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Laura Curry  
*West Virginia University*

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## **“Sweep All These Pests from Our Midst”: The Anti-Chinese Prostitution Movement, the Criminalization of Chinese Women, and the First Federal Immigration Law**

LAURA CURRY\*

Often forgotten in light of later pieces of anti-Chinese legislation, the Page Act of 1875 and the anti-Chinese prostitution movement were critical in creating a legal precedent for racially exclusionary immigration laws. Religious leaders in California aggressively campaigned against Chinese prostitution by creating rehabilitation centers for former Chinese prostitutes, investigating Chinese women arriving at the port, and focusing media attention on the issue. Concentrated specifically on Chinese prostitution, religious leaders created an implicit association between Chinese women and prostitution while ignoring the larger white prostitution trade. The potential for Chinese women to give birth to Chinese American citizens also made Chinese women a threat to America’s racial hierarchy. By branding all Chinese women as prostitutes and Chinese men as purveyors of the trade, political leaders were able to justify racially exclusionary laws barring Chinese people from the United States.

The anti-Chinese prostitution movement was critically important to the exclusion of Chinese women and the creation of racially exclusionary laws. While the anti-Chinese prostitution movement supposedly sought to end Chinese prostitution, its focus on Chinese women led to the creation of negative stereotypes that justified the exclusion of Chinese people from America. Although largely noted as ancillary to the sweeping Chinese Exclusion Act, recent scholarship has begun to reposition the anti-Chinese prostitution movement as critical to both Chinese exclusion and the history of immigration in America.<sup>1</sup> In the absence of access to California state house debates, I have used the legislation itself, newspaper coverage, and the report of the Joint Special Committee to Investigate Chinese Immigration to reveal a pattern of using Chinese prostitution to justify Chinese exclusion. The Joint Special Committee report was published after the passage of the Page Act and included testimony from law enforcement, doctors, political leaders, and religious leaders in California.

Religious leaders in California in the 1800s focused on eradicating Chinese prostitution. Their aid and advocacy generated an implicit association between Chinese women and prostitutes. The rhetoric surrounding the movement was laced with notions of American cultural supremacy and the dehumanization of Chinese people. The anti-Chinese prostitution movement created the formula for associating certain racial groups with criminality in order to pass racially exclusionary immigration laws. The success of the Page Act of 1875 signaled that lawmakers could exclude certain racial groups from America if done by relying on a supposedly neutral factor such as

\*Laura Curry graduated from West Virginia University in 2021 with a BA in history and a minor in business administration. Her research interests include the history of immigration in the United States and East African history. Laura Curry is entering law school in the fall of 2021 with the intention of becoming an immigration attorney specializing in working with refugees from East Africa.

<sup>1</sup>Scholarship includes: Kerry Abrams, “Polygamy, Prostitution, and the Federalization of Immigration Law,” *Columbia Law Review* 105, no. 3 (April 2005): 641-716; Catherine Lee, “‘Where the Danger Lies’: Race, Gender, and Chinese and Japanese Exclusion in the United States, 1870-1924,” *Sociological Forum* 25, no. 2 (June 2010): 248-71; Eithne Luibhéid, “A Blueprint for Exclusion: The Page Law, Prostitution, and Discrimination against Chinese Women,” in *Entry Denied: Controlling Sexuality at the Border* (Minneapolis: University of Minnesota Press, 2002), 31-54.

criminal status. Chinese women were targeted in part because they violated American family and gender norms. As such, Chinese women were viewed as a threat to traditional American families.

The stereotypes created by the anti-Chinese prostitution movement were used by lawmakers to prevent the immigration of Chinese women and the birth of a class of Chinese American citizens. By preventing the formation of families, lawmakers prevented the expansion of citizenship rights to a large Chinese American population. Thus, the anti-Chinese prostitution movement and the resulting legislation were critical to precluding Chinese people from acquiring political power and maintaining America's racial hierarchy as a country for white people.

Chinese immigrants first began traveling to California in large numbers due to the Gold Rush in the late 1840s. The early Chinese immigrants were almost exclusively men. These men were referred to by white Californians as "coolies." The term coolie was first used by the Portuguese in the sixteenth century to describe local workers in India. By the mid-nineteenth century the term had evolved to refer to Chinese and Indian laborers who were contracted to work on colonial plantations in the Americas and Southeast Asia.<sup>2</sup> In the American West, coolie was used to describe Chinese laborers who often worked in mines. According to American cultural understanding, a coolie was defined as "a Chinese slave."<sup>3</sup> The term reflected the belief that Chinese immigrants were slaves for the mining companies. Thus, opposition to Chinese miners, similarly to opposition to Chinese prostitution, was framed as an anti-slavery issue. Most Chinese immigrants contracted out their labor voluntarily through the "credit-ticket system."<sup>4</sup> According to the "credit-ticket system," Chinese immigrants would enter a contract to repay their debt after a certain number of years working in America.<sup>5</sup> Scholarship has debated whether Chinese immigrants were indeed unfree laborers and therefore coolies.<sup>6</sup> Rather than engage in this debate, recent historians have advocated for studying the term coolie as an "ideational construct."<sup>7</sup> Members of other immigrant groups arriving at the same time as the Chinese were similarly bound by labor systems, yet only the Chinese were labeled as coolies. Examined in this light, the term coolie operated "as an artifice of nation and empire that helped to produce American exceptionalism and sanitize U.S. imperial ventures in the Americas and across the Pacific as 'humanitarian' projects."<sup>8</sup> By labeling Chinese immigrants as coolies and thus slaves, Americans were able to justify their imperial ambitions and exclusionary immigration policies.

The large number of Chinese men immigrating to work in the mines resulted in a significant gender imbalance. By 1855, only 2 percent of Chinese immigrants living in California were women.<sup>9</sup> This gender imbalance was partially due to the patriarchal nature of Chinese culture. In China, the primary wife was expected to remain at her husband's ancestral home and care for his parents. Until 1911, it was even technically illegal for any Chinese woman to emigrate from China. The prospect of racial animosity in America also contributed to the decision for Chinese women to remain in China.<sup>10</sup> Furthermore, Chinese men often viewed their status in

<sup>2</sup>Kornel Chang, "Coolie," in *Keywords for Asian American Studies*, ed. Cathy J. Schlund-Vials, K. Scott Wong, and Linda Trinh Võ (New York: New York University Press, 2015), 37-38, <https://www.jstor.org/stable/j.ctt15r3zv2.13>.

<sup>3</sup>"Coolies," *Harper's Weekly*, August 14, 1869.

<sup>4</sup>Abrams, "Polygamy."

<sup>5</sup>Abrams.

