

OPPOSITION TO CHINESE EXCLUSION (1850-1902)

By Edward O'Mahony



Photo of the Chin Quan Chan family from the Seattle District, Chinese Exclusion Act Case Files. Applications to Reenter circa 1911. Source: National Archives Catalog at <https://tinyurl.com/2p8np8y3>.

In the nineteenth and early twentieth century, there was considerable hostility towards Chinese immigrants in the United States, culminating in the Chinese Exclusion Act (1882) and subsequent legislation. Nevertheless, during the period 1850–1943, many individuals and groups opposed Chinese exclusion and anti-Chinese discrimination. They did so for various reasons, including commercial and religious interests, but also because of an idealistic adherence to American republican values.

In 1849, thousands of Chinese migrants arrived in California to take part in the Gold Rush. In December 1849, a *huiguan*, or Chinese mutual-aid society, was established in San Francisco to help the new immigrants adjust to life in America. The *huiguan*, which were organized and led by the local Chinese merchant community, helped recent Chinese immigrants find jobs and acquire accommodation. They also acted as post offices, enabling immigrants to send and receive letters, and they provided a place where Chinese immigrants would meet and socialize. The *huiguan* also provided medical services for sick immigrants, and they would arrange the transportation of dead Chinese immigrants to their home towns.¹

Many employers in California encouraged Chinese immigration, because it provided a stable and relatively cheap workforce. The majority of Chinese immigrants were recruited by American and British labor brokers to meet this demand. However, by the early 1850s, a strong anti-Chinese movement began to develop among white American workers, who saw the Chinese as a threat to their livelihoods.

In 1852, Governor John Bigler asked the California Assembly to pass laws to stop Chinese immigration. Bigler argued that the Chinese could not be assimilated for racial and cultural reasons, and that they were therefore incapable of becoming good citizens. In response, two senior leaders of the *huiguan*, Norman Asing (a naturalized US citizen) and Tang Yazhi responded with open letters in local English-language newspapers. They both argued that the Chinese, particularly Chinese merchants, made substantial contributions to the California economy, and they both stressed the importance of trade between China and the United States.²

One of the first white American supporters of the Chinese was a former Presbyterian missionary in China named William Speer. In 1852, Speer established a mission church, school, and medical clinic for the Chinese community in San Francisco. He subsequently published a widely distributed pamphlet called *China and California*:



Chinese gold miners working alongside white miners at Auburn Ravine in central California, 1852. Source: *Britannica* at <https://tinyurl.com/ycxmb25>.



Governor John Bigler 1805–1871). Source: Wikipedia at <https://tinyurl.com/2p9fpwkr>.

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Their Relations Past and Present, in which he emphasized the historical achievements of the Chinese and discussed the enormous benefits of trade with China. The Presbyterians shared the general view of American Protestants that the United States had been given a special duty to help convert Chinese immigrants so that they could serve as missionaries in their own country. Protestant ministers and California businessmen were the main public supporters of the Chinese in California.

