Post-Trayvon stress disorder (PTSD): A theoretical analysis of the criminalization of African American students in U.S. schools

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Abstract

This article examines the historical and contemporary intersections of race in education. Specifically, this article explores the African American schooling experience in relation to the *Black Lives Matter* movement. Although the *Brown vs. Board of Education* [1954] decision promised more racial cohesion in public schools, many African American students still experience widespread disparities (Kozol, 2005). With African American students receiving three times the number of suspensions or expulsions (Lewis, Butler, Bonner, & Joubert, 2010), it is imperative to explore the undeniable relationship between public schooling and the criminal justice system. To that end, it is important to consider ways that U.S. schools continuously underserve students and communities of color. This theoretical article highlights the criminalization of Black youth and draws parallels between public schooling and the criminal justice system. The results of this article are exigent for school and community reform.

Introduction

With the racially motivated killings in Oakland, California [2009], Sanford, Florida [2012], Ferguson, Missouri [2014], Staten Island, New York [2014], Cleveland, Ohio [2014], Baltimore, Maryland [2015], Charleston, South Carolina [2015], Waller County, Texas [2015], St. Paul, Minnesota [2016], and Baton Rouge, Louisiana [2016], the utopian archetype of "post-racialism" has consistently proven to be a historical fallacy. Although the concept of "race" is a synthetic social construct (Ferber, 1998; Hartigan, 2010; Sanders, 1969), the poisonous repercussions of racial injustice have negatively impacted many African American communities and schools (Bell, 2004; Sears & Savalei, 2006). To that end, there is a need to explore the intersections of race and criminalization in a coined "post-racial" world. Whereas schools would seem like pinnacle spaces for critical inquiry, most U.S. classrooms cautiously avoid social justice

conversations (Dei, 2003, 2012). If schools are to raise informed citizenry, there is an insistent need to incorporate critical conversations into classroom pedagogy.

The inspiration for this research is rooted in the 2012 shooting death of Trayvon Martin. Martin's death, and the subsequent 2013 acquittal of George Zimmerman, spearheaded the viral social media hashtag #BlackLivesMatter. As a note, *Black Lives Matter* (BLM) has since become a global movement that advocates for racial justice through social media presence, political advocacy, and direct action (Eligon, 2015). Today, BLM aims to "…fight anti-Black racism, to spark dialogue among Black people, and to facilitate the types of connections necessary to encourage social action and engagement" (Black Lives Matter, 2017). Although BLM is perhaps most known for the nationally televised protests in Ferguson, Missouri (Luibrand, 2015), it is important to note that Martin's 2012 death was a precursor.

To that end, this study focuses on Trayvon Martin's death as a point of departure. In reference to Martin's death, researcher Chris Emdin posited via Twitter: "This generation hasn't been the same since that verdict," and subsequently coined the term *Post-Trayvon Stress Disorder*, or (PTSD), to describe the pervasive fear and trauma related to state-sanctioned violence against Black youth (Emdin, 2014). Thus, this article explores the concept of PTSD in relation to schooling and criminalization. Additionally, this article investigates the convergence of *Black Lives Matter* in direct contradistinction to the oppositional economic system of capitalism. The remainder of this article will; a) provide a brief contextualization of Martin's death; b) survey existing literature on school discipline and student criminalization; c) present a hybrid theoretical framework [*post-modern conflict theory*] in relation to PTSD; and d) provide an in-depth discussion on racial healing and restoration in schools.

The Shooting Death of Trayvon Martin and *Black Lives Mater*

Armed with a grey hooded sweatshirt, canned iced tea, candy, and cellular phone, a young seventeen year-old African American boy was killed by a local Florida citizen. Reported as looking "suspicious," twenty-nine year-old George Zimmerman reported to local police that Trayvon Martin was a potential threat to his Florida neighborhood (Brown & Francescani, 2012). It is important to note that Trayvon was 17-years old, Black, and unarmed. Police tapes revealed that Zimmerman uttered his concerns to emergency responders via the phrases "these people always get away" and "this guy is up to no good" (Angert, 2013). Additionally, released police tapes revealed that Zimmerman repeatedly referred to Martin's race when referring to his "suspicion" (Brown & Francescani, 2012). Zimmerman proceeded to follow young Trayvon through his neighborhood,

despite opposing advice from police authorities (Lee, 2013). Martin questioned Zimmerman's actions, but was continuously followed. After pleading for neighbors to help him, Martin was shot in the chest and killed. Due to Florida's controversial *Stand Your Ground* law ["Use of Force in Defense of Person," Fla. Statute § 776.012], Zimmerman was acquitted of all charges in 2013.

The story of Trayvon Martin swept the nation and riveted the African American community. Regrettably, Martin's case surfaced many unresolved issues concerning racism in the United States. Martin's death confirmed that Black fear was a *quintessential* part of American history (Hartman, 1997; Hill, 2016). Even as a frequent visitor of his father's girlfriend's neighborhood, Martin was considered an "outsider" and a *threat* to middle class suburbia. Thus, Zimmerman's killing of Martin was based solely on preemptory biases. Martin – by nature of race, age, gender, and perceived social class – was innately "suspicious" and inherently deviant (Brown & Francescani, 2012). Thus, the notion of *Post-Trayvon Stress Disorder* (PTSD) captures the haunting trauma within the Black community, specifically surrounding issues of safety, equality, and justice. The *Black Lives Matter* movement sought to bring national attention to racial injustice and the countless killings of unarmed Black citizens. Additionally, the movement posited the simple notion that Black human life is valuable (Edwards & Harris, 2016). To that end, although not considered an educational issue by mainstream media, Trayvon Martin's case and the subsequent *Black Lives Matter* movement have direct connections to broader conversations.

Historical Examination of Social Institutions and Race

The shooting death of Trayvon Martin is the result of varying social institutions that have overwhelmingly underserved communities of color (Alexander, 2012; Children's Defense Fund, 2012). To better understand this intricate relationship, it is important to acknowledge the historical ramifications of racial injustice in the United States. From the transatlantic slave trade, until now, the contrariety between racial inequality and U.S. citizenship has been a paradox for African Americans (Baldwin, 1962; Harding, 1981; Oakes, 1990). Transatlantic slavery was the precursor to decades of subsequent criminalist policies against African Americans, including the Fugitive Slave Act, the 3/5 Compromise, Black codes, Jim Cow Laws, convict leasing, the War on Drugs, and mandatory minimum sentencing (Alexander, 2012; Franklin & Moss, 2000; Harding, 1981). In each of these cases, African Americans were [are] not considered full citizens under the law.

