

“Bills may originate in either House; but may be amended, altered or rejected by the other. No bill shall become a law which embraces more than one subject, that subject to be expressed in the title. All acts which repeal, revive or amend former laws, shall recite in their caption, or otherwise, the title or substance of the law repealed, revived or amended.”

Tenn. Const. art. 2, § 17.

“Prior to the Constitution of 1870 there had been great abuse of legislation in Tennessee. The practice prevailed of preparing omnibus bills, in which were combined the most incongruous subjects, with a view of enlisting for their passage as many legislators as were interested in the several subjects, and thus by a combined effort secure the enactment of a bill as a whole, when no one of the subjects so embraced, if left to its own merits, would have been able to secure the favorable consideration of the Legislature. This practice was found deleterious in its effects upon legislators, and often harmful to the state. In addition, experience had shown that many times objectionable clauses were, by astute and interested members, craftily introduced into pending bills of which no intimation was given by the title, and which thus, practically concealed, passed undiscovered through the legislative body, the greater part of whose members were aware of their existence or effect. Fraught as this practice was with many evils, it was the purpose of the framers of the Constitution in this provision to eradicate it. [citation omitted].

While, however, it has been uniformly held that this provision is mandatory, and should be enforced by the courts so as to accomplish the purpose to which it was addressed, yet it has often been announced that it should be liberally construed so as not unnecessarily to embarrass the Legislature in the enactment of wholesome laws: [citations omitted]”

*State v. Hayes*, 116 Tenn. 40, 93 S.W. 98 (1905)

