# **Anti-Immigration Politics Pre Trump**

"I Know Nothing": Faith, Fear, and Politics in Antebellum America

## By Emily Sosolik

Let our opponents torture and distort the truth as they may, no specious reasoning, no political sophistry can alter the fact that those who are constantly laboring to fight down Americanism and Protestantism are enemies of their country, and tories or traitors of their native land.

— The Know Nothing Almanac and True Americans' Manual for 1856

he fear of the other has manifested wildly and destructively throughout America's political history. In antebellum America, adult male Apolo America at the political history. political history. In antebellum America, adult male Anglo-Americans saw many groups as "others"—African Americans, Native Americans, women—and this fear often was intimately tied to the belief that white native-born Americans should be treated better than immigrants, a concept known as nativism. One group in particular caused such fears to run wild: Irish and German Catholic immigrants. While nativist, anti-Catholic sentiment had been present in America since the arrival of the first Protestant English settlers, the arrival of more than 5 million immigrants (many of them Irish and German Catholics) during the forty years leading up to the Civil War induced a fitful, breathless panic among Anglo-American Protestants. As the immigrants arrived in unprecedented numbers and dramatically altered the country's labor force and religious landscape, not only were nativist fears stirred, but anti-Catholic sentiment reached new heights and began to make itself felt in the political sphere. As the fear of the other collided with politics, the result was an aggressive brand of political nativism—groups determined to enact legislation to limit the participation of the "ill-equipped" Catholic immigrants in the government, a notion that eventually found expression in the infamous Know Nothing Party. Tracing the evolution of citizenship, the national identity, and the influx of Catholics during the "Second Wave" of immigration in antebellum America, it becomes apparent that the nativist, anti-Catholic response embodied by the Know Nothing Party was a reaction to tectonic shifts occurring in American society at large. As the country's foundation lurched under the pressure of this Second Wave, the "other" religion of the newcomers became a point of contention.

Emily Sosolik is a graduate student in the History M.A. program at Arizona State University (ASU). She obtained a Master of Liberal Studies, as well as bachelor's degrees in world history and political science, from ASU, and she will attend the Michigan State University College of Law this fall. Her research interests include the history of political thought, American religious traditions, and the intersection of religion and law in American history. See her previous Zeteo article: Woman, Wake Up! Know your Rights.

### "A New Race of Men": Becoming American

The irony of the "fear of the other" in antebellum America should not be overlooked. Since America's formation, the country boasted an exceptionally ethnically diverse population. The 1790 census, for instance, recorded people of English, African, German, Scotch-Irish, Irish, Welsh, Scotch, French, and, of course, indigenous descent. In response to this diversity, the forging of America's national identity and the concept of citizenship often were coupled with an expectation of being "made" into an American: Americans had to shed the unenlightened ways of the Old World and be born again as free members of the republic. This sentiment was famously captured by J. Hector St. John de Crèvecoeur in1782, whose statements helped birth the "melting pot" image of America known today:

He is an American, who, leaving behind him all his ancient prejudices and manners, receives new ones from the new mode of life he has embraced, the new government he obeys, and the new rank he holds. . . . Here individuals of all nations are melted into a new race of men, whose labours and posterity will one day cause great changes in the world.<sup>2</sup>

Especially after the success of the Revolution, America's national identity was marked by positivity, newness, and future orientation—all notions that had Protestant features.<sup>3</sup>

In the eyes of Anglo-American Protestants, Catholicism, with its complicated traditions and rigid hierarchy, directly challenged these notions. Since colonial times, Anglo-American Protestants had labeled Catholicism "a foreign device," a shadowy, superstitious creed controlled by the Pope, opposed to democracy, and perpetuated through mysticism and ignorance. Although both Protestantism and Catholicism were branches of Christianity, the differences between them were considered irreconcilable. The worship of Mother Mary, the leadership of the Pope, infant baptism, the doctrine of transubstantiation—Protestants considered all of these Catholic teachings not only misguided but heretical.<sup>4</sup> Accordingly, "making" a Catholic into a true American would be a difficult task.