The lamentable relationship between race and freedom buttresses U.S. social institutions, and has likewise marred the utopian ideal of "equality for all." Even from inception, American slavery associated *Blackness* with criminality (Sanders, 1969). Furthermore, *Blackness* was perceived as a form of religious deviance from the White moral norm (Sanders, 1969). Thus, the pathology of race and racial difference has since steeped the American fabric from inception (Hartigan, 2010; Hartman, 1997; Sanders, 1969). Today, the historical ramifications of racism are pervasive and intergenerational.

The corollaries of race also clandestinely influence public servants, such as teachers and law enforcement officials. Thus, the criminal justice system and education are two important avenues to explore in relation to Martin's death. Since schools are merely conduits of existing social norms, beliefs, and ethos, the need for transformative race conversations are paramount (Dei, 2003, 2012; Nieto & Bode, 2008). To start, the public education system in the 21st century is more racially segregated than it was prior to the 1954 *Brown vs. Board of Education* decision (Mickelson, 2001). African American students are three times as likely to be suspended or expelled from school (Kim, Losen, & Hewitt, 2010; Lewis, Butler, Bonner & Joubert, 2010; Schott Foundation, 2012). Additionally, most schools that predominately serve African American students are disproportionately underfunded and underserved (Kozol, 2005). Since its inception, public education in the U.S has been tainted with racial disparity. Thus, Black student criminalization today is simply a conduit of existing racial injustice.

Literature Review

Black Male Criminalization in Schools

As noted, the underservice of African American students in U.S. schools is widely documented. Today, racial inequality permeates U.S. classrooms via the school-to-prison pipeline (Kim, Losen, & Hewitt, 2010; Morris, 2016), discipline disproportionality (Lewis, Butler, Bonner, & Joubert, 2010), unequal funding (Kozol, 2005), and lack of critical or multicultural pedagogy (Dei, 2003, 2012; Ighodaro & Wiggan, 2011). Additionally, Black students are overwhelmingly penalized in the public education system for non-violent offenses (Kim, Losen, & Hewitt, 2010; Morris, 2016; Skiba, Peterson, & Williams, 1997). This precisely mirrors the criminal justice system, as Black males are unambiguously targeted (Alexander, 2012; Schott Foundation, 2012). To that end, the story of Martin directly parallels the experiences of African American males across the entire U.S. Whereas Trayvon was racially profiled and criminalized in a local

neighborhood, Black students are equally targeted in school.

Discipline disproportionality is perhaps the most visible racial disparity in schools. While African American students comprise only 16% of the public school population nationwide (NCES, 2013b), African American students comprise 46% of school suspensions, 39% of school expulsions, 49% of office referrals, and 36% of student arrests on campus (Khadaroo, 2013; Schott Foundation, 2012). Harper (2017) established that 55% of all Black student suspensions originated from thirteen Southern states. Additionally, Harper (2017) surveyed these thirteen states and found that in 84 districts, Black students represented 100% of the student suspensions. These racial disparities are alarming. Yet, research consistently confirms there is no difference in student behavior between racial groups (Skiba & Williams, 2014). The most conclusive findings, however, are in school-level factors such as faculty and student representation, school procedures and processes, and school climate (Skiba & Williams, 2014).

Aside from quantitative differences, there are also racial disparities in the *types* of infractions. White students, for example, are often suspended for observable or egregious infractions like weapons; meanwhile, African American students are often suspended for more subjective offensives, such as disorderly conduct, noncompliance, or dress code (Kunjufu, 2002; Skiba, Michael, Nardo, & Peterson, 2002). Additionally, research also finds that even when Black and White students have the same violation, the two racial groups often receive different punishments. For example, Kunjufu (2002) notes, "the White child [is] asked to write a paper while the African American child [is] suspended for three days" (p. 128). One exigent problem of school extraction is the longitudinal effects on academic performance. Kim, Losen, and Hewitt (2010) find that exclusion from the classroom "…disrupts a child's education and may escalate misbehavior by removing the child from a structured environment, which gives the child increased time and opportunity to get into trouble" (p. 3). When students are suspended from school, there are direct academic and social consequences associated with time away from instruction (Balfanz, Herzog, & Mac Iver, 2007; Balfanz, 2009; Kim, Losen, & Hewitt, 2010). Research also suggests there is a direct correlation between student suspension and dropping out (Balfanz, Herzog, & Mac Iver 2007; Balfanz, 2009). In fact, 49% of students who enter high school with three or more suspensions fail to graduate high school (Balfanz, Byrnes, & Fox, 2012). Moreover, those students who do not complete high school are three times as likely to become incarcerated (Lochner & Moretti, 2004). Research consistently confirms that school extraction [i.e. suspension or expulsion] is a

counterproductive approach to student behavior (Bloomberg, 2004). Likewise, criminal justice theorists posit that over-criminalization and mandatory minimum sentencing is the quintessential antithesis to restorative justice (Yeh, 2008). Yet, both are currently used as a method of punishment and population control (Alexander, 2012).

An Interrogation of Schools and Society

The connections between criminal justice and education showcase the fluidity of various social institutions. In most large public school districts, suspension rates for African American students reach over 20% (Kim, Losen, & Hewitt, 2010). In these same districts, 50% of African American males are suspended at least once during a school year (Kim, Losen, & Hewitt, 2010). Similar to Alexander's (2012) research on *The New Jim Crow*, African American criminalization in a broader sense is often due to minor, non-violent offenses. These policies rely on biased and racially subjective interpretations. Within the narrow context of schooling, teachers are often left to interpret student behavior for subjective policies like noncompliance, classroom disruption, and defiance.

Many researchers attribute racial disparities in discipline to the widely controversial, draconian "zero tolerance" policies (Martinez, 2009; Welch & Payne, 2010). Zero-tolerance describes suspension or expulsion for the first offense. Many of these policies impact African American and Latinx students, specifically (Lewis, Butler, Bonner, & Joubert 2010; Morris, 2016; Rodriguez, 2013; Schott Foundation, 2012). Additionally, because of *No Child Left Behind* and high-stakes assessments, zero tolerance policies are now used as mechanisms for student population control (Shaw, 2014). Many districts manipulate summative test scores by removing low-performing students who might damper a school's ratings (Shaw, 2014). In these cases, low-income and low-performing students are the primary victims of school extraction [i.e.: suspensions or expulsions]. Notwithstanding, most non-violent offenders in the criminal justice system are also from low-income communities of color (Alexander, 2012). There is a myriad of economic implications from these findings, especially considering the interconnectivity of school privatization, high-stakes state testing, state merit performance, and the prison-industrial complex (Alexander, 2012; Hartnett, 2008; Tuck, 2012). Here, there is an economic for-profit value for deviance, both within schools and society (Alexander, 2012; Hartnett, 2008; Tuck, 2012).

