

The Trouble with Minna: A Case of Slavery and Emancipation in the Antebellum North**Hendrik Hartog****Chapel Hill: University of North Carolina Press, 2018****208 pages****ISBN: 9781469640884****DOI: <http://dx.doi.org/10.14713/njs.v5i1.162>**

In 1836, a New Jersey woman walked into her local county court to demand compensation for the ten-years' worth of costs she had incurred while begrudgingly providing for an enslaved woman in her care. Elizabeth Haines claimed that Minna, the enslaved African formerly owned by Henry Force and leased to Haines for a short term, was a "worthless" worker, stating "she drank, and she had become blind in one eye." (1-2) Although the local court ruled in Haines's favor, awarding her \$300 in damages, the New Jersey Supreme Court overturned the decision four years later. Haines had merely provided Force a "voluntary courtesy" by caring for Minna. The case, known as *Force v. Haines*, serves as a lens through which Hendrik Hartog explores the complex and often conflicting legal landscape of New Jersey's gradual emancipation in his engaging and deftly written work *The Trouble with Minna*.

The trouble with Minna, or rather Minna's case, reflects the troubled process of gradual emancipation in the North. Through his analysis, Hartog reveals how social, political, and legal frameworks reactively responded to situations like Minna's case by constantly re-defining both slavery and freedom. This created a convoluted and cloudy transition from a slave society to an emancipated one. Hartog begins by skillfully navigating this process through an examination of *Force v. Haines*. Despite framing Minna's case as a question regarding the relationship between poor relief and public and personal responsibility, Minna's status as an enslaved woman remained an implicit, fixed denominator within the legal arguments and considerations of the New Jersey Supreme Court. The Court's arguments reflected the inherent struggle to define responsibility – or liability – for the care of an enslaved individual within the context of the state's accepted laws of

slavery and emancipation. By engaging with multiple historiographical bodies including literature on the legal landscape of gradual emancipation and elder care, inheritance, and abolition, Hartog unravels this convoluted legal framework to expose the problem at the core of Minna's case: designating who would be responsible for the welfare of an enslaved person and even more so, the growing population of newly liberated freedmen and women in New Jersey within the legal context of gradual emancipation.

Aside from the few brief glimpses of Minna's life reflected throughout the litigant's discourse and legal dossiers, she remains largely obscured in Hartog's analysis. Although his focus is admittedly on the legal complexities of New Jersey's gradual emancipation rather than the lived experiences of enslaved Africans trapped within this liminal legal space, one wonders how enslaved Africans in New Jersey engaged with, understood, and perhaps even navigated autonomy along these chaotic contours. For example, Jared Hardesty's work *Unfreedom*, although situated in Boston during the Revolutionary era, demonstrates enslaved Africans' engagement with the law as a means of achieving a sort of freedom within the limitations of the New England institution.

Nevertheless, Hartog moves away from the litigants of *Force v. Haines* themselves to examine the cloudy legal processes of gradual emancipation in practice throughout the latter portion of his work. Readers interested in slavery, New Jersey law, and gradual emancipation will find chapters two and three most useful as he traces the changing legal boundaries of the enslaver-enslaved relationship within New Jersey's regime of gradual emancipation. What initially began in 1804, Hartog reveals, took decades to implement fully. In addition to *Force v. Haines*, Hartog is equally comfortable deciphering cases on arson, libel, kidnapping, and cruelty to illuminate the changing and often contradictory legal and factual understandings of slavery and emancipation statutes passed in 1798, 1812, and 1818. For example, in the 1827 case *Ogden v. Price* (nine years

before *Force v. Haines*) two brothers sued the original owner of an enslaved thirteen-year-old girl named Betty because they could not access her labor. However, Betty's parents had been previously been manumitted and, according to interpretations of the 1804 act, "once a child's mother was dead or free, they believed the child was free as well..." (124) Determining Betty's status, specifically whether she embodied a contractually assignable piece of property, predicated the case. Through an exploration of cases similar to Minna's, Hartog emphasizes the muddy understanding of what, or rather *who* constituted public property and the contradictory jurisdictions under which they fell. As the years continued and gradual emancipation persisted, legal issues continued to reflect the problematic nature of identifying who was enslaved and who was freed within New Jersey's complex legal landscape.

Unable to provide closure on the effect of the Supreme Court's decision of Minna's life, Hartog instead speculates on the lives of the litigants following *Force v. Haines* in the book's final chapter. While Elizabeth Haines remained in New Jersey, Henry Force moved to Virginia, and Minna's later life remains hidden from view. Despite her absence throughout the work, Hartog's short and well-researched work serves as an excellent case study for the complex and often contradictory legal process of emancipation for students and scholars alike.

Amanda McGee
University of Arkansas