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"Make Washington Safe for Negro Womanhood": The Politics of Police Brutality in Washington, D.C., 1920-1945

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**“MAKE WASHINGTON SAFE FOR NEGRO WOMANHOOD”:
THE POLITICS OF POLICE BRUTALITY IN WASHINGTON,
D.C., 1920-1945**

MARY-ELIZABETH B. MURPHY*

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INTRODUCTION¹

In March 2020, white police officers in Louisville, Kentucky, wielded a battering ram to enter the apartment of a twenty-six-year-old Black woman named Breonna Taylor.² At the time, she was lying in bed with her boyfriend, Kenneth Walker.³ As the situation escalated, the police officers removed Taylor’s front door from its hinges, prompting Walker to shoot one officer in the thigh.⁴ In response, white officers fired their guns with abandon, shooting Breonna Taylor five times. The Jefferson County coroner concluded that Taylor likely died within one minute of these five gunshots and could not have been saved.⁵

The slaying of Breonna Taylor did not generate news stories until three months later, when white police officers arrested a Black man,

1. This Article has been adapted from the author’s previously published work and is printed here with the permission of the original publisher, University of North Carolina Press. MARY-ELIZABETH B. MURPHY, *JIM CROW CAPITAL: WOMEN AND BLACK FREEDOM STRUGGLES IN WASHINGTON, D.C., 1920-1945* (2018), www.uncpress.org.

This Article references quotations that contain archaic language that may be offensive to some. These direct quotes are included to provide historical context to the discrimination, racism, and violence that the Black community suffered at the hands of police. I am aware of the sensitivity surrounding these subjects.

2. Richard A. Oppel et al., *What to Know about Breonna Taylor’s Death*, N.Y. TIMES (Aug. 23, 2022), <https://www.nytimes.com/article/breonna-taylor-police.html>.

3. *Id.*

4. *Id.*

5. *Id.*

George Floyd, and pinned him to the ground until he lost consciousness and died.⁶ The visceral video footage of Floyd's death sparked global protests in the Black Lives Matter movement.⁷

Yet while many of the most heavily covered stories of police violence involve black male victims, Black women also have been longstanding victims of police violence, and should also be centered in the fight against racism.⁸ Senator Kamala D. Harris, then the only Black woman in the Senate, and now the Vice President of the United States, tweeted, "We cannot forget about black women in our quest for justice."⁹ Harris also tapped into activism against gendered police brutality by tweeting #SayHerName—a hashtag launched by the African American Policy Forum in 2015 as a way to commemorate the Black women and girls killed at the hands of white law enforcement.¹⁰ But the movement against gendered police brutality has a much longer history,¹¹ and a critical early effort demonstrates why we cannot lose sight of the particular threat of police violence against Black women.¹²

In 1933, an editorial in the Black-owned Washington Tribune titled "Women, Bravery, Freedom" recounted the remarks of former Alabama Senator Thomas Heflin. In 1930, Heflin entered into the Congressional Record a letter exchange he had with a news outlet in

6. Evan Hill, *How George Floyd Was Killed in Police Custody*, N.Y. TIMES (Jan. 24, 2022), <https://www.nytimes.com/2020/05/31/us/george-floyd-investigation.html>.

7. Jen Kirby, 'Black Lives Matter' Has Become a Global Rallying Cry Against Racism and Police Brutality, VOX (June 12, 2020, 7:30 AM), <https://www.vox.com/2020/6/12/21285244/black-lives-matter-global-protests-george-floyd-uk-belgium>.

8. Keisha N. Blain, *A Short History of Black Women and Police Violence*, THE CONVERSATION (June 12, 2020, 8:16 AM), <https://theconversation.com/a-short-history-of-black-women-and-police-violence-139937>.

9. Mary-Elizabeth Murphy, *Black Women Are the Victims of Police Violence, Too*, WASH. POST (July 24, 2020), <https://www.washingtonpost.com/outlook/2020/07/24/police-violence-happens-against-women-too/>; see also Kamala Harris (@KamalaHarris), TWITTER (June 5, 2020, 11:33 AM), <https://twitter.com/kamalaharris/status/1268974253862522889>.

10. KIMBERLÉ CRENSHAW, ANDREA RITCHIE, RACHEL ANSPACH, RACHEL GILMER & LUKE HARRIS, SAY HER NAME: RESISTING POLICE BRUTALITY AGAINST BLACK WOMEN (2015), 42–69; see also Kamala Harris, *supra* note 9.

11. ANDREA RITCHIE, INVISIBLE NO MORE: POLICE VIOLENCE AGAINST BLACK WOMEN AND WOMEN OF COLOR (2017).

12. Murphy, *supra* note 9.

which Heflin had referred to women as the “crowning glory of God’s creation.”¹³ Heflin’s reference to “women” was racially coded to signify white women, and in this speech, he linked their protection and purity to bans on interracial marriage.¹⁴ Assessing the contradictions in Heflin’s argument, the editorial remarked, “We too look upon our women with high regard.”¹⁵ It then described a recent episode of police brutality against two Black women—sixty-five-year-old Cornelia Diggs and her forty-eight-year-old daughter, Dedia Coates—in Washington, D.C.¹⁶ The editorial asked why, in “this land of the brave, where women are the crowning glory of God’s creation, two policemen—either drunk with liquor or authority—force[d] their way into the privacy of a sober residence” and attacked two women¹⁷ While Diggs had witnessed “seventy years of racial oppression,” she had never experienced the “forces of the law visited on her.”¹⁸ The officers beat Diggs and then “dragged [her] by the hair out of the house” to arrest her.¹⁹ The editorial ironically concluded that the brutality inflicted on Diggs and Coates represented another example of the “crowning Glory of God’s creation.”²⁰ Writers at the Washington Tribune reflected on the hypocrisy of figures like Senator Heflin, who vociferously defended the virtues of “women,” but turned a blind eye toward the rising levels of white violence against Black women in Washington, D.C.²¹

The early 1900s were a tumultuous period for Black women in Washington D.C. During the late 1920s, the number of reported cases of interracial police brutality against African American women in Washington, D.C., began to climb.²² These patterns of police vio-

13. 71 CONG. REC. 3174 (1930) (statement of Rep. Thomas J. Heflin). *See also* Editorial, *Women, Bravery, Freedom*, WASH. TRIB., Nov. 16, 1933, at 4 [hereinafter *Editorial*].

14. 71 CONG. REC. 3174, *supra* note 13.

15. *Editorial, supra* note 13.

16. *Id.*

17. *Id.*

18. *Id.*

19. *Id.*

20. *Id.*

21. *Editorial, supra* note 13.

22. *See, e.g., Woman and Baby Brutally Beaten by Policeman*, WASH. TRIB., Apr. 1, 1927, at 1; *Justice Blind in Police Abuse Case*, BALT. AFRO-AM., Apr. 16,

lence often affected Black men and women differently.²³ Between 1928 and 1938, white police officers shot and killed fifty citizens in the city, forty of whom were African American men.²⁴ While white police officers did kill Black women and girls during this period, the police subjected at least twenty-nine to a range of violent behaviors—including street harassment, racial epithets, physical assaults, and intrusions into their houses.²⁵ In addition to these abusive encounters,

1927, at 3; *Policeman Brutally Beats Woman*, WASH. TRIB., Oct. 11, 1930, at 1; *Officer Who Beat Woman Dismissed by Trial Board*, WASH. TRIB., Nov. 1, 1930, at 1; *Brutal Beating of Woman Deplored by Baptist Clergy*, WASH. TRIB., Oct. 18, 1930, at 1; *Our Mail Box*, WASH. TRIB., Nov. 29, 1930, at 6; *Brutal Police Stir City to Curb Menace*, WASH. TRIB., Dec. 27, 1929, at 2.

23. ERIC S. GELLMAN, *DEATH BLOW TO JIM CROW: THE NATIONAL NEGRO CONGRESS AND THE RISE OF MILITANT CIVIL RIGHTS* 109–147 (2012).

24. *Id.*

25. See, e.g., *Policeman Brutally Assaults Young Girl*, WASH. TRIB., June 18, 1921, at 1; *D.C. Woman Charges Cop with Attack*, CHI. DEF., Apr. 16, 1927, at 2; sources cited *supra* note 22; *White Capital Policemen Held for Assault on Woman*, BALT. AFRO-AM., Jan. 22, 1933, at 1; *White Policemen Held for the Grand Jury for Assault on Druggist*, WASH. TRIB., Jan. 20, 1933, at 9; *D.C. Cops Terror to Women*, BALT. AFRO-AM., Dec. 24, 1932, at 11; *Police Beat Her, Woman Charged*, WASH. TRIB., Aug. 24, 1933, at 1; *Can't Arrest Her Assailant*, WASH. AFRO-AM., Oct. 7, 1933, at 1; *Dragged Down Steps by Hair*, BALT. AFRO-AM., Nov. 25, 1933, at 11; *Brutality Arouses Ire of Citizens*, WASH. TRIB., Nov. 9, 1933, at 1; *Woman, 65, Acquitted of Assaulting Officers*, NORFOLK J. & GUIDE, Mar. 10, 1934, at 2; Harlan Glazier, *Brutality Enthroned* (pamphlet on file with Howard University, Moorland-Spingarn Research Center Archives); *Protest Arrest of Woman at Beer Garden*, WASH. AFRO-AM., July 28, 1934, at 8; *East Central Civic Association Meets*, WASH. TRIB., July 21, 1929, at 6; *Civic Association Protests Police Brutality*, WASH. TRIB., Mar. 24, 1933, at 9; *Police Brutality Greater Menace than Reds, Declares Civic Group*, WASH. TRIB., Apr. 21, 1933, at 9; *DePriest Speaks to Southwest Civic Group*, WASH. TRIB., June 16, 1933, at 9; *Says Brutal Cops Broke into Home*, BALT. AFRO-AM., Apr. 24, 1937, at 1; *Spectators Laugh as Cops Say Woman They Beat Assaulted Them*, WASH. TRIB., Apr. 13, 1935, at 1; *NAACP Pledges to Help Fight Cop Brutality*, WASH. TRIB., Aug. 3, 1935, at 7; *Policeman Freed of Brutality*, WASH. TRIB., Aug. 17, 1935, at 1; *Police Brutality Given Commissioners*, WASH. TRIB., Jan. 16, 1937, at 1; *Cop Exonerated in 53rd Killing*, BALT. AFRO-AM., Mar. 27, 1937, at 1; *Commissioners on Spot in Brutality*, BALT. AFRO-AM., Apr. 17, 1937, at 1; *Delegation to Present Petition to Cummings for Negro Police Judge*, WASH. TRIB., Mar. 20, 1937, at 1; *Murders by Police in Nation's Capital Protested at Meet*, CHI. DEF., May 22, 1937, at 3; *Citizens Protest Police Brutality*, WASH. AFRO-AM., June 25, 1938, at 3; *Police Brutality Case in D.C. Called Plain Murder*, NORFOLK J. & GUIDE, July 16, 1938, at 8; Affidavit of Ruth Clark (Aug. 1, 1938) (on file with the author); Affidavit of Dorothy Brice, August 1, 1938 (on file with

white police officers and detectives in the Washington Metropolitan Police Department often employed a negligent, double standard by refusing to conduct thorough investigations when Black women were abused, raped, or murdered.²⁶

Interracial police violence created a culture of fear for Black Washingtonians. Known victims of police brutality lived in every quadrant of the city, ranged in age from fifteen to sixty-eight, and represented diverse class backgrounds.²⁷ African American women living in the nation's capital were deeply connected to police brutality—whether they were victims, litigants, bystanders, family members of an injured party, or political activists.²⁸

author); *Brutality!*, WASH. TRIB., Feb. 11, 1939, at 2; *D.C. Matrons Sue Cop*, BALT. AFRO-AM., July 29, 1939, at 1; *Police Brutality on the Increase in Washington*, CHI. DEF., Oct. 14, 1939, at 1; *Cop Brutality on Mock Trial September 26*, WASH. TRIB., Sept. 21, 1940, at 1; *Solve 7 Sex Slayings in Washington, NY*, ATL. DAILY WORLD, Aug. 30, 1941, at 1; *Don't Blame the Cops*, WASH. AFRO-AM., July 19, 1941, at 1.

26. *Solve 7 Sex Slayings in Washington, NY*, *supra* note 25; *Page Mister Ripley; Cato; Indicts Police!*, BALT. AFRO-AM., Sept. 20, 1941, at 19.

27. *See, e.g., Policeman Brutally Assaults Young Girl*, *supra* note 25, at 1; *D.C. Woman Charges Cop with Attack*, *supra* note 25, at 2; *White Capital Policemen Held for Assault on Woman*, *supra* note 25, at 1; *White Policemen Held for the Grand Jury for Assault on Druggist*, *supra* note 25, at 9; *D.C. Cops Terror to Women*, *supra* note 25, at 11; *Police Beat Her, Woman Charged*, *supra* note 25, at 1; sources cited *supra* note 22.

28. *See, e.g.,* sources cited *supra* note 27.

Figure 1: Female Victims of Police Brutality in Washington, D.C.²⁹

First	Last	Age	Region	Year	Site of Attack	Source
Novella	Johnson	17	NW	1921	Street	Newspaper
Josephine	White	32	NE	1927	Home	Newspaper
Anne	Burleigh	55	NW	1929	Street	Newspaper
M.	Body	<i>Unknown</i>	NW	1929	Street	Newspaper
Catherine	Brawner	46	NW	1929	Street	Newspaper
Constance	Spencer	24	NW	1929	Street	Newspaper
Ida	Turner	38	NW	1930	Street	Newspaper
Corinne	McCowe	<i>Unknown</i>	NW	1932	Street	Newspaper
Virgie	Togood	22	SE	1932	Street	Newspaper
Mattie	Ford	25	SE	1932	Street	Newspaper
Alberta	Young	54	SE	1933	House	Newspaper
Cornelia	Diggs	68	SE	1933	House	Newspaper
Dedia	Coates	48	SE	1933	House	Newspaper
Ida	Lindsey	22	NW	1934	Beer Garden	Newspaper
Jeannette	Kidd	34	SW	1935	House	Newspaper
Jessie	Sterling	56	SW	1935	House	Newspaper
Mildred	deArellano	25	NE	1935	House	Newspaper
Jennie	Peters	45	NE	1935	House	Newspaper
Martha	Lloyd	17	NW	1936	Street	Newspaper
Ruth	Lloyd	15	NW	1936	Street	Newspaper
Georgia	Watkins	36	NW	1937	Street	Newspaper
Ruth	Clark	29	NW	1938	Home	NNC Report
Viola	Harris	<i>Unknown</i>	NW	1939	Home	Newspaper
Lillie	Watson	<i>Unknown</i>	NW	1939	Home	Newspaper
Ethel	McKinney	25	NW	1940	Street	Newspaper
Frances	James	<i>Unknown</i>	NW	1940	Street	Newspaper
Dorothy	Bowles	30	NE	1940	Street	NNC Flier
Eva	Moxley	30s	<i>Unknown</i>	<i>Unknown</i>	Street	Newspaper
Dorothy	Wood	<i>Unknown</i>	<i>Unknown</i>	<i>Unknown</i>	Street	IC Report

29. See sources cited *supra* note 25.

Black Washingtonians politicized interracial police brutality in the 1930s and 1940s to hold police accountable for their actions. Officers of the Metropolitan Police Department were contracted to uphold the law and were subject to trial boards,³⁰ but they were rarely punished for their brutal behavior. For example, in 1931, Officers Sirola and Vivian Landrum barged into the house of Henry Johnson, a veteran of World War I who worked as a Pullman porter.³¹ Both officers beat him with a Blackjack and broke his skull.³² Johnson sued the officers in Police Court for damages, and Sirola and Landrum were suspended from duty.³³ But in Criminal Court, Landrum was charged with simple assault and fined \$100.00; Sirola was acquitted.³⁴ Two years later, in 1933, Detective Frank Ashley similarly went unpunished for using iron clamps to force George Mahoney, a Black man, to confess to a crime.³⁵ These examples demonstrate that Trial Boards rarely held white police officers accountable for their brutal behavior toward African Americans. Black Washingtonians worked to plead their cases in Police Court, pressured the Board of Commissioners and the United States Congress to investigate officer abuse, and pushed for the appointment of African American judges to Police Court.³⁶ Black Washingtonians recognized that there were avenues of accountability

30. GELLMAN, *supra* note 23, at 109–147.

31. *Man Sues 2 Police on Beating Charge*, WASH. POST, Aug. 28, 1931, at 2. John Sirola was also known as “John Cirol.” GELLMAN, *supra* note 23, at 109–147.