In addition to the economic implications, in some states, there are also legal consequences. Some of the most extreme cases of student interdiction result

in the *school-to-prison pipeline*. The extensive magnitude of student extraction has impacted entire states. In fact, some states have been known for aiding student criminalization by treating school-related offenses as crimes. In 2013, select school districts in Mississippi were investigated for using extreme and unfair discipline policies towards African American students (Mock, 2013). Mississippi findings revealed that students who were disruptive in class or violated minor dress code rules were arrested and sent directly to juvenile jails (Mock, 2013). Similarly, more recently, the state of Missouri passed recent legislation that now classifies a school fight as a felony (Klein, 2017). Thus, there is a need to pursue more restorative consequences for school discipline. Furthermore, there is a need to revisit and revise racial bias within school policies.

Post-Traumatic Stress Disorder (PTSD)

As noted in the previous section, Black criminalization is ubiquitous in schools (Kim, Losen, & Hewitt, 2010; Lewis, Butler, Bonner & Joubert, 2010; Morris, 2016). The reciprocal effects of school and community marginalization have observable consequences on the African American psyche. Emdin's (2014) coined "Post-Trayvon Stress Disorder [PTSD]" captures the reciprocal penalty of overrepresented criminalization in schools and society. PTSD, in this sense, refers specifically to the Trayvon Martin case. Notwithstanding, many researchers have noted that many African American students suffer from actual *post-traumatic stress disorder*, or PTSD (Beckett, 2014; Tokuda, 2014). From a clinical perspective, the impact of Black criminalization has long-term psychological and physiological repercussions (Smith & Patton, 2016; Tokuda, 2014). According to Tokuda (2014), mental and physical health complications often result from violence, poverty, and police-related trauma in urban communities.

Today, post-traumatic stress disorder [PTSD] is commonly associated with soldiers or war veterans. PTSD is characterized as, "…a serious condition that can develop after a person has experienced or witnessed a traumatic or terrifying event in which serious physical harm occurred or was threatened" (Farmer, 2014, p. 112). According to the *Center for Disease Control's Division of Violence Prevention*, inner-city youth have higher levels of PTSD than military soldiers (Smith & Patton, 2016; Tokuda, 2014). In fact, some researchers suggest one in three urban youth have mild to severe PTSD (Beckett, 2014). Many Black male students are especially at-risk. Smith and Patton (2016) find that concentrated amounts of poverty position many students of color to be especially vulnerable for exposure to generational violence and trauma (Children's Defense Fund, 2012). The disproportionate exposure of urban Black youth mirrors the same PTSD characterized by middle-income and White homicide survivors

(Smith & Patton, 2016). Additionally, "… [the] premature violent death and traumatic loss, particularly when peers are murdered," situates Black males in the midst of chronic trauma (Smith & Patton, 2016, p. 212). Without addressing these issues, mental and emotional trauma in many Black communities remain unresolved.

Being exposed to violence, social and political underservice, racial trauma, and/or limited healthcare, has a direct impact on education (Bennett, 2014). Tokuda (2014) notes, it is nearly impossible to teach students suffering from PTSD without empathy and addressing basic human needs. Sadly, instead of addressing the issue as a heath disorder, it is often regarded as "hood disease" or typical urban behavior (Rice, 2014). Rice (2014) brings to question society's primitive understanding of urban communities and normalization of violence among Black students. Furthermore, Lee (2013) notes that racial salience, or understanding the transience of human experiences, is necessary to promote empathy and understanding. Lee (2013) states, "making race salient or calling attention to the relevance of race in a given situation encourages individuals to suppress what would otherwise be automatic, stereotypic-congruent responses in favor of acting in a more egalitarian manner" (p.1563). Critical race theorists also contend these findings (Bell, 2004; Ladson-Billings, 2009).

Internalized Racism and Self-Hatred

What is perhaps most interesting about the Martin case is Zimmerman's racial and ethnic background. Zimmerman was a second-generation Peruvian American citizen (Francescani, 2012). Researchers provide a phenomenological explanation for cultural disillusionment, more popularly known as "internalized racism" or "self-hatred." *Self-hatred* describes, "the acceptance of stereotypes or beliefs that paint one's racial group as subhuman, inferior, incapable, or a burden to society" (Hipolito-Delgado, 2010, p. 319). The inseparability between racial identity and economic value is a quintessential component of American capitalism (Williams, 1994). Here, the "acceptance of inferiority" has the ability to produce adverse effects on both physical and mental health, as well as negatively influence identity development (Hipolito-Delgado, 2010). Although internalized racism and self-hatred are prevalent topics within Black psychology and history research (Clark & Clark, 1947; Hall, 1995; hooks, 1995; Woodson, 1933/1977), Hipolito-Delgado (2010), Gómez (2000), and Padilla (2001) also find rampant evidences of this in the Latinx community as well. In particular, research consistently contends that skin color plays a role in intra/intercultural stratification (Gómez, 2000). In this case, fairer skin is often favored and associated with the privileges of Whiteness. Many of these confounding variables situated Zimmerman in

positions of privilege and fabricated separation from people of color. Thus, Zimmerman's own deliberate "positionality" compelled him to find Trayvon Martin, an unknown African American teenager, *fundamentally* deviant. Zimmerman's vigilante prowess was fueled by a skewed, and *internalized*, view of race in America. According to Zimmerman's police report, Martin's racial identity was conspicuous and intimidating.

