

classification, to be valid, must rest on some reason of public policy, some substantial difference of situation or circumstances that would naturally suggest the justice or expediency of diverse legislation with respect to the objects classified. In the case that we have before us here today with the exemption being offered, the only policy involved is a personal policy on the part of those senators who want to be reelected and the Governor. I'm going back to the case. There is no substantial difference of situation or circumstance that would naturally suggest the justice or expediency of diverse legislation with respect to the objects classified. Reasoning or refinement which would harmonize such classifications with the Constitution would make of the supreme law of the act of the Legislature and of the judgment of the court, a farce or a delusion. The bill that the court was discussing at that time, "is an attempt to legalize," well, it's talking about a special interest rate, and my time is running, and it has said that there is no basis for giving a special interest rate to one category of lenders and not another. They should all be subject to the same provision. But then the other language that applies to our situation here, and this is on page 260. The classification must rest upon real differences in situations and circumstances surrounding the members of the class relative to the subject of the legislation which render appropriate its enactment and, to be valid, the law must operate uniformly and alike upon every member of the class so designated. Classifications of persons for the purpose of legislation must be real and not elusive. They cannot be based on distinctions without a substantial difference. And when you try to distinguish this kind of equipment that would be granted the exemption from other similar equipment that is included in the definition of...or classification, there is no rational basis. Page 261, the very purpose of Article III, Section 18, of the Constitution is to prevent legislative action which grants benefits or immunities to persons or property within the general class that is made the subject of legislation. The accepted classes are so numerous and varied and cover such a broad field that the act, in fact, does not have the semblance of a general law but of a special one aimed at a special and limited class. It clearly denies to that class the equal protection of the laws. It grants to the excepted classes special privileges and immunities in violation of the State Constitution. On page 263, the Legislature may not create lesser classes of persons or property not permitted by the Constitution as...