32. *Man Sues 2 Police on Beating Charge*, *supra* note 31, at 2.

33. *Id.*

34. *Policeman Found Guilty of Beating Wielder of Stick*, WASH. POST, Dec. 12, 1931, at 22; *Cop Convicted of Assault, Fined \$100*, BALT. AFRO-AM., Mar. 12, 1932, at 4.

35. Glazier, *supra* note 25.

36. After officers arrested a citizen, a hearing occurred in Police Court. Here, a white judge heard the testimony from both the officer and the arrested citizen and rendered a judgment. In the 1930s, all Police Court judges were white. *Delegation to Present Petition to Cummings for Negro Police Judge*, *supra* note 25; *Brutality Arouses Ire of Citizens*, *supra* note 25; *Mrs. R. G. McGuire Named President of Local NAACP*, WASH. TRIB., Mar. 8, 1934, at 1; *East Central Civic Association Meets*, *supra* note 25, at 6; *Civic Association Protests Police Brutality*, *supra* note 25, at 9; *Police Brutality Greater Menace than Reds, Declares Civic Group*, *supra* note 25, at 9; *NAACP Pledges to Help Fight Cop Brutality*, *supra* note 25, at 7; *Washington, D.C., Federation Meets and Elects Officers*, CHI. DEF., Oct. 8, 1938, at 17; H.R. Res. 77, 75th Cong. (1937).

in police violence that did not exist for civilian violence.³⁷ At this time in the 1930s and 1940s, prosecutors were not filing charges against civilian white men engaging in violence against Black women.³⁸ Civilian violence against Black women was a serious problem. Women faced danger in every corner of the city, including worksites, the homes where they labored as domestic servants, on streets and alleys, in streetcars, buses, and taxis, in places of public amusement, in schools and hospitals, and in their own houses.³⁹

Both the federal and local governments supervised law enforcement in Washington, D.C., in the 1920s.⁴⁰ The city's three-person Board of Commissioners appointed the police commissioner, who hired the officers, while the Congressional Committee of the District of Columbia approved the budget and oversaw the administrative workings of the department.⁴¹ In 1920, 995 white men and 38 Black men worked as police officers in the city.⁴² After citizens were arrested, they could plead their case in Police Court in front of one of the four white male presiding judges in Northwest Washington.⁴³ During the 1920s and 1930s, the Police Court was busy.⁴⁴ An article in the *Washington Post* reported that the "present congestion of the District Police Court interferes with adequate and sufficient consideration" of

37. *Delegation to Present Petition to Cummings for Negro Police Judge*, *supra* note 25, at 1; *Brutality Arouses Ire of Citizens*, *supra* note 25, at 1; *Mrs. R. G. McGuire Named President of Local NAACP*, *supra* note 36, at 1; *East Central Civic Association Meets*, *supra* note 25, at 6.

38. GELLMAN, *supra* note 23, at 109–147.

39. African American women faced both intra-racial and interracial violence in Washington, D.C. Legal records help illuminate some of the violent situations that Black women faced. Of nineteen divorce cases filed in Washington, D.C. during the 1920s, five of the plaintiffs cited spousal abuse or cruelty in their petition. *See, e.g.,* *Craney v. Craney*, No. 46786 (D.C. Mun. Ct. 1927); *see also Brutes Flee after Girls Are Beaten*, CHI. DEF., Aug. 19, 1922, at 2 (discussing interracial violence against Black women).

40. GELLMAN, *supra* note 23, at 109–47.

41. *Id.*

42. U.S. CENSUS BUREAU, CENSUS 1920 (1920) [hereinafter 1920 CENSUS] (on file with author).

43. GELLMAN, *supra* note 23, at 109–47.

44. *Police Court Congestion*, WASH. POST, Sept. 10, 1923, at 6; *Police Court Congestion Blamed for Inadequate Administration*, WASH. POST, Jan. 15, 1935, at 1.

many cases.⁴⁵ If Black citizens were brave enough to plead their innocence in Police Court, they faced long delays and crowded conditions.⁴⁶ When citizens believed that an officer had demonstrated abusive behavior and had not been reprimanded, they could appeal to the Police Trial Board and request a hearing.⁴⁷ At the hearing, a committee would recommend whether that officer should be suspended, pay a fine, receive a warning, or be dismissed from the force.⁴⁸ Even though officers rarely faced significant punishments for violence against citizens, it was deeply important that Black Washingtonians exercised their citizenship rights in the nation's capital by appearing in Police Court and appealing to the Trial Board for justice.⁴⁹

Historians who have examined police brutality against Black citizens in Washington, D.C., in the 1930s have not yet fully analyzed the broad spectrum of violence against Black women during that time. In his study of the National Negro Congress, Professor Erik Gellman documents Black citizens' campaigns against police brutality in Washington, D.C., but he centers the majority of his study on the experiences of male shooting victims and male activists who worked to reduce this violence.⁵⁰ Gellman argues that Black Washingtonians' experiences with police brutality were similar to the lynching that occurred in the United States South⁵¹ Racial violence in both settings had the effect of bolstering white supremacy.⁵² However, focusing on victims of police shootings obscures the ways that gender shaped violence against Black women in the 1930s.⁵³

Scholars have analyzed interracial police violence and its impact on Black women in other cities. In her study of Detroit during the 1920s and 1930s, Professor Victoria Wolcott argues that Black women's participation in underground economies—including bootlegging

45. *Police Court Congestion*, *supra* note 44, at 6; *Police Court Congestion Blamed for Inadequate Administration*, *supra* note 44, at 1.

46. *Police Court Congestion*, *supra* note 44, at 6; *Police Court Congestion Blamed for Inadequate Administration*, *supra* note 44, at 1.

47. GELLMAN, *supra* note 23, at 109–47.

48. *Id.*

49. *Id.*

50. *Id.* at 110.

51. *Id.*

52. *Id.*

53. *Id.*

and prostitution—made them vulnerable to police brutality.⁵⁴ She also links the absence of Black police officers with the escalating rates of violence against Black women.⁵⁵ Similarly, Cheryl Hicks’s scholarship on Black women in New York City argues that police officers instinctively linked African American women with crime to justify their violence.⁵⁶ This historiography helps contextualize some of the violent encounters between white police officers and African American women in Washington, D.C. But, as Sarah Haley argues, scholars are just beginning this work. She contends that police violence against Black women and girls is part of “historical erasure.”⁵⁷ This Article chronicles police brutality through the eyes of Black women, like Cornelia Diggs and Dedie Coates, and grapples with some of the reasons for its absence from historical records.

Historians have applied different methodologies to their research on Black women’s violent encounters with the police.⁵⁸ Since violence involves lingering trauma, a discussion of this experience is always fragmented, partial, and incomplete.⁵⁹ As Professor LaKisha Simmons argues, “Silence is absence; it is stories half-told, knowing glances, and narratives ignored.”⁶⁰ The history of overt police violence and institutional negligence against Black women brims with these very silences.

54. VICTORIA WOLCOTT, *REMAKING RESPECTABILITY: AFRICAN AMERICAN WOMEN IN INTERWAR DETROIT* 111–14 (2000).

55. *Id.*

56. CHERYL D. HICKS, *TALK WITH YOU LIKE A WOMAN: AFRICAN AMERICAN WOMEN, JUSTICE, AND REFORM IN NEW YORK, 1890–1935*, at 64–70 (2010).

57. SARAH HALEY, *NO MERCY HERE: GENDER, PUNISHMENT, AND THE MAKING OF JIM CROW MODERNITY* 251 (2016).

58. These methodologies include reading against a grain, foregrounding a consideration of power relations, and understanding the ways that violence was ever present in the lives of African American women in the early twentieth century. *See, e.g.*, KIDADA WILLIAMS, *THEY LEFT GREAT MARKS ON ME: AFRICAN AMERICAN TESTIMONIES OF RACIAL VIOLENCE FROM EMANCIPATION TO WORLD WAR I*, at 1–15 (2012); Ashley D. Farmer, *In Search of the Black Women’s History Archive*, 1 *MOD. AM. HIST.* 289, 289–93 (July 2018).

59. Lingering trauma occurs when one witnesses an incident of violence and that experience remains with the person for the rest of their life. *See, e.g.*, Williams, *supra* note 58, at 1–15.

60. LAKISHA SIMMONS, *CRESCENT CITY GIRLS: THE LIVES OF YOUNG BLACK WOMEN IN SEGREGATED NEW ORLEANS* 82 (2018).

This Article draws on newspapers, organizational papers, records of the Washington Metropolitan Police Department, and census data to document gendered police violence against Black women from 1920-40.⁶¹ While Black newspapers offer the most comprehensive treatment of police brutality cases, it is rare to find in-depth descriptions of particular cases reporting on police violence, which requires complex investigative journalism. Not only did this pose a financial burden to the cash-strapped Black press but it also demanded that Black reporters question white police officers.⁶² These encounters could range from uncomfortable to violent.⁶³ This challenge posed by a paucity of sources is compounded by the reality that it was dangerous for Black women to report violent encounters, especially those involving rape or sexual assault. Whenever a Black woman in Washington, D.C., experienced violence, she faced a weighty decision about whether to disclose this assault because her morality would be questioned, her respectability scrutinized, and her future potentially compromised. As one unknown African American woman wrote in 1904, “[a] Colored woman, however respectable, is lower than the white prostitute.”⁶⁴ The historical record contains twenty-nine cases of brutality.⁶⁵ There were many, many more cases that were left unreported.

61. There are few records of the Washington Metropolitan Police between 1920 and 1945. The annual reports, prison statistics, and arrest records between 1910 and 1920 are on file with the author. Records for the Police Court were not preserved.

62. See *Afro Employs 396 in Washington*, WASH. AFRO-AM., Nov. 11, 1933, at 2.

63. *Id.* In the early 1930s, the *Washington Afro-American* published a weekly paper and employed a staff of newspaper staff of six, along with agents and delivery workers.

64. Anonymous Black Woman, *A Colored Woman, However Respectable, Is Lower than the White Prostitute* (1904), in BLACK WOMEN IN WHITE AMERICA: A DOCUMENTARY HISTORY 167 (Gerda Lerner ed.) (1992).

65. See sources cited *supra* note 25.

I. THE CRIMINALIZATION OF BLACK WOMEN IN WASHINGTON, D.C.

Relations between Black Washingtonians and police officers had always been strained, but they worsened for a variety of reasons during the 1920s.⁶⁶ In 1919, the Eighteenth Amendment banned alcohol in the United States, which prompted some Americans to engage in underground economies of smuggling and bootlegging alcohol.⁶⁷ Police officers disproportionately punished African Americans for these activities.⁶⁸ Beginning in 1929, the Great Depression prompted more Washingtonians to pursue petty theft or bootlegging for survival.⁶⁹ As the Depression dragged on, Black and white citizens staged militant marches in the nation's capital for economic relief, sometimes with the assistance of the Communist Party.⁷⁰ This increased face-to-face interactions between white police officers and Black citizens.⁷¹ Additionally, the Washington Metropolitan Police Department and its Women's Bureau, which handled female offenders, were understaffed throughout the 1930s and did not hire enough Black officers in proportion to the city's Black population.⁷² Taken together, these conditions produced discernible patterns of interracial police violence against Black Washingtonians, typified by arbitrary arrests, unnecessary force, home intrusions, verbal threats, and shootings. As police violence increased in the late 1920s and early 1930s, Black women and men responded to this crisis by filing lawsuits, engaging in investigations, and attending meetings—all while continuing their efforts to pass a federal anti-lynching law.⁷³

Throughout the 1930s, a diverse group of Black women protested police brutality.⁷⁴ Women's campaigns to end police violence under-

66. GELLMAN, *supra* note 23, at 110.

67. LISA MCGIRR, *WAR ON ALCOHOL: PROHIBITION AND THE RISE OF THE AMERICAN STATE* (2015).

68. *Id.*

69. CHRIS MYERS ASCH & GEORGE DEREK MUSGROVE, *CHOCOLATE CITY: A HISTORY OF RACE AND DEMOCRACY IN THE NATION'S CAPITAL* 249–284 (2017).

70. *Id.*

71. *Id.*

72. *Washington Policewomen Making Good*, CHI. DEF., Apr. 1, 1922, at 20.

73. GELLMAN, *supra* note 23, at 109–147.

74. *See, e.g., Brutality Arouses Ire of Citizens*, *supra* note 25, at 1; *Mrs. R. G. McGuire Named President of Local NAACP*, *supra* note 36, at 1; *East Central Civic*

scored the connections between their grassroots community organizing and government lobbying. Their efforts encompassed a variety of situations: they supported individual citizens who resisted officers' aggressions and pled innocence in Police Court, stood by the middle-class activists who lobbied government officials, and—dozens, sometimes hundreds of Black women—read reports in the press, attended mass meetings, witnessed mock police trials, and marched in protest parades.⁷⁵ While police brutality was not an exclusively women's movement, Black women's networks mobilized in neighborhood associations, the Phyllis Wheatley YWCA, fraternal orders, and political organizations.⁷⁶ African American women worked to make the city "Safe for Negro Womanhood," contending that the fight for justice and equality across the nation could never be achieved until it was realized in its capital.⁷⁷

Throughout the city, police officers treated African American women and girls with suspicion.⁷⁸ Records between 1917 and 1920 show that Black women in Washington were arrested at significantly higher rates than white women for various charges, including disorderly conduct, intoxication, and enticing prostitution.⁷⁹ Even more, within female jails, only Black women labored as laundresses, which reinforced their second-class status in these institutions.⁸⁰ In a hearing

Association Meets, *supra* note 25, at 6; *Civic Association Protests Police Brutality*, *supra* note 25, at 9; *Police Brutality Greater Menace than Reds, Declares Civic Group*, *supra* note 25, at 9; *NAACP Pledges to Help Fight Cop Brutality*, *supra* note 25, at 7; *Washington, D.C., Federation Meets and Elects Officers*, *supra* note 36, at 17.

75. See sources cited *supra* note 74.

76. *Id.*

77. *Id.*

78. See *Under the Capital Dome*, CHI. DEF., July 22, 1922, at 19; *A Hundred Are Seized in a Hotch Raid*, CHI. DEF., Feb. 17, 1923, at 13; see also METROPOLITAN POLICE DEPARTMENT, REPORTS OF ARRESTS, 1917–1920 (on file with the National Archives and Records Administration) (for newspaper accounts of Black women and crime); *Repression of Prostitution in the D. of Columbia: Hearings Before the Subcomm. on the D. of C. of the S. Comm. on Pub. Health, Hospitals, & Charity*, 67th Cong. (1921) [hereinafter *Repression of Prostitution Hearings*] (for government investigations).

79. See sources cited *supra* note 78.

80. *Man Sues 2 Police on Beating Charge*, *supra* note 31, at 2; *Capital Jail Has Our Women Do All Laundry Work*, WASH. AFRO-AM., Apr. 13, 1935, at 14.

before the U.S. House of Representatives, Assistant Superintendent of the Jails Thomas Rives argued that it was “necessary” to employ Black women in these laundry facilities because it provided a “form of occupation for them” and “served a useful purpose for the jail.”⁸¹ Rives cast Black women as the natural population to work as laundresses in the city’s jails and even expressed surprise that “disorderly” Black women had not destroyed the laundry facilities, further perpetuating the poor image of Black women in the eyes of law enforcement officials.⁸²

Black women were also far more likely to be convicted of crimes. During the 1920s, 11,623 African American women served time in prison, as compared to 1,810 white women. Eighty-eight percent of all female prisoners were Black, though Black women comprised only twenty-six percent of the female population in Washington, D.C.⁸³ That Black women were the majority of police arrests among women and disproportionately dominated the population of female prisoners helped perpetuate stereotypes about all African American women in the city, linking them with crime and participation in underground economies.