Theoretical Framework

While race is a quintessential component of the Trayvon Martin case, there are also imperative economic implications as well. Race and economics have inseparable connections to U.S. history, specifically in regards to capitalism (Davis, Barat, & West, 2016; Hill, 2016; Williams, 1994). Marxism helps to unravel the dialectic relationship between capitalism and exploitation, specifically in regards to economic stratification and property. Karl Marx asserts that society is buttressed by conflict and diametrically opposing power differentials. These two power groups are most notably the proletariats and bourgeoisie (Marx, 1867/1887). This underlying tension of power is known as *social conflict theory*. According to conflict theorists, the unequal distribution of wealth creates stratification in society (Lemert, 2004). Karl Marx identified the systemic problem as capitalism; however, there are also racial implications nuanced within this economic theory as well. In specific reference to the U.S., Marx (1867/1887) associates class tension to racial conquest. He notes:

> The discovery of gold and silver in America, the extirpation, enslavement and entombment in mines of the aboriginal population, the beginning of the conquest and looting of the East Indies, the turning of Africa into a warren for the commercial hunting of black-skins, [signalized] the rosy dawn of the era of capitalist production. These idyllic proceedings are the chief momenta of primitive accumulation. On their heels treads the commercial war of the European nations, with the globe for a theatre. (Marx, 1867/1887, p. 533)

Here, Marx's critique of capitalism is rooted not only in the disdain for economic stratification, but also for the necessity of human labor, and slavery, to finance industrialization (Hunt & Lautzenheiser, 2011). To Marx's point, the most exigent connection between race and human capital is American slavery (Williams, 1994). From the dawn of its inception, slavery was an inhumane apparatus needed bolster capitalism (Williams, 1994).

On arguably a completely different side of the theoretical spectrum, post-modernism provides additional insight into deviance and the criminal justice

system. Post-modernist Michel Foucault depicts systematic problems within social institutions like schools, prisons, and the military. Whereas Marx focuses solely on economics, and more specifically capitalism, Foucault more broadly uncovers problematic social institutions. Foucault's (1975/1995) *Discipline and Punish* highlights the role of condemnation, execution, and punishment. Foucault antagonizes contemporary uses of prisons as mechanisms to promote and exploit deviance (Lemert, 2004). According to a post-modern analysis, the criminal justice system is a social institution that ferments crime. Foucault's concept of *outlaw* refers to "the great social nomad who prowls on the confines of a docile, frightened order" (Lemert, 2010, p. 419). In this definition, individuals are considered deviant, not by behavior, but by social hierarchy. Essentially, deviance exists in the realms of opposition. Foucault suggests that criminals are not judged because of the offense, but because of common interest and the departure from the norm (Lemert, 2004, 2010). In this case, it was Martin's racial *appearance* that separated him from the common interest of George Zimmerman's neighborhood. Additionally, a post-modern analysis of criminalization questions historical evidences of exploitation and public display (Foucault, 1975/1995). This is confirmed by public lynchings during post-Reconstruction, for example. Here, images of deviances permeate society's psyche and fail to preemptively address criminality. It is important to note that Foucault generally fails to intersect race, gender, and class variables into his social theories. Thus, it is important to explore the merging of *both* theoretical thoughts.

Intertwining the two theories into one, an analysis of Trayvon Martin's case should be examined from a *post-modern conflict* lens. Post-modern conflict theory addresses Black criminalization through Marxian views of capitalism, conflict, and societal worth. Additionally, it analyzes Martin's death in relation to deviance and punishment. *Post-modern conflict theory* establishes that human beings are assessed through their life's value to capitalism. Here, it is important to analyze individuals' contributions to the capitalist market as an indicator of privilege. Moreover, it embeds Foucault's research on the prison system to further explain phenomenon of "demonization," "delinquents," and "outlaws" (1975/1995).

#BlackLivesMatter and Post-Modern Conflict Theory

Using *post-modern conflict theory* as a mode for interpretation, it is important to note that race and appearance are preemptively used to classify the value of human life. This is evident both in schools and the criminal justice system. This is how the notion of *Black Lives Matter* radically addresses race when antagonizing the criminal justice system's general dismissal of Black life.

Today, racial corruption manifests in a myriad of ways. Most notably, racial exploitation is seen through the prison industrial complex (Thompson, 2012), the efflorescence of unregulated charter schools in low-income communities of color (Prothero, 2016) and even professional sports (Rhoden, 2006). Like slavery, in each of these cases, African Americans are *solely* seen as contrivances for capitalism. Although professional sports are arguably *optional* career avenues, in many cases Black athletes compete both within *and against* conflicting systems of racism and White supremacy (Rhoden, 2006). There are both historical and contemporary evidences of this. The convergence of race, capitalism, and human labor is seen historically [i.e. Jessie Owens, Jackie Robinson] and contemporarily [i.e. University of Missouri, Colin Kaepernick] as a form of resistance to racist and capitalistic policies. Rhoden's (2006) *Forty Million Dollar Slave* captures this sort of racial exploitation. While some argue that capitalist mechanisms are not inherently negative, there are nevertheless unwavering connections between race and capitalist manipulation. In fact, conflict theorist Karl Marx coined the term *exploitation of labor* to detail the conditions of these historical and predatory practices.

Marx's *exploitation of labor* perfectly describes the inseparable connection between race, slavery, and American capitalism (Williams, 1994). Williams' *Capitalism and Slavery* (1994) posits the indistinguishable convergence of human labor and economic value in the United States. The historical dismissal of Black lives is perhaps one the U.S.'s greatest hypocrisies. For example, arguably one of the greatest evidences of capitalist success in the U.S. is the Industrial Revolution. Black bodies, quite literally, built the industrial U.S. (Davis, Barat, & West, 2016; Wilder, 2014; Williams, 1994). However, while Western expansion and the modern industry expanded wealth for the bourgeoisie, the exploitation of the poor increased dramatically. Additionally, racial disparities also heightened. Marx (1867/1887) notes:

> In the United States of North America, every independent movement of the workers was [paralyzed] so long as slavery disfigured a part of the Republic. [Labor] cannot emancipate itself in the white skin where in the black it is branded. But out of the death of slavery a new life at once arose. The first fruit of the Civil War was the eight hours' agitation that ran with the seven-leagued boots of the locomotive from the Atlantic to the Pacific, from New England to California. (p. 195)

The economic association of Black life with property, or *chattel*, unequivocally characterizes the apathetic relationship between market economies and the non-

White, proletariat class. Hill (2016) further confirms the economic connections to unarmed Black killings. He notes:

> Michael Brown, Tamir Rice, Jordan Davis, and Trayvon Martin were not killed simply because they were Black, although it is entirely reasonable to presume that they would be still alive if they were White. They were killed because they belong to a disposable class for which one of the strongest correlates is being Black. (p. 28).

To that end, this is why *Black Lives Matter* is both a sociopolitical and economic statement.

