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On March 13, 1866, Congress passed the Civil Rights Act, which declared that the 1870 Massachusetts anti-Radical bill to be unconstitutional. The 1866 bill failed because of the strength of the Southern states. By 1870, the Civil Rights Act had failed to pass. The act was signed into law on April 9, 1870.

Richard H. Cain was a member of the House Committee on Civil Rights in the 1870s. He later became a lawyer in Washington, D.C.

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