In 1918, Mina Van Winkle, a white officer, formed the Women’s Bureau in the Police Department, which worked to improve conditions for all women in Washington.⁸⁴ As the bureau’s director during the 1920s, Van Winkle ordered policewomen to patrol the city and conduct “preventative and protective work.”⁸⁵ Van Winkle valued the importance of Black policewomen.⁸⁶ During World War I, she recruited prominent political activist Marian D. Butler to serve as a matron and attendant in the city’s jailhouse.⁸⁷ Van Winkle also hired twenty white women and two Black women to serve as police officers.⁸⁸ While two female Black officers may seem insignificant, in

81. *Id.*

82. *Id.*

83. These statistics were calculated using general population and prison statistics from the Washington, D.C., Board of Commissioners’ annual reports from 1920 through 1930. The reports are on file with the author.

84. *Repression of Prostitution Hearings*, *supra* note 78.

85. *Id.*

86. *Id.*

87. *Career Women of the Capital*, WASH. AFRO-AM., Apr. 13, 1940, at 7.

88. *Washington Policewomen Making Good*, *supra* note 72, at 20.

1923 there were only seven Black policewomen in the entire country.⁸⁹

Since African American policewomen were so rare, the Black press ran several articles on the officers in Washington, D.C.⁹⁰ The Chicago Defender labeled Washington a “pioneer” for having so many policewomen.⁹¹ The Southern Workman profiled Washington’s two policewomen, reporting that officers traded day and night shifts to ensure that at least one Black woman officer was on call in the evenings.⁹² The officers acknowledged the high rate of arrests for Black women and sought to lower it by working with reformers and community organizations across the city.⁹³ They also patrolled, taking “young girls in the streets or in questionable places of amusement” to their homes for questioning—not to jail.⁹⁴ “The two colored policewomen,” the article concluded, “have resolved to reduce this staggering number of arrests by prophylaxis,” working with the YWCA, women’s organizations, schools, and churches to keep women out of danger; the “results have been most gratifying.”⁹⁵

The evidence suggests that Van Winkle’s leadership in the Women’s Bureau and the individual advocacy of the city’s two Black policewomen were relatively effective: in the early 1920s, there was only one reported case of police brutality against a Black woman.⁹⁶ In 1921, Novella Johnson, a seventeen-year-old girl, was walking along Fairmount Avenue near Georgia Avenue in Northwest Washington at 5 p.m.⁹⁷ Along the way, two Black boys were throwing stones at an iron post near a street lamp, which inspired a white woman to chase after the boys.⁹⁸ Presumably sensing that this situation could turn explosive, Johnson intervened, explaining to the white woman that the

89. *Do You Know?*, PITT. COURIER, Nov. 3, 1923, at 11.

90. *Washington Policewomen Making Good*, *supra* note 72, at 20; *Do You Know?*, *supra* note 89, at 11; *Colored Policewomen of Washington*, S. WORKMAN, at 135–36.

91. *Washington Policewomen Making Good*, *supra* note 72, at 20.

92. *Colored Policewomen of Washington*, *supra* note 90.

93. *Id.*

94. *Id.*

95. *Id.*

96. *Policeman Brutally Assaults Young Girl*, *supra* note 25, at 1.

97. *Id.*

98. *Id.*

boys were throwing stones at the post, not the street lamp.⁹⁹ E. C. Spaulding, a white police officer dressed in plain clothes, emerged on the scene and “slapped Miss Johnson down.”¹⁰⁰ Acting in self-defense—and not realizing Spaulding was a police officer—Johnson grabbed a stone and struck Officer Spaulding in his left eye.¹⁰¹ Spaulding retaliated by choking her as he “pummeled her in the face,” causing blood to pour from her nose and mouth.¹⁰² Spaulding continued to beat Johnson until a white bystander pulled him off of her.¹⁰³ Two Black women witnessed this assault and swiftly called the police, informing them that a white man was attempting to kill a Black girl.¹⁰⁴ When the police officers arrived, they took Johnson to Garfield, a white hospital nearby, and later arrested her for assaulting an officer.¹⁰⁵

Johnson’s attorney, Royal Hughes, pressed the city of Washington, D.C., to convene a jury trial, but the case was deferred.¹⁰⁶ Rather than punish Officer Spaulding, the Metropolitan Police Department transferred him to another precinct.¹⁰⁷ An article about the incident noted, “[t]he whole neighborhood was worked up on this inhuman attack on this young woman.”¹⁰⁸ While disturbing and brutal, Johnson’s assault was the only recorded episode of police violence against Black women in Washington D.C. in 1921.¹⁰⁹

II. “D.C. COPS A TERROR TO WOMEN”: BRUTALITY SURGES

Beginning in the late 1920s and early 1930s, Black newspapers began to report rising levels of police violence against Black Washingtonians.¹¹⁰ Multiple factors account for this, such as the Metropoli-

99. *Id.*

100. *Id.*

101. *Id.*

102. *Policeman Brutally Assaults Young Girl*, *supra* note 25, at 1.

103. *Id.*

104. *Id.*

105. *Id.*

106. *Id.*

107. *Id.*

108. *Policeman Brutally Assaults Young Girl*, *supra* note 25, at 1.

109. *Id.*

110. *See generally* GELLMAN, *supra* note 23, at 109–147.

tan Police Department employing only forty Black men and two Black women as officers.¹¹¹ Henrietta Burwell, one of the city's two Black policewomen, died suddenly in 1930 and was not replaced for several years.¹¹² The Metropolitan Police Department also underwent administrative changes around this time. In 1932, Ernest W. Brown, a white officer, was appointed police commissioner.¹¹³ One year later, Mina Van Winkle retired as director of the Women's Bureau and was succeeded by Rhoda Milliken, another white officer.¹¹⁴ Under Milliken's management, Black policewomen reported that they no longer patrolled the city, which created more opportunities for white officers to abuse African American women.¹¹⁵

In addition to these departmental changes, the Great Depression transformed the culture of the city. Police officers' brutal treatment of African Americans grew after the stock market crash, leading all Black Washingtonians to fear harsh treatment.¹¹⁶ As citizens streamed into the nation's capital and staged public demonstrations for economic relief, officers in the Metropolitan Police Department expressed frustration and concern.¹¹⁷ The department's annual reports hint at struggles between officers and citizens.¹¹⁸ A report from 1931 noted that a "national hunger march" brought "some 1,500 Communists and agitators" into Washington.¹¹⁹ The characterization of marchers as "agitators" reflected the negative perception of the marchers.¹²⁰ One year

111. *Capital Police Woman Dies at Age 40*, N.Y. AGE, Apr. 30, 1930, at 14. See also *Seven Whites Seek Vacancy*, WASH. AFRO-AM., Aug. 2, 1930, at 2; *Would Colored Police Reduce Crime?*, BALD. AFRO-AM., May 21, 1932, at 11.

112. *Capital Police Woman Dies at Age 40*, *supra* note 111, at 14. See also *Seven Whites Seek Vacancy*, *supra* note 111, at 2.

113. *The Chief of Police*, WASH. POST, Oct. 22, 1932, at 6.

114. *Days Work Curse of Women, Says District Policewoman*, WASH. AFRO-AM., Sept. 21, 1935, at 11.

115. *Id.*

116. ASCH & MUSGROVE, *supra* note 69, at 249–284.

117. WASH. D.C. BOARD OF COMMISSIONERS, REPORTS OF THE BOARD OF COMMISSIONERS OF WASHINGTON, D.C. (1931) (on file with the Washington, D.C., Government Publishing Office (GPO)); see also WASH. D.C. BOARD OF COMMISSIONERS, REPORTS OF THE BOARD OF COMMISSIONERS OF WASHINGTON, D.C. (1934) (on file with the GPO).

118. See sources cited *supra* note 117.

119. *Id.*

120. *Id.*

later, 20,000 veterans from World War I camped in Washington, D.C., to demand payment of a bonus, which greatly strained the resources of the Metropolitan Police.¹²¹ A report in 1934 noted that there were “a number of smaller marches and gatherings” that “made problems for the police department”—equating public demonstrations with problems.¹²² These reports were made race central by highlighting the presence of African Americans and linking them to communist activities.¹²³ Taken together, these events—personnel changes, a lack of Black officers, Prohibition, the Great Depression, and political militancy—led to violent encounters between white officers and Black women in the late 1920s and early 1930s.

A. Officers’ Invasion of Black-Owned Homes

There were several different scenarios white officers capitalized on to attack Black women. Sometimes, policemen invaded their homes, especially when men were absent.¹²⁴ In April 1927, Josephine White, a domestic servant, was sitting in her parlor with her fifteen-month-old son, Wilbur, at their home at Linden Court in Northeast Washington.¹²⁵ Her husband, Charles, was out when Police Officer Clifton J. Gary barged into the home, asked White where her husband was, and then “dragged her out into the alley and tried to force her into his automobile and beat her with a heavy stick.”¹²⁶ White escaped from the officer and limped one block onto H Street, a business and residential street, where she collapsed and was taken to Casualty Hospital.¹²⁷ A few minutes later, three other policemen in plainclothes “began to terrorize the citizens living on the street.”¹²⁸ An article reported, “[i]n their wild orgy they broke into people’s doors, intimidated them, and in general created a disturbance.”¹²⁹ The riot finally

121. *Id.*

122. *Id.*

123. *Id.*

124. *See, e.g.,* sources cited *supra* note 22.

125. For residency information of Charles and Josephine White, *see generally* BOYD’S CITY DIRECTORY OF THE DISTRICT OF COLUMBIA (1927), at 1574.

126. *D.C. Woman Charges Cop with Attack*, *supra* note 25, at 2.

127. *Woman and Baby Brutally Beaten by Policeman*, *supra* note 22, at 1.

128. *Justice Blind in Police Abuse Case*, *supra* note 22, at 3.

129. *Id.*

ended when a sergeant from the Ninth Precinct arrested Officer Gary, placed him in a cell, and charged him with drunk and disorderly conduct.¹³⁰ The case went to Police Court, and five witnesses testified about the beating and police brutality against White and the citizens of H Street.¹³¹ However, Judge McDonald dismissed the case.¹³² An article in the Baltimore Afro-American titled “Justice Blind in Police Abuse Case” claimed Assistant District Attorney Bruce received “considerable criticism” for “not vigorously cross-examin[ing] the witnesses” or “emphasiz[ing] the weight of the testimony against the white offender.”¹³³ The fact that Officer Gary was inebriated when he barged into White’s home suggests he was looking for alcohol.¹³⁴

Newspaper accounts in the Black press emphasized White’s respectability.¹³⁵ Interviews of her neighbors revealed White was a woman of “small build” who had a “quiet, unassuming manner,” maintained an “excellent reputation for peace and good order,” and was of “model character.”¹³⁶ This language was precise, racially coded, and grounded in notions of sexual propriety. Her “small build” might contradict allegations of sexual promiscuity, while her “reputation” for peace and order would suggest the absence of loud visitors and disorder.¹³⁷ Linden Court had an alley associated with disease, crime, and vice, but the article noted that she lived there for three years—implying her stable and permanent housing, rather than labeling her as transient.¹³⁸ Historian Cheryl Hicks argues that in times of violence, Black working-class women clung to a discourse of respectability, and that was precisely the case with the depiction of Josephine White.¹³⁹

130. *Id.*

131. *Id.*

132. *Id.*

133. *Id.*

134. *Justice Blind in Police Abuse Case*, *supra* note 22, at 3.

135. *Woman and Baby Brutally Beaten by Policeman*, *supra* note 22, at 1.

136. *Id.*

137. *Id.*

138. *Id.*

139. HICKS, *supra* note 56, at 53–90.

B. Officers' Violence on the Streets

In other situations, officers detained women on the street. In October 1930, Ida Wheeler Turner, a cook, was walking in Northwest Washington on her way home from church.¹⁴⁰ A white police officer, Arthur E. Fredette, suspected that she was intoxicated and tried to arrest her.¹⁴¹ When she protested, Officer Fredette struck her, badly bruising her face and temporarily blinding her.¹⁴² Officer Fredette arrested Turner, charging her with drunkenness, assaulting an officer, and resisting arrest.¹⁴³ However, when Turner arrived at the police station, her husband informed the officers that earlier in the year she had been a patient at Gallinger Municipal Hospital, where she had been treated for a nervous breakdown.¹⁴⁴ It was clear Turner had not fully recovered from her hospitalization because she confused her identity when she was arrested by using her maiden name, Wheeler, rather than by her married name, Turner.¹⁴⁵ Her husband later confirmed that his wife often suffered from memory lapses and was known to wander around.¹⁴⁶ However, Judge Mattingly ignored her husband's testimony, found Turner guilty of disorderly conduct, and fined her \$65.00.¹⁴⁷ The story of Ida Wheeler Turner illustrates that neither police officers nor Police Court judges expressed any kind of leniency when it came to Black women's mental illness.¹⁴⁸ It also signaled the levels of police cruelty toward Black women in the city.¹⁴⁹

Turner's lawyers, Archibald S. Pinkett, from the local branch of the NAACP, and Harry A. Dyson, publicized her case and rallied on her behalf. According to an article in the Washington Tribune, Turner's mental state and her mistreatment by the police "attracted

140. *Policeman Brutally Beats Woman*, *supra* note 22, at 1.

141. *Id.*

142. *Id.*

143. *Id.*

144. *Id.*

145. *Id.*

146. *Policeman Brutally Beats Woman*, *supra* note 22, at 1.

147. *Officer Who Beat Woman Dismissed by Trial Board*, *supra* note 22, at 1.

148. *Id.*

149. *Id.*

city-wide attention.”¹⁵⁰ In October 1930, at a meeting of the Baptist Ministers’ Conference at the Florida Avenue Baptist Church, attendees deplored the recent episode of brutality in the city.¹⁵¹ The Reverend J. P. Nichols denounced this violence, announcing that Turner’s case “was simply the record of another brutal attack of the Police on defenseless Negroes,” and he urged his fellow attendees to “rise up to protest this brutality.”¹⁵² Dyson was able to schedule a hearing for Officer Fredette before the Police Trial Board, but he was ultimately exonerated.¹⁵³

Turner wrote a letter to the editor of the Black newspaper in the Washington Tribune, where she publicly discussed the assault and narrated her experience with police violence.¹⁵⁴ “I wish to thank the Tribune,” Turner wrote, “for the kind interest shown during the trial I went through in reference to [the] time I was assaulted by Officer Arthur Fredette.”¹⁵⁵ Turner noted that the Tribune had “rendered me valuable service” and “at all times presented my case to the public in the true light.”¹⁵⁶ She informed the public that her eye was healing, although the doctors warned her to be careful so as not to further jeopardize her vision.¹⁵⁷ The publication of Turner’s letter underscored the important role of the Black press, both in the nation’s capital and across the country, in helping to increase awareness of the violence white police afflicted on African American women and men. In contrast, in the 1920s and 1930s, the white newspapers in Washington, D.C. —the Washington Post and the Washington Star—failed to report episodes of police violence against African American residents of the nation’s capital, instead restricting their coverage to incidents in which African Americans committed crimes.¹⁵⁸

150. *Id.*

151. *Brutal Beating of Woman Deplored by Baptist Clergy*, *supra* note 22, at 1.

152. *Id.*

153. *Officer Who Beat Woman Dismissed by Trial Board*, *supra* note 22.

154. *Our Mail Box*, *supra* note 22, at 6.

155. *Id.*

156. *Id.*

157. *Id.*

158. *See, e.g., Three Women Held in Raid*, WASH. POST, Aug. 19, 1930, at 3.