<sup>6</sup>Gunther Barth classified Chinese immigrants as coolies and renewed the debate in 1964. *Bitter Strength: A History of the Chinese in the United States, 1850-1870* (Cambridge, MA: Harvard University Press, 1964).

<sup>7</sup>These historians include Moon-Ho Jung, Lisa Lowe, and Mae Ngai; Chang, "Coolie," 38.

<sup>8</sup>Chang, "Coolie," 38.

<sup>9</sup>Judy Yung, *Unbound Feet: A Social History of Chinese Women in San Francisco* (Oakland: University of California Press, 1995).

<sup>10</sup>William Wei, "Importing Chinese Prostitutes, Excluding Chinese Wives," in *Asians in Colorado: A History of Persecution and Perseverance in the Centennial State* (Seattle: University of Washington Press, 2016), 97-119.

America as temporary. Chinese men traveled to America with the intention of earning wealth and ultimately returning to China.<sup>11</sup> The combination of these factors resulted in a small number of Chinese families choosing to settle in America. Charles P. O'Neill, the deputy sheriff of the Chinese section of San Francisco, stated in 1876, "It is a very unusual thing for Chinamen to bring their families here from China, so much so that I have never even heard of such a case. In conversation with me, they always speak as if opposed to such a thing."<sup>12</sup> While in the context of the Joint Special Committee report this was clearly used as evidence of poor character, the Chinese had an abundance of practical and cultural reasons for deciding to allow their families to remain in China.

The gender imbalance among Chinese immigrants, like the gender imbalance of white Americans in the West, also led to a high demand for prostitution. However, the number of Chinese prostitutes was overcounted due to cultural differences concerning what qualified as a legitimate marriage or family. In Chinese culture, men were able to marry multiple wives and have concubines as well. Every marriage was considered legally binding and legitimate in China. The offspring of all wives were considered legitimate children. However, culturally and eventually legally, marriage in America in the 1800s was considered to be between one man and one woman. Thus, secondary wives were often counted as prostitutes. Concubines were also considered to be prostitutes, even though in Chinese culture they occupied a higher social status than prostitutes. The third group of people often mistakenly labeled as prostitutes were household workers. Household workers, known as *mui tsai* in China, aided with the household chores and rearing of children.<sup>13</sup> Due to the misidentification of these classes of women as prostitutes, the number of Chinese prostitutes expounded by politicians and newspapers was significantly higher than the actual number of Chinese prostitutes in America. The 1870 census noted that 70 percent of the Chinese women in America were prostitutes. However, George Anthony Peffer estimates that the proportion of Chinese women who were prostitutes was actually closer to 50 percent.<sup>14</sup> The testimony of Michael A. Smith, a police officer in San Francisco, demonstrates the suspicions white Americans held toward the legitimacy of any Chinese family. While speaking of recent campaigns to disrupt the Chinese prostitution business, Smith states, "Lately the houses were broken up pretty well, and what they call Chinese families moved into these houses and some of the prostitutes moved out."<sup>15</sup> Smith refuses to acknowledge them as legitimate families, instead using the phrase, "what they call Chinese families." His testimony clearly displays that many Americans were unwilling to consider any Chinese family legitimate within the confines of American cultural values.

In America, Chinese prostitution experienced an initial free entrepreneurial period during which a prostitute could make her own money and move up or out of prostitution if she so desired. One of the earliest Chinese prostitutes recorded in America was Ah Toy. Ah Toy traveled to America at the age of twenty in 1849. Within a short period of time Ah Toy was able to become a madam and own her own house of prostitution. Undeterred by gender norms or racial stereotypes, Ah Toy sued people in court several times over theft or unpaid services. On one occasion, she sued men who attempted to pay with brass filings instead of gold. Although Ah Toy was the highest paid Chinese prostitute in San Francisco in the early 1850s, her earnings were still a fraction of what was paid to white prostitutes. Ah Toy charged one ounce of gold, yet white prostitutes at

<sup>11</sup>Yung, *Unbound Feet*.

<sup>12</sup>"The Chinese Commission," *San Francisco Bulletin*, May 3, 1876.

<sup>13</sup>Yung, *Unbound Feet*.

<sup>14</sup>Abrams, "Polygamy."

<sup>15</sup>United States Congress, "Report of the Joint Special Committee to Investigate Chinese Immigration" (Washington, DC: Government Printing Office, 1877), 197.

the time were able to ask for up to twenty ounces of gold.<sup>16</sup> The San Francisco Committee of Vigilance, formed in 1851 to fight government corruption and protect public morals, launched an investigation into Chinese prostitution. As the most visible representative of Chinese prostitution, Ah Toy was vulnerable to deportation or a mandatory closure of her house. Yet, Ah Toy eluded both of these risks. John A. Clarke, the lead investigator of brothels, allegedly became a lover of Ah Toy and protected her from actions by the committee.<sup>17</sup>

As criminal organizations solidified their control over prostitution and the anti-Chinese prostitution movement grew, Ah Toy increasingly struggled to successfully operate her business. In December of 1855, it was reported that Ah Toy was living in poverty and had attempted to commit suicide by overdosing on opium.<sup>18</sup> In 1857, Ah Toy sold her house of prostitution and returned to China. However, at some point in the intervening years Ah Toy returned to America and was arrested in 1859 in San Francisco for operating a house of prostitution. Ah Toy later receded from public view and died in 1928 in Santa Clara County, California.<sup>19</sup> While Ah Toy was able to take advantage of the initial period of independent Chinese prostitution operators, her later years in the prostitution business were characterized by struggles stemming from the anti-Chinese prostitution movement and Chinese criminal organizations known as tongs.

After 1854, the Chinese prostitution business was almost entirely controlled by the tongs. The term tong was derived from the Cantonese word for “hall” or “pavilion.”<sup>20</sup> Tongs could signify legitimate business organizations or gangs.<sup>21</sup> In the context of the Chinese prostitution business, the tongs operated as gangs. The tongs used representatives in China to procure girls to bring to America for the purpose of prostitution. Representatives of the tongs in China would often tell the families of the girls that they would be sold in America as household workers or brides. However, once in America they were often sold as prostitutes. The tongs were even known to kidnap women in China. Other women voluntarily agreed to travel to America to act as prostitutes hoping that they could better their lives once they finished their contract. However, the promise of eventual freedom eluded most Chinese prostitutes. As Judy Yung writes, “Most Chinese prostitutes were subjected to such physical and mental abuse that few could outlive their contract terms of four to six years.”<sup>22</sup> Many Chinese prostitutes died as a result of contracting venereal diseases.<sup>23</sup> Additionally, their contracts were often extended as a result of illness, pregnancy, and menstruation.<sup>24</sup>

Chinese prostitutes could be sold to wealthy Chinese men, parlor houses, or cribs. Parlor houses operated as typical houses of prostitution with a parlor room where the women would wait and meet clients. Cribs had the worst conditions. Chinese prostitutes in cribs would serve poor laborers for meager wages in small shacks.<sup>25</sup> Immigration to America for Chinese prostitutes following 1854 did not bring freedom or prosperity. Instead, Chinese prostitutes often endured great suffering and were bound to prostitution by the tongs. The only potential allies for these women were religious leaders in San Francisco. Religious leaders in San Francisco became fixated on Chinese prostitution and were major leaders in the anti-Chinese prostitution movement.