As repeatedly stated, there are irreconcilable race and class antagonisms that stem from historical oppression (Davis, Barat, & West, 2016). French Marxist Althusser (1971/2014) contends that repressive state apparatuses, such as courts, police, and prisons, benefit the wealthy and subjugate the powerless. Additionally, Althusser asserts that these institutions operate as a way to reify existing sociopolitical structures (1971/2014). In relation to today's prison industrial system and the privatization of school discipline, Althusser's theories are especially applicable. Alexander (2012) posits that African American life is still being exploited through the criminal justice system. The false notion of Black inferiority is based on capitalistic themes of ownership and property. Similar to slavery, Black labor and criminality are still lucrative in today's contemporary context via the school-to-prison pipeline and the prison-industrial complex. The efflorescence of privatized prisons is a leading example of neoliberal, capitalist economics that specifically exploit low-income African American and Latinx communities.

Educational Implications

Both the perpetrators and victims in Martin's case are directly connected to social institutions. The criminalization of African American males in the criminal justice system is both a contributing factor and byproduct of Black marginalization in schools. Many African American and Latinx students who question authority [i.e.: dress code violation, noncompliance, etc.] are automatically considered *defiant*. This same idea of "questioning" authority was also witnessed in the Martin case. Although Zimmerman was a self-proclaimed and otherwise unauthorized vigilante, he cavalierly followed and killed Martin. Contrastingly, it is important to note that Martin "questioned" Zimmerman following him (Angert, 2013; Brown & Francescani, 2012). In reference to countless other unarmed Black killings, police reports frequently describe feelings

of "threat" or "intimidation" from victims who questioned authority (Visser, 2016). Often these victims are unarmed (Visser, 2016). Similar to Zimmerman, Michael Dunn also killed an unarmed Black teen, Jordan Davis [Jacksonville], in 2012. Dunn's dispute involved "loud music" in a parking lot (Hill, 2016). What is peculiar about both Martin's and Davis' case is that their killers were not law enforcement officials; rather, in both cases they were local, pseudo-vigilante authority figures. Similarly, unsubstantiated Black criminalization in schools often stems from a misappropriation of authority as well. To that end, Delpit (2006), Emdin (2016), and Kunjufu (2002) assert that power dynamics between students and teachers are important issues to investigate when teaching students of color. These dynamics are often exacerbated with White teachers and students of color (Hyland, 2005).

Trayvon's assumed deviance was under the guise of Black male threat and deviance (Lee, 2013). It is important to note that Zimmerman's vigilante killing of Martin, under Florida law ["Use of Force in Defense of Person," Fla. Statute § 776.012], was lawful. However, Martin's presumed guilt was based on racial optics alone. This is confirmed by local police reports that failed to investigate Martin's death for six weeks (Hill, 2016). For six weeks, Martin was instinctively assumed guilty with little law enforcement interrogation. Zimmerman's presumed innocence was also based on his racial optics. As a White-passing Latino man in a gated community, both race and class buttressed him from assumed criminality. The relevance of this issue to urban education today is embedded in nearly every facet. The unbeknownst bias associated with race, racism, and diversity, is something educators especially need to address (Emdin, 2016). Researchers (Ito & Urland, 2003; Rattan & Ambady, 2013) note that race is one of the most *visible* and *unavoidable* forms of identification. With race being a factor of nearly every facet of life, it is indisputably unrealistic to consider the U.S. post-racial. This notion is especially important for U.S. teachers.

The zenith of school discipline reform stems from the acknowledgement of prejudice and bias in school policies. In today's classrooms, many students of color are targeted for this very reason. Foucault's post-modern theory of "delinquents" and "outlaws" suggests those who stray from societal norms are outcast and demonized. In the case of many African American students, the rejection of White, European ethos is considered deviant (Delipt, 2006; Morris, 2012). Addressing teacher bias is a preliminary step in reforming school discipline (Delpit, 2006; Kunjufu, 2002; Milner & Hoy, 2003). Gleaning from Trayvon Martin's case, it is also important for districts to reexamine discipline disputes that are embedded with racial bias and cultural misunderstanding. Polling

data from the Zimmerman trial provides contextualization of racial bias on a national level. Survey results from *Washington Reuters* demonstrated 91% of African American participants believed that Martin was unjustly killed, whereas only 35% of White participants agreed (Charles, 2012). The survey participants' interpretations of Martin's death were inadvertently viewed through individual perceptions of deviance. To that end, the value of Martin's life was preemptively assessed according to race, gender, and social class. Although the facts of the case remained constant, perceptions of deviance differed significantly based on race (Bell & Cooney, 2012; Charles, 2012).

The varying perspectives in Martin's case are essential for educators to understand, especially when addressing school discipline in the classroom. To that end, it is important to consider that 82% of the U.S. teaching force is White (NCES, 2013a), while 50% of students are racial minorities (Maxwell, 2014). While race is not indicative of effective teaching, it can be argued that cultural incongruence easily fosters classroom misunderstandings (Delpit, 2006; Milner & Hoy, 2003). As repeatedly stated, many of these misunderstandings result in student discipline and punishment in schools. Thus, if the aforementioned poll results are proportionate to the public's perception, most of teaching force would agree with many of the other White respondents. In relation to teacher bias, this is an important area to address.

Conclusion

Contemporary society views itself as post-racial. Yet, the events in Oakland [2009], Sanford [2012], Ferguson [2014], Staten Island [2014], Cleveland [2014], Baltimore [2015], Charleston [2015], Waller County [2015], St. Paul [2016], and Baton Rouge [2016], further reinforce the notion that race is an inseparable part of American contemporary history. Like Marx (1867/1887) and Foucault (1975/1995), many citizens in these aforementioned cities express dissatisfaction with local schools and police (Flaherty, 2014; George & Puente, 2015; Moulthorp, 2015). It is imperative for teacher preparation programs to adequately prepare educators for racial difference and diversity in the classroom. Likewise, law enforcement officials must also confront their own racial biases. Even though modern history believes itself to be beyond the realms of racism, implicit bias can influence perceptions of, "… threat, danger, and suspicion in cases involving minority defendants and victims" (Lee, 2013). The cavalier killing Trayvon Martin could have been prevented if systemic racism were addressed at both the individual and institutional levels.