Ida Turner's encounter with street brutality was not uncommon. Given African American women's high representation in prisons for their work in underground economies, it seems that police officers sometimes instinctively associated Black women with crime.¹⁵⁹ In September 1929, police officers knocked down Anne E. Burleigh in the streets.¹⁶⁰ Burleigh was a fifty-five-year-old widow who worked for the federal government as a charwoman (an office cleaner).¹⁶¹ Three months later, a police officer detained Mrs. M. Body while she was shopping and checked her bag for liquor, which was illegal at the time. In the process of searching her bag, the officer struck her.¹⁶² And in September 1930, Catherine Brawner, an operator in the Bureau of Printing and Engraving, and her daughter, Constance Spencer, a teacher, were walking down the street when an officer began to hurl racial epithets and abuse at Spencer.¹⁶³ When Catherine Brawner protested, the white officer struck both of them in the face.¹⁶⁴

The violence of white police officers toward Black women in Washington was not very different from the treatment they received in the Jim Crow South. In June 1932, Police Officer Timothy J. McDonald located Corinne McCowe, who was currently living at the Phyllis Wheatley YWCA, and arrested her for stabbing her husband.¹⁶⁵ It is telling that McCowe was staying at the YWCA, likely using this institution as a refuge for protection against her abusive spouse.¹⁶⁶ When McCowe resisted arrest, pleading her innocence, McDonald dragged her body to the Second Precinct Police Station.¹⁶⁷ McCowe was later released when it was revealed that she was not the wanted person.¹⁶⁸ She pleaded her innocence in Police Court, but was

159. See KALI N. GROSS, *COLORED AMAZONS: CRIME, VIOLENCE, AND BLACK WOMEN IN THE CITY OF BROTHERLY LOVE, 1880–1910* (2006).

160. *Local News*, WASH. TRIB., Sept. 30, 1929, at 1.

161. *Id.* See also U.S. CENSUS BUREAU, *CENSUS 1930* (1930) [hereinafter 1930 CENSUS] (on file with author) (for Burleigh's age and profession).

162. *Brutal Police Stir City to Curb Menace*, *supra* note 22, at 2.

163. *Id.*

164. *Id.*

165. *Says Detective Dragged Her to Station House*, WASH. TRIB., June 16, 1932, at 1.

166. *Id.*

167. *Id.*

168. *Id.*

found guilty of disorderly conduct.¹⁶⁹ McCowe, like many other victims, expressed a great deal of bravery in appearing in Police Court. Although she, like many others, did not win, her use of the legal system was a form of political activism.¹⁷⁰

C. Officers' Retaliation Against Attempted Intervention

Not only did police officers attack Black women but they also assaulted citizens who tried to stop police brutality. On the evening of December 8, 1932, two Black women—Virgie Togood, who was pregnant, and her sister-in-law Mattie Ford—were walking toward Garfield Park in Southeast Washington when a police car pulled up to them.¹⁷¹ The officers began to shout disparaging remarks, yelling, “Hello Sweetie; Hello Baby.”¹⁷² When Ford protested, the officers jumped from their car and slapped her.¹⁷³ At that moment, George W. Beasley, an African American druggist and president of the Federation of Civic Associations, was closing his store with two companions and noticed the altercation.¹⁷⁴ Beasley appealed with the officers to stop assaulting Ford, reportedly pleading, “Don’t do that.”¹⁷⁵ The officers responded by ordering Beasley and his two companions to line up against the fence.¹⁷⁶ There, an officer drew a pistol and rubbed it against their heads while threatening to “blow their brains out.”¹⁷⁷ While the officers were assaulting Beasley and his companions, Virgie Togood and Mattie Ford escaped.¹⁷⁸ A newspaper article on this

169. *Id.*

170. *Id.*

171. *Says Detective Dragged Her to Station House*, *supra* note 165.

172. *White Capital Policemen Held for Assault on Woman*, *supra* note 25, at 1; *White Policemen Held for the Grand Jury for Assault on Druggist*, *supra* note 25, at 9.

173. *White Capital Policemen Held for Assault on Woman*, *supra* note 25, at 1; *White Policemen Held for the Grand Jury for Assault on Druggist*, *supra* note 25, at 9.

174. *White Capital Policemen Held for Assault on Woman*, *supra* note 25, at 1; *White Policemen Held for the Grand Jury for Assault on Druggist*, *supra* note 25, at 9.

175. *White Capital Policemen Held for Assault on Woman*, *supra* note 25, at 1; *White Policemen Held for the Grand Jury for Assault on Druggist*, *supra* note 25, at 9.

176. *White Capital Policemen Held for Assault on Woman*, *supra* note 25, at 1; *White Policemen Held for the Grand Jury for Assault on Druggist*, *supra* note 25, at 9.

177. *White Capital Policemen Held for Assault on Woman*, *supra* note 25, at 1; *White Policemen Held for the Grand Jury for Assault on Druggist*, *supra* note 25, at 9.

178. *White Capital Policemen Held for Assault on Woman*, *supra* note 25, at 1.

event noted that Garfield Park had been the site of many attacks on Black women.¹⁷⁹ As the owner of a drugstore in this neighborhood, Beasley exercised caution and, in some instances, made sure that his customers "received protection on their way home" in the evenings.¹⁸⁰ This episode demonstrated that Black bystanders were often powerless to stop white violence against Black women. As the president of the Federation of Civic Associations, Beasley used his local influence to charge the officers in Police Court, but as in most such cases, the police officers were exonerated from all charges.¹⁸¹ This attack prompted the Baltimore Afro-American to run a headline article titled "D.C. Cops Terror to Women," that underscored the escalating police violence toward Black women in the city.¹⁸²

In August 1933, a misunderstanding escalated into a case of brutality.¹⁸³ Alberta Young, a fifty-four-year-old Black woman who lived on Morris Road in Southeast Washington, testified in Police Court about an incident of police brutality following her attempt to secure welfare assistance for her brother, Roy Henderson.¹⁸⁴ When a white welfare worker arrived at her house and mistook her for Roy's wife, Alberta Young asked the woman to leave.¹⁸⁵ The welfare worker reported the incident to the police, who came to the house and brutally assaulted both Alberta and her fifty-six-year-old husband, William Young, and later charged them with disorderly conduct.¹⁸⁶ Alberta Young sued the officers in Police Court, and came to court with a "blood bandage around her head and a wound that required six stitches to close."¹⁸⁷ Despite the palpable evidence of Young's abuse, the judges in Police Court sided with the police officers rather than the victim.¹⁸⁸

179. *Id.*

180. *Id.*

181. *White Policemen Held for the Grand Jury for Assault on Druggist, supra* note 25, at 9; *see also G.W. Beasley Remains Head of Civic Body, WASH. POST.*, Nov. 26, 1933, at R9 (describing Beasley's privileged status).

182. *D.C. Cops Terror to Women, supra* note 25, at 11.

183. *Police Beat Her, Woman Charged, supra* note 25, at 1.

184. *Id.*

185. *Id.*

186. *Id.*

187. *Id.*

188. *Id.*

In October 1933, Ollie Rice, a maid at the Spanish Embassy in Washington, D.C., contacted the local branch of the NAACP where she requested a meeting with President Jennie Richardson McGuire.¹⁸⁹ In their meeting, Rice informed McGuire that an employee of the Spanish Embassy had tried to rape her.¹⁹⁰ McGuire immediately reported the incident to the Spanish Embassy, but later discovered that the attempted rapist held diplomatic immunity through the Spanish Legation.¹⁹¹ McGuire then reached out to the U.S. State Department to determine if there was any way to seek justice for Ollie Rice.¹⁹² While this was not a case of police brutality, the unique circumstances of international law illustrated that Black servants in Washington, D.C. were vulnerable to multiple forms of violence and that their perpetrators were rarely punished.

1. *The Story of Cornelia Diggs and Dedia Coates*

One of the worst episodes of brutality in the early 1930s was the beating of two Black women—Cornelia Diggs, an elderly woman in her sixties, and her daughter Dedia Coates—both described at the beginning of this Article.¹⁹³ Both women lived in Anacostia, a working-class neighborhood in Southeast Washington.¹⁹⁴ At 2 a.m. on Tuesday, November 8, 1933, two white police officers, W. W. Humphreys and Henry Marzurski, fired shots into Coates's and Diggs's home, striking a buffet in the kitchen and breaking glass near the stairs.¹⁹⁵ The two police officers broke down two doors and bounded up the stairs, grabbed Diggs from her bedroom, and “dragged her by the hair from her bedroom to the first floor of the house and brutally beat her and her forty-eight-year-old daughter, Mrs. Dedia Coates.”¹⁹⁶ Diggs was still dressed in her nightclothes and later testified that she smelled

189. *Can't Arrest Her Assailant*, *supra* note 25, at 1.

190. *Id.*

191. *Id.*

192. *Id.*

193. *See Editorial*, *supra* note 13, at 4; *Dragged Down Steps by Hair*, *supra* note 25, at 11.

194. *Id.*

195. *Id.*

196. *Id.*

alcohol on the breath of both policemen.¹⁹⁷ The officers arrested both Diggs and Coates and took them to the Eleventh Police Precinct where they were charged with disorderly conduct.¹⁹⁸ A reporter from the Baltimore Afro-American who visited Diggs in jail noted that she had “two blackened eyes, a badly battered face, and bruises about the shoulders and left leg.”¹⁹⁹

When Black Washingtonians learned about these brutal beatings, they worked to ensure that Diggs and Coates would see some justice.²⁰⁰ Ivory Brown, from the Hillsdale Civic Association in Anacostia, and Jennie McGuire, from the NAACP, demanded a thorough police investigation into the beating.²⁰¹ Four months after their attack, Diggs and Coates appeared before the Police Court and were acquitted of their alleged crimes²⁰²; the police officers were not punished for the attacks.²⁰³ That same month, McGuire worked through the State Department to acquire a cash settlement for Ollie Rice.²⁰⁴ Diggs’s, Coates’s, and Rice’s legal victories were rare. The only other known episode when police were held responsible for violence against Black women occurred when Police Officer Middleton slapped Dorothy Wood.²⁰⁵ A fellow policeman, Officer Sanderson, observed this violence and felt it was uncalled for, forcing Officer Middleton to pay a fine.²⁰⁶

Black women were sometimes brutalized when they were arrested. In July 1934, the manager of the Atlantic Beer Gardens on Fourteenth Street in Northwest Washington had Ida Lindey, aged twenty-two, arrested and charged with drunk and disorderly conduct.²⁰⁷ Lindey claimed that the white police officer “slapped her, threw her to

197. *Id.*

198. *Id.*

199. *Dragged Down Steps by Hair*, *supra* note 25, at 11.

200. *Brutality Arouses Ire of Citizens*, *supra* note 25, at 1.

201. *Id.*

202. *Woman, 65, Acquitted of Assaulting Officers*, *supra* note 25, at 2.

203. *Id.*

204. *Mrs. R. G. McGuire Named President of Local NAACP*, *supra* note 36, at 1.

205. Glazier, *supra* note 25.

206. *Id.*

207. *Protest Arrest of Woman at Beer Garden*, *supra* note 25, at 8.

the ground, and placed his knees on her breast.”²⁰⁸ The officer reportedly stated that Lindey “really deserved it” and “should have been given a good beating.”²⁰⁹

D. *The Fight Against Brutality*

Middle-class Black women used their social and political networks to protest gendered police violence. Corinne Martin, a teacher and assistant director of penmanship in the city’s Black public schools, served as a key activist in the campaign to end brutality.²¹⁰ Martin’s administrative position put her in contact with many different residents of the city, which extended her reach and influence.²¹¹ In 1929, she was elected president of the East Central Civic Association, which represented the middle-class neighborhoods of Shaw and LeDroit Park in Northwest Washington.²¹² In 1933, police attacked two Black Washingtonians, Virgie Togood and Mattie Ford. In her capacity as president of the Association, Martin led a delegation of Black citizens to meet with Police Commissioner Ernest J. Brown.²¹³ At the meeting, Martin expressed concerns about the rising levels of brutality, drawing specific attention to the recent attacks against participants in the unemployment march.²¹⁴ She told Commissioner Brown that the “brutal beating of half-starved unarmed men and women by stalwart police” was “unnecessary” and urged him to pay closer attention to the actions of various police officers.²¹⁵

Martin and members of the East Central Civic Association also presented Brown with a chart that starkly outlined the disproportionately few Black police officers in the city. It showed that there was one white police officer or fire fighter for every 153 white people.²¹⁶ In contrast, the city employed only one Black police officer or fire

208. *Id.*

209. *Id.*

210. *East Central Civic Association Meets*, *supra* note 25, at 6.

211. *Id.*

212. *Id.*

213. *Id.*

214. *Id.*

215. *Id.*

216. *Civic Association Protests Police Brutality*, *supra* note 25, at 9.

fighter for every 2,047 Black residents.²¹⁷ At this meeting, Brown was “visibly impressed with the facts presented by the committee” and “promised to look into the complaints” that were presented.²¹⁸ One month later, in April 1933, Martin boldly declared that police brutality in Washington, D.C., posed a greater threat to American democracy than communism.²¹⁹ She highlighted the recent example of Major Jones, who was brutally attacked by two white police officers after leaving a barbershop.²²⁰ Martin’s declaration positioned the threats of interracial police brutality as greater than those posed by communism and other forms of political radicalism, both in the United States and around the world.²²¹ This remark was especially provocative, given the Red Scare had swept the United States only fourteen years earlier.²²²

The Southwest Civic Group represented working-class residents of Southwest Washington, and women held several prominent leadership positions in the organization. Inez W. Clomax served as secretary, Mary Proctor was the vice president, and Lillian Dodson was the assistant vice president.²²³ In June 1933, the members hosted a special guest, Illinois representative Oscar DePriest.²²⁴ His presence was noteworthy because he was the first Black Congressional representative to serve since 1901.²²⁵ At the meeting, residents discussed police violence in their section of the city. DePriest emphasized the “power to be wielded by an organization” and “advised block organization for real tangible service and contact.”²²⁶ The fact that members of the Southwest Civic Group reached out to a national politician to address their local concerns in Washington suggests that they felt a lack of responsiveness from the local commissioners.

217. *Id.*

218. *Id.*

219. *Police Brutality Greater Menace than Reds, Declares Civic Group, supra* note 25, at 9.

220. *Id.*

221. *Id.*

222. *Id.*

223. *DePriest Speaks to Southwest Civic Group, supra* note 25, at 9.

224. *Id.*

225. *Id.*

226. *Id.*

A turning point in Black women's activism against police violence occurred in December 1934, after police officers moved quickly to arrest NAACP members who were picketing at the National Crime Conference.²²⁷ Police officers informed activists that they lacked a permit to protest and held signs that exceeded the legal size limit.²²⁸ Ten years earlier, these regulations had not existed.²²⁹ This moment signaled the hostility of Washington, D.C., police officers to political protests and the surge in police violence in the nation's capital over the past several years—including deadly force against unarmed Black men and brutality against innocent Black women. The arrests of the demonstrators echoed police violence toward Black citizens in the city. They marked a watershed moment for anti-lynching activists, causing them to shift their attention toward combatting police brutality in Washington, D.C. Women and men applied the methods, institutional networks, and grassroots constituencies used in their fight for a federal anti-lynching bill to the local campaign of police violence.²³⁰

III. ARE COPS BRUTAL? VIOLENCE AND ACTIVISM

By the mid-1930s, police brutality increased across the city, but officers rarely faced professional consequences for their actions. Black citizens witnessed Officer George Struder beat a ninety-eight-pound mentally ill Black woman on the street.²³¹ Struder's force was so extreme that a trail of blood ran from the location of the assault to the call box.²³² When a local bystander, Eva Moxley, a widow in her thirties, observed this abuse, she asked Struder to stop beating the woman; in response, he arrested Moxley for disorderly

227. *Silent NAACP Pickets Let Crime Conferences Know the Horrors of Lynching*, NEW NEGRO OP., Dec. 15, 1934, at 1.

228. *Id.*

229. *Id.*

230. *Delegation to Present Petition to Cummings for Negro Police Judge*, *supra* note 25, at 1; *Brutality Arouses Ire of Citizens*, *supra* note 25, at 1; *Mrs. R. G. McGuire Named President of Local NAACP*, *supra* note 36, at 1; *East Central Civic Association Meets*, *supra* note 25, at 6; *Civic Association Protests Police Brutality*, *supra* note 25, at 9; *Police Brutality Greater Menace than Reds, Declares Civic Group*, *supra* note 25, at 9; and *NAACP Pledges to Help Fight Cop Brutality*, *supra* note 25, at 7.