<sup>16</sup>Yung, *Unbound Feet*.

<sup>17</sup>May Jeong, “Ah Toy, Pioneering Prostitute of Gold Rush California,” *New York Book Review*, June 19, 2020.

<sup>18</sup>*Evening Star* (Washington, DC), December 14, 1855, 2.

<sup>19</sup>Yung, *Unbound Feet*.

<sup>20</sup>Anne Mendelson, “The Road to Chinatown,” in *Chow Chop Suey: Food and the Chinese American Journey* (New York: Columbia University Press, 2016), 72-96.

<sup>21</sup>Mendelson, “Road to Chinatown,” 72-96.

<sup>22</sup>Yung, *Unbound Feet*, 28.

<sup>23</sup>Yung, 28.

<sup>24</sup>Wei, “Importing Chinese Prostitutes.”

<sup>25</sup>Yung, *Unbound Feet*.

Their aid was not without strings attached, and they often sought to remake Chinese prostitutes in the image of Victorian-era women. Their activism ignored the prostitution of white women and helped reinforce racial stereotypes about Chinese women.

The moral reform movement in America was responsible for a shift in the perception of prostitution. Previously, prostitution was regarded as a temporary occupation that women could freely enter or leave. However due to the campaign of religious leaders, prostitution became a permanent identity marker and prostitutes were increasingly excluded from American society. The idea that women who worked in the sex industry could be permanently differentiated from other women was a fallacy that allowed for legislation such as the Page Act of 1875. Yet as Eithne Luibhéid writes, "The notion that prostitutes are inherently distinct in some way from other women is a ruse of power, which upholds literal and symbolic policing strategies that have markedly racist, sexist, and classist effects."<sup>26</sup> In enforcing laws that exclude prostitutes, officials often relied on irrelevant factors such as the perceived wealth of the woman, whether she had children, and whether she was married.

The anti-prostitution movement largely focused on the prostitution of foreign women and poor women. The sex industry has many different tiers, yet the prostitutes most often targeted were those who worked on the lowest tier: "streetwalkers."<sup>27</sup> The label of prostitute was reserved almost solely for streetwalkers while other higher paid sex workers did not suffer from the same stigma or persecution. Streetwalkers were largely made up of women from a low socioeconomic status and racial minorities.<sup>28</sup> Thus, the anti-prostitution movement was designed to disproportionately affect immigrants and people of color.

As the anti-prostitution religious movement began to coalesce in California, it became clear that the campaign was meant only to target Chinese prostitution. White prostitutes outnumbered Chinese prostitutes, yet religious leaders highlighted Chinese prostitution specifically. In the Joint Special Committee report, police officer Michael A. Smith testified, "[White prostitutes] are brought down in a great deal larger numbers than the Chinese, because there are a great many more of them. I think the records will show a great many more white prostitutes than Chinese arrested for soliciting."<sup>29</sup>

To avoid criticism of the xenophobia and racism inherent in their campaign, the anti-Chinese prostitution movement sought to brand itself as an anti-slavery campaign. Chinese prostitutes were repeatedly referred to as "female slaves,"<sup>30</sup> "human cattle,"<sup>31</sup> and "chattel."<sup>32</sup> The dehumanizing language was meant to portray the brutality of the Chinese prostitution system. However, it also helped to establish negative racial stereotypes of Chinese women. Although sometimes referred to as victims, Chinese prostitutes were not treated as victims. Chinese prostitutes were often blamed in some regard for their situation due to their ignorance, cultural failings, or "defective

<sup>26</sup>Luibhéid, "A Blueprint for Exclusion."

<sup>27</sup>Luibhéid.

<sup>28</sup>Luibhéid.

<sup>29</sup>United States Congress, "Report."

<sup>30</sup>"The Coolie Question," *Daily National Democrat* (Marysville, CA), December 22, 1860, *Chronicling America: Historic American Newspapers*, Library of Congress, <https://chroniclingamerica.loc.gov/lccn/sn84038814/1860-12-22/ed-1/seq-3/>.

<sup>31</sup>"The Slave Trade in California," *Weekly Trinity Journal* (Weaverville, CA), December 3, 1864, *Chronicling America: Historic American Newspapers*, Library of Congress, <https://chroniclingamerica.loc.gov/lccn/sn85025202/1864-12-03/ed-1/seq-4/>.

<sup>32</sup>"Traffic in China Women," *Daily Inter Ocean*, September 1874.

womanhood.”<sup>33</sup> Their “defective womanhood” was considered to be their violation of American gender norms and their supposed complicity in allowing themselves to be sold into the sex trade.

Religious leaders in California were at the forefront of the anti-Chinese prostitution movement. Reverend Otis Gibson, one of the most prominent religious figures in the movement, oversaw the Methodist Chinese Mission Home. As the name implies, the Methodist Chinese Mission home was a refuge for Chinese prostitutes seeking to escape prostitution. The Methodist Chinese Mission Home included a school for younger Chinese women. In a newspaper article in the *San Francisco Bulletin*, the students are referred to as “heathen scholars,” and much of the article is devoted to describing the transformation in their physical appearance.<sup>34</sup> The article mentions that “the hair is either twisted into a knot at the back of the head and held by a metal pin or comb or is allowed to fall behind in a single glossy braid of massive proportions. The grotesque gear of the head worn by fashionable Celestial women is dispensed with.”<sup>35</sup> The focus on the transformation of their physical appearance reveals an interest in transforming the women to conform to American cultural norms. The aid of religious organizations often came with dehumanizing rhetoric that deemphasized the humanity of those it sought to help.

