ers had become so pronounced that AFL chief Samuel Gompers (Figure 5) declared, "If the colored man continues to lend himself to the work of tearing down what the white man has built up, a race hatred worse than any ever known before will result. Caucasian civilization will serve notice that its uplifting process is not to be interfered with in any such way."[18] Not surprisingly, black leaders felt differently. The black political leader Ida B. Wells praised strike-breakers as "men who proved their value by risking their lives to obtain work," and she endorsed "the constitutional right of all men to earn a living and to protect themselves in the exercise of that right."[19]

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Figure 5. "Samuel Gompers—Federal Commission on Industrial Relations, New York, New York," 1915.

Prints and Photographs Division, Library of Congress (LC-B2-3361-1).

Workers and labor reformers also struggled to organize during one the most conservative eras in United States judicial history. In its 1905 decision in *Lochner v. New York* (198 U.S. 45), the United States Supreme Court overruled a New York law limiting hours for bakery employees. Rather than being necessary to protect the welfare of the workers, the court found that such hours legislation amounted to an unconstitutional attempt to regulate business, and "unreasonable, unnecessary and arbitrary interference with the right and liberty of the individual to contract." With this reading of the Fourteenth Amendment's due process clause, the Court would go on in subsequent years to constrain workers' rights and legislative efforts to reform the industrial system. In 1908, for instance, the Court upheld what were known as "ironclad" or "yellow dog" contracts, which forced individual workers to sign an agreement not to join a union in order to secure a job. Also in 1908, the Court found that labor boycotts of employers had been banned by the 1890 Sherman Anti-Trust Act. In fact, there were more antitrust actions brought against union activities than business combinations until the Clayton Act of 1914 attempted to exclude union activity from the regulation of commerce, declaring that "the labor of human beings is not a commodity." In 1911, the Court banned consumer boycotts, and in this period it also upheld blacklisting of union organizers, the constitutionality of company towns, and employers' use of civil lawsuits to resist interference in their businesses. Even when the Court did support the constitutionality of reform