Despite the anti-Catholic sentiment of colonial times, citizenship in the early republic did not exclude Catholics. The Articles of Confederation, ratified in 1781, did not address the standards of citizenship, only mentioning that free inhabitants of each state would be protected and have the same privileges in other states. The Constitution drew clearer lines, making distinctions between native-born and naturalized citizens and specifically stating that

<sup>&</sup>lt;sup>1</sup> Roger Daniels, Coming to America: A History of Immigration and Ethnicity in American Life (New York: HarperCollins, 2002), 31; Jon Gjerde, ed., Major Problems in American Immigration and Ethnic History (Boston: Houghton Mifflin Company, 1998), 151.

<sup>&</sup>lt;sup>2</sup> J. Hector St. John de Crèvecoeur, "What Is an American?" in *Major Problems in American Immigration and Ethnic History*, ed. Jon Gjerde (Boston: Houghton Mifflin Company, 1998), 76.

<sup>&</sup>lt;sup>3</sup> Daniels, Coming to America, 117.

<sup>&</sup>lt;sup>4</sup> Tyler Anbinder, The Ideology of the Know Nothing Party (1994) in Major Problems in American Immigration and Ethnic History, ed. Jon Gjerde (Boston: Houghton Mifflin Company, 1998), 152.

Congress had the power "to establish an uniform Rule of Naturalization." Not until the first Congress passed the Naturalization Act of 1790 was the issue directly addressed. The act stated that "free white persons" could become citizens in court after residing in America for two years, which was extended to five years in 1795 and preserved in the Naturalization Law of 1802.<sup>5</sup> For free white males (including Catholic immigrants), this was a generous statute but one that set the stage for strife as the country became more heterogeneous. By the advent of the Second Wave of immigration, America continued to look less like a melting pot and more like a mosaic in which immigrants retained their past identities, which in turn fanned the flames of nativist fears.

### "The Open Foe of Progress": Catholic Immigrants in the Second Wave

While Catholics had been a very significant minority in America's Protestant-heavy religious landscape after the American Revolution, the Second Wave of immigration from the 1820s to the Civil War changed this. Spurred on by home-country overcrowding, political upheaval, and natural disasters (most notably the Irish potato famine of 1845), Irish and German Catholic immigrants flooded the United States during this time. The arrival of the Catholic newcomers had profound economic, political, and religious impacts.

Most significantly, Second Wave immigrants started to change the face of the labor force. Immigrants flocked to cities and the agricultural Middle West, taking jobs at factories and establishing farms. With more laborers who would work longer for less, workplace competition intensified, the status of American workingman declined, and wages were lowered. Immigrants who did not work in industry pushed into the western frontier, occupying large swaths of land and becoming farmers and homesteaders. Nearly every corner of the country felt the economic impact of their arrival: Irish immigrants typically settled in New England to work in the industrial sector, and German immigrants typically settled in the Midwest to farm. The only area in America that was somewhat insulated was

<sup>&</sup>lt;sup>5</sup> Daniels, *Coming to America*, 112-113; The Naturalization Act of 1790, United States Statutes, vol. 1, p. 103 (First Congress, Session II). The current requirement for naturalization is even easier now. You must show that you: (1) are a lawful permanent resident (LPR); that is, you have a green card, (2) have, as an LPR (or "conditional resident"), resided "continuously" in the U.S. for at least three years (if married to and living with a U.S. citizen all that time), or five years, and (3) have been actually, physically in the U.S. for at least half the required three or five years before filing your application. Source: Residency Requirements For Naturalization, by Ilona Bray; webpage consulted 2017.

<sup>&</sup>lt;sup>6</sup> Even today. Protestants remain a dominant force in the religious landscape. According to a 2014 study by the Pew Research Center, 70.6 percent of the American population identified themselves as Christians, with 46.5 percent professing attendance at a variety of churches that could be considered Protestant, and 20.8 percent professing Roman Catholic beliefs. The same study says that other religions (including Judaism, Buddhism, Hinduism, and Islam) collectively make up about 6 percent of the population.

<sup>&</sup>lt;sup>7</sup> Dale T. Knobel, *Paddy and the Republic: Ethnicity and Nationality in Antebellum America* (Middletown, Connecticut: Wesleyan University Press, 1986), xi, 4, 13.

