

VIRGINIA LAW REVIEW ONLINE

VOLUME 105

NOVEMBER 2019

149–154

LETTER TO THE EDITOR

REMEMBERING CHARLOTTESVILLE 2017 AND ENGAGING BLACK-JEWISH ALLIANCES

*Alexander Tsesis**

To the Editor:

In September 2018, the *Virginia Law Review* co-hosted a symposium entitled “One Year After Charlottesville: Replacing the Resurgence of Racism with Reconciliation.”¹ The event convened scholars to reflect upon and move past the “Unite the Right” rally, the act of domestic terrorism that shook Charlottesville, Virginia on August 11 and 12, 2017. The Symposium’s organizers aimed to gather national experts and thought leaders who would introduce new tools to theorize, measure, and assess this nation’s longstanding history of and current struggle against racism, nationalism, and white supremacy. Remarkably, however, the Symposium seemed to almost completely ignore the historic hatred of Jews that fueled Charlottesville’s marchers. This was more than an oversight. It was a significant missed opportunity to reaffirm the enduring importance and impact of the alliance between Black and Jewish advocates for equality.

* Raymond & Mary Simon Chair in Constitutional Law and Professor of Law, Loyola University School of Law, Chicago. Thanks to Dayna Bowen Matthew for comments on this letter and support for the project.

¹ See Symposium, One Year After Charlottesville: Replacing the Resurgence of Racism with Reconciliation, 105 Va. L. Rev. 263 (2019).

The Symposium could and should have used the marchers' hateful chants to reflect on the role that unified activism among Jews and Blacks plays in protecting civil rights. Moreover, the *Virginia Law Review's* editors should have commemorated the first anniversary of the violence and mayhem with recognition of the tragic surge in hate crimes across the United States that continues to principally target Blacks and Jews.² This letter is submitted to begin to address these omissions.

The August 2017 rally—which drew about five to six hundred participants from across the country³—sought to unify white supremacist and white nationalist movements. Members from a variety of anti-Semitic and racist organizations alighted on the college town, including the Ku Klux Klan and David Duke, the Atomwaffen Division (“AWD”),⁴ Proud Boys, Vanguard America, and Identity Evropa.⁵

Supremacist organizers Jason Kessler and Richard Spencer planned the event ostensibly to oppose removal of a statue of Confederate General

² Federal Bureau of Investigation, Table 1: Incidents, Offenses, Victims, and Known Offenders by Bias Motivation, 2017 Hate Crime Statistics (2017), <https://ucr.fbi.gov/hate-crime/2017/tables/table-1.xls> [<https://perma.cc/C4C7-QE7D>]. In 2017, 48.73% of all 4,131 racial hate crime incidents were against Blacks, and 59.97% of all 1,564 religious hate crime incidents were against Jews, accounting for the largest portions of their respective groups. See *id.*

³ Spencer S. Hsu, Charlottesville White Supremacist Rally in August Drew Attendees from 35 States, Study Finds, Wash. Post (Oct. 8, 2017), https://www.washingtonpost.com/local-public-safety/study-charlottesville-white-supremacist-rally-in-august-drew-attendees-from-35-states/2017/10/08/fe57868e-ac45-11e7-a908-a3470754bbb9_story.html?utm_term=.df63eba2cf4f [<https://perma.cc/KM8G-N86P>].

⁴ AWD is “a neo-Nazi organization eager for a race war and committed to terrorist attacks against Jews, immigrants and other targets in the U.S.—power grids, nuclear facilities—that would foment fear.” Joe Sexton, Las Vegas Man Arrested in Plots Against Jews Was Said to Be Affiliated with Atomwaffen Division, ProPublica (Aug. 14, 2019, 5:00 PM), <https://www.propublica.org/article/las-vegas-man-conor-climo-was-said-to-be-affiliated-with-atomwaffen-division> [<https://perma.cc/K23M-954D>]. Additionally, the Anti-Defamation League, a watchdog that tracks hate organizations, reports that “Atomwaffen members have a macabre fascination with serial killer Charles Manson and his vision of a race war between whites and blacks.” Atomwaffen Division (AWD), Anti-Defamation League, <https://www.adl.org/resources/backgrounders/atomwaffen-division-awd> [<https://perma.cc/A67X-YA88>] (last visited Oct. 29, 2019).