Due to his position working with former Chinese prostitutes, Reverend Gibson participated in investigations of Chinese women conducted at the port of San Francisco. The Anti-Kidnapping Law passed in California in 1870 mandated that port officials investigate Asian women entering the US to ensure that they were not immigrating for the purposes of prostitution.<sup>36</sup> Reverend Gibson participated in the investigation of fourteen women traveling on the ship *MacGregor* from Japan and China. These fourteen women were described as “parcels” and regarded with the utmost suspicion.<sup>37</sup> After an outline of the women’s reasons for immigrating, the author writes, “It became apparent that each female had received the cue from some Mongol expert to matters pertaining to the evasion of the law for the answers to questions propounded were, as a rule, false in every respect.”<sup>38</sup> Even the aid given to women who allegedly admitted to coming for the purposes of prostitution was encompassed by suspicions of criminality. Eight women aboard the *MacGregor* decided to go to the Methodist Chinese Mission Home. It is described that, “they were towed up to the Mission for the purposes of reclamation, and placed under the surveillance of the fifteen women lately reformed.”<sup>39</sup> The language used displays that the Methodist Chinese Mission Home was not meant to simply aid Chinese women, but that the home sought to attack a problem it viewed as intrinsically linked to the racial and cultural inferiority of Chinese women.

The Presbyterian Church also administered a Chinese Mission Home in San Francisco known as the Occidental Mission Home for Chinese Girls. Established in 1874, the home branded a more aggressive approach than its Methodist neighbor.<sup>40</sup> Upon receiving a tip from a Chinese woman who sought to escape prostitution, the Occidental Mission Home for Chinese Girls would coordinate with law enforcement to raid the house of prostitution. During the raid, the mission home would locate and remove the girl seeking to escape the prostitution business. According to

<sup>33</sup>Stacey L. Smith, *Freedom’s Frontier: California and the Struggle over Unfree Labor, Emancipation, and Reconstruction* (Chapel Hill: University of North Carolina Press, 2013), 168.

<sup>34</sup>“Saving Women,” *San Francisco Bulletin*, September 12, 1873.

<sup>35</sup>*San Francisco Bulletin*.

<sup>36</sup>California State Legislature, “An Act to Prevent the Kidnapping and Importation of Mongolian, Chinese and Japanese Females, for Criminal or Demoralizing Purposes, S.B. 269,” in *The Statutes of California Passed at the Eighteenth Session of the Legislature, 1869-70* (Sacramento, CA: D. W. Gelwicks, State Printer, 1870), 330.

<sup>37</sup>California State Legislature, “Act to Prevent Kidnapping,” 330.

<sup>38</sup>California State Legislature, 330.

<sup>39</sup>“Reclamation Missionary Work among the Celestial Women Imported by the ‘MacGregor,’” *San Francisco Bulletin*, September 11, 1873.

<sup>40</sup>“Mission and History,” Cameron House, <https://cameronhouse.org/about-us/history/>.

Donaldina Cameron, the supervisor of the house from 1897 to 1934,<sup>41</sup> 1,500 Chinese girls were rescued through these raids in the first thirty years after its founding.<sup>42</sup>

The focus on Chinese prostitution created the image that all Chinese women were prostitutes and thus all Chinese women were criminals. Despite this stereotype, there were many Chinese women immigrating to the United States as wives, daughters, students, and women seeking to earn wealth in America.<sup>43</sup> However, in the lead up to exclusionary laws, politicians and newspapers consistently portrayed all Chinese women as prostitutes. The former governor of California, Frederick Low, stated, "There may be some wives of merchants who come, but I infer that by far the larger portion, perhaps nine-tenths, or nineteen-twentieths are prostitutes, or women brought here for the purpose of prostitution."<sup>44</sup> In California in the late 1800s, Chinese prostitution became the subject of American cultural fears.

Prior to the latter half of the 1860s, Chinese prostitution in California was not heavily criminalized. In an 1859 article in the *Weekly Trinity Journal*, the existence of Chinese prostitutes is casually noted. Concerning the construction of a new building, the author notes, "They will be occupied by some of the sixty odd Chinese prostitutes now resident here, we suppose."<sup>45</sup> In 1860, it was reported that five Chinese women were arrested for inhabiting a house of prostitution. These women were ordered to pay a fine of sixty dollars or spend eighty days in jail.<sup>46</sup> Under the Page Act of 1875, this would later become a deportable offense. Yet as anti-Chinese sentiment against Chinese laborers grew, so too did the call for greater enforcement measures against Chinese prostitutes and Chinese women seeking to immigrate to America. Population growth and economic insecurity in the 1870s led to a shortage of jobs. Historians estimate that by 1871, there were four workers for every one job in California.<sup>47</sup> The economic insecurity of white Americans was translated into anti-Chinese sentiment and legislation. The most aggressively enforced elements of anti-Chinese legislation often targeted Chinese prostitutes and, by association, Chinese women.

The enforcement of anti-Chinese prostitution legislation such as the California Anti-Kidnapping Act of 1870 focused on decreasing the number of Chinese women entering the US. The number of Chinese women still able to enter the US was viewed as evidence of the failure of law enforcement. One newspaper article decried "the recent arrival in San Francisco of nearly 100 Chinese women, after it had been supposed that the importation of women to this city for the vilest of purposes had practically ceased."<sup>48</sup> The presence of one hundred Chinese women constituted as evidence that prostitutes were entering the United States. Chinese women in America were viewed as synonymous with prostitutes.

In the Joint Special Committee investigation into Chinese immigration in 1876, special attention was given to exploring potential links between Chinese people and criminal behavior. The chairman of the committee asked Alfred Clarke, the chief of police of San Francisco, "What is your general observation, in the position in which you have been placed, as to crime among the

<sup>41</sup>Cameron House.

<sup>42</sup>Yung, *Unbound Feet*.

<sup>43</sup>Wei, "Importing Chinese Prostitutes."

<sup>44</sup>United States Congress, "Report."

<sup>45</sup>"China Row," *Weekly Trinity Journal* (Weaverville, CA), November 26, 1859, *Chronicling America: Historic American Newspapers*, Library of Congress, <https://chroniclingamerica.loc.gov/lccn/sn85025202/1859-11-26/ed-1/seq-2/>.

<sup>46</sup>*Daily National Democrat* (Marysville, CA), February 25, 1860, 2, *Chronicling America: Historic American Newspapers*, Library of Congress, <https://chroniclingamerica.loc.gov/lccn/sn84038814/1860-02-25/ed-1/seq-2/>.

<sup>47</sup>Erika Lee, "The Chinese are Coming. How Can We Stop Them? Chinese Exclusion and the Origins of American Gatekeeping," in *Asian American Studies Now: A Critical Reader*, ed. Jean Yu-wen, Shen Wu, and Thomas C. Chen (New Brunswick, NJ: Rutgers University Press, 2010), 143-67.

<sup>48</sup>"Traffic in China Women," *Daily Inter Ocean*, September 1874.