The issue of racial profiling was a pivotal factor in Martin's murder (Lee, 2013). Similarly, race is also a pivotal factor in school discipline (Lewis, Butler, Bonner, & Joubert, 2010). Martin's case provides contextualization for all institutions, especially schools, to assess implicit bias. Racial and ethnic prejudgments stimulate incorrect perceptions of entire groups of people (Traore & Lukens, 2006). Zimmerman's predisposition of Martin was systemically rooted in prejudice. Furthermore, Zimmerman's later acquittal displayed an overall assumption of Black deviance. As a result, *Post-Trayvon Stress Disorder* captures the never-ending reality of fear and injustice within the Black community.

Challenging teacher bias and prejudice must begin in pre-service teacher training. It is important to consider ways schools can serve as sites of racial healing and transformation. Equipping teachers and students to take responsibility for their fears and presumptions is critical. In fact, anti-racism and critical multicultural educators, such as Dei (2003, 2013) and Nieto and Bode (2008), argue that education *must* address racism. Many researchers like Awad (2011), May and Sleeter (2010), and Dei (2003, 2012) also advocate for a more *critical* approach to race within classroom instruction. Additionally, there are pedagogical implications as well. Delpit (2006), Emdin (2016), and Kunjufu (2002) warn against creating binary expectations for African American students. Teacher should instead embrace student difference and recognize alternative forms of teaching and learning (Delpit, 2006; Emdin, 2016; Hopkins, 1997; Ladson-Billings, 1994).

Schools undoubtedly teach a hidden curriculum. In many schools, the overcriminalization of Black youth creates a pervasive narrative of deviance in children as young as Pre-K and kindergarten-aged (Anderson, 2015). Not only does this pervade the pathology of Black students, it also inaccurately seeps into the minds of White students as well. To that end, it is imperative for teachers and administrators to continuously ensure students of color are not disproportionately exploited through school discipline. Considering that Trayvon Martin and George Zimmerman were both former public school students in Florida and Virginia, respectively, there is potential for widespread restorative impact in classrooms.

References

Alexander, M. (2012). *The new Jim Crow: Mass incarceration in the age of colorblindness*. New York, NY: The New Press.

Althusser, L. (1971/2014). *On the reproduction of capitalism: Ideology and ideological state apparatuses*. London, UK: Verso.

Anderson, M. D. (2015, December 15). Why are so many preschoolers getting suspended? The frequency of punishment has a troubling racial skew. *The Atlantic*. Retrieved from https://www.theatlantic.com/education/archive/2015/12/why-are-so-many-preschoolers-getting-suspended/418932/.

Angert, B. L. (2013). Prejudice, omission is permission! Colorblind is color-mute. *EmpathyEducates*. Retrieved from http://empathyeducates.org/Journeys-to-and-through/prejudice-omission-is-permission-colorblind-is-color-mute/

Awad, I. (2011). Critical multiculturalism and deliberative democracy: Opening spaces for more inclusive communication. *Javnost – The Public, 18*(3), 39-54.

Baldwin, J. (1962). *The fire next time*. New York, NY: Random House.

Balfanz, R. (2009). Can American high school become an avenue of advancement for all? *The Future of Children, 19*(1), 17-36.

Balfanz, R., Byrnes, V., & Fox, J. (2012). *Sent home and put off-track: The antecedents, disproportionalities, and consequences of being suspended in the ninth grade*. Presented at the National Conference on Race and Gender Disparities in Discipline.

Balfanz, R., Herzog, L., & Mac Iver, D. J. (2007). Preventing student disengagement and keeping students on the graduation path in urban middle-grades schools: Early identification and effective interventions. Educational Psychologist, 42(4), 223-35.

Beckett, L. (2014). The PTSD crisis that's being ignored: Americans wounded in their own neighborhoods. *ProPublic*a. Retrieved from https://www.propublica.org/article/the-ptsd-crisis-thats-being-ignored-americans-wounded-in-their-own-neighbor

Bell, D. (2004). *Silent covenants: Brown v. Board of Education and the Unfulfilled Hopes for Racial Reform*. New York: Oxford.

Bell, A., & Cooney, P. (2012). *Big gap between races in U.S. over Trayvon Martin's killing*. Washington Reuters.

Black Lives Matter (2017). What we believe: Guiding principles. Retrieved from http://blacklivesmatter.com/

Bloomberg, N. (2004). Effective discipline for misbehavior: In school v. out of school suspension. *Concept: Interdisciplinary Journal of Graduate Studies*. Retrieved from http://www.healthiersf.org/RestorativePractices/Resources/documents/suspension%20ineffective.pdf.

Brown, T. & Francescani, C. (2012, April 13). Shooter of Florida teen Trayvon Martin pleads not guilty. *Washington Reuters*. Retrieved from http://www.reuters.com/article/us-usa-florida-shooting-zimmerman-idUSBRE83A1ET20120412

Children's Defense Fund (2012). *State of America's Children Report*. Washington, D.C.: Children's Defense Fund.

Charles, D. (2012). Big gap between races in Trayvon Martin killing. *Washington Reuters*. Retrieved from http://www.reuters.com/article/us-usa-florida-shooting-poll-idUSBRE83B1BB20120412

Clark, K. B., & Clark, M. P. (1947). Racial identification and preference among negro children. In E. L. Hartley (Ed.), *Readings in School Psychology* (pp. 169-78). New York, NY: Holt, Rinehart, and Winston.

Davis, A. Y., Barat, F., & West, C. (2016). *Freedom is a constant struggle: Ferguson, palistine, and the foundations of a movement*. Chicago, IL: Haymarket Books.

Dei, G.J. (2003). Communication across the tracks: Challenges for anti-racist educators in Ontario today. *Orbit, 33*(3), 2-5.

Dei, G. J. S. (2012). *Teaching Africa: Towards a transgressive pedagogy*. Dordrecht: Springer.

Delpit, L.D. (2006). *Other People's Children: Cultural Conflict in the Classroom*. New York: New Press.

Emdin, C. (2014, August, 19). Post Trayvon stress disorder. Retrieved from https://twitter.com/chrisemdin/status/501906576337154048.

Emdin, C. (2016). *For white folks who teach in the hood… and the rest of y'all too: Reality pedagogy and urban education*. Boston, MA: Beacon Press.

Edwards. S. B., & Harris, D. (2016). *Black lives matter*. North Mankato, MN: Abdo Publishing.

Eligon, J. (2015, November 18). One slogan, many Methods: Black lives matter enters politics. *New York Times*. Retrieved from https://www.nytimes.com/2015/11/19/us/one-slogan-many-methods-black-lives-matter-enters-politics.html

Farmer, S. (2014). *Healing ancestral karma: Free yourself from unhealthy family patterns.* San Antonio, TX: Hierophant Publishing.