⁵ Two Years Ago, They Marched in Charlottesville. Where Are They Now?, Anti-Defamation League (Aug. 8, 2019), <https://www.adl.org/blog/two-years-ago-they-marched-in-charlottesville-where-are-they-now> [<https://perma.cc/X78N-4EXC>]; Proud Boys, Anti-Defamation League, <https://www.adl.org/resources/backgrounders/proud-boys> [<https://perma.cc/L39T-RCTM>] (last visited Oct. 29, 2019); VICE, Charlottesville: Race and Terror – VICE News Tonight on HBO, Youtube (Aug. 14, 2017), https://www.youtube.com/watch?time_continue=1&v=RIrcB1sAN8I [<https://perma.cc/4A9F-GUW5>].

Robert E. Lee from Charlottesville's Market Street Park.⁶ But the aims of those gathered for the event was grander; some participants' stated purpose was to regain control of America, a country they believe was founded by white people, as an inheritance for white people, and destined to remain under the exclusive control of white people.⁷ Even more alarmingly, rally participants planned to ignite a race war against Jews, Blacks, immigrants, and "anti-white vermin."⁸

They sought to intimidate and terrorize the Charlottesville community by shouting statements that denigrated Blacks and Jews. They sang "Dixie," the Confederate anthem, and shouted, "The South Will Rise Again."⁹ Larry Sabato, the director of the University of Virginia Center for Politics, heard shouts for Jews to be thrown "[i]nto the ovens,"¹⁰ and one banner proudly asserted, "Jews are Satan's children."¹¹ They wielded torches claiming, "White lives matter" and proclaimed "Dylann Roof was

⁶ VICE, *supra* note 5. The park was originally named Lee Park but was renamed Emancipation Park amidst white supremacist stirrings in June 2017. Charlottesville City Council Changes the Names of Two Renamed Parks, Daily Progress (July 16, 2018), https://www.dailyprogress.com/news/local/charlottesville-city-council-changes-the-names-of-two-renamed-parks/article_9ac64d52-8963-11e8-853a-a3864982745e.html [<https://perma.cc/7S-U5-EXVQ>]. In July 2018, the Charlottesville City Council changed the name again to the more neutral Market Street Park. *Id.*

⁷ "The Fight for the White Race": What Some of the Charlottesville Rally Participants Stand For, N.Y. Times (Aug. 19, 2017), <https://www.nytimes.com/interactive/2017/08/19/us/charlottesville-quotes.html> [<https://perma.cc/AE3R-NB8J>].

⁸ Rabbi Spike Anderson, Temple Emanu-El: Rise Up to Drive Out Hate, Atl. Jewish Times (Sept. 13, 2017, 1:07 PM), <https://atlantajewishtimes.timesofisrael.com/temple-emanu-el-we-must-rise-up-to-drive-out-hate/> [<https://perma.cc/PTN9-5HQB>] ("Robert Ray, who runs the neo Nazi website the Daily Storm, spoke to the reporter about the reason why 1,000 people were marching with torches, guns and Nazi flag [sic]: 'We are showing this parasitic class of anti-white vermin that this is our country . . . We will clear them from the streets, forever. We are starting to slowly unveil our power level. You ain't seen nothing yet.'").

⁹ David Neiwert, When White Nationalists Chant Their Weird Slogans, What Do They Mean?, S. Poverty L. Ctr. (Oct. 10, 2017), <https://www.splcenter.org/hatewatch/2017/10/10/-when-white-nationalists-chant-their-weird-slogans-what-do-they-mean> [<https://perma.cc/Q3-B3-8NXC>].