Chinese, its proportion as compared with the white people. . . ?”<sup>49</sup> The chief of police responded that the conviction rates among Chinese people were low due to the disinclination of Chinese people to testify in an American court against other Chinese people.<sup>50</sup> The question and the evasive answer demonstrate a proclivity toward associating Chinese people with crime. Michael A. Smith, a police officer of San Francisco, was also called to testify. Mr. Smith had conducted his own investigation of Chinese women who were admitted into the United States. Of the forty-eight Chinese women he investigated, he found twelve of them to be prostitutes. The women that Mr. Smith arrested were not charged with prostitution but rather for residing in a house of prostitution. A member of the committee, Mr. Bee, probed Mr. Smith as to the definition of what constitutes a prostitute. The exchange between Mr. Bee and Mr. Smith continued as follows:

Q. They might not be prostitutes—A. Well, I do not know.

Q. You are not so sure about these houses—A. I have seen these others. [Exhibiting photographs] Here is a woman I know you can find almost any time in Sullivan’s alley.<sup>51</sup>

When called upon to justify his assertion that twelve of the forty-eight women were prostitutes, Mr. Smith relies on circumstantial evidence. He claims that a certain woman is a prostitute based solely on the fact that she has been known to be present in an alley. In later questioning, Mr. Bee refers to the character of these women as “doubtful,” rather than labeling them as prostitutes.<sup>52</sup> Mr. Smith’s so-called investigation displays the implicit association between Chinese women and Chinese prostitutes among law enforcement officials.

Since the Chinese prostitution trade was largely controlled by the tongs, Chinese men were also seen as criminals. Chinese prostitution was extremely lucrative for the tongs. Yung writes that “the Hip Yee Tong, which reportedly started the traffic in 1852, imported six thousand women and netted \$200,000 profit from the trade between 1852 and 1873.”<sup>53</sup> Due to the wealth involved in the trade, Chinese prostitutes were fiercely guarded by the tongs. In 1875, it was reported that nine people were seriously injured in a fight between the Suey Sing Tong and the Kwong Dock Tong over one prostitute, Kum Ho.<sup>54</sup> The women who fled to the Chinese mission homes faced threats from the tongs. In order to retrieve them from the mission homes, some men arrived claiming to be their husbands. Young Chow filed a writ of habeas corpus to obtain the release of Yat Sing, who he claimed to be his wife. The judge presiding, Judge Morrison, denied the request “with the remark that it had become a habit of the Chinese to use the processes of courts for the purpose of trying to get possession of women and he would not encourage such proceedings.”<sup>55</sup> While the women at the Chinese mission homes certainly faced threats from the tongs to reclaim them, a stereotype was formed of all Chinese men as deceitful and cruel.

Newspaper articles published an abundance of stories detailing the abuse of Chinese women by Chinese men. In an article in 1874, it was reported that a Chinese woman was beaten in an alleyway. In graphic detail the article described that “a sack enveloped her head and shoulders, and the brutes were beating her with cudgels.”<sup>56</sup> The prevalence of articles of this nature made it

<sup>49</sup>United States Congress, “Report,” 144.

<sup>50</sup>United States Congress, 144.

<sup>51</sup>United States Congress, 1143.

<sup>52</sup>United States Congress, 1143.

<sup>53</sup>Yung, *Unbound Feet*, 30.

<sup>54</sup>Yung, 30.

<sup>55</sup>“A Dodge That Didn’t Work,” *San Francisco Bulletin*, March 10, 1876, 3.

<sup>56</sup>“Traffic in China Women,” *Daily Inter Ocean*, September 1874.

seem as though violence against women was a distinctly Chinese practice. After eloping, one former Chinese prostitute was charged with stealing jewelry from the house of prostitution. The man charging her with the crime was alleged to be her brother. In the article titled "A Sad Picture of Chinese Society," the author notes, "Think of a brother forcing a sister to continue a life which is worse than death. Humanity shudders at the picture."<sup>57</sup> While all Chinese women were branded as prostitutes, Chinese men were branded as dangerous and violent "brutes."<sup>58</sup>

The attention given to Chinese prostitution was instrumental in the creation of Chinese racial stereotypes. As Luibhéid writes, "The process was not just racist but also racializing, in the sense of helping to literally construct the Chinese as a distinct and racialized group."<sup>59</sup> The presence of Chinese prostitutes and the tongs protecting the trade was used to create Chinese racial stereotypes. In the town of Sonora, California, it was reported that a fire started at a house of Chinese prostitution and quickly spread across the town. The author blamed all Chinese people for their innate lack of responsibility. The author writes:

The Chinese houses have been the worst; for the inmates smoke opium and become perfectly stupid and insensible—It is high time that the industrious, hard-working citizens, who have made Sonora all that she is, so far as character, business and value of property is concerned, should combine together and sweep all these pests from our midst.<sup>60</sup>

The author extrapolates from reporting on a fire at a house of prostitution that all Chinese residents of the town should be expelled due to their innate character flaws.

Chinese prostitutes were the target of the worst racial stereotypes, because they violated gender norms. The sexual deviance of Chinese prostitutes was viewed as a threat to the traditional American family, public morality, and white purity. Discussions about Chinese prostitution and Chinese polygamy were critical to making the case for outright Chinese exclusion. As racial stereotypes were still forming in the late nineteenth century, Japanese women were treated differently from Chinese women. Japanese women were seen as conforming to gender norms and acting as proper wives. Even after the passage of the Page Act in 1875, Japanese women were still able to enter the United States. As Catherine Lee writes:

Chinese immigrants were described as racially undesirable and unassimilable, which was supposedly illustrated by gender and sexual deviance—the women's participation in prostitution. However, three decades later, Japanese immigrants enjoyed a period of favorable characterization. Political and intellectual leaders did not typify the women as deviant, despite their links to prostitution, and highlighted the immigrants' willingness to come and settle as families.<sup>61</sup>

The differing treatment of Chinese and Japanese women illustrates the instrumental role of gender norms in creating racial stereotypes and immigration policy. The greater gender balance of Japanese immigrants and the perception of Japanese women as proper wives allowed Japanese people to continue immigrating to the United States even after laws such as the Chinese Exclusion Act. However, the racializing process was ongoing, and eventually Japanese people were negatively

<sup>57</sup>"A Sad Picture of Chinese Society," *Daily Democratic State Journal*, June 17, 1856.

<sup>58</sup>"Traffic in China Women," *Daily Inter Ocean*, September 1874.

<sup>59</sup>Luibhéid, "A Blueprint for Exclusion," 14.

<sup>60</sup>"The Fire in Sonora," *Nevada Journal*, November 11, 1853, *Chronicling America: Historic American Newspapers*, Library of Congress, <https://chroniclingamerica.loc.gov/lccn/sn84026884/1853-11-11/ed-1/seq-1/>.

