurant.

*WEBSITE- Here is a website that might be helpful*

<http://www.answers.com/topic/heart-of-atlanta-motel-v-united-states>

---

## Links / Bibliography

[Home](#)

[Question](#)

[Facts / Issues](#)

[Conclusions](#)

[Images](#)

[Map](#)

[Relating  
Cases /  
Appeals](#)

[Links /  
Bibliography](#)

[Chronology](#)

[Full Case /  
Opinions](#)

Answers.com. <http://www.answers.com/topic/heart-of-atlanta-motel-united-states> 14 Apr 2010

CNN. <http://www.cnn.com/EVENTS/1997/mlk/links.html> -17 Jun 2010

Google Images. [www.google.com](http://www.google.com).—25 Apr 2010

Heart of Atlanta Motel v. U.S. , 379 U.S. 241 (1964)

J-Rank Law Website. [Heart of Atlanta Motel v. United States - Significance http://law.jrank.org/pages/24309/Heart-Atlanta-Motel-v-United-States-Significance.html#ixzz0mEgeWFSy](http://law.jrank.org/pages/24309/Heart-Atlanta-Motel-v-United-States-Significance.html#ixzz0mEgeWFSy) - 25 Apr 2010

OYEZ. [www.oyez.org/cases/1960-1969/1964/1964\\_515](http://www.oyez.org/cases/1960-1969/1964/1964_515) - 01 Apr 2010

UMKC School of Law. <http://www.law.umkc.edu/faculty/projects/ftrials/conlaw/heartofatlanta.html> - 17 Jun 2010





## Chronology

[Home](#)

[Question](#)

[Facts / Issues](#)

[Conclusions](#)

[Images](#)

[Map](#)

[Relating  
Cases /  
Appeals](#)

[Links /  
Bibliography](#)

[Chronology](#)

[Full Case /  
Opinions](#)

The following events occurred during the Civil Rights Movement prior to 1963. Each of the events help to establish the context of this case.

**1954** -- U.S. Supreme Court rules school segregation based on race to against the U.S. Constitution in *Brown v. Board of Education of Topeka*. - *This case helps to set a precedent that ALL public services cannot be based on race-even though public schools are different in that public education is compulsory by law and funded by tax dollars, the notion that public services should be equal plays into this suit*

**1955** -- Rosa Parks refuses to move to the back of a Montgomery, Alabama, bus as required by city ordinance; boycott follows and bus segregation ordinance is declared unconstitutional.

Federal Interstate Commerce Commission bans segregation on interstate trains and buses.- *This case also helps to set a precedent that ALL public services cannot be based on race-unlike the Brown case, transportation is not compulsory by law. Even though the FICC bans segregation federally, this case helps to establish that separate but equal is unconstitutional.*

**1957** -- Arkansas Gov. Orval Rubus uses National Guard to block nine black students from attending a Little Rock High School; following a court order, President Eisenhower sends in federal troops to ensure compliance. *A reinforcement to the Brown ruling*

**1960** -- Four black college students begin sit-ins at lunch counter of a Greensboro, North Carolina, restaurant where black patrons are not served. Congress approves a watered-down voting rights act after a filibuster by Southern senators. *Although watered-down, the voting rights act comes on the heels of the protests of unequal service at lunch counters such as Woolworth's. By instituting a voting rights bill, further segregations would be difficult as blacks further and further their equality on a federal level. This also shows the trickle down of more and more public services becoming desegregated.*

**1961** -- Freedom Rides begin from Washington, D.C., into Southern states.

**1962** -- President Kennedy sends federal troops to the University of Mississippi to quell riots so that James Meredith, the school's first black student, can attend. The Supreme Court rules that segregation is unconstitutional in all transportation facilities.

The Department of Defense orders full integration of military reserve units, the National Guard excluded.

**1964** -- *Heart of Atlanta v United States* After the passage of the Civil Rights Act of 1964, *Heart of Atlanta v United States* is the first major and glaring challenge to the Act.



## Full Case / Opinion

[Home](#)

[Question](#)

[Facts / Issues](#)

[Conclusions](#)

[Images](#)

[Map](#)

[Relating  
Cases /  
Appeals](#)

[Links /  
Bibliography](#)

[Chronology](#)

[Full Case /  
Opinions](#)

Read the Full Case using the link below:

<http://supreme.justia.com/us/379/241/case.html>

Read the Opinions of each Justice for the case using the link below:

[http://www.law.cornell.edu/supct/html/historics/USSC\\_CR\\_0379\\_0241\\_ZS.html](http://www.law.cornell.edu/supct/html/historics/USSC_CR_0379_0241_ZS.html)