231. Glazier, *supra* note 25.

232. *Id.*

conduct.²³³ Although a Police Court judge exonerated Moxley, Officer Struder kept his job.²³⁴ In another instance, thirty-seven-year-old Georgia Watkins observed Officer N. T. Imlay killing a dog.²³⁵ When Watkins protested, Officer Imlay attacked and arrested her for disorderly conduct; Imlay received no punishment for his actions.²³⁶

In April 1935, Jeanette Kidd, a single woman in her thirties who lived in a working-class neighborhood in Southwest Washington, alleged that three white detectives broke into her house, grabbed her without consent, dragged her through the streets, and then struck her in the mouth.²³⁷ When she sued the officers in Police Court, her still-visible bruises made no difference in the outcome of the case.²³⁸ Police officers testified that Kidd had assaulted them, causing spectators in the court to laugh hysterically.²³⁹ The white judge sustained Kidd's charges of disorderly conduct while levying no punishment on the white officers.

As police officers were rarely punished for acts of violence against Black women, they were often free to attack again. In 1933, Detective Frank Ashley used iron clamps to force George Mahoney, a Black man, to confess to a crime.²⁴⁰ Two years later, Ashley was still on the job, hunting for a Filipino suspect.²⁴¹ Warrantless, Ashley barged into the home of Mildred de Arellano, an African American woman married to the assistant secretary of the Philippine Trade Commission.²⁴² Detective Ashley insulted both de Arellano and her mother, Jennie V. Peters, and knocked Peters to the ground in his search for the suspect.²⁴³ He rifled through a desk in the house look-

233. *Id.*

234. *Id.* See also 1920 CENSUS (for case information pertaining to Eva Moxley).

235. Glazier, *supra* note 25.

236. See *Says Brutal Cops Broke into Home*, *supra* note 25, at 1; Glazier, *supra* note 25.

237. *Spectators Laugh as Cops Say Woman They Beat Assaulted Them*, *supra* note 25, at 1.

238. *Id.*

239. *Id.*

240. Glazier, *supra* note 25.

241. *Id.*

242. *Id.*

243. *Id.*

ing for incriminating evidence, but found none.²⁴⁴ Out of frustration, he reportedly lashed out at the woman, shouting that “niggers have no constitutional rights.²⁴⁵ The Constitution was made by and for white men.”²⁴⁶ Detective Ashley faced no professional consequences for this display of physical violence, unlawful entry, or verbal abuse against de Arellano and Peters.²⁴⁷

In July 1935, Black newspapers reported that Jessie Sterling, a fifty-nine-year-old woman, was another victim of police brutality.²⁴⁸ Sterling had smelled gas escaping from the pipes in her home at 807 Virginia Avenue in Southwest Washington.²⁴⁹ When she went out on her porch to call the police for help, two white police officers, D. H. Mayo and George B. Reid, passed by in their patrol car.²⁵⁰ Officer Reid reportedly shouted at her, “Sweets, get back in the house.”²⁵¹ When Sterling protested, Officer Reid forced her into the house and violently beat her.²⁵² Reid’s beating was so brutal that Sterling suffered from a black eye, scraped knees, a broken arm, and two missing teeth.²⁵³ Officer Reid then arrested Sterling and charged her with disorderly conduct. Sterling claimed that Officer Reid also beat her while she was held in the Fourth Police Precinct.²⁵⁴ In her study of Black women in the underground economy in New York City, histori-

244. *Id.*

245. *Id.*

246. Glazier, *supra* note 25.

247. *Id.*

248. *Id.* See also *Citizens to Protest Cop Brutality*, WASH. TRIB., July 20, 1935, at 11.

249. Glazier, *supra* note 25; *Citizens to Protest Cop Brutality*, *supra* note 248, at 11.

250. Glazier, *supra* note 25; *Citizens to Protest Cop Brutality*, *supra* note 248, at 11. While working as a domestic servant during the 1920s, Sterling also supported herself through the underground economy’s drug trade, earning her the nickname “Sweets.” See, e.g., *On Bond, Arrested Again*, WASH. POST, Mar. 28, 1922, at 5.

251. Glazier, *supra* note 25; *Citizens to Protest Cop Brutality*, *supra* note 248, at 11.

252. Glazier, *supra* note 25; *Citizens to Protest Cop Brutality*, *supra* note 248, at 11.

253. Glazier, *supra* note 25; *Citizens to Protest Cop Brutality*, *supra* note 248, at 11.

254. Glazier, *supra* note 25; *Citizens to Protest Cop Brutality*, *supra* note 248, at 11.

an LaShawn Harris argues that white police officers sometimes took advantage of Black women who labored in the underground economy, framing them for crimes they did not commit.²⁵⁵

Sterling's assault prompted a strong response from Black citizens and organizations across the city.²⁵⁶ The Black press vigilantly monitored the case, and reporters interviewed Sterling in her house to bring attention to the situation.²⁵⁷ A newspaper article in the *Baltimore Afro-American*—titled "Are Cops Brutal?"—featured a photograph of Sterling, providing a visual narrative of the violence inflicted on her body.²⁵⁸ A reporter noted that the left side of Sterling's face and her arms were "permanently disfigured."²⁵⁹ The injuries she sustained from the assault, most notably the gaps in her mouth where her missing teeth should have been, would remain visible for the rest of her life.²⁶⁰ While reporters in the Black press diligently circulated news of Sterling's assault, political organizations strategized to affect a legal response.²⁶¹ Members of the Southwest Civic Association banded together to protest her beating. Its president, John T. Rhines, appointed a five-person committee to investigate mounting cases of brutality.²⁶² The local chapter of the NAACP also joined the fight.²⁶³ Although Jennie McGuire was no longer president of the local branch, other women, including Nannie Helen Burroughs and YWCA executive secretary Martha A. McAdoo, were active in the organization's leadership.²⁶⁴ In a letter to the police, NAACP secretary Archibald S. Pinkett argued, "Nobody believes that a policeman is justified in blacking a woman's eye, bruising her body, and breaking her arms in attempt to maintain arrest."²⁶⁵

255. LASHAWN HARRIS, *SEX WORKERS, PSYCHICS, AND NUMBERS RUNNERS: BLACK WOMEN IN NEW YORK CITY'S UNDERGROUND ECONOMY* 132–33 (Darlene Clark Hine & Dwight A. McBride eds., 2016).

256. *NAACP Pledges to Help Fight Cop Brutality*, *supra* note 25, at 7.

257. *Are Cops Brutal?*, *BALT. AFRO-AM.*, July 20, 1935, at 14.

258. *Id.*

259. *Id.*

260. *Id.*

261. *Id.*

262. *Citizens to Protest Cop Brutality*, *supra* note 248, at 11.

263. *Id.*

264. *Id.*

265. *NAACP Pledges to Help Fight Cop Brutality*, *supra* note 248, at 7.

In August 1935, Sterling appeared in Police Court where she pled not guilty.²⁶⁶ Sterling's injuries were still visible to all present.²⁶⁷ However, as a newspaper article noted, "[a] photograph and testimony of witnesses" were unable to persuade the judge of Sterling's innocence and Officer Reid's guilt.²⁶⁸ Judge Robert E. Mattingly upheld Sterling's sentence and fined her for disorderly conduct.²⁶⁹ Five years earlier, Judge Mattingly upheld similar charges of disorderly conduct for Ida Wheeler Turner.²⁷⁰ Black citizens were incensed that Officer Reid escaped punishment.²⁷¹ James R. Cobb, a Black municipal judge and civil rights activist in the city, arranged for a grand jury to examine Reid's crimes; ultimately, Officer Reid was not indicted.²⁷² Officer Reid was previously involved in the death of an innocent Black man, Daniel Woodland, illustrating the lack of punishment for repeat offenders.²⁷³

A. *Attacks of Multiple Victims*

This disturbing trend of officers attacking multiple victims continued in March 1936, when Martha and Ruth Lloyd, seventeen- and fifteen-year-old sisters attending Dunbar High School, were traveling by bus from their school's cadet drill practice to their home.²⁷⁴ When their bus stopped at Tennessee Avenue and Fourteenth Street in Northeast, the sisters disembarked as a riot was unfolding in the streets near their home.²⁷⁵ While running to escape the violence, a white police officer dressed in plain clothes grabbed Martha and pinned her to the ground.²⁷⁶ A uniformed police officer arrived at the scene and arrested both Martha and Ruth Lloyd; Ruth had protested

266. *Policeman Freed of Brutality*, *supra* note 25, at 1.

267. *Id.*

268. *Id.*

269. *Id.*

270. *Officer Who Beat Woman Dismissed by Trial Board*, *supra* note 22, at 1.

271. *Id.*

272. *Policeman Freed of Brutality*, *supra* note 25, at 1.

273. Glazier, *supra* note 25.

274. *Id.*

275. *Id.*

276. *Id.*

her sister's arrest.²⁷⁷ Officers grabbed the sisters and threw them into a police car where Officer John Sirola beat Martha on the head with a Blackjack.²⁷⁸ In Police Court, Sirola defended his use of force, stating that Martha had "sassed him." Judge Isaac R. Hitt ruled that Martha was guilty, upheld her charge of disorderly conduct, and fined her five dollars.²⁷⁹ Officer Sirola's treatment towards Martha and Ruth Lloyd reflected the harsh reality that not all Black girls enjoyed the rights and privileges of childhood.²⁸⁰ Moreover, this was not the first incident of police brutality that involved Officer Sirola.²⁸¹ The lack of punishment for brutalizing Henry Johnson paved the way for Sirola to wield the same weapon with impunity on seventeen-year-old Martha Lloyd.²⁸²

The attacks in the mid-1930s demonstrated that police brutality was an epidemic in Washington, D.C. In attacking Black residents, white police officers in the city did not discriminate on the basis of age, sex, or mental fitness, which ultimately resulted in brutal treatment toward girls like Martha and Ruth Lloyd, elderly women like Cornelia Diggs and Jessie Sterling, and mentally ill women like Ida Wheeler Turner.²⁸³ Just as enslaved women were beaten and women in the Jim Crow era were lynched, Black women were assaulted by the police in Washington, D.C., sometimes at the hands of the same officers who had attacked and shot Black men. Police officers who brutalized one victim and received little-to-no punishment were likely to repeat the same behavior.²⁸⁴

277. *Id.*

278. *Id.*

279. Glazier, *supra* note 25.

280. *See* SIMMONS, *supra* note 60; MARCIA CHATELAIN, *SOUTH SIDE GIRLS: GROWING UP IN THE GREAT MIGRATION* (2015); SUSAN K. CAHN, *SEXUAL RECKONINGS: SOUTHERN GIRLS IN A TROUBLING AGE* (2012).

281. *Man Sues 2 Police on Beating Charge*, *supra* note 31, at 2.

282. *Id.*

283. *See, e.g.*, sources cited *supra* note 22.

284. *See Policeman Found Guilty of Beating Wielder of Stick*, *supra* note 34, at 22; *Cop Convicted of Assault, Fined \$100*, *supra* note 34, at 4; Glazier, *supra* note 25.

B. The Political Mobilization

Between 1936 and 1938, Black political organizations in the city united to address the epidemic of police brutality.²⁸⁵ The diversity of organizations that joined this movement reflected the complexity of Black politics in Washington. Established organizations, such as the local branch of the NAACP, the Phyllis Wheatley YWCA, and the Federation of Civic Associations were joined by newcomers founded in the 1930s: the Washington Interracial Committee (IRC), the National Negro Congress, and the New Negro Alliance.²⁸⁶ The IRC viewed interracial alliances as a fundamental resource to securing civil rights in the city, while the National Negro Congress and New Negro Alliance were left-leaning organizations that infused militancy into the struggle for justice in the nation's capital.²⁸⁷ Additionally, members of the local Morningstar Lodge of the Elks held a fundraising drive to secure legal funds for the cause, and the Civil Liberties Branch of the Elks brought their political expertise to bear on the issue.²⁸⁸ While these organizations were comprised of diverse members from all corners of the Black community in Washington, women emerged as crucial voices in the fight against police brutality.²⁸⁹

Grassroots participants and veteran organizers from the anti-lynching movement joined the campaign to end police brutality.²⁹⁰ Arnetta Randall, a teacher who was involved in the Rope Protests in 1934, was elected secretary of the New Negro Alliance. Natalie Moorman, a member of the Phyllis Wheatley YWCA, was a prominent member of the same group.²⁹¹ Five Black women served on the board of the IRC: civic leader Mary Church Terrell, pharmacist Amanda Gray Hilyer, physicians Sarah Brown and Ionia Whipper, and teacher Mae Stewart Thompson.²⁹² All five women were also members of the Phyllis Wheatley YWCA and brought their prior ex-

285. GELLMAN, *supra* note 23, at 109–147.

286. *Id.*

287. *Id.*

288. *Cop Brutality*, BALT. AFRO-AM., Mar. 6, 1937, at 1.

289. *Id.*

290. *Id.*

291. *Join Meeting to Discuss Vote for District*, WASH. TRIB., Aug. 14, 1937, at 1; *Forum Here to Hold Youth Act Symposium*, WASH. POST, Feb. 11, 1937, at 15.

292. *Police Brutality Given Commissioners*, *supra* note 25, at 1.

periences with activism to their new positions.²⁹³ Terrell had marched in the Silent Parade and testified in Congress about the Dyer Bill. Jennie Richardson McGuire had organized the Rope Protests under the auspices of the NAACP; she then headed the local chapter of the National Negro Congress.²⁹⁴ One woman who typified this political transformation from national to local politics was Theresa Lee Connelly Robinson.²⁹⁵ During the 1920s, she had served as chair of the Committee of One Hundred, which mobilized churches, fraternal orders, schools, ministers, and social and political organizations to march in the Silent Parade against lynching in 1922.²⁹⁶ In the 1930s, Robinson coordinated the anti-police brutality activism effort as the Assistant National Chair of the Civil Liberties Bureau of the Elks.²⁹⁷

These examples not only illuminate the connections between lynching and police brutality but also underscore women's widespread participation as leaders, participants, and grassroots organizers. Black women shaped the police brutality movement in important ways. They brought previously developed organizing skills to various political campaigns, helping spearhead mass meetings, protest parades, and petition drives.²⁹⁸ Within each organization, Black women described interracial political brutality as a gendered process that claimed both male and female victims.²⁹⁹

293. *YWCA News*, WASH. TRIB., Feb. 19, 1926, at 5.

294. See *YWCA News*, *supra* note 293, at 5 (for Brown); *YWCA Notes*, WASH. TRIB., Feb. 17, 1923, at 6 (for Hilyer); *Local Unit of Congress Plans Mass Meeting*, WASH. TRIB., Jan. 24, 1936, at 8 (for McGuire); Letter from Frances Boyce to Mary Church Terrell (Mar. 8, 1928) (on file with the Library of Congress) (for Terrell); *YWCA News*, WASH. TRI., June 20, 1925, at 2 (for Thompson).

295. *The Elks' Real Job*, CHI. DEF., Oct. 8, 1927, at 1; Letter from Theresa Lee Robinson to Dr. Herbert Marshall (July 17, 1939) (on file with the Library Of Congress).

296. See sources cited *supra* note 295.

297. *Id.*

298. See, e.g., *Brutality Arouses Ire of Citizens*, *supra* note 25, at 1; *Mrs. R. G. McGuire Named President of Local NAACP*, *supra* note 36, at 1; *East Central Civic Association Meets*, *supra* note 25, at 6; *Civic Association Protests Police Brutality*, *supra* note 25, at 9; *Police Brutality Greater Menace than Reds, Declares Civic Group*, *supra* note 25, at 9; *NAACP Pledges to Help Fight Cop Brutality*, *supra* note 25, at 7; *Washington, D.C., Federation Meets and Elects Officers*, *supra* note 36, at 17.