Ferber, A. L. (2012). The culture of privilege: Color-Blindness, postfeminism, and christonormativity. *The Society for the Psychological Study of Social Issues*. 68(1), 63-77.

Flaherty, J. (2014, May 13). New Orleans teachers and students wrestle with racial tension. *The Root*. Retrieved from http://www.theroot.com/articles/culture/2014/05/new_orleans_schools_plagued_by_racial_tension/

Foucault, M. (1975/1995). *Discipline and punish: The birth of the prison* (A. Sheridan, Trans.). New York, NY: Random House.

Francescani, C. (2012, April 25). George Zimmerman: Prelude to a shooting. *Reuters*. Retrieved from https://www.reuters.com/article/us-usa-florida-shooting-zimmerman/george-zimmerman-prelude-to-a-shooting-idUSBRE83O18H20120425.

Franklin, J. H., & Moss, A. A. (2000). *From slavery to freedom: A history of African Americans*. New York, NY: McGraw-Hill.

George, J., & Puente, M. (2015, March 14). Baltimore leaders agree: City has a race problem. *The Baltimore Sun*. Retrieved from http://www.baltimoresun.com/news/maryland/baltimore-city/bs-md-ci-baltimore-racism-20150314-story.html

Gómez, C. (2000). The continual significance of skin color: An exploratory study of Latinos in the northeast. *Hispanic Journal of Behavioral Sciences, 22*(1), 94-103.

Hall, R. (1995). The bleaching syndrome: African Americans' response to cultural domination vis-á-vis skin color. *Journal of Black Studies, 26*(2), 172-84.

Harper, S. (2017). Disproportionate impact of K-12 school suspension and expulsion on black students in southern states. *Center for the Study of Race and Equity in Education, University of Pennsylvania*. Retrieved from http://www.gse.upenn.edu/equity/SouthernStates

Harding, V. (1981). *There is a river: The black struggle for freedom in America*. San Diego, CA: Harvest Books.

Hartigan, J. (2010). *Race in the 21st century: Ethnographic approaches*. New York: Oxford.

Hartman, S. V. (1997). *Scenes of subjection: Terror, slavery, and self-making in the nineteenth-century America.* New York, NY: Oxford University Press.

Hartnett, S. J. (2008). The annihilating public policies of the prison-industrial complex: Crime, violence, and punishment in an age of neoliberalism. *Rhetoric and Public Affairs*, 11(3), 491-515.

Hill, M. L. (2016). *Nobody: Casualties of America's war on the vulnerable, from Ferguson to Flint and beyond*. New York, NY: Atria Books.

Hilpolito-Delgado, C. P. (2010). Exploring the etiology of ethnic self-hated: Internalized racism

in Chicana/o and Latina/o college students. *Journal of College Student Development,*
51(3), 319-31.

hooks, b. (2003). *Rock my soul: Black people and self-esteem*. New York, NY: Atria Publishers.

Hopkins, R. (1997). *Educating black males: Critical lessons in schooling, community, and power*. State University of New York Press, New York.

Hunt, E. K., & Lautzenheiser, M. (2011). *History of economic thought: A critical perspective.* New York, NY: Routledge.

Hyland, N. A. (2005). Being a good teacher of black students? White teachers and unintentional racism. *Curriculum Inquiry, 35*(4), 429-59.

Ighodaro, E., & Wiggan, G. (2011). *Curriculum Violence: America's New Civil Rights Issue*. New York: Nova Science Publishers.

Ito, T. A., & Urland, G. R. (2003). Race and gender on the brain: Electrocortical measures of attention to the race and gender of Multiply categorizable individuals. *Journal of Personality and Social Psychology.* 85, 616–626.

Khadaroo, S. T. (2013, March 31). School suspensions: Does racial bias feed the school-to-prison pipeline? *Christian Science Monitor*. Retrieved from http://www.csmonitor.com/USA/Education/2013/0331/School-suspensions-Does-racial-bias-feed-the-school-to-prison-pipeline

Kim, C. Y., Losen, D. J., & Hewitt, D. T. (2010). *The school-to-prison pipeline*. New York, NY: New York University Press.

Klein, R. (2017, January 10). New Missouri law could give kids serious criminal records for

school fights, schools say. *Huffington Post*. Retrieved from http://www.huffingtonpost.com/entry/missouri-school-law_us_585d26b1e4b0de3a08f4f5c0

Kozol, J. (2005). *The shame of the nation: Apartheid schooling in America*. New York, NY:

Random House.

Kunjufu, J. (2002). *Black Students Middle Class Teachers*. Chicago: African American Images.

Ladson-Billings, G. (1994). *The dreamkeepers: Successful teachers of African American children*. San Francisco, CA: Jossey-Bass.

Ladson-Billings, G. (2009). Critical race theory in education. *Routledge International Handbook of Critical Education, 110*, 110-22.

Lee, C. (2003). Making race salient: Trayvon Martin and implicit bias in a not yet post-racial society. *North Carolina Law Review, 91*, 101-57.

Lemert, C. (2004). *Social theory: The multicultural and classic readings* (4th ed.) Boulder, CO: Westview Press.

Lemert, C. (2010*). Social theory: The multicultural and classic readings*. Philadelphia: Wesleyan University.

Lewis, C. W., Butler, B. R., Bonner, F. A., & Joubert, M. (2010). African American male discipline patterns and school district responses resulting impact on academic achievement: Implications for urban educators and policy makers. *Journal of African American Males in Education*, *1*(1), 1-19.

Lochner, L., & Moretti, E. (2004). The effect of education on crime: Evidence from prison inmates, arrests, and self reports. *The American Economic Review, 94*(1), 155-89.

Luibrand, S. (2015, August 7). Black lives matter: How the events in Ferguson sparked a

movement in America. *CBS News*. Retrieved from https://www.cbsnews.com/news/how-the-black-lives-matter-movement-changed-america-one-year-later/

Martinez, S. (2009). A System gone bezerk: How zero tolerance polices really effecting schools. *Preventing School Failure, 53*(3), 153-157.

Marx, K. (1867/1887). Capital: A critique of political economy, Vol. 1. Retrieved from https://www.marxists.org/archive/marx/works/download/pdf/Capital-Volume-I.pdf

Maxwell, L. A. (2014, February). "U.S. enrollment hits majority-minority milestone." *Education Weekly*. Retrieved from http://www.edweek.org/ew/articles/2014/08/20/01demographics.h34.html

May, S., & Sleeter, C. E. (2010). *Critical multiculturalism: From theory to practice*. New York, NY: Routledge.