<sup>&</sup>lt;sup>8</sup> Gjerde, ed., Major Problems in American Immigration, 133.

the South, simply because it was not as industrialized and immigrants did not want to compete with slave labor. While immigrants provided an unlimited supply of laborers for manufacturing plants and westward expansion projects like railroads, and they often took over menial tasks in the workplace, allowing some native-born Americans to advance to higher positions, few Anglo-American workingmen appreciated the competition. Plus, some worried that the presence in the workplace of what was, pejoratively, called "Romanism" would stifle the republic's burgeoning capitalist economy. Ignoring centuries of Italian, Portuguese, and Spanish exploration, trade, and conquest, New York State Senator Thomas Whitney proposed that Republicanism (and relatedly Protestantism) sent "its smoking steamships to the far ends of the earth," whereas Romanism was "the open foe of progress" and gave "no incentive to industry." This fear seemed to be confirmed when the Second Wave coincided with a painful depression, which actually was caused by widespread inflation but was blamed in part on the immigrants.

Catholic immigrants not only were competing for jobs but were quickly becoming citizens. Since the Naturalization Act of 1802 made it rather easy for free, white immigrants to become citizens, the process tended to occur rapidly, haphazardly, and sometimes fraudulently. Some immigrants voted or held office before they were naturalized. They took part in mass naturalization "ceremonies" arranged before election days by political organizations such as New York City's Tammany Hall. Some immigrants were even declared citizens by branches of the government that did not hold the power of naturalization. Such activities spoke to the corruption of the government yet immigrants often were blamed and labeled as criminals and paupers.<sup>12</sup>

Furthermore, the Catholic immigrants threatened the Protestant foundation of America's religious life and, relatedly, its national identity. Despite the fact that many Catholic immigrants were becoming citizens, many had little interest in assimilating, abandoning their beliefs, or being melted into a "new race of man." On the contrary, these immigrants, especially German Catholics in rural settlements, tried to replant their communities in America and preserve their Catholic traditions. Consequently, the Catholic Church in America grew exponentially. For instance, in the early 1800s Ohio had no Catholic churches; by the 1830s it was home to twenty-four priests and twenty-two churches, as well as having a Catholic newspaper, college, and seminary. Before this Second Wave of immigration, Anglo-Americans had viewed Catholicism mostly as an external threat, similar to the threat of Catholic French Canada. The growing presence of Irish and German Catholic immigrants, however, made them wonder if Catholicism was becoming an

<sup>9</sup> Ray Allen Billington, The Protestant Crusade, 1800-1860 (New York: The Macmillan Company, 1938), 241.

<sup>&</sup>lt;sup>10</sup> Thomas R. Whitney, A Defence of the American Policy (1856) in Major Problems in American Immigration and Ethnic History, ed. Jon Gjerde (Boston: Houghton Mifflin Company, 1998), 146.

<sup>&</sup>lt;sup>11</sup> Billington, The Protestant Crusade, 334-35; Daniels, Coming to America, 266.

<sup>&</sup>lt;sup>12</sup> Daniels, Coming to America, 109-15, 265-66.

internal threat.<sup>13</sup> Although nativism undoubtedly was spurred on by political and economic concerns, the stark religious differences between the Protestant Anglo-Americans and the Catholic newcomers did not do much to calm nativist fears. The cure, it seemed, was to protect the country from the evils of Catholicism by forcing Catholic immigrants to assimilate and by preventing them from participating in politics until this happened.

#### "Revolutions Never Go Backward": The Know Nothings Emerge

From the 1830s to the 1850s, anti-Catholic sentiment and nativism reached fever pitch. Nativists cited multiple reasons why Irish and German Catholic immigrants should be excluded from participating in the republic; all of them pointed to economic and political concerns, yet all roads led back to the immigrants' religion. The absolute government of the Catholic Church was "diametrically opposed" to the popular government of Republicanism, warned Thomas Whitney. The Catholic Church was "opposed to civil and religious liberty," and thus Catholic immigrants would force each American to "surrender his liberty, civil and religious, into the hands of foreign powers," declared the inventor Samuel F.B. Morse. Even worse, Catholic immigrants in the West would "decide our elections, perplex our policy, inflame and divide the nation, break the bond of our union, and throw down our free institutions," prophesied clergyman Lyman Beecher, father of the famous abolitionist and author Harriet Beecher Stowe. Time and time again, nativists pointed to the corrosive effects that Catholic beliefs had on rational minds. One Protestant minister proselytized in the mid-1830s:

No man, in his senses, ever believed fully and fairly, the [Catholic] doctrine of transubstantiation. [Many men] thought they believed it, but . . . their minds, in this point, were dark, and saw things that were not as they thought they were. So often do we see individuals inflicted with mental imbecility on some particular subject.<sup>15</sup>