299. Glazier, *supra* note 25.

Washington activists in the anti-police brutality movement employed several proven strategies that had proven successful in their anti-lynching campaigns.³⁰⁰ First, they used their location in the nation's capital to seek federal assistance.³⁰¹ After meeting with several members in Congress, they found an ally in Byron N. Scott, a newly elected representative from California's Eighteenth District.³⁰² Scott agreed to introduce a resolution in the U.S. House of Representatives to launch a federal investigation into police brutality in Washington, D.C.³⁰³ Black Washingtonians' ability to turn to the House of Representatives for support in their local campaign against police brutality illustrated the unique political benefits of residency in the nation's capital. On January 19, 1937, Representative Byron Scott proposed House Resolution 77, calling for an "investigation of police brutality in the District of Columbia."³⁰⁴

During Representative Scott's Congressional push, members of the IRC banded together with thirty organizations in the city to bring the issue of police violence to the Board of Commissioners.³⁰⁵ This gave local organizations the leverage of potential federal legislation in the fight against police brutality. IRC Chair Charles Edward Russell, a white journalist, told the commissioners that it was unacceptable that fifty citizens had died at the hands of the police in less than ten years.³⁰⁶ Russell also emphasized that Washington's culture of violence included "cases of brutal beatings by police, invasion of homes of colored people without warrants, and the case of an officer who alleged criminally assaulted the wife of a colored man."³⁰⁷ He stated that, with one exception, all of accused the officers were still employed.³⁰⁸ Russell's assessment of police violence included male and female victims, which speaks to the influence of the five Black women who served on the IRC board.

300. GELLMAN, *supra* note 23, at 109–147.

301. *Id.*

302. *Id.*

303. *Id.*

304. H.R. 77, 75th Cong. 313 (1937).

305. *Police Brutality Given Commissioners, supra* note 25, at 1.

306. *Id.*

307. *Id.*

308. *Id.*

In addition to meeting with members of Congress and the Board of Commissioners, activists worked with different forms of media to ensure that police brutality did not disappear from Black public consciousness, both in Washington and across the nation.³⁰⁹ They wrote press releases to maintain coverage of brutality in the Black press.³¹⁰ On two occasions, activists addressed police brutality over the radio.³¹¹ In March 1937, National Negro Congress representative John P. Davis delivered an address on radio station "WOL."³¹² Davis emphasized that while much media attention focused on male victims, "such assaults have not been confined to men or adults."³¹³ He specifically mentioned the cases of Martha Lloyd, Jessie Sterling, and Eva Moxley.³¹⁴ By reciting the names of these women over the radio, Davis helped alert Washington's large Black community about violence against women, perhaps reaching citizens whom the pages of the press did not.³¹⁵ One month later, Representative Scott appeared in a separate radio broadcast.³¹⁶ He questioned why the Board of Commissioners "oppose[d] such an unbiased search for truth on this question, in the light of the serious charges lodged with them."³¹⁷ He also highlighted the lawlessness that existed in the nation's capital.³¹⁸ "When the third degree is substituted for the judicial process and when punishment is meted out at the time of arrest by a policeman's night stick instead of by judges in a court of law," he stated, "then anarchy replaces the democratic process."³¹⁹ Representative Scott's politically charged words likely resonated with Black citizens who had grown weary of the countless acquittals of brutal white police officers.

Alongside these radio addresses, the IRC published a pamphlet demonstrating that police violence in the nation's capital was not

309. *Cop Exonerated in 53rd Killing*, *supra* note 25, at 1.

310. *Id.*

311. *Id.*

312. *Id.*

313. *Id.*

314. *Id.*

315. *Cop Exonerated in 53rd Killing*, *supra* note 25, at 1.

316. *Id.*

317. *Id.*

318. *Id.*

319. *Commissioners on Spot in Brutality*, *supra* note 25, at 1.

merely episodic, it was an epidemic.³²⁰ Just as Ida B. Wells tracked lynchings and analyzed them in publications to illuminate patterns, activists in the anti-police brutality movement used searing language and disturbing examples to highlight the crisis of interracial brutality.³²¹ Harlan Glazier, a white activist in the IRC, titled his pamphlet “Brutality Enthroned (with apologies to the Animals).” It provocatively argued that, for Black citizens, the rule of law did not exist in Washington, D.C.³²² Glazier argued:

If any person should permit a mad dog to run at large, he would be denounced as a menace to the community; and yet, in this District of Chaos, our officials, over whom we have no control, allow the police of the city to commit crimes of the most dastardly sort against our citizenry.³²³

The pamphlet summarized the scope of police brutality cases in the 1930s, including examples of violence against both men and women.³²⁴ Glazier emphasized that half of the victims were shot in the back, indicating the victims did not even know there was a potential for death.³²⁵ Glazier also argued that police brutality in Washington, D.C., was “truly critical.”³²⁶ The pamphlet concluded by encouraging readers to pressure Congress to end the crisis of police brutality in Washington.³²⁷

Black citizens recognized that replacing existing judges in Police Court with fairer ones would help reduce the incidents of police brutality throughout the city. In March 1937, Black citizens gathered en masse at the Phyllis Wheatley YWCA.³²⁸ The term of one Police Court judge was set to expire, and meeting attendees vowed to lobby

320. Glazier, *supra* note 25.

321. *Id.*

322. *Id.*

323. *Id.*

324. *Id.*

325. *Half of Police Pistol Victims Shot in Back*, BALT. AFRO-AM., Apr. 10, 1937, at 13.

326. Glazier, *supra* note 25.

327. *Id.*

328. *Id.*

the Board of Commissioners to appoint a fair judge to succeed him.³²⁹ Several days later, a delegation of Black citizens sent a petition to the Board of Commissioners requesting that an African American serve as a judge on the city's Police Court.³³⁰ Prominent among those signatories was Nannie Helen Burroughs, who personally carried anti-lynching petitions to Congress in the 1920s to make lynching a federal crime. Another signatory was YWCA President Julia West Hamilton, who served on the planning committee for the Silent Parade in 1922.³³¹ The localized activism of Burroughs and Hamilton mirrored the shifting concerns among many African American women in Washington, D.C.³³²

Despite mass meetings, petitions, pamphlets, radio addresses, and a congressional resolution, police violence persisted. Under these circumstances, activists elected to convene their own trial on police brutality at the storied John Wesley AMEZ Church.³³³ This public event provided an opportunity for the Black community in Washington to hear the facts of the different cases of brutality that had been dismissed in Police Court and craft their own judgments.³³⁴ Importantly, the activists defined brutality as both murders and beatings, which allowed a discussion of male and female victims.³³⁵ This "trial" illustrated two important aspects of Black political culture in the nation's capital. First, Black Washingtonians, whether by virtue of their close proximity to Howard University Law School and the Supreme Court; or their eagerness to plead individual cases in Police Court, were litigious citizens.³³⁶ They possessed deep familiarity with the law and legal proceedings, which would prove helpful in their campaigns for economic justice and civil rights.³³⁷ Second, this community trial confirmed a fundamental aspect of Black citizens' quest for justice in

329. *Police Brutality Given Commissioners*, *supra* note 25, at 1.

330. *Delegation to Present Petition to Cummings for Negro Police Judge*, *supra* note 25, at 1.

331. *Id.*

332. ASCH & MUSGROVE, *supra* note 69, at 249–84.

333. *Murders by Police in Nation's Capital Protested at Meet*, *supra* note 25, at 3.

334. *Id.*

335. *Id.*

336. *Id.*

337. *Id.*

the United States.³³⁸ In their campaigns for Black freedom, African Americans were merely asking for a fair trial in court, to be presided over by judges who took an oath to uphold the law of democracy and fairness.³³⁹ Judges in this trial included YMCA director Campbell Johnson, Howard University Dean of Women Lucy Slowe, Reverend of the Lincoln Congregational Temple Robert W. Brooks, and Stephen Gill Spotswood, Bishop of the African Methodist Episcopal Zion Church.³⁴⁰ A newspaper article noted that this public trial “provided a complete picture of the lawless police terrors which has reigned in Washington for the past ten years.”³⁴¹ Through this act of political theater, the Black community in the nation’s capital could symbolically witness these perpetrators receive a punishment.³⁴²

Activists amplified their protest message in 1938.³⁴³ Natalie Moorman, a resident of Arlington, Virginia, who was affiliated with the New Negro Alliance, the Phyllis Wheatley YWCA, and the American Youth Congress, testified at a congressional hearing on the American Youth Act in March 1938.³⁴⁴ In her testimony, Moorman urged the government to create programs for youth to promote their education, health, and—most importantly—their safety.³⁴⁵ She began her testimony by saying that she could “talk perhaps [two] days about things that would be of interest here,” but “decided to tell only one story.”³⁴⁶ Before an audience of senators and representatives, Moorman described a seventeen-year-old boy in Arlington who, after burglarizing a grocery store, “was shot down by Arlington County depu-

338. *Id.*

339. *Murders by Police in Nation’s Capital Protested at Meet*, *supra* note 25, at 3.

340. *Id.*

341. *Id.*

342. *Id.*

343. GELLMAN, *supra* note 23, at 109–147.

344. *Forum Here to Hold Youth Act Symposium*, WASH. POST, Feb. 11, 1937, at 15; *YWCA Notes*, BALT. AFRO-AM., Feb. 13, 1937, at 7; *Police Brutality Given Commissioners*, *supra* note 25, at 1.

345. *American Youth Act: Hearing on S. 1463 Before the Subcomm. of the S. Comm. on Educ. & Lab.*, 75th Cong. 113–116 (1938) [hereinafter *American Youth Act Hearing*] (statement of Natalie Moorman, Progressive Caucus of Arlington, Va.).

346. *Id.*

ties.”³⁴⁷ She soberly noted, “[t]here was no inquest and there was no investigation.” The lesson to be drawn was that “colored boys should not break into company stores” because they will become victims of police violence.³⁴⁸ In her testimony, Moorman argued that economic injustice and a lack of a support system led to social disorder, which led to the robberies.³⁴⁹ She pointed out that the boy’s father was missing and his mother was in a state insane asylum.³⁵⁰ He was forced to support himself, which led to his crime, and ultimately, his death.³⁵¹ Moorman’s testimony powerfully illuminated the inhumanity of police violence and helped keep the focus on police brutality in Washington, D.C.

In June 1938, representatives of a coalition of thirty organizations across the city—including churches, fraternal orders, and interracial organizations—met for two hours with a member of the Board of Commissioners, Melvin C. Hazen.³⁵² In the meeting, Reverend Brooks, chair of the Committee of Churches, told Hazen that African Americans in Washington, D.C., “feared the police.”³⁵³ The cooperation of thirty organizations working against police brutality reflected not only the importance of the issue to the Black community in Washington, but also the strength of Black political culture across the capital. Conscious that Black Washingtonians had exhausted all other options, activists decided to stage a protest parade against police brutality in the nation’s capital.

C. The Parade Seen Around the Country

On the evening of Friday, July 9, 1938, 400 white citizens and 1,600 Black citizens staged a march against police brutality.³⁵⁴ The Washington branch of the Communist Party sponsored the parade, which lasted three hours and was endorsed by the National Negro

347. *Id.*

348. *Id.*

349. *Id.*

350. *Id.*

351. *American Youth Act Hearing*, *supra* note 345.

352. *Citizens Protest Police Brutality*, *supra* note 25, at 3.

353. *Id.*

354. *Id.*

Congress and the New Negro Alliance.³⁵⁵ Protesters started marching at the intersection of U and Fourth Street in Northwest Washington and ended at Rhode Island Avenue and Ninth Street.³⁵⁶ A crowd of ten thousand Washingtonians lined the route and witnessed its activist message.³⁵⁷ Mollie Davis McKnight, a laundress and widow of a recent victim of police violence, was a key figure in the parade.³⁵⁸ Mollie and her late husband, Wallace McKnight, had migrated to Washington, D.C., during the 1920s from South Carolina, along with Mollie's brother, View Davis.³⁵⁹ Earlier that month, Wallace McKnight had been walking along Fifteenth and M Streets NW, carrying a large bag. Police officers stopped him to question him about the contents of the bag, and he began to run away; in response, the police officers shot and killed him instantly.³⁶⁰ The police officer was found guilty of manslaughter.³⁶¹ The National Negro Congress would later sue the city, but Mollie McKnight was only awarded \$85.00 in damages.³⁶²

The parade marchers originally intended to carry Black coffins to symbolize the victims of brutality, but police officers forbade them from doing so.³⁶³ Marchers instead carried signs that illustrated their protests. The signs read, "You May Be Next," "Prosecute Police Murders," and, perhaps most chillingly, "Washington Is Now Scottsboro."³⁶⁴ By invoking the recent episode of racial injustice in Scottsboro, Alabama—where nine African American teenage boys were wrongfully convicted of raping two white women and sentenced to death—protesters mounted an argument that police actions in the nation's capital resembled the worst practices of injustice in the Jim

355. *Id.*

356. *Id.*

357. *Id.*

358. *Citizens Protest Police Brutality*, *supra* note 25, at 3.

359. *See* 1920 CENSUS (for biographical information pertaining to Wallace Knight); *see also id.* (for case information including the damages award to Mollie Davis).

360. *Id.*

361. *Police Brutality Case in D.C. Called Plain Murder*, *supra* note 25, at 8.

362. *Warn Brutality May Cause Riots*, *BALT. AFRO-AM.*, Aug. 13, 1938, at 24.

363. *Citizens Protest Police Brutality*, *supra* note 25, at 3.

364. *Id.*

Crow South.³⁶⁵ Furthermore, the comparison demonstrated that, before justice could be achieved nationally, it was necessary to intervene in local politics in the District of Columbia.

During the parade, protesters and police officers battled over boundaries of resistance and domination. In addition to barring coffins, police officers also forbade protesters from carrying signs and obtaining signatures that demanded the immediate dismissal of Major Ernest Brown.³⁶⁶ But protesters cleverly devised ways to convey their message without text. "Inspector Kelly took the signs," an article in the *Washington Afro-American* noted, "but the marchers did him one better by chanting 'Major Brown Must Go.'"³⁶⁷ This clever adjustment evoked the 1934 Rope Protests when activists replaced large signs with rope on their necks.³⁶⁸ In addition to repeating this activist message over and over, protesters also chanted "Police Brutality Must Stop," "Join the Big Parade," and "Stop Legal Lynching."³⁶⁹ By referencing "legal lynching," marchers offered a powerful message that police violence in their city mirrored the terrors that Black southerners confronted on a daily basis.³⁷⁰

Important parallels and key differences can be discerned between the anti-lynching parade in 1922 and the anti-police brutality parade in 1938. Both parades rallied significant numbers of Black citizens from all walks of life who carried protest signs to press for justice against violence.³⁷¹ However, changes in Black women's political involvement between these two parades illustrate the dramatic shift in African American activism. The five thousand uniformly Black participants in the Silent Parade of 1922 were arranged in various formations according to organizational affiliation and circled federal buildings to influence Congress, using silence to draw awareness to their cause.³⁷² Sixteen years later, the protest crowd was interracial, featuring Black

365. *Id.*

366. *Id.*

367. *Id.*

368. *Id.*

369. *Citizens Protest Police Brutality*, *supra* note 25, at 3.

370. *2,000 March as a Protest in Brutality*, WASH. POST, July 9, 1938, at Z13 [hereinafter *2,000 March as a Protest*] (quoting the phrase "legal lynching").

371. *See generally 5,000 Negroes Parade as Lynching Protest*, WASH. POST, June 15, 1922, at 2.

372. *Id.*

and white participants.³⁷³ In 1922, in the aftermath of the first Red Scare, it would have been politically toxic to ally with the Communist Party; in the leftist climate of the 1930s, however, this alliance was more acceptable.³⁷⁴ In their protest against police brutality, participants marched through Black and white neighborhoods, illustrating that this parade was a local, not national, affair. And yet, activists did wish to attract national press coverage.³⁷⁵ Perhaps most tellingly, in 1922, Washingtonian activists received legal permission to stage their parade.³⁷⁶ In fact, police officers supported the anti-lynching march and did not appear to question the marchers' paraphernalia, including the size of their signs.³⁷⁷ When marching against police brutality sixteen years later, police and activists battled over the props that protesters carried and the messages emblazoned on their signs.³⁷⁸ The differences between these two protests illustrate first and foremost that the Washington Metropolitan Police Department had become more hostile toward civil rights protests, especially when police actions were the subject of scrutiny.