<sup>61</sup>Lee, "Where the Danger Lies," 3.

associated with Chinese people as part of the “Asiatic” race.<sup>62</sup> With the National Origins Quotas that began in 1921, Japanese people were also excluded from entering the United States.<sup>63</sup>

The practice of prostitution was promoted as being intrinsically linked to the Chinese race and culture. The Joint Special Committee report on Chinese immigration attempted to establish the fact that prostitution was permissible and even respected in Chinese culture. In the introduction to the report the committee writes, “We shall show by Mr. Shaw, and by reference to his testimony, that prostitution in China is a profession, and not a disgrace.”<sup>64</sup> Despite this strong claim, both Reverend Gibson and the former governor of California, Governor Law, dispute this in their testimony. Governor Law strongly rebukes this assertion in his statement that “prostitution in China is regarded with more aversion and disgust by respectable Chinese than it is, if possible, by Americans or Europeans and a prostitute is more of a pariah in Chinese society than among Americans.”<sup>65</sup> Governor Law clearly stated that prostitution was not acceptable in Chinese culture. Yet a committee member, Mr. Pixley, asked a follow up question in an attempt to demonstrate that prostitution was connected to Chinese culture:

Q. Do you not infer that prostitution is a recognized profession there, in fact outranking that of cooper, barber, and other lower pursuits.

A. No; it may be considered at the bottom.<sup>66</sup>

Politicians clearly sought to demonstrate a connection between prostitution and Chinese culture.

Chinese prostitutes were further differentiated from white prostitutes. Thus, the sexual deviance and moral depravity of Chinese prostitutes were advocated as being inherently linked to the Chinese race. Davis Louderback, the police judge in San Francisco, testified:

I find these Chinese prostitutes often get boys. I suppose they initiate them into the ways of lewdness when white prostitutes would not. I have sent boys to industrial schools that have been affected by diseases by contact with Chinese prostitutes—small boys, fifteen or sixteen—just over the age of puberty.<sup>67</sup>

Chinese prostitutes were described as purposefully inciting the moral decay of young boys and encouraging interracial relationships. As such, Chinese prostitutes represented a far greater threat to the American community than white prostitutes. Chinese prostitutes were allegedly a part of an organized campaign to ruin the moral fabric of the nation. Mob violence erupted in Antioch, California, after “the discovery of an organized system, existing among the Asiatics for the enticement of youths into their dens of prostitution.”<sup>68</sup> The sons of reputable families were allegedly tricked into entering a Chinese house of prostitution and later contracted diseases from the Chinese prostitutes. The town was already incensed that it had been “afflicted with a ‘Chinatown.’”<sup>69</sup> Upon learning of the organized system for seducing children, the townspeople gathered to burn down the Chinese section of town and expel the Chinese residents. The perceived threat of Chinese prostitutes led to the expulsion all Chinese residents.

<sup>62</sup>“The Chinese Pest,” *Eureka Daily Sentinel*, May 6, 1876, *Chronicling America: Historic American Newspapers*, Library of Congress, <https://chroniclingamerica.loc.gov/lccn/sn84022044/1876-05-06/ed-1/seq-2/>.

<sup>63</sup>Lee, “Where the Danger Lies.”

<sup>64</sup>United States Congress, “Report,” 22.

<sup>65</sup>United States Congress, 67.

<sup>66</sup>United States Congress, 67.

<sup>67</sup>United States Congress, 190.

<sup>68</sup>“The Chinese Pest,” *Eureka Daily Sentinel*, May 6, 1876.

<sup>69</sup>*Eureka Daily Sentinel*.

As the anti-Chinese prostitution movement grew, some members of American society still advocated against the expulsion and negative characterization of Chinese people. *Harper's Weekly* reported on a growing number of legislators that opposed Chinese immigration. Yet in its article in 1870, *Harper's Weekly* notes, "We may trust American sagacity to defend American civilization from obliteration by that of Asia, without supposing it necessary to preach hatred and horror of one of the chief human races, as if every individual of it were a nameless sinner."<sup>70</sup> Despite a negative characterization of Asia in general, *Harper's Weekly* advocates against fomenting hatred against all Asian people. Based in New York City, *Harper's Weekly* and other northern newspapers were not as quick to demonize Chinese people in the 1870s as the newspapers in California and the western territories. Reverend Gibson also decried the growing hatred for the Chinese. In his testimony, Reverend Gibson argued, "The charge of immorality brought against the Chinese in this country, may be brought, with almost if not quite equal force, against most of the European immigration, whether the specific charge be drunkenness, profanity, fighting and quarreling, gambling, or prostitution."<sup>71</sup> Reverend Gibson argued passionately against attributing the behavior of some Chinese people to the Chinese race.

Unfortunately, the idea that not only certain characteristics but certain diseases could be attributed to race was gaining momentum in the United States. The eugenics movement sought to prevent interracial relationships, which it saw as diminishing the white race. Furthermore, doctors alleged as part of the germ theory that certain races could unwittingly carry diseases that could decimate the populations of other races.<sup>72</sup> Thus, Chinese people—specifically Chinese prostitutes—were thought to threaten the very existence of white Americans. The disease most commonly cited as a threat from Chinese prostitutes was syphilis. Dr. J. Marion Sims, the president of the American Medical Association in 1876, blamed the spread of syphilis on the "Chinese slave" in his address at its centennial jubilee.<sup>73</sup> Sims advocated for an end to Chinese immigration to protect the health of white Americans. A physician in California, Charles O'Donnell, testified in the Joint Special Committee Report that "the virus of the cooly, in [his] opinion, is almost sure death to a white man. . . . There are cases of syphilis among the whites that originated from these Chinese prostitutes which are incurable."<sup>74</sup> The association between syphilis, criminality, and Chinese prostitutes proved to be an effective combination in generating anti-Chinese sentiment and legislation.

The anti-Chinese prostitution movement allowed lawmakers to regulate the immigration of Chinese women and thus regulate the birth of Chinese American citizens. The potential for Chinese people to acquire citizenship was a major political concern for lawmakers and white citizens in the western United States. James Bassett, the editor of the *Los Angeles Herald*, testified, "If the Chinaman ultimately becomes a voter, he will hold the balance of power in a very short time, if they continue to come. Morally, I think the effect is bad."<sup>75</sup> The debate over the regulation of immigration was colored by a desire to prevent Chinese people from acquiring citizenship and political power. In 1858, when Oregon drafted a constitution for statehood, its constitution included a clause barring black people and Chinese people from acquiring citizenship rights.<sup>76</sup>

<sup>70</sup>"Asia and America," *Harper's Weekly*, August 27, 1870.

<sup>71</sup>United States Congress, "Report," 402.

<sup>72</sup>Luibhéid, "A Blueprint for Exclusion."

<sup>73</sup>Stuart Creighton Miller, *The Unwelcome Immigrant: The American Image of the Chinese, 1785-1882* (Berkeley and Los Angeles: University of California Press, 1969), 163.