In other words, immigrants were completely unfit to participate in a democracy because, as nativist Frederick Saunders wrote, they were "*ignorant* and in every way *incompetent*." <sup>16</sup>

Anti-Catholic propaganda continued to grow in popularity. By the 1830s, around thirty anti-Catholic religious newspapers were in circulation, and a growing number of

<sup>&</sup>lt;sup>13</sup> Knobel, Paddy and the Republic, xi-13, 134; Roger Daniels, Coming to America, 266-67; Gjerde, Major Problems in American Immigration, 112; Billington, The Protestant Crusade, 37.

<sup>&</sup>lt;sup>14</sup> Whitney, A Defence of the American Policy, 144-45; Samuel F.B. Morse, Imminent Dangers to the Free Institutions of the United States through Foreign Immigration and the Present States of the Naturalization Laws (1835) in Major Problems in American Immigration and Ethnic History, ed. Jon Gjerde (Boston: Houghton Mifflin Company, 1998), 136-37; Lyman Beecher, A Plea for the West (1835) in Major Problems in American Immigration and Ethnic History, ed. Jon Gjerde (Boston: Houghton Mifflin Company, 1998), 136.

<sup>&</sup>lt;sup>15</sup> Knobel, Paddy and the Republic, 56.

<sup>&</sup>lt;sup>16</sup> Frederick Saunders and T.B. Thorpe, *The Progress and Prospects of America* (1855) in *Major Problems in American Immigration and Ethnic History*, ed. Jon Gjerde (Boston: Houghton Mifflin Company, 1998), 141.

editorial attacks on Catholicism appeared in secular papers. Sensationalist anti-Catholic pieces sold like hot cakes, the most successful being the supposed ex-nun Maria Monk's "confession," which historians have dubbed "the Uncle Tom's Cabin of nineteenth-century anti-Catholicism." In her confession, Monk told of her time at the Hotel Dieu convent in Montreal. Her inside-look at the horrors of Catholicism included nuns being forced to have "criminal intercourse" with the priests and then "baptize and immediately strangle" any infants that resulted from their union. Her story was later debunked—Monk never had been a nun or even been inside the Hotel Dieu, and she actually was a brain-injured escapee from Montreal's Catholic Magdalen asylum—yet that did not diminish the popularity of her "confession" or its sequel. Anti-Catholic sentiment was not confined to rhetoric either, as numerous riots erupted in the 1840s and 1850s. The most dramatic incident undoubtedly was the Philadelphia Riots of 1844. After a local Catholic priest sent a letter to the Board of Controllers requesting that Catholic children use their own version of the Bible in public schools, an angry mob formed and started to burn down Irish homes and Catholic churches. The incident culminated in temporary mob rule and the death of thirteen citizens over the course of three days.<sup>18</sup>

This anti-Catholic, nativist sentiment laid the groundwork for the creation of nativist societies and their eventual involvement in American politics during the 1840s and 1850s. While the early attempts of political nativist societies were inconsistent, true success came in the form of the Order of the Star-Spangled Banner, which was established in 1849 as the American Party but was commonly known by 1853 as the "Know Nothings." The moniker was a nod to the party's notorious secrecy. When Thomas Whitney and other politicians and voters broke away from their political parties to join the nativists, they were not allowed to speak about the new organization's activities or meetings, the names of other members, or even the name of the order. Instead, when asked about their party, they were supposed to cryptically reply, "I know nothing," a tactic that was meant to keep outsiders in the dark, while the Know Nothings coordinated their political activities behind closed doors.

Despite the party's secrecy, its platform, laden with patriotic rhetoric, was on public display in the American Party's *Know Nothing Almanac and True Americans' Manual for 1855*. <sup>19</sup> In the Manual, the party traced its existence back to "the day and hour when the 'one idea' of deliverance from foreign influence, rule, and dictation, first found birth in the head and heart of a true patriot." It claimed, too, that its anti-Catholic political demands "will be

<sup>&</sup>lt;sup>17</sup> Daniels, Coming to America, 268.