¹⁰ Mykal McEldowney, What Charlottesville Changed, Politico (Aug. 12, 2018), <https://www.politico.com/magazine/story/2018/08/12/charlottesville-anniversary-supremacists-protests-dc-virginia-219353> [<https://perma.cc/5223-JFYF>]. The Nazis not only threw dead victims but also living ones into ovens at concentration camps. Mary Fulbrook, *Reckonings: Legacies of Nazi Persecution and the Quest for Justice* 215 (2018).

¹¹ Yair Rosenberg, 'Jews Will Not Replace Us': Why White Supremacists Go After Jews, Wash. Post (Aug. 14, 2017, 10:03 AM), <https://www.washingtonpost.com/news/acts-of-faith/wp/2017/08/14/jews-will-not-replace-us-why-white-supremacists-go-after-jews/> [<https://perma.cc/6E2T-D6B3>].

a hero!”¹² Duke told the crowd that Jews control the news media, the Federal Reserve, and American politics.¹³ Finally, participants’ central slogan was, “The Jews will not replace us!”¹⁴

This mix of violent racism with Nazi-inspired anti-Semitism not only whipped the mob into a deadly fervor, but should have reminded us all that racism and anti-Semitism are inextricably linked in the white supremacist mind. In 1952, renowned psychoanalyst Frantz Fanon wrote:

At first glance it might seem strange that the attitude of the anti-Semite can be equated with that of the negrophobe. It was my philosophy teacher from the Antilles who reminded me one day: “When you hear someone insulting the Jews, pay attention; he is talking about you.” And I believed at the time he was universally right, meaning that I was responsible in my body and soul for the fate reserved for my brother. Since then, I have understood that what he meant quite simply was that the anti-Semite is inevitably a negrophobe.¹⁵

The history that joins Blacks and Jews has suffered the tensions of any filial relation, especially one borne of each having overcome centuries of oppressions, state-sponsored injustices, and violent hatreds. At times that history has overlapped, both Blacks and Jews were united against the social formation of what one scholar has called “the archetypal ‘Others.’”¹⁶ The overlap historically emerged from the American abolitionist tradition, which linked the Jewish Exodus to the Black emergence from slavery.¹⁷ This religious imagery played a prominent role from nineteenth-century abolition to twentieth-century civil rights activism.¹⁸ Reverend Martin Luther King, Jr. adopted this imagery of the emergence from bondage to advocate for concrete liberation of Soviet

¹² Joe Heim, *Recounting a Day of Rage, Hate, Violence and Death*, Wash. Post (Aug. 14, 2017), <https://www.washingtonpost.com/graphics/2017/local/charlottesville-timeline/> [<https://perma.cc/DRG5-HAZT>].

¹³ Ronsenberg, *supra* note 11.

¹⁴ Julian E. Zelizer, *Trump Needs to Demilitarize His Rhetoric*, Atlantic (Oct. 29, 2018), <https://www.theatlantic.com/ideas/archive/2018/10/americas-long-history-anti-semitism/5-74234/> [<https://perma.cc/J96Y-D52W>].

¹⁵ Frantz Fanon, *Black Skin, White Masks* 101 (Richard Philcox trans., Grove Press 2008) (1952).

¹⁶ Edith Bruder, *The Black Jews of Africa: History, Religion, Identity* 37, 41 (2008).

¹⁷ Melanie Kaye/Kantrowitz, *The Colors of Jews: Racial Politics and Radical Diasporism* 47 (2007).

¹⁸ See David Brion Davis, *Inhuman Bondage: The Rise and Fall of Slavery in the New World* 396 n.26 (2006) (listing Jewish abolitionists during the nineteenth century).