The protest parade generated coverage in both local and national newspapers, and in its aftermath, activists continued to press for justice.³⁷⁹ In August 1938, the Washington Interdenominational Ministers' Alliance spearheaded a petition drive to send fifty thousand signatures from Black and white Washingtonians to President Roosevelt, calling on him to personally intervene in cases of police brutality.³⁸⁰ Activists forged a coalition with ministers across the city and advised them to educate their congregants about police brutality in their Sunday sermons and urged them to sign the petitions.³⁸¹

373. *2,000 March as Protest*, *supra* note 370

374. *Id.*

375. *5,000 Negroes Parade as Lynching Protest*, *supra* note 371; *2,000 March as Protest*, *supra* note 370.

376. *Silent Protest Parade against Lynching Celebrates the Birth of Old Glory*, NAACP Papers (1922) (on file with the Library of Congress).

377. *Id.*

378. *2,000 March as Protest*, *supra* note 370.

379. *Warn Brutality May Cause Riots*, *supra* note 362.

380. *Id.*

381. *Washington Ministers Send Petition to Roosevelt*, ATL. DAILY WORLD, Aug. 13, 1938, at 2.

As Washingtonians channeled their energy into protesting and halting police brutality, several points of progress were apparent. Activists marshaled thirty politically-oriented organizations across D.C., found an ally in Congress, spread their message on the radio waves and in print, paraded in protest, and staged trials when they could not find justice in Police Court or the Trial Board.³⁸² These activities demonstrated the strength of Black activism at the grassroots level. Unfortunately, African Americans were unable to enact significant changes in their local police department.

IV. "MAKE WASHINGTON SAFE FOR NEGRO WOMANHOOD": THE PERSISTENCE OF VIOLENCE

Despite citizens' coordinated campaigns against brutality, officers continued to attack Black Washingtonians. On August 10, 1938, shortly after 5 a.m., three police officers banged on the door of Julia McKay's boarding house and demanded to be let in.³⁸³ McKay, a widow, was a prominent citizen of Washington.³⁸⁴ McKay mingled in reform circles, including the Tuesday Evening Club, a group for middle-class social workers.³⁸⁵ Eleven women lived in her house.³⁸⁶ The police officers were looking for a man named "Manassas" and asked to speak to Ruth Clark, a Black domestic worker who rented a room from McKay.³⁸⁷ The officers entered her room, demanding to know if she was alone.³⁸⁸ Using a flashlight, they searched underneath her

382. *Delegation to Present Petition to Cummings for Negro Police Judge, supra* note 25, at 1; *Murders by Police in Nation's Capital Protested at Meet, supra* note 25, at 3; *2,000 March as Protest, supra* note 370.

383. Affidavit of Ruth Clark, *supra* note 25; Affidavit of Dorothy Brice, *supra* note 25.

384. Affidavit of Ruth Clark, *supra* note 25; Affidavit of Dorothy Brice, *supra* note 25.

385. Affidavit of Ruth Clark, *supra* note 25; Affidavit of Dorothy Brice, *supra* note 25.

386. U.S. CENSUS BUREAU, CENSUS 1940 (1940) [hereinafter 1940 CENSUS] (on file with author) (for household size of Julia McKay).

387. Affidavit of Ruth Clark, *supra* note 25; Affidavit of Dorothy Brice, *supra* note 25.

388. Affidavit of Ruth Clark, *supra* note 25; Affidavit of Dorothy Brice, *supra* note 25.

bed.³⁸⁹ One of the police officers also took his baton and struck her in the stomach, uttering racial epithets and calling her a “god damn nigger.”³⁹⁰ Clark’s experiences with police brutality underscored the collective nature of trauma and abuse: because Clark lived in a boarding home, her trauma presumably impacted all of the other women living in the house.

This episode of brutality prompted Black citizens in various organizations to speak out. Charles M. Thomas, the Elks’s Civil Liberties Director, told a Washington Post reporter that “support for anti-lynching legislation must be coupled with protests against police brutality” in order to ensure “civil liberty for us all.”³⁹¹ In this message, Thomas offered a rhetorical link between the dual imperatives of anti-lynching and anti-police violence legislation. This article was the first coverage by the Washington Post of Black protests against police brutality.³⁹² Activists in the National Negro Congress also addressed—for the first time—the gendered nature of police brutality by issuing an open letter in August 1938 to the Black women of Washington, D.C. The letter was titled “Make Washington Safe for Negro Womanhood.”³⁹³ While the letter was unsigned, its deep familiarity with the intersections between gender, race, and safety in Washington suggests a female author, possibly Jennie Richard McGuire, who was the local chair of the National Negro Congress.³⁹⁴ The letter began:

Dear Friends, if you are a colored woman enthroned in your house at five o’clock in the morning and a police sergeant weighing some three hundred pounds pushes his night stick onto your stomach and calls you a God Damn Nigger, there is NOTHING you can do about it.³⁹⁵

389. Affidavit of Ruth Clark, *supra* note 25; Affidavit of Dorothy Brice, *supra* note 25.

390. Affidavit of Ruth Clark, *supra* note 25.

391. *Civil Rights Important to All*, WASH. POST, Aug. 23, 1938, at 7.

392. *Id.*

393. National Negro Congress, *Make Washington Safe for Negro Womanhood*, AFRO-TRIB. Aug. 30, 1938 (on file with author). For a discussion of this letter, see GELLMAN, *supra* note 23, at 125.

394. *Brutality Arouses Ire of Citizens*, WASH. TRIB., November 9, 1933, at 1.

395. *Make Washington Safe for Negro Womanhood*, *supra* note 393. See GELLMAN, *supra* note 23.

The letter writer then explained that she had taken five witnesses to the district attorney's office and had asked that a warrant be issued for the arrest of Sergeant Sullivan, who had assaulted Clark.³⁹⁶ The District Attorney, Mr. Underwood, declined to issue the warrant and insisted that no assault had taken place.³⁹⁷ The writer then asked, "What would have happened if Miss Clark had been a white woman and Sergeant Sullivan had been a Negro Officer?"³⁹⁸

The writer further argued that Clark's case fit into a larger pattern of police brutality against Black citizens in Washington, D.C. There, the author argued, injustice stretched from the district attorney to rank-and-file police officers.³⁹⁹ "What happened to Miss Ruth Clark," the writer warned, "can and will happen to any other decent, self-respecting Negro woman of Washington" and called on readers to "ACT NOW."⁴⁰⁰ She urged Black citizens to sign their names to a petition to be forwarded to President Roosevelt.⁴⁰¹ She called on "three thousand women of Washington representing the clubs and churches to not only sign their names to that petition," but "to ask that petitions be mailed to them to be circulated among their friends for signature."⁴⁰² She invited people to "collect 20,000 signatures to be sent to the President within the next ten days to demand that Washington be made a safe place for Negro womanhood."⁴⁰³ This letter articulated the specific forms of injustice that afflicted Black women: verbal threats, physical intimidation, and vulnerability to sexual assault and rape.⁴⁰⁴

One month after Clark's assault, the Washington Federation of Colored Women's Clubs of the District of Columbia held a meeting at the Phyllis Wheatley YWCA, where they endorsed the National Negro Congress and its campaign against police brutality.⁴⁰⁵ The women

396. *Make Washington Safe for Negro Womanhood*, *supra* note 393.

397. *Id.*

398. *Id.*

399. *Id.*

400. *Id.*

401. *Id.*

402. *Make Washington Safe for Negro Womanhood*, *supra* note 393.

403. *Id.*

404. *Id.*

405. *Washington, D.C., Federation Meets and Elects Officers*, *supra* note 36, at 17.

who signed onto this campaign included Marian Butler, Julia West Hamilton, and Nannie Helen Burroughs, all of whom were seasoned anti-lynching activists.⁴⁰⁶ This endorsement demonstrated that African American women in the local chapter of the NACW were cognizant of the mounting violence—specifically the violence aimed at Black women—and supported the National Negro Congress in its fight against police brutality.⁴⁰⁷

Violence continued to afflict Black women across the city. In February 1939, police broke into Viola Harris's rented room and attacked her, Leroy Moses, and Lillie Watson.⁴⁰⁸ The National Negro Congress conducted an investigation into the incident.⁴⁰⁹ In July, five months later, Ethel McKinney was out walking with her mother, Frances James, on Fourteenth and Irving Streets in Northwest Washington, D.C.⁴¹⁰ The two women were peering into a store window when a white police officer, Charles S. Mills, "ran between them and knocked them aside."⁴¹¹ He reportedly shook James and knocked McKinney backward.⁴¹² As McKinney extended her hands to protect herself, Officer Mills slammed into her body.⁴¹³ The only protection McKinney had was her shoes, which she wielded as a weapon of self-defense.⁴¹⁴ As James watched Officer Mills attack her daughter, she tried to pull him backwards; Mills turned on James, threatening to knock her teeth out.⁴¹⁵ Officer Mills then threatened to "blow her head off" and hurled racial epithets at her.⁴¹⁶ Two boys walking down the street witnessed the incident and scolded the cop, telling him not to "draw a gun out on a girl like that."⁴¹⁷

406. *Id.*

407. *Id.*

408. *Brutality!*, *supra* note 25, at 2.

409. *Id.*

410. *Id.*

411. *D.C. Matrons Sue Cop*, *supra* note 25, at 1–2; *Police Brutality on the Increase in Washington*, *supra* note 25, at 1.

412. *D.C. Matrons Sue Cop*, *supra* note 25, at 1–2; *Police Brutality on the Increase in Washington*, *supra* note 25, at 1.

413. *D.C. Matrons Sue Cop*, *supra* note 25, at 1–2.

414. *Id.*

415. *Id.*

416. *Id.*

417. *Id.*

Ethel McKinney and Frances James filed a civil suit in the district court, asking for damages of \$10,000 for verbal abuse, beating, and mental anguish.⁴¹⁸ Officer Mills pled not guilty to the charges.⁴¹⁹ Newspaper articles about the case were quick to point out James's and McKinney's class background and respectability.⁴²⁰ McKinney was a secretary for the D.C. School Board and the wife of Roscoe L. McKinney, a professor of embryology and zoology at the Howard University Medical School.⁴²¹ McKinney also sued for damages in Police Court and received money for her troubles⁴²²; it is possible that McKinney's elite status might have been a factor.

V. POLICE VIOLENCE AGAINST AFRICAN AMERICAN WOMEN IN THE 1940S

The summer of 1940 proved dangerous for Black citizens. On Sunday, June 9, the police entered the home of William and Susan Anderson.⁴²³ The police officer assaulted and beat William, Susan—who was pregnant at the time—and William's sister, dragging all of them to jail.⁴²⁴ The officer was never charged.⁴²⁵ One month later, Dorothy Bowles, a "hard working and law abiding Negro citizen," was involved in a conflict with a neighbor.⁴²⁶ A police officer who intervened in the dispute kicked and bruised Bowles in the breast. A Police Court judge later sentenced Bowles to one year of probation.⁴²⁷ The Citizens Committee against Police Brutality distributed a flier referencing the incident, calling on Washingtonians to "... [s]top th[e] Atrocious beating of innocent Negroes before you yourself are

418. See sources cited *supra* note 425.

419. *Id.*

420. *Id.*

421. *Id.*

422. *D.C. Matrons Sue Cop*, *supra* note 25, at 2; *Police Brutality on the Increase in Washington*, *supra* note 25, at 1.

423. *Flash: Do Your Part*, NAACP (July 1940) (on file with Howard University, Moorland-Springarn Research Center Archives).

424. *Id.*

425. *Id.*

426. *Id.*

427. *Id.*

the next victim!!!!!!”⁴²⁸ That month, 100 men and women gathered en masse at the Zion Baptist Church to protest police brutality against residents in the Fourth Police Precinct.⁴²⁹

A. The Police Brutality Continues and Political Activism Heightens

In September 1940, activists gathered at the Metropolitan Baptist Church to stage another mock trial.⁴³⁰ In the 1920s, the Metropolitan Baptist Church was one of the principal sites for Black women’s anti-lynching prayer protests.⁴³¹ In 1940, the church was a place for Black citizens to stage mock trials to seek justice when it was not meted out at the local level.⁴³² Belford V. Lawson, a lawyer who had represented many women in Police Court, including Frances James and Ethel McKinney, served as the defense lawyer.⁴³³ A number of women served as messengers, including Beatrice Morton, Thelma Dale, Marcella Moore, Charlotte Payne, Rachel Robinson, Marie Richardson, and Alice Wright.⁴³⁴ The women’s participation at the trial signaled not only their interest in the epidemic of violence but also their desire to address racialized violence against Black women.⁴³⁵

While citizens continued to protest police brutality, other forms of violence against women emerged. Between 1939 and 1941, an unknown perpetrator raped and murdered four Black women—Josephine Robinson, Lucy Kidwell, Mattie Steward, and Ada Puller. It is likely he attacked and robbed other Black women, including Florence Dancy and Cora Doy.⁴³⁶ The white press did not cover these attacks when they occurred; police officers conducted minimal investigations to locate the culprit.⁴³⁷ While these murders did not occur at the hands of

428. *Id.*

429. *100 Voices Protest Police 4th Precinct*, PITT. COURIER, July 27, 1940, at 10.

430. *Cop Brutality on Mock Trial September 26*, *supra* note 25, at 1.

431. *Id.*

432. *Id.*

433. *Id.*

434. *Id.*

435. *Id.* It is likely the women “messengers” performed clerical tasks in the mock trial.

436. *Cop Brutality on Mock Trial September 26*, *supra* note 25, at 1.

437. *Id.*

the police, the police department's apathetic response signaled an institutional culture of racialized negligence around Black women's safety in the city, which was itself a form of brutality.⁴³⁸

B. *The Tipping Point*

The profound indifference toward Black women was thrown into sharp relief in June 1941, when Jesse Elizabeth "Betty" Strieff, a twenty-two-year-old white clerk from Iowa, was raped and murdered.⁴³⁹ News of Strieff's murder made local and national headlines. In response, Felix Edward Hèbert, a Democratic congressman from Louisiana, conducted a federal investigation into the Washington Metropolitan Police Department.⁴⁴⁰ As Representative Hèbert argued, "[t]here is no excuse for the failure of the department to check crime and solve a murder occasionally."⁴⁴¹ Only days before the congressional hearing, Mabel Everett, a Black woman, was raped and murdered, presumably by the same killer.⁴⁴² It was noteworthy that Strieff's murder sparked a congressional investigation into the Police Department.⁴⁴³ Four years earlier, Black Washingtonians had worked tirelessly to engage senators and representatives on the issue of police violence in the nation's capital.⁴⁴⁴ Although Representative Byron N. Scott had then agreed to issue a resolution on police brutality, no investigation materialized.⁴⁴⁵

Over a period of two weeks in June and July 1941, the Committee on the District of Columbia convened hearings about the Washington Metropolitan Police Department.⁴⁴⁶ The hearings were notable for

438. *Id.*

439. *Government Girl Disappears on Trip to Buy Butter*, WASH. POST., Jan. 16, 1941, at 1.

440. *Legislators Seek Investigation Police, FBI Intervention*, WASH. POST., June 18, 1941, at 3 [hereinafter *Legislators Seek Investigation*].

441. *Id.*

442. *Don't Blame the Cops*, *supra* note 25, at 1.

443. *Legislators Seek Investigation*, *supra* note 440, at 3.