<sup>&</sup>lt;sup>18</sup> Billington, *The Protestant Crusade*, 44, 101-3, 221-30; Daniels, *Coming to America*, 268; Maria Monk, *Awful Disclosures of the Hotel Dieu Nunnery of Montreal* (1836) in Major Problems in American Immigration and Ethnic History, ed. Jon Gjerde (Boston: Houghton Mifflin Company, 1998), 139-40; Knobel, *Paddy and the Republic*, 84.

<sup>&</sup>lt;sup>19</sup> Anbinder, The Ideology of the Know Nothing Party, 152; Billington, The Protestant Crusade, 193; Mark Dash, "New Light on the Dark Lantern: The Initiation Rites and Ceremonies of a Know-Nothing Lodge in Shippensburg, Pennsylvania," Pennsylvania Magazine of History and Biography, vol. CXXVII, no. 1 (January 2003), 89.

remembered with gratitude by every American."<sup>20</sup> In order to preserve the American republic, the party demanded:

- Stricter naturalization laws, including a twenty-one-year waiting period. This
  was to guarantee "the purity of the ballot-box" and to prevent foreigners
  from thrusting "their unhallowed hands into the ark of our political
  covenant."<sup>21</sup>
- A capitation tax (or a poll tax that the government would levy on individuals, regardless of income). This was to "restrain the most worthless and vicious of foreign emigrants from debarking on our shores."<sup>22</sup>
- A partition of the public domain among native-born Americans (both male and female) in quantities of 160 acres to each. This was so the land "may not be seized by the swarms of aliens" and so the American workingmen and their families would have "something to fall back upon when they are ousted from their employments by the terrible competition of pauper laborers from the Old World."<sup>23</sup>

The focus of these measures never was to restrict immigration but to severely circumscribe the political influence of unassimilated immigrants and to defend what made America American. In fact, while members of the Know Nothing Party held differing views about tariffs, homesteading, territorial expansion, government aid, and slavery, all were united over the issue of immigration and anti-Catholicism. Historian Tyler Anbinder has proposed that Know Nothing ideology can be summed up in a few, basic assumptions: Protestantism defined American society, and thus Catholicism was incompatible with basic American values; and not only had Catholics attained political power disproportionate to their numbers but current political parties and professional politicians were corrupt, which betrayed the Founding Fathers.<sup>24</sup> The Manual clearly was meant to evoke patriotic sentiment and lead the Know Nothings to rally together to stop the decay of the republic. To the Know Nothings, the noble struggle to preserve American institutions was a revolution "in public sentiment," one that carried on slowly yet surely and was immune to defeat. As the Manual declared, "Revolutions never go backward."<sup>25</sup>

<sup>&</sup>lt;sup>20</sup> Know Nothing Almanac and True Americans' Manual for 1855 (1855) in Major Problems in American Immigration and Ethnic History, ed. Jon Gjerde (Boston: Houghton Mifflin Company, 1998), 147-48.

<sup>&</sup>lt;sup>21</sup> Know Nothing Almanac, 148.

<sup>&</sup>lt;sup>22</sup> Know Nothing Almanac, 148.

<sup>&</sup>lt;sup>23</sup> Know Nothing Almanac, 148.

<sup>&</sup>lt;sup>24</sup> Tyler Anbinder, "The Ideology of the Know Nothing Party," 152-54.

<sup>&</sup>lt;sup>25</sup> Know Nothing Almanac, 147.

## "An Outbreak of Men's Passions in Another Direction": The Rise and Fall of Anti-Catholic Political Nativism

Starting on the local level and then quickly expanding into a national organization, the Know Nothing Party grew meteorically and almost instantly came to prominence during the years of 1854 and 1855—growing from forty-three members to more than 1 million. Bound by their mistrust of Catholic immigrants, members of the Know Nothing Party entered the 1854 elections more united than any other major political party in America, including the splintered Democrats and Whigs. The Know Nothings shocked the nation and won a startling number of local, state, and national elections. For instance, Know Nothings came to make up approximately 20 percent of the U.S. House of Representatives, and 376 out of 378 seats in the Massachusetts House of Representatives went to Know Nothings. When the party experienced similarly-stunning victories in 1855, the Know Nothings seemed poised to place a candidate in the White House, especially as other political parties remained fractured over the issue of slavery. *The Know Nothing Almanac of 1856* boasted, "No one, in his sane mind, can question, for a single moment, the ultimate success of the American Party." 26