Jews from the Iron Curtain.¹⁹ He spoke out vigorously against anti-Semitism and in support of Israel.²⁰ King's fellow travelers in supporting Jewish causes included influential civil rights leaders such as W.E.B. Du Bois,²¹ Roy Wilkins,²² Whitney Young,²³ and A. Philip Randolph.²⁴ An integrated coalition drove civil rights progress throughout much of the twentieth century, with the NAACP, National Urban League, and Southern Christian Leadership Conference joining forces with the American Jewish Congress, American Jewish Committee, and the Anti-Defamation League.²⁵ One study finds that during the 1960s about half of all civil rights lawyers in the South were Jewish, and that Jews were well represented among those who challenged Jim Crow segregation laws.²⁶

At other historical moments, however, the relationship was strained, sometimes to a breaking point, despite all the two groups had in common.²⁷ There are and have been internal challenges to the vital alliance between the Black and Jewish communities, making opportunities to reflect on the historical alliance—such as the 2018 Symposium—even more pressing. Dangerous alliances harm both Jews

¹⁹ Albert D. Chernin, *Making Soviet Jews an Issue: A History*, in *A Second Exodus: The American Movement to Free Soviet Jews* 15, 33, 48 (Murray Friedman & Albert D. Chernin eds., 1999).

²⁰ *Anti-Semitism Held Immoral by Dr. King*, N.Y. Times, Oct. 11, 1967, at 59.

²¹ Benjamin Sevitch, *W.E.B. Du Bois and Jews: A Lifetime of Opposing Anti-Semitism*, 87 *J. Afr. Am. Hist.* 323 (2002).

²² Nancy L. Green, *Blacks, Jews, and the "Natural Alliance": Labor Cohabitation and the ILGWU*, *Jewish Soc. Stud.*, Fall 1997, at 79, 96; Johnpeter Horst Grill & Robert L. Jenkins, *The Nazis and the American South in the 1930s: A Mirror Image?*, 58 *J. S. Hist.* 667, 689 (1992).

²³ Yvonne D. Newsome, *International Issues and Domestic Ethnic Relations: African Americans, American Jews, and the Israel-South Africa Debate*, 5 *Int'l J. Pol., Culture, & Soc.* 19, 36–37 (1991); Alan Petigny, *Black-Jewish Relations and the Decline of Modern Liberalism*, 35 *Rev. Am. Hist.* 556, 563 (2007) (reviewing Cheryl Greenberg, *Troubling the Waters: Black-Jewish Relations in the American Century* (2006)).

²⁴ James H. Meriwether, *African Americans and the Mau Mau Rebellion: Militancy, Violence, and the Struggle for Freedom*, *J. Am. Ethnic Hist.*, Summer 1998, at 63, 76.

²⁵ See generally Hasia R. Diner, *In the Almost Promised Land: American Jews and Blacks, 1915–1935* (Johns Hopkins Paperbacks ed. 1995) (1977) (discussing early twentieth-century relations between Blacks and Jews).

²⁶ *Black and Jewish Relations, An Article*, AAREG (Sept. 29, 2019), <https://aaregistry.org/story/black-and-jewish-relations-an-article/> [<https://perma.cc/3696-Z72S>].

²⁷ See, e.g., Annalisa Jabaily, *1967: How Estrangement and Alliances Between Blacks, Jews, and Arabs Shaped A Generation of Civil Rights Family Values*, 23 *L. & Ineq.* 197, 205–07 (2005) (discussing black nationalist break with mainstream Jewish organizations); Winston McDowell, *Race and Ethnicity During the Harlem Jobs Campaign, 1932–1935*, 69 *J. Negro Hist.*, 134, 136 (1984).

and Blacks and draw us away from our shared interest in equality, liberty, and the common good.

The central message of this letter is this: The *Virginia Law Review*, and indeed all who seek to create a path toward racial and ethnic reconciliation, should critically engage with the fact that anti-Semitism lies at the core of white nationalism and supremacism. That ancient hatred is often coupled with anti-Black racism, as it was at the 2017 Unite the Right rally. The failure to see and vigorously oppose the existential and historical linkages between the two is to give power to the terrorists who roamed the streets of Charlottesville and who are increasingly invading the hearts and minds of people well beyond Virginia today.