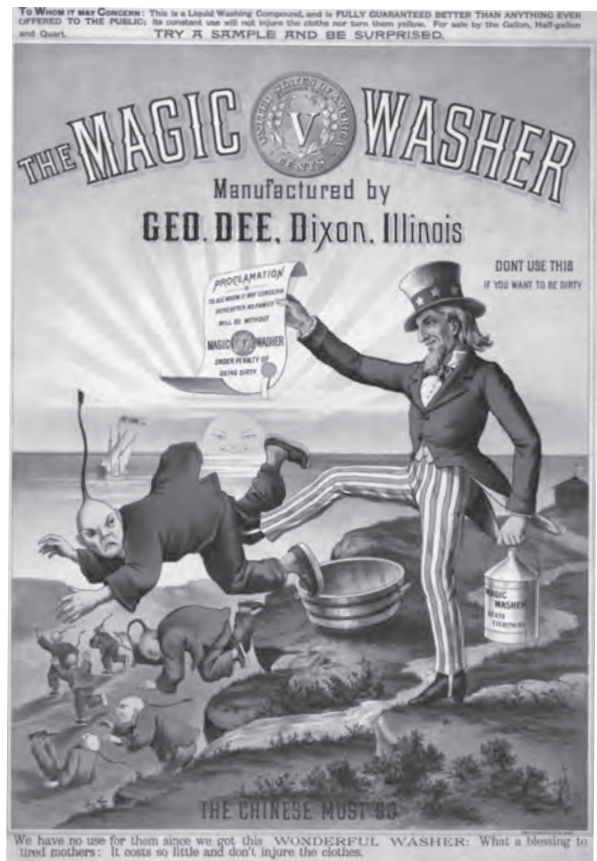
The Chinese huiguan also took steps to reform their own community in reaction to criticism from white Americans. In 1853, at a public meeting attended by William Speer and Norman Asing, the huiguan undertook to create a Chinese hospital, appointed an official to regulate hygiene within the Chinese districts, and took steps to try and eliminate gambling and prostitution in their community. The huiguan also took steps to try and discourage Chinese immigration, in an attempt to reduce anti-Chinese sentiment. They published letters in Hong King newspapers that emphasized the growing hostility of Americans towards the Chinese, and there is some evidence that this did lead to a reduction in Chinese immigration in the 1850s.

The hostility towards the Chinese often resulted in violence. The situation was exacerbated by the case of *People v. Hall* (1854). In 1853, a white miner named George Hall robbed one Chinese miner and killed another. Based on the testimony of several Chinese witnesses, Hall was arrested and sentenced to hang. However, the California Supreme Court declared that the testimony of Chinese people could not be used against white defendants, and Hall was released. This effectively meant that there were now almost no legal protections for the Chinese, and assaults on the Chinese community continued unabated throughout the 1850s.

As the gold fields petered out, many Chinese became agricultural laborers. As a result, the Chinese population began to spread throughout California and into neighboring states. Violence and harassment of the Chinese continued, however, and in 1860 the major huiguan merged to form one organization for their common protection. Officially called the Zhonghua Huiguan (Chinese Consolidated Benevolent Association), it became better known as the Six Companies.



Officers of the Chinese Six Companies (Chinese Consolidated Benevolent Association). This image is in the collection of the UC Berkeley, Bancroft Library. Source: Online Archive of California at <https://tinyurl.com/mr2w37xd>.



An anti-Chinese ad for a washing machine company from 1886. Source: Wikimedia Commons at <https://tinyurl.com/mryhcscha>.



Norman Speer (1822–1904). Source: The Log College Press at <https://tinyurl.com/2p992ydw>.

The Burlingame Treaty and earlier court cases made it practically impossible for California to ban or interfere with Chinese immigration.



The Honorable Anson Burlingame, Ambassador of the Chinese Empire, with the members of his legation. *The Illustrated London News*, supplement, Oct. 3, 1868, pg. 325. Source: The New York Public Library Digital Collections at <https://tinyurl.com/bdd8uynt>.



Chinese railroad workers on the transcontinental railroad. Source: *KUER BBC World Service* article, "Remembering Chinese Laborers 145 Years Later" by Andrea Smardon at <https://tinyurl.com/pjw6mezd>.

The Six Companies became the main lobbyist for all the Chinese in the United States. It also established close connections with the Chinese government. In 1867, the former American minister to China, Anson Burlingame, was hired to serve as a plenipotentiary for the Chinese government. This position gave Burlingame full authority to sign treaties and similar agreements. The Burlingame Treaty (1868) placed the Chinese on the same level as other nationalities with regards to trade, immigration, travel, and residence. Although it did not provide the Chinese with the right to be naturalized, the treaty did grant the Chinese coverage under the equal protection clause of the Fourteenth Amendment. All of these elements reflected the input of the Six Companies, and it used the treaty to test the constitutionality of anti-Chinese legislation.