However, once Know Nothing legislators were voted into office, they were able to do surprisingly little. First off, many of the Know Nothing officials were poorly trained and lacked the legislative experience necessary to enforce their demands, including the twentyone-year waiting period before naturalization. Since the majority of the party's demands interfered with freedom of religion and the rights of the states, constitutional amendments were required, and the Know Nothings did not have the political experience to navigate this process, nor did they ever hold the majority of seats in the Congress. The party's "darklantern" politics (a term that critics and historians have used to describe the party's intense secrecy) also started to catch up with the members. The public became tired of hearing "I know nothing" and became suspicious that the party was involved in some of the violent anti-Catholic riots of the early 1850s. Whether or not the party was directly involved in the riots remain a mystery, but the allegations damaged the party's reputation. For the 1856 presidential election, Millard Fillmore accepted the Know Nothing nomination after his Whig party disintegrated and he refused to join the Republicans. He captured about 25 percent of the popular vote but only one electoral vote. Considering the party's previous political victories, this was an embarrassing defeat.<sup>27</sup>

The sectional crisis put the final nail in the Know Nothing Party's coffin. The Civil War marked not only the closing of the Second Wave of immigration but the waning of the power of anti-Catholic organizations. Although the Know Nothings had successfully opened old, nativist wounds, they were defeated by their inability to offer effective solutions to the real issues facing antebellum America. The changing labor force and economic woes caused

<sup>&</sup>lt;sup>26</sup> Billington, The Protestant Crusade, 380-388; W.S. Tisdale, ed., The Know Nothing Almanac and True Americans' Manual, for 1856 (New York: DeWitt & Davenport, 1856), 17; Tyler Anbinder, Nativism and Slavery: The Northern Know Nothings and the Politics of the 1850's (New York: Oxford University Press, 1992), 50.

<sup>&</sup>lt;sup>27</sup> Billington, *The Protestant Crusade*, 412-19.

by the depression remained unaddressed, and the battle over working conditions and wages raged. The religious landscape continued to change, and the pressing issue of slavery could no longer be overlooked. As the country spiraled into a bloody and costly war over the future of slavery and the country, conspiracies about the pope trying to take over the republic or nuns having affairs with priests seemed inconsequential. As Catholic priest Father Augustus Thébaud explained in 1904, "The permanent downfall of the enemies of the [Catholic] Church in the United States resulted from an outbreak of men's passions in another direction . . . Civil War." Although the Civil War resulted in the Citizenship Clause of the Fourteenth Amendment (ratified in 1868) and led to the establishment of a standardized naturalization process, this was not the stringent, anti-Catholic naturalization process for which earlier nativists like the Know Nothings had yearned. 29

f the battle was simply to get once into office, Know Nothingism could be considered successful. Building on the anti-Catholic, nativist propaganda of the early-nineteenth century, the Know Nothings crafted a form of political nativism that successfully struck a nerve: fear of the other. The real battle, however, was delivering on the party's promises of "defending" Americanism and Protestantism against the evils of the Catholic immigrant, and the Know Nothings failed due to their inexperience and misplaced aggression. While the country certainly was undergoing significant demographic, economic, and political transformations, the party erroneously focused on "un-American" religious beliefs of Second Wave immigrants. For Anglo-Americans caught in the societal upheaval of the nineteenth century, something had to differentiate them from "the others," and Catholicism allowed such differentiation, which in turn allowed for the brief rise of Know Nothingism. In reality, the fear of Catholic immigrants deflected attention away from more vital issues: the definition of citizenship in a nation of immigrants, the nature of the national identity in a heterogeneous society, the uncomfortable effects of industrialization, the issue of slavery, and the wages and working conditions of "free labor." And once civil war broke out, anti-Catholicism became an afterthought.

Above all, the history of the rise and fall of anti-Catholic political nativism in antebellum America reveals, or recalls, how the fear of the other possesses a unique ability to galvanize and mobilize masses of people, and can also serve as a powerful distraction from the more vital concerns of a citizenry. Such fears and dynamics continue to loom over both American and world politics.

<sup>&</sup>lt;sup>28</sup> Father Augustus J. Thébaud, Forty Years in the United States of America, 1839-1885 (New York, 1904), 256-57; Daniels, Coming to America, 270-71.

<sup>&</sup>lt;sup>29</sup> The Citizenship Clause of the Fourteenth Amendment states, "All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United States and of the State wherein they reside."