<sup>74</sup>United States Congress, "Report," 1097.

<sup>75</sup>United States Congress, 1139.

<sup>76</sup>"Who May Be Citizens of the United States?" *Harper's Weekly*, May 15, 1858.

The focus on restricting the political rights and immigration of Chinese people, especially following the Civil War, was in part a reaction to the cultural shift occurring in America. Following the Civil War, African Americans were given citizenship and the right to vote. With the Fourteenth Amendment, any person born in the United States was automatically an American citizen. A stratum of Americans viewed the growing enfranchisement of other racial groups as “levelling down.”<sup>77</sup> In response to the expression of support for the political rights of African Americans following the Colfax massacre, one California journalist wrote, “Shall the white man be asked to bring himself down to the level of the Chinese and Negroes? The very suggestion is an insult to him.”<sup>78</sup> In addition to Fourteenth Amendment protections, the federal government had agreed not to regulate Chinese immigration in the Burlingame Treaty of 1868. In Article V of the Burlingame Treaty, it was stated: “The United States of America and the Emperor of China cordially recognize the inherent and inalienable right of man to change his home and allegiance, and also the mutual advantage of...free migration and emigration.”<sup>79</sup> The treaty forbade any prohibition or regulation of Chinese immigration to the United States as well as American immigration to China.

Branded as prostitutes and criminals, Chinese women were thought to threaten public safety. In an article titled, “The Coolie Question,” the author writes about Chinese prostitution that “the introduction of this class of slaves into California has worked immeasurable evil as thousands of white men can testify, and the moral health of the State requires that it be stopped.”<sup>80</sup> The racial implication of the article is made even more clear in a statement urging lawmakers to write legislation to “protect all free white citizens.”<sup>81</sup> The trade of Chinese prostitution was framed as endangering white Americans and thus necessitating legislative action. Articles describing the horrors and dangers of Chinese prostitution neglected to mention the prostitution of white women. Reverend Gibson even claimed, “Indeed, it is not at all improbable that some of the chief manipulators of this anti-Chinese excitement are themselves guilty of the very vices which they charge against the Chinese, such as gambling, prostitution, and incapacity to hold office in this republican government.”<sup>82</sup> By focusing on the issue of Chinese prostitution, political figures were able to engineer exclusionary laws and stimulate a sense of fear and urgency in the hearts of white Americans.

On the state and local level, exclusionary policies based on race had already been passed. In 1854, the case *People v. Hall* upheld the prohibition on Chinese people testifying in court against white people.<sup>83</sup> Towns such as Gold Hill, Nevada, passed ordinances forbidding all Chinese residents from the incorporated town boundaries.<sup>84</sup> In 1866, San Francisco passed an ordinance specifically excluding Chinese prostitutes from the city limits.<sup>85</sup> In the same year, the state of

<sup>77</sup>“Tweed at Colfax,” *Placer Herald* (Auburn, CA). “Tweed at Colfax,” July 27, 1867, *Chronicling America: Historic American Newspapers*, Library of Congress, <https://chroniclingamerica.loc.gov/lccn/sn82014998/1867-07-27/ed-1/seq-2/>.

<sup>78</sup>*Placer Herald*.

<sup>79</sup>Johnson, Andrew, “Additional Articles to the Treaty Between the United States of America and the Ta-Tsing Empire, of June 18, 1858” (Washington, DC: July 28, 1868).

<sup>80</sup>“The Coolie Question,” *Daily National Democrat*, December 22, 1860.

<sup>81</sup>*Daily National Democrat*.

<sup>82</sup>United States Congress, “Report,” 1139.

<sup>83</sup>John S. Caragozian, “People v. Hall: A Postscript,” *California Supreme Court Historical Society Newsletter* (Fall/Winter 2017): 13-14, 25.

<sup>84</sup>“Ordinance No. 19,” *Gold Hill Daily News*, August 18, 1864, *Chronicling America: Historic American Newspapers*, Library of Congress, <https://chroniclingamerica.loc.gov/lccn/sn84022046/1864-08-18/ed-1/seq-1/>.

<sup>85</sup>*Daily Mountaineer* (Dalles, OR), March 9, 1866, 2, *Chronicling America: Historic American Newspapers*, Library of Congress, <https://chroniclingamerica.loc.gov/lccn/sn89055266/1866-03-09/ed-1/seq-2/>.

California passed a law titled "An Act for the Suppression of Chinese Houses of Ill-Fame."<sup>86</sup> Pursuant to this act, Chinese houses of prostitution were declared to be public nuisances. The evidence used for finding a building to be a Chinese house of prostitution was simply "common repute."<sup>87</sup> Furthermore, the determination made on the house itself was stated to reflect on "the character of the women inhabiting it."<sup>88</sup> It was not until 1874, eight years later, that the word Chinese was removed from the act in order to target all houses of prostitution.<sup>89</sup>

The California State Legislature sought to control the immigration of Chinese women to California with a law passed in 1870. Using its state police power, California passed "An Act to Prevent the Kidnapping and Importation of Mongolian, Chinese and Japanese Females, for Criminal or Demoralizing Purposes"<sup>90</sup> The act required any Asian woman entering the United States to submit evidence to the commissioner of immigration attesting that "such female desires voluntarily to come into this State, and is a person of correct habits and good character."<sup>91</sup> Thus, California imposed a vague moral standard on Asian women seeking to enter the United States. The law was amended in 1874 and expanded to apply to any "lewd or debauched woman."<sup>92</sup> In order to circumvent the growing consensus that immigration was a matter to be regulated by the federal government, California framed it as a law to protect the "public decency" of the state under its state police power.<sup>93</sup> The law was designed to establish barriers for the immigration of Asian women to the United States.

Barriers obstructing the immigration of Asian women to the United States and anti-miscegenation laws prevented the birth of a class of Chinese American citizens. Although originally designed to prevent relationships between black and white people, anti-miscegenation laws were revised to prevent relationships between Chinese and white people as well.<sup>94</sup> The naturalization process to become a United States citizen remained closed to Chinese people.<sup>95</sup> Thus the only pathway to citizenship for Chinese people was to be born in the United States following the Fourteenth Amendment. By restricting the immigration of Chinese women, lawmakers effectively restricted the formation of families and the birth of Chinese American citizens. As William Wei writes, "Excluding Chinese women from the country meant breaking the link between generations, leading to the eventual extinction of Chinese American communities."<sup>96</sup> Furthermore, by preventing the formation of families, lawmakers were able to maintain the migratory nature and low wages of Chinese laborers.<sup>97</sup>

The amended 1874 California Anti-Kidnapping Law was challenged in a case that went all the way to the Supreme Court. On August 22, 1874, twenty-two women arrived aboard the ship *Japan* from Hong Kong. Upon inspection and interrogation, the twenty-two women were

<sup>86</sup>California State Legislature, "An Act for the Suppression of Chinese Houses of Ill-Fame, S.B. 352," in *The Statutes of California Passed at the Sixteenth Session of the Legislature, 1865-6* (Sacramento, CA: O. M. Clayes, State Printer, 1866), 729.