The Burlingame Treaty was to a certain extent a reflection of the growth of the Chinese community in the United States. This community had seen a huge expansion in the mid-1860s, when the Central Pacific Railroad had hired thousands of Chinese workers to help build the transcontinental railroad. This resulted in a renewed rise in anti-Chinese sentiment, which was exacerbated even more by the depression of 1873-1877. The Burlingame Treaty and earlier court cases made it practically impossible for California to ban or interfere with Chinese immigration. The anti-Chinese movement therefore changed tactics and began to focus much more on so-called moral issues, specifically prostitution, polygamy, and coolie labor, all of which were regarded as forms of slavery.



Chinese workers on the construction of a hugh trestle for the transcontinental railroad. Source: Screen capture from the short documentary, *The Work of Giants*. Source: YouTube at <https://tinyurl.com/3a5yp2wb>.

Part of this shift may also have reflected changes in the Chinese community in the United States. Like many other immigrant groups, the Chinese community had originally consisted primarily of men. By the 1860s, many of these men had become established in the United States, and they began to send for their wives and children to join them. Unmarried Chinese men would temporarily return to China to obtain a wife and bring her to the United States. The presence of women and children effectively meant that the Chinese community would become permanent and expand. This was unacceptable to the anti-Chinese movement.

As noted above, the supposed dangers of Chinese prostitution to white Americans through the spread of disease became one of the main arguments used against the Chinese population in the United States. There were also widespread allegations that the prostitutes were effectively slaves, an incendiary claim during the Civil War era. Part of the reason for this belief was a misunderstanding of the *mui tsai* system (bonded domestic servants). In this system, which had a long tradition in China, poor families would sell their daughters for a period of four to five years. These women would work as domestic servants, courtesans, or prostitutes, depending on the wishes

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of the contract owners. After they finished their terms of service, the women could do whatever they wanted, and many either became servants or married local Chinese men. Although undoubtedly degrading, this system was a form of indentured servitude rather than slavery.³

In 1869, Rev. Augustus Loomis attempted to clarify this situation for other Americans in an article he published in the *Overland Monthly*. Loomis had succeeded Speer as head of the Presbyterian mission in San Francisco, and he had very close ties to the Chinese community. In the article, Loomis explained how the contract system worked and insisted that most of the women left prostitution and got married through a process called “returning to virtue.”⁴ The Chinese did not regard prostitutes “as ‘fallen women,’ but as daughters who obeyed the wishes of the family.”⁵ This viewpoint, and the extreme shortage of Chinese women in the United States, meant that former prostitutes had little trouble obtaining husbands.

Nevertheless, the Six Companies recognized the danger to the Chinese community posed by the existence of Chinese prostitution. It repeatedly took legal action against Chinese prostitutes and the Tong criminal gangs that controlled the industry. As a result, numerous Chinese prostitutes were arrested and deported. This did not stop the anti-Chinese movement. In 1870, California passed legislation against Chinese prostitutes and coolie labor, arguing that they were both examples of slavery. These restrictions were later incorporated into California’s 1874 Immigration Act, which imposed steep fines for a violation of the law. The 1874 immigration law was successfully contested by the Six Companies in two significant legal cases, *In re Ah Fong* (1874) and *Chy Lung v. Freeman* (1876).

Ah Fong was a woman ordered by port authorities in San Francisco to be deported as a possible prostitute. She filed for habeas corpus in federal court with the assistance of the Six Companies. The case was heard before three federal judges, including Supreme Court Justice Stephen Field, who was riding circuit in San Francisco. The court struck down the California law on the basis that it undermined the federal government’s power over immigration. Even more importantly, Justice Field stated that the law violated the 1870 Civil Rights Act on due process grounds, because it treated the Chinese as different from other immigrants. At the same time, Field made clear his moral support of the anti-Chinese movement and his animosity towards the Chinese, and he called on Congress to address the issue.

The Page Act (1875), which was the first federal law to limit immigration and specifically barred Chinese prostitutes, should be seen, in part, as a response to the decision of *In re Ah Fong* (1874). A second major element in its passage was the changing political environment in the country. In 1874, Democrats took control of the House of Representatives for the first time since the Civil War. Although Republicans maintained



“The Chinese Question” by Thomas Nast for *Harper’s Weekly*, Feb. 2, 1871. Features Columbia (symbol of America), protecting the Chinese. A full-page cartoon published in *Harper’s Weekly*, February 18, 1871. Source: Thomas Nast Cartoons at <https://tinyurl.com/7yv3uyz6>.