Mickelson, R. A. (2001). Subverting swann: First and second generation segregation in the Charlotte-Mecklenburg schools. *American Educational Research Journal, 38*, 215-252.

Milner, H. R., & Hoy, A. N. (2003). A case study of an African American teacher's self-efficacy, stereotype threat, and persistence. *Teaching and Teacher Education, 19*, 263-276.

Mock, B. (2013, May 31). Good News in Mississippi: School to Prison Pipeline Closes. *ColorLines: News For Action*. Retrieved from http://colorlines.com/archives/2013/05/good_news_in_miss_school-to-prison_pipeline_'closed.html

Morris, M. W. (2016). *Pushout: The criminalization of black girls in schools*. New York, NY: The New Press.

Moulthorp, D. (2015, February 19). Cleveland's race problem: How longstanding injustice could cripple the city's rebirth. *Politico Magazine.* Retrieved from http://www.politico.com/magazine/story/2015/02/cleveland-segregation-115320

National Center for Education Statistics. (2013a). "Public School Teacher Data File," 1987-88 through 2011-12. Retrieved from http://nces.ed.gov/programs/digest/d13/tables/dt13_209.10.asp

National Center for Education Statistics. (2013d). "Percentage distribution of students enrolled in public elementary and secondary schools, by race/ethnicity: Fall 2002, fall 2012, and fall 2024," Retrieved from http://nces.ed.gov/programs/coe/indicator_cge.asp

Nieto, S., & Bode, P. (2008). *Affirming diversity, The Sociopolitical context of multicultural education* (5th ed.). Boston: Allyn & Bacon.

Oakes, J. (1990). *Slavery and freedom: An interpretation of the old south*. New York, NY: W. W. Norton & Company.

Padilla, L. (2001). But you're not a dirty Mexican: Internalized oppression, Latinos and the law. *Texas Hispanic Journal of Law and Policy*, *7*(1), 59–113.

Prothero, A. (2016, August 30). Charter schools aren't good for blacks, civil rights groups say. *Education Week*. Retrieved from http://www.edweek.org/ew/articles/2016/08/31/charter-schools-arent-good-for-blacks-civil.html.

Rattan, A., & Ambady, N. (2013). Diversity ideologies and intergroup relations: An examination of colorblindness and multiculturalism. *European Journal of Social Psychology,* 43, 12-21.

Rice, Z. (2014, May 20). "Hood disease:" Is everything wrong with how we talk about inner city youth. *Identities.Mic.* Retrieved from https://mic.com/articles/89691/hood-disease-is-everything-wrong-with-how-we-talk-about-inner-city-youth#.eMj9OVuPH

Rodriguez, C. M. (2013). Saving the nation's expendable children: Amending state education laws to encourage keeping students in school. *Family Court Review*, *51*(3), 469-84.

Rhoden, W. C. (2006). *Forty million dollar slaves: The rise, fall, and redemption of the black athlete*. New York, NY: Three Rivers Press.

Sanders, E. (1969). The Hamitic hypothesis, its origins and functions in time perspective. *JAH, 10*(4), 521-32.

Schott Foundation. (2012). "The urgency of now: The Schott 50 state report on public education and black males." Cambridge, MA. Retrieved from http://www.schottfoundation.org/urgency-of-now.pdf.

Sears, D. O., & Saveli, V. (2006). The political color line in America: Many "peoples of color" or black exceptionalism? *Political Psychology, 27*(6), 895-924.

Shaw, K. (2014, July 30). The intersection of No Child Left Behind and the school-to-prison pipeline: The irony of a progressive act. *Civil Rights Under the Law*. Retrieved from https://lawyerscommittee.org/2014/07/the-intersection-of-no-child-left-behind-and-the-school-to-prison-pipeline-the-irony-of-a-progressive-act/

Skiba, R. J., Michael, R. S., Nardo, A. C., & Peterson, R. L. (2002). The color of discipline: Sources of racial and gender disproportionality in school punishment. *The Urban Review, 24*(4), 317-342.

Skiba, R. J., Peterson, R. L., & Williams, T. (1997). Office referrals and suspension: Disciplinary intervention in middle schools. *Education and Treatment of Children, 20*(3), 295-315.

Skiba, R. J., & Williams, N. T. (2014). Are black kids worse? Myths and facts about racial difference s in behavior.*The Equity Project*. Retrieved from http://www.indiana.edu/~atlantic/wp-content/uploads/2014/03/African-American-Differential-Behavior_031214.pdf

Smith, J. R., & Patton, D. U. (2016). Posttraumatic stress symptoms in context: Examining trauma responses to violent exposures and homicide death among Black males in urban neighborhoods. *Journal of Orthopsychiatry, 86*(2), 212-223.

Tokuda, W. (2014, May 16). "Inner-city Oakland youth suffering From PTSD." *CBS News*. Retrieved from http://sanfrancisco.cbslocal.com/2014/05/16/hood-disease-inner-city-oakland-youth-suffering-from-post-traumatic-stress-disorder-ptsd-crime-violence-shooting-homicide-murder/

Thompson, H. A. (2012). The prison industrial complex: A growth industry in a shrinking economy. *New Labor Forum, 21*(3), 38-47.

Traore, R. & Lukens, R.J. (2006). *This isn't the America I thought I'd find: African American students in U.S. high schools*. Lanham: University Press of America. .

Tuck, E. (2012). *Urban youth and school pushout: Gateways, get-aways, and the GED*. New York: Routledge.

Visser, S. (2016, November 30). Why do police shoot to kill? *CNN*. Retrieved from http://www.cnn.com/2016/09/28/us/why-police-shoot-to-kill/index.html

Welch, K., & Payne, A. A. (2010). Racial threat and punitive school discipline. *Social Problems, 57*(1), 25-48.

Wilder, C. S. (2014). *Ebony and ivy*. London, U.K.: Bloomsbury Press.

Williams, E. (1994). *Capitalism and slavery*. Chapel Hill, NC: The University of North Carolina Press.

Woodson, C. G. (1977). *The miseducation of the negro*. New York: AMS Press.

Yeh, M. L. (2008). Restorative justice, affirmative action sentencing legislation and the Canucks: Lessons from our Northern neighbor. *Washington University Global Studies Law Review*, 7(3), 661-81.