<sup>87</sup>California State Legislature, "An Act for Suppression," 729.

<sup>88</sup>California State Legislature, 729.

<sup>89</sup>Abrams, "Polygamy."

<sup>90</sup>California State Legislature, "Act to Prevent Kidnapping," 330.

<sup>91</sup>California State Legislature, 330.

<sup>92</sup>Abrams, "Polygamy."

<sup>93</sup>California State Legislature, "Act to Prevent Kidnapping," 330; Abrams, "Polygamy."

<sup>94</sup>Wei, "Importing Chinese Prostitutes."

<sup>95</sup>Eileen Bolger, "Background History of the United States Naturalization Process," Rocky Mountain Regional National Archives and Records Administration, 2013, accessed through the Virginia Commonwealth University Libraries Social Welfare History Project, <https://socialwelfare.library.vcu.edu/federal/naturalization-process-in-u-s-early-history/>.

<sup>96</sup>Wei, "Importing Chinese Prostitutes," 11.

<sup>97</sup>Yung, *Unbound Feet*.

found to be “lewd or debauched” by the commissioner of immigration.<sup>98</sup> This determination was based on their lack of children and suspicions concerning their claims of marriage. The options for the classification of Chinese women were reduced to “prostitute” or “married woman.” The ship holder refused to pay the bond for the women, and thus they were detained aboard the ship. Through a lawyer, the women applied for and were granted a writ of habeas corpus. The case eventually reached the Supreme Court in 1876, where in *Chy Lung v. Freeman* it decided that the California law was unconstitutional on the basis that immigration was a matter to be regulated solely by the federal government. The court declined to rule on the equal protection argument. Even though the court struck down the discriminatory state law, it still allowed for the creation of discriminatory federal laws. This case set an important precedent for the creation of federal immigration laws that targeted people of certain racial categories.

When the case was decided, the Page Act had already been passed at the federal level. The Page Act of 1875 represented the culmination of the anti-Chinese prostitution movement. Representative Horace Page of California authored the legislation. As it was written, the law targeted the importation of Asian prostitutes and “the labor of any cooly.”<sup>99</sup> However, the section of the law most rigorously enforced was the clause against Asian, and more specifically Chinese, prostitutes. The Hong Kong consul general was mandated to either provide or deny a certificate attesting to the moral character of Chinese women seeking to immigrate to the United States under the act. The port collector in the United States would then interrogate and reevaluate the determination made by the Hong Kong consul general. Unlike any other immigrant group, Chinese women were required to obtain a certificate and submit a photograph of themselves. Through an investigation and interrogation of the women, the Hong Kong consul general ruled on whether the women were immigrating for “immoral purposes.”<sup>100</sup> There was no “evidentiary standard” for the approval or rejection of immigration certificates.<sup>101</sup> Instead, the Page Act was widely applied to exclude most Chinese women from entering the United States.<sup>102</sup>

The anti-Chinese prostitution movement and the Page Act were used to restrict the immigration of Chinese women. The Page Act was the first federal immigration law and helped develop the modern immigration enforcement apparatus. More importantly, it set a precedent for racially exclusionary immigration policies. While supposedly targeting prostitution, the law only applied to women traveling from China who were required to obtain certificates from the Hong Kong consul general. The religious movement against Chinese prostitution pressured lawmakers to end what they deemed to be a slave trade. Yet their treatment of former Chinese prostitutes revealed their belief in the cultural and racial supremacy of white America. The press they generated about Chinese prostitution enflamed negative stereotypes of Chinese people. While religious leaders in San Francisco provided an important service to Chinese prostitutes, namely refuge and a means of escape, their assistance was done to help those they saw as weak, not empower them. The insistence of religious leaders on ending Chinese prostitution led to an implicit association between prostitution and Chinese women.

The anti-Chinese prostitution movement was not ancillary to the anti-Chinese movement, but central to creating stereotypes to justify wider Chinese exclusion. The stereotype that all Chinese women were prostitutes allowed the government to pass laws treating all Chinese women as criminals. Chinese men were portrayed as brutal and cruel in their engagement in the Chinese

<sup>98</sup>Abrams, “Polygamy.”

<sup>99</sup>United States Congress, “An Act Supplementary to the Acts in Relation to Immigration,” in *Forty-Third Congress, Session II, Chapter 141* (Washington, DC: March 3, 1875), 477-78.

<sup>100</sup>United States Congress, “Act Supplementary to the Acts,” 477-78.

<sup>101</sup>Abrams, “Polygamy.”

<sup>102</sup>Abrams.

prostitution trade. Thus, all Chinese people were viewed as inherently criminal. This notion of criminality justified increasingly exclusionary legislation beginning at the local level and eventually culminating with the federal Page Act of 1875. The stereotypes formed due to the Chinese prostitution trade extended beyond criminality. Chinese prostitutes violated gender norms and the sanctity of family relations, thereby establishing a stereotype of their "defective womanhood."<sup>103</sup>

The success of laws passed against Chinese prostitutes set the mold for later racially exclusionary legislation. The laws themselves relied heavily on stereotypes and cultural opinions. When Giles Gray, the surveyor of the port, declined to state his opinions as evidence for the Joint Special Committee investigation, Mr. Pixley, the former attorney general of California, stated, "O, no; we wander into opinions in this investigation."<sup>104</sup> Gray declined to answer once more, but this exchange highlights the true motivations for the Page Act and exclusionary policies. The campaign targeting Chinese prostitution was simply a means to justify racially exclusionary policies that white Americans already sought due to negative stereotypes of the Chinese. The campaign against Chinese prostitution successfully connected Chinese people with criminality, thereby justifying policies excluding them from entering the United States. Following the Page Act, "between 1876 and 1882, the number of Chinese women entering the United States declined relative to the previous seven-year period by 69 percent."<sup>105</sup> By restricting the immigration of Chinese women, lawmakers were able to control the formation of families and birth of Chinese American citizens. By branding Chinese women as prostitutes, lawmakers set an important precedent for racially exclusionary policies and prevented the expansion of citizenship to people viewed as racially inferior.

<sup>103</sup>Smith, *Freedom's Frontier*, 168.

<sup>104</sup>United States Congress, "Report," 392.

<sup>105</sup>Yung, *Unbound Feet*, 33.



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