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control of the Senate, their majority was significantly narrowed. This event made the party wary of losing any more support.

About a year after the passage of the Page Act, the Supreme Court gave its decision in the case of *Chy Lung v. Freeman* (1876). In its ruling, the Supreme Court upheld the federal court's decision in *In re Ah Fong* and struck down the California Immigration Act (1874). However, this decision should not be seen as mandating the equal treatment of the Chinese in California. Instead, it reinforced federal control over immigration and thereby effectively strengthened the power of the Page Act, which in many respects was significantly harsher than the California statutes.

These cases, however, had attracted national attention. In 1876, Congress established a joint commission to investigate Chinese immigration. The committee chairman, Senator Oliver P. Morton of Indiana, asked California businessman Frederick A. Bee, to represent the interests of the Chinese. Bee had arrived in California during the Gold Rush, during which he was favorably impressed with the work ethic of the Chinese. Subsequently, a California lawyer named Benjamin Brooks volunteered to work with Bee.

Both men argued that Chinese labor was vital for the development of the California's economy, particularly its agricultural sector. They also argued that much of the opposition to the Chinese came from a violent section of the working class who threatened not only the Chinese, but also "property and the established civil order."⁶ These were views that were also expressed by many other businessmen during the committee's hearings, many of whom were invited to testify by Bee.

In its report, the commission recognized the beneficial aspects of Chinese immigration. However, in its conclusion it firmly came down on the side of the anti-Chinese movement, and it called for modifications to the Burlingame Treaty.⁷ These calls were reinforced by President Hayes's support for such measures in an address he gave to Congress in January 1878. This ultimately resulted in the Angell Treaty (1880), which allowed the United States to place limits on the immigration of Chinese laborers, while protecting the Chinese currently living in the United States.

One other key factor in this move towards further restrictions on Chinese immigration was the influence of the California Workingmen's Party (WPC). This organization arose as a response to the Great Railway Strike in 1877, but it soon moved from anti-capitalist agitation to an anti-Chinese platform under the leadership of an Irish immigrant named Dennis Kearney. However, the rise of the WPC had alarmed the business class in California, and Kearney was regularly imprisoned for making threatening speeches against both the Chinese and the wealthy, and the organization eventually declined.

However, the WPC did have a significant effect on national politics by helping strengthen Democratic cohesion while splitting the Republican Party. At the time, the Democratic Party was dominated by Southern Redeemers and Irish immigrants, who shared a dislike for both blacks and Chinese. For Republicans, however, the issue struck at the heart of their party's ideology. Throughout the 1860s and 1870s, Republicans had played a major role in freeing the slaves and later trying to give civil rights to the freedmen. The issue divided the Republican Party between its western supporters, who tended to be anti-Chinese, and the New Englanders.⁸

Senators such as Henry Dawes of Massachusetts argued strenuously that discrimination against Chinese workers not only violated the party's tradition of support for civil rights, but also represented a threat to American trade with China. These views were shared by many Eastern Republicans, most notably the writer Mark Twain and the cartoonist Thomas Nast, who exposed much of the hypocrisy of the anti-Chinese movement in his cartoons in *Harper's Weekly*.⁹

Despite this opposition, many Republicans were worried that the party could lose California's electoral votes if they did not address the issue. It is probably no coincidence that the Chinese Exclusion Bill was introduced by Senator John Miller and Representative Horace Page, both Republicans from California. The Chinese Exclusion Act (1882) was the first major immigration law aimed at a specific nationality or ethnic group. It banned the immigration of Chinese laborers and their families for ten years. Most importantly, it excluded all Chinese immigrants from US citizenship, and any Chinese who temporarily left the United States (for example to marry) had to obtain a certificate of residence to allow re-entry.