444. H.R. 77, 75th Cong. 313 (1937).

445. *Id.*

446. *See generally Investigation of the Metro. Police Dep't Before the Subcomm. on Spec. Police Investigation of the H. Comm. on D.C., 77th Cong. 1* (1941) [hereinafter *Confidential Investigation*].

what was said and what was omitted. House Representatives and witnesses from the police department limited their discussion to the gendered violence committed against Betty Strieff, ignoring the five Black women who had also died, including the most recent murder victim, Mabel Everett.⁴⁴⁷ At several points during the hearings, Representative Hèbert justified the use of police brutality against Black Washingtonians based on the alleged crime rate perpetrated by Black citizens by arguing, “[f]orce begets force.”⁴⁴⁸ He contended that Black citizens were lawless and suggested that Washington police officers needed to locate “a way to handle those fellows.”⁴⁴⁹ Otherwise, officers were “going to have trouble.”⁴⁵⁰ In this stunning statement, Representative Hèbert endorsed the use of police brutality in Washington, D.C.—on the floor of the United States Congress.⁴⁵¹

The congressional investigation following Strieff’s murder undermined every aspect of the freedom struggle that Black Washingtonians had waged for the past twelve years. Activists had highlighted assaults against Black women, protested the persistence of police violence, and sought a federal ally in the fight. Ultimately, the congressional investigation demonstrated that the federal government was not an ally, but a foe.⁴⁵² Representative Hèbert embodied the mores of the Jim Crow South when he recommended the use of police force against African Americans in the nation’s capital. He demonstrated that Black Washingtonians lacked the political power to transform the culture of racialized and gendered violence in their city.⁴⁵³

In July 1941, an editorial in the Washington Afro-American appeared on the front page of the weekly newspaper titled “Don’t Blame the Cops.”⁴⁵⁴ The newspaper, accustomed to reporting cases of police violence, provocatively remarked, “[t]he police department is not wholly to blame.”⁴⁵⁵ The article noted that police officers were men

447. *Id.*

448. *Id.* at 59–60.

449. *Id.* at 60.

450. *Id.*

451. *Confidential Investigation, supra* note 446, at 60–61.

452. *Id.* at 435–36, 442.

453. *Id.* at 59–61, 436, 442.

454. *Don’t Blame the Cops, supra* note 25, at 1.

455. *Id.*

and women who “reflected the temper of the community which, in turn, is reflected by the Congressional chairmans [sic] who supervise the departments and have the right at will to probe into its operation.”⁴⁵⁶ The editorial highlighted the critical importance of race in shaping reactions to Betty Strieff’s murder versus those of the unnamed Black women.⁴⁵⁷ Posing a powerful, rhetorical question, the editorial asked, “When colored citizens were shot down in cold blood, beaten, and maltreated by the Nazi-minded police officers, did Congress respond to the pleas of civic organizations to investigate?”⁴⁵⁸ Furthermore, the editorial described the numerous occasions when “colored girls and women were molested and raped by white perverts who crossed the color line to invade our neighborhoods after dark,” asking whether there was “any investigation of laxity?”⁴⁵⁹ The response: “You may bet your life there wasn’t.”⁴⁶⁰ Discussing the fact that Strieff and Evertt were murdered in the same month, the article grimly surmised that “Mabel wasn’t very important.”⁴⁶¹ The editorial concluded by noting, “[i]s it any wonder that the police have so little regard for colored citizen when the Congressional bosses display such an attitude? At least that’s one mystery which has been cleared up.”⁴⁶²

Ironically, the congressional hearings convinced white Washingtonians that Commissioner Brown was ineffective, an assessment that Black Washingtonians had made years earlier.⁴⁶³ Within days of the congressional investigation, the Washington Post called for Ernest Brown to step down as head of the Washington Metropolitan Police.⁴⁶⁴

456. *Id.*

457. *Id.*

458. *Id.*

459. *Id.*

460. *Don’t Blame the Cops*, *supra* note 25, at 1.

461. *Id.*

462. *Id.*

463. *Major Brown*, WASH. POST, July 5, 1941, at 6.

464. *See Solve 7 Sex Slayings in Washington, NY*, *supra* note 25, at 1. In August 1941, a Black man named Jarvis Roosevelt Cato confessed to murdering six women in Washington, D.C., and one in New York City. Four of his victims were Black and three were white. African Americans supported his arrest and prosecution for his crimes but worked to keep the focus on his Black victims, not on his

C. A New Hope

After Brown stepped down as commissioner in August 1941, Black Washingtonians persisted in their visible and vocal opposition to police violence.⁴⁶⁵ Activists were determined to demonstrate that Black Washingtonians did not favor police brutality, even if certain members of Congress advocated for it.⁴⁶⁶ Seven prominent citizens formed the Citizen's Committee against Police Brutality.⁴⁶⁷ The three women on the committee included: government worker Ruby Hawkins, New Negro Alliance member Natalie Moorman, and veteran organizer Theresa Lee Robinson.⁴⁶⁸ This organization's name was similar to the Citizen's Protest Parade Committee, which Theresa Lee Connelly had formed nineteen years earlier. This name reflected the ways that Connelly applied her skills from the anti-lynching movement to her campaigns against police brutality.⁴⁶⁹ In September 1941, the Citizen's Committee against Police Brutality staged a mass march in Washington, D.C., where an estimated 2,000 women, men, and children marched through the streets.⁴⁷⁰ Participants carried placards with messages proclaiming, "Old Jim Crow Has Got to Go," "Protect Our Civil Rights," and "Police Brutality Is a Disgrace to the Nation's Capital."⁴⁷¹ The protest parade route went through several sections of the city and converged at the corner of Tenth and U Streets in Northwest,⁴⁷² the center of the Black community.⁴⁷³ In the parade, the Citizen's Committee celebrated its collaboration with the Congress of In-

crimes. The details and context of the Cato murders are beyond the scope of this article.

465. *500 Negroes Protest 'Brutal' District Police*, WASH. POST, Sept. 15, 1941, at 1.

466. *Id.*

467. *Id.*

468. *Id.*

469. *Id.*

470. *Id.*

471. *500 Negroes Protest 'Brutal' District Police*, WASH. POST, Sept. 15, 1941, at 1.

472. *D.C. Citizens March to Protest Meet against Police Brutality*, BALT. AFRO-AM., Sept. 27, 1941, at 24.

473. *Id.*

dustrial Organizations.⁴⁷⁴ The militancy of this protest parade demonstrated that Black citizens were absolutely livid with the level of violence in their city.

Major Edward J. Kelly became the new police commissioner of Washington D.C. in August 1941.⁴⁷⁵ Kelly was familiar with Black activism.⁴⁷⁶ He was present when African Americans staged the Rope Protests in 1934 and affirmed then that the participants' signs conformed to police regulations.⁴⁷⁷ He had also been an officer on duty during the 1938 protest against police brutality.⁴⁷⁸ When Kelly was appointed, the NAACP and the National Negro Congress sent him a joint letter congratulating him on his new position, but tempered their enthusiasm by acknowledging ongoing police violence in the nation's capital.⁴⁷⁹ "Law abiding colored citizens must be made to know that policemen are the hired protectors of them," the letter read, "and not their law protected lynchers."⁴⁸⁰ This language was very direct and made clear that Black Washingtonians would not tolerate any patterns of brutality. Moreover, the organizations specifically characterized police violence as "urban lynching."⁴⁸¹

During his tenure as superintendent of the Washington Metropolitan Police, Commissioner Kelly listened and responded to the concerns of Black civic organizations.⁴⁸² In September 1941, Kelly held a meeting with 1,600 Black citizens at the Metropolitan Baptist Church, which only one year earlier had been the site of a citizen's police trial.⁴⁸³ Kelly announced that he favored a change in the Trial Board to include both officers and civilians.⁴⁸⁴ He also signaled his

474. *Id.*

475. *New Police Chief Gets Protest*, WASH. AFRO-AM., Aug. 23, 1941, at 1.

476. *Id.*

477. *Id.*

478. *55 Rope Picketers Picket Capital Crime Session*, BALT. AFRO-AM., Dec. 22, 1934, at 2; *Protest Parade Staged in Nation's Capital*, PITT. COURIER, July 16, 1938, at 4.

479. *New Police Chief Gets Protest*, *supra* note 475, at 1.

480. *Id.*

481. *Id.*

482. *Kelly Says He Won't Permit Police Brutality*, WASH. POST, Sept. 8, 1941, at 24.

483. *Id.*

484. *Id.*

disapproval of “holding persons for investigation without charges,” which had been a common practice.⁴⁸⁵ As police commissioner, Kelly worked to alleviate crowding in the Police Court by extending its hours so that citizens’ cases could be heard in a more timely manner.⁴⁸⁶ One year later, in October 1942, the D.C. Police and Municipal Courts merged, resulting in employee transfers.⁴⁸⁷ Armond W. Scott, a Black judge in the Municipal Court, was assigned to the criminal bench.⁴⁸⁸ An article in the Washington Tribune noted that this was “the first time in history that a Negro judge [] sat in this criminal branch” in Washington, D.C.⁴⁸⁹ Judge Scott’s appointment fulfilled the wish of many activists, who had lobbied for an African American to serve on the Police Court.⁴⁹⁰ Only one month after Judge Scott began his tenure, high school teacher and New Negro Alliance activist Mary Mason Jones brought her class to observe the court proceedings.⁴⁹¹ These students, whose communities had been ravaged by police brutality, witnessed an African American judge presiding over a court of law. This mattered tremendously and demonstrated the change that had occurred in the nation’s capital.

The African American community in Washington, D.C., applauded Major Kelly’s efforts.⁴⁹² In January 1943, the Washington Afro-American named Kelly to their annual Honor Roll, a rarity for white citizens.⁴⁹³ The newspaper stated that Kelly deserved the honor because he had been “made acting head at a time when he was under fire from all quarters, [and had] since worked diligently to bring [the police department to] a high level of efficiency.”⁴⁹⁴ The article also

485. *Id.*

486. *Police Court Opens at 8 A.M.*, WASH. POST, Oct. 16, 1941, at 36.

487. *Judge Scott, First Negro to Serve in Police Court*, WASH. TRIB., Oct. 3, 1942, at 4.

488. *Id.*

489. *Id.*

490. *Delegation to Present Petition to Cummings for Negro Police Judge*, *supra* note 25, at 1.

491. *Students of Social Studies Visit D.C. Municipal Court*, WASH. TRIB., Nov. 21, 1942, at 8.

492. *See 4 Women, 6 Men on D.C. Honor Roll*, WASH. AFRO-AM., Jan. 23, 1943, at 3.

493. *Id.*

494. *Id.*

commended Kelly's administration for helping crime to decline by thirty-five percent, noting "a marked decrease in brutality."⁴⁹⁵ Kelly had also worked to address the demographic imbalance in the police force.⁴⁹⁶ By 1945, he had increased the number of Black police officers from forty-two to 138, of whom six were detectives, four were motorcycle patrolmen, and four were policewomen.⁴⁹⁷ The more diverse police personnel was a decisive factor in helping prevent further cases of brutality in Washington, D.C.: fewer cases of police brutality were reported after 1941.⁴⁹⁸ Kelly became a forceful advocate of racial justice by appointing more African American police officers and improving race relations in the city.⁴⁹⁹ In 1943, E. Franklin Frazier invited Kelly to speak at a roundtable on police violence at the University of Chicago, where Kelly was lauded as an "example of a police chief who does his duty regardless of race."⁵⁰⁰ In June 1945, Kelly held a meeting with the local chapter of the NAACP, where he said: "We will tolerate neither police brutality nor attacks upon police officers, regardless of race, creed, or color."⁵⁰¹

CONCLUSION

In the 1920s, police brutality against Black men and women rose dramatically, making no Black citizen in Washington D.C. safe. Beginning in the late 1920s, Black women became primary victims of a surge in police violence in Washington, D.C. while walking down the street, protesting abuse, or even sleeping in their own homes.⁵⁰² Police officers attacked Black women from all walks of life, including those who were model citizens and women who participated in underground economies.⁵⁰³ Regardless of their social standing, teachers, cooks, clerks, and maids joined forces to express their desire to be

495. *Id.*

496. *Id.*

497. *Police Brutality Hit by D.C. Police Chief*, CHI. DEF., June 23, 1945, at 4.

498. *See id.*

499. *Id.*

500. *Major Kelly Lauded by Chicago Roundtable*, WASH. TRIB., July 10, 1943, at 1.

501. *Police Brutality Hit by D.C. Police Chief*, *supra* note 497, at 4.

502. *See sources cited supra* note 25.

503. *Id.*

treated as citizens. Collectively, they contested police brutality by fighting back, suing abusive officers in Police Court and participating in interviews with the local press.⁵⁰⁴

In the 1930s, a cohort of middle-class activists joined the campaign against police violence by meeting with local officials, marching in the protest parades, circulating petitions, and attending mass meetings and citizens' police trials. Many of the same women who had been prominent in 1920s anti-lynching politics joined the campaign against police violence in the 1930s.⁵⁰⁵ Young newcomers also banded together with the veteran organizers. These newcomers assumed prominent positions in the National Negro Congress and the New Negro Alliance to address interracial police violence against women.⁵⁰⁶ Within this broad coalition, Black women recruited large numbers of citizens to join the crusade.⁵⁰⁷ This mobilization against police brutality evidenced of the growth of their protest politics, which employed militant language, direct action resistance, and an unwavering quest for first-class citizenship in the United States.⁵⁰⁸ By the mid-1940s, activists had successfully convinced the police commissioner to change the culture of the police department by hiring more Black officers, adjusting Police Court policies, and most importantly, demonstrating zero tolerance for brutality.⁵⁰⁹ Cumulatively, these changes lowered the incidence of police violence in Washington D.C.⁵¹⁰

The campaigns against police brutality highlighted the importance of addressing other matters of racial justice in the nation's capital. If

504. See GROSS, *supra* note 159, for a call for scholars to write about Black women's history beyond the duality of suffering and success.

505. *Washington, D.C., Federation Meets and Elects Officers*, *supra* note 36, at 17.

506. *Id.*

507. *Mrs. R. G. McGuire Named President of Local NAACP*, *supra* note 36, at 1; *East Central Civic Association Meets*, *supra* note 25, at 6; *Civic Association Protests Police Brutality*, *supra* note 25, at 9; *Police Brutality Greater Menace than Reds, Declares Civic Group*, *supra* note 25, at 9; *NAACP Pledges to Help Fight Cop Brutality*, *supra* note 25, at 7.

508. *2,000 March as Protest*, *supra* note 370 (quoting the phrase "legal lynching").

509. *Police Brutality Hit by D.C. Police Chief*, *supra* note 497, at 4.

510. *Id.*

citizens of Washington, D.C. had been able to vote, it would have been easier to remove Commissioner Ernest Brown, appoint Black judges to Police Court, and select trial boards composed of officers and civilians.⁵¹¹ The city's culture of segregation made "Blackness" inherently deviant and nurtured police brutality precisely because it sanctioned a racial hierarchy.⁵¹² Many of the Black women who suffered from police violence in the 1930s worked low-wage jobs as maids and cooks and lived in poor neighborhoods with few public resources.⁵¹³ Some were elderly and lacked family support.⁵¹⁴ These conditions of poverty made Black women more vulnerable to police brutality.⁵¹⁵ In the 1930s, activists began recognizing that police violence was only one dimension of a larger culture of oppression in Washington, D.C.⁵¹⁶

In the 1940s, Black female activists called attention to over-policing, which forced the new police commissioner to implement local reforms. Just as Black women in Washington D.C. stood against police brutality and violence, modern citizens can alter the current police violence crisis against Black women. Sadly, police brutality against Black women remains an ever-present issue. Since the murder of Breonna Taylor in 2020, the mobilization of communities across the country has inspired national protests⁵¹⁷ and local reforms, including the Louisville police department banning no-knock warrants. The community mobilization likely contributed to the firing of one of the officers involved in Taylor's death. The firing occurred only weeks after Taylor's story entered the spotlight.⁵¹⁸ Activists can call attention to, and politicize, the over-policing and violence against Black women, while recognizing that gendered violence upholds white supremacy. Communities can only be safe if they are safe for Black women, and the narrative of Black women organizing against gen-

511. ASCH & MUSGROVE, *supra* note 69, at 268–69.

512. *Id.* at 253, 259, 267.

513. *Id.* at 253.

514. *Id.* at 250.

515. *Id.* at 267.

516. *Id.* at 249–284.

517. *See* Richard A. Oppel et al., *supra* note 2.

518. Nicholas Bogel-Burroughs, *Federal Officials Charge Four Officers in Breonna Taylor Raid*, N.Y. TIMES (Aug. 4, 2022), <https://www.nytimes.com/2022/08/04/us/breonna-taylor-officers-charged.html>.

dered police brutality in 1930s offers an illuminating roadmap for the current struggle.