What is notable, however, about this law is what it did not do. It did not expel Chinese laborers, although its restrictions did ultimately result in a significant decline in the Chinese population. It also allowed Chinese merchants, students, professionals, and diplomats continued free access to the United States. It also did not interfere with Chinese merchants, which kept trade with China alive. It was also only supposed to last for ten years, which gave hope to the bill's opponents that the restrictions would eventually be lifted.

The weaknesses of the Chinese Exclusion Act soon became obvious to the opponents of Chinese immigration. In 1888, the United States signed a new treaty with the Chinese government that would have extended the ban against Chinese laborers to twenty years. The Six Companies issued strenuous protests



"A Matter of Taste," full-page cartoon by Thomas Nast for the March 15th, 1879 issue of *Harper's Weekly*. In this full-page cartoon, a Chinese merchant has stopped at the entry of "Kearney's Senatorial Restaurant." Politicians dine at a "Table Reserved for Presidential Candidates" and eat from "A Mess of Sand-Lot Pottage." Blaine, a Republican senator from Maine, scoops up a heaping spoonful of Kearney's sandy stew. The sight sickens the merchant as he grabs his hands to his stomach in disgust. A sign hovers over the inner wall, "Hoodlum Stew." Source: *Thomas Nast Cartoons* at <https://tinyurl.com/2p9cxtfp>.



Frederick Bee. Source: Frderick Bee photography at <https://tinyurl.com/5n6rwp5>.

against this new treaty. Many of its merchants relied on Chinese laborers for their business. The treaty was ultimately rejected by the Chinese government. In response, Congress passed the *Scott Act* (1888), which expanded on the Chinese Exclusion Act by forbidding the re-entry of Chinese laborers who had temporarily left the United States. In 1892, the Geary Act extended the Chinese Exclusion Act for another ten years.

During this time, opposition to the Chinese Exclusion Act was relatively subdued. The Angell Treaty (1880), which had permitted restrictions on Chinese immigration, had incorporated significant recommendations from the Six Companies. This was because the Six Companies was more interested in protecting the existing Chinese communities than in encouraging further immigration.

However, the Six Companies and the Chinese legation to the United States were adamant that the US government had to provide protection for Chinese residents in America.

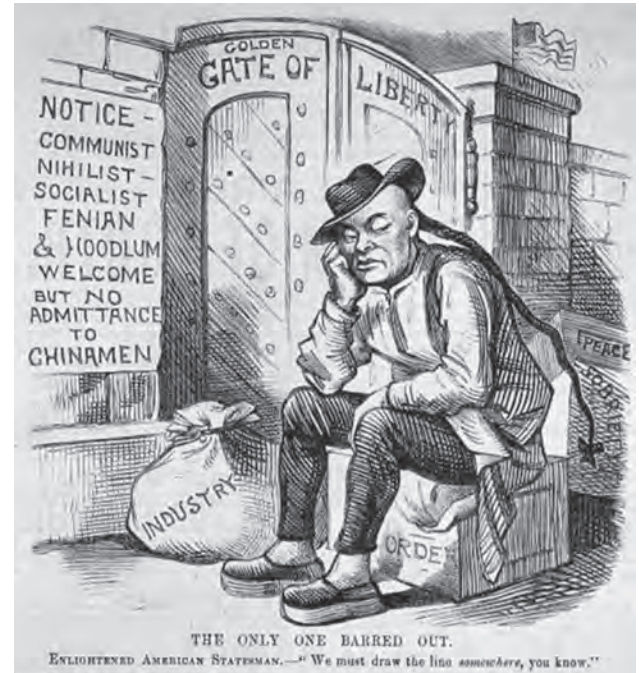
In particular, they started demanding reparations for the deaths and destruction caused during anti-Chinese riots. Frederick Bee, who had been appointed the Chinese Consul in San Francisco in 1879, took the lead in demanding compensation for these attacks. Bee pointed out that China had reimbursed the United States for Chinese attacks on American missionaries and businessmen. President Cleveland successfully pressured Congress into paying all the money demanded by the Chinese.

The Six Companies also provided legal and financial assistance to Chinese individuals wrongly prohibited from landing in the United States by immigration authorities under the Chinese Exclusion Act. Between 1882 and 1890, a total of 7,080 petitions challenging these decisions were filed in federal courts, leading to reversals in 85 to 90 percent of the cases. In 1891, however, Congress eliminated this loophole by making the decisions of the federal immigration officers final. The following year, in *Nishimura Ekiu v. United States* (1892), the US Supreme Court reiterated its support of Congress's plenary power by upholding the power of Congress to forbid judicial review in immigration cases.

The Six Companies also played a major role in fighting against the Scott Act, which it regarded as an abrogation of the Angell Treaty. The organization raised over \$100,000 to test the constitutionality of the act in the case of *Chae Chan-pin v. United States* (1889). In this case, the Supreme Court agreed that the Scott Act did violate the Angell Treaty, but it was nevertheless constitutional because Congress had the plenary power to exclude aliens of any nationality from US territory. This was an enormous setback for the Chinese community, made worse by the Supreme Court's subsequent decision in *Fong Yue Ting v. United States* (1893). In this case, the court "held that aliens reside in the United States under the absolute authority of Congress to expel them whenever it feels their removal is necessary."¹⁰ These two cases made the position of Chinese residents in the United States extremely precarious.

The case of *Chae Chan Pin v. United States* alarmed many members of the American business community who were worried that it would lead to retaliation by the Chinese government or people. Despite calls for negotiations, Congress passed the Geary Act in 1892, which banned all Chinese except diplomats and their servants from entry into the United States. It also required all Chinese residents in the United States to register with American authorities and to carry a resident permit. This act was in part designed to prevent Chinese migrants from illegally crossing into the United States from Mexico or Canada, although it was not particularly effective.

Despite all these efforts, the Chinese community in the United States gradually went into decline, and with it, the power and resources of the Six Companies.



Chinese man being excluded from entry to the United States. Source: Wikimedia Commons at <https://tinyurl.com/2p8vzbkx>.

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The Chinese government and various organizations vociferously objected to the Geary Act. Ironically, the act provided a way for the Chinese community to evade the exclusion laws. Once a Chinese resident was registered, he could travel back to China and return with his family. This created the system of paper sons, whereby a registered Chinese resident would be paid to smuggle a young Chinese man into the United States as one of his sons. In 1895, the Supreme Court ruled in the case of *United States v. Wong Kim Ark* (1898) that Chinese individuals born in the United States were automatically US citizens under the terms of the Fourteenth Amendment. This case provided some stability to the Chinese community in the United States, but it also created a small cottage industry that created false biographies for Chinese migrants trying to enter the United States as citizens. The fire that destroyed much of San Francisco in 1906 was particularly fortuitous, as it destroyed many of the birth records of the Chinese in California, making fraudulent claims that much easier.

Despite all these efforts, the Chinese community in the United States gradually went into decline, and with it, the power and resources of the Six Companies. The 1890s also witnessed a severe decline in the power of the Chinese government, as it became subject to European and Japanese

imperialism. All of these factors effectively meant that the US government essentially stopped caring about the opinion of the Chinese government. As a result, in 1902, the Chinese Exclusion Act was extended indefinitely.

Although these laws were aimed specifically at the Chinese, they served as models for many of the subsequent immigration laws enacted by the US government in the first part of the twentieth century. The Immigration Act of 1891 created a federal office of immigration to regulate the arrival of immigrants at the main ports of entry. This was followed the next year by the establishment of Ellis Island in New York Harbor in 1892, which served as the main processing center for European immigrants. Under the 1891 act, people who were diseased or had a criminal background were prevented from entering and subsequently deported. A similar center was established in Angel Island in San Francisco in 1910 for immigrants from Asia.

In 1907, President Theodore Roosevelt signed a Gentlemen's Agreement with Japan, substantially curtailing Japanese immigration. This was followed ten years later by the Immigration Act of 1917, also known as the Asiatic Barred Zone Act, which barred immigration from most countries in the Asia-Pacific region. Limitations were also placed on other unwanted nationalities, most notably Europeans from eastern and southern Europe in the Emergency Quota Act of 1921 and the Immigration Act of 1924. The subsequent 1929 Great Depression effectively ended almost all immigration to the United States.

World War II changed the situation. The Chinese Exclusion Act became an embarrassment when the United States entered the war against Japan, Germany, and Italy. China was now a US ally. In 1943, the Magnusen Act repealed the Chinese Exclusion Act and allowed very small numbers of Chinese to immigrate to America. Twenty years later, the Immigration and Nationality Act (1965) abolished the 1920s immigration laws and replaced them with a system that emphasized skilled immigrants and family reunification. Since then, the Chinese-American population has expanded to about 5 million people, about a quarter of all Asian-Americans, but still only 1.5 percent of the US population. In 2011 and 2012, the US Senate and the US House of Representatives formally passed resolutions expressing regret for the passage of the Chinese Exclusion Act. ♦

The Immigration Act of 1924

The Immigration Act of 1924 limited the number of immigrants allowed entry into the United States through a national origins quota. The quota provided immigration visas to two percent of the total number of people of each nationality in the United States as of the 1890 national census. It completely excluded immigrants from Asia.

In 1917, the US Congress enacted the first widely restrictive immigration law. The uncertainty generated over national security during World War I made it possible for Congress to pass this legislation, and it included several important provisions that paved the way for the 1924 Act. The 1917 Act implemented a literacy test that required immigrants over 16 years old to demonstrate basic reading comprehension in any language. It also increased the tax paid by new immigrants upon arrival and allowed immigration officials to exercise more discretion in making decisions over whom to exclude. Finally, the Act excluded from entry anyone born in a geographically defined "Asiatic Barred Zone" except for Japanese and Filipinos. In 1907, the Japanese Government had voluntarily limited Japanese immigration to the United States in the Gentlemen's Agreement. The Philippines was a US colony, so its citizens were US nationals and could travel freely to the United States. China was not included in the Barred Zone, but the Chinese were already denied immigration visas under the Chinese Exclusion Act.

In all of its parts, the most basic purpose of the 1924 Immigration Act was to preserve the ideal of US homogeneity. Congress revised the Act in 1952.

NOTES

1. Yucheng Qin, *The Diplomacy of Nationalism: The Six Companies and China's Policy Toward Exclusion* (Honolulu, Hawaii: University of Hawaii Press, 2009), 27.
2. Norman Asing, "To His Excellency Governor Bigler (1852)" in *Chinese American Voices: From the Gold Rush to the Present*, ed. Judy Yung, Gordon H. Chang, and Him Mark Lai (Berkeley: University of California Press, 2006), 9.
3. Elizabeth Sinn, *Pacific Crossing: California Gold, Chinese Migration, and the Making of Hong Kong* (Hong Kong: Hong Kong University Press, 2013), 219–221.
4. A. W. Loomis, "Chinese Women in California," *The Overland Monthly*, vol. 2 (San Francisco: A. Roman & Company, 1869), 348.
5. Lucie Cheng Hirata, "Free, Indentured, Enslaved: Chinese Prostitutes in Nineteenth-Century America," *Signs* 5, no. 1 (1979): 19.
6. Charles J. McClain, *In Search of Equality: The Chinese Struggle Against Discrimination in Nineteenth-Century America* (Berkeley: University of California Press, 1994), 65.
7. *Report of the Joint Special Committee to Investigate Chinese Immigration: February 27, 1877* (Washington DC: Government Publishing Office, 1877), v–vi.
8. Jungkun Seo, "Wedge-issue Dynamics and Party Position Shifts: Chinese Exclusion Debates in the Post-Reconstruction US Congress, 1879–1882" *Party Politics* 17, no. 6: 823–830.
9. Wenxian Zhang, "Standing Up Against Racial Discrimination: Progressive Americans and the Chinese Exclusion Act in the Late Nineteenth Century," *Phylon* 56, no. 1 (2019): 15–23.
10. Polly J. Price, "A 'Chinese Wall' at the Nation's Borders: Justice Stephen Field and The Chinese Exclusion Case," *Journal of Supreme Court History* 43, no. 1 (2018): 13–14.

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