

WHEN GANGS WERE WHITE: RACE, RIGHTS, AND YOUTH CRIME IN NEW YORK CITY, 1954–1964

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On August 17, 1954, the District Attorney for Kings County, New York charged four white teenagers with a series of crimes committed in the Williamsburg section of Brooklyn.¹ The District Attorney identified the boys as Jack Koslow, 18, Melvin Mittman and Jerome Lieberman, both 17, and Robert Trachtenberg, 15.² Police arrested them on August 6, after catching them beating a homeless man in Louis Sobel Park on Division Avenue.³ Once in custody, the boys quickly confessed to more crimes, including the murder of “a middle-aged vagrant” named Rheinhold Ulrickson, the killing of a black homeless man named Willard Menter, and an assault on two girls, both of whom disappeared after the four boys “waylaid and horse-whipped” them in Brooklyn’s McCarren Park around 11:00 pm on August 6.⁴ Police later discovered the whip in one of the boys’ homes.⁵

Though largely forgotten, the trial of Koslow, Mittman, and Lieberman made headlines during the late summer of 1954, providing a unique lens into popular fears and political responses to juvenile delinquency in the early 1950s. Their trial showcased the manner in which a majority white city looked sympathetically on a crime committed by “bookish” white youth, immediately pushing parents, public officials, and commentators to search for structural causes of youth violence, whether poor schools, inadequate city services, or

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1. *4 Teen-Agers Seized In Death by Kicking*, N.Y. TIMES, Aug. 18, 1954, at 1.

2. *Id.*

3. *Id.*; Emanuel Perlmutter, *Brutal Slaying by 3 Youths Baffles Everyone Involved: Court Debate*, N.Y. TIMES, Aug. 19, 1954, at 1.

4. *4 Teen-Agers Seized in Death by Kicking*, *supra* note 1; Perlmutter, *supra* note 3; Murray Schumach, *Path to Murder Traced by Youth: Brooklyn Boy Tells How He and 3 Others Passed Up Girls for Night of Crime*, N.Y. TIMES, Dec. 4, 1954, at 34.

5. *4 Teen-Agers Seized In Death by Kicking*, *supra* note 1.

failing juvenile courts.⁶ Such sympathy, this Comment will posit, contrasted dramatically with public outrage over a similar string of violent crimes perpetrated by black youth on New York City subways during the summer of 1964.⁷ Even a brief comparison of the way that newspapers covered these two episodes—situated almost exactly a decade apart—bolsters Professor Lawrence Friedman’s larger thesis that headline trials may in fact provide a useful lens through which to view larger cultural and legal trends.⁸

I. PATH TO MURDER: THE TRIAL OF KOSLOW, MITTMAN, AND LIEBERMAN

Boredom, not evil, led to the callous murder of a Brooklyn homeless man on August 6, 1954. At least that was the story told by Ben Trachtenberg, 15, who spoke openly to a Kings County Court judge and an all-male jury in December of that year.⁹ According to Trachtenberg, he and three of his friends, Jack Koslow, Melvin Mittman, and Jerome Lieberman, all met regularly at the Young Men’s Hebrew Association building on Bedford Avenue four or five times a week and were there early on the night of August 6, the night of the crime in question.¹⁰ However, as the evening progressed the boys decided to leave the Association, either to go into Manhattan “to meet girls” or stay in Brooklyn and “look for some bums,” and maybe some real “entertainment.”¹¹

Opting for the latter, the boys set out through Brooklyn’s streets, eventually happening upon Willard Menter, a black man sleeping on a bench.¹² According to Trachtenberg, they “burned” Menter “with a cigarette” to wake him.¹³ Once roused, the boys forced their victim to a pier on the nearby East River where Mittman struck him “in the face” knocking him to the ground.¹⁴ Koslow then pushed Menter into the water.¹⁵ “The last I saw of him,” described Koslow in a separate trial, “he was floating on his back toward the barges.”¹⁶

6. See Murray Schumach, *Brutal Slaying by 3 Youths Baffles Everyone Involved: Case Studies*, N.Y. TIMES, Aug. 19, 1954, at 1.

7. See *Gangs Beat and Rob 2 Riders on Upper Manhattan Subways*, N.Y. TIMES, July 18, 1964, at 23; *Wilkins Denounces Negro “Hoodlums”*, N.Y. TIMES, June 24, 1964, at 1.

8. Lawrence M. Friedman, *Front Page: Notes on the Nature and Significance of Headline Trials*, 55 ST. LOUIS U. L.J. 1243 (2011).

9. Schumach, *supra* note 4.

10. *Id.*

11. *Id.*

12. *4 Teen-Agers Seized in Death by Kicking*, *supra* note 1; Schumach, *supra* note 4.

13. Schumach, *supra* note 4.

14. Murray Schumach, *Alleged Slayer Linked to Sadism: Koslow Said to Have Termed Burning Victim a “Gag” and Drowning Top “Adventure”*, N.Y. TIMES, Dec. 2, 1954, at 35.

15. Schumach, *supra* note 4.

16. Schumach, *supra* note 14.

Conducted in two separate proceedings, the trials of Koslow, Mittman, Lieberman, and Trachtenberg shocked audiences—Melvin Mittman’s father collapsed in court—and even alarmed the general public.¹⁷ Of particular concern was that the teenagers described Menter’s killing as “a gag” and an “adventure,” characterizations that hinted at a perverse frivolity discordant with murder.¹⁸ Yet, the boys were not known in their neighborhood for hoodlum tendencies.¹⁹ On the contrary, friends and family described them as “bookish.”²⁰ “Shyness and love of books and music,” reported the *New York Times*, “emerged yesterday as a behavior pattern for the four adolescents accused of having brutally beaten defenseless persons in Brooklyn.”²¹ “One boy devoted his spare time to playing piano accompaniment to his father’s violin,” noted the paper.²² “Another enjoyed studying medieval history. A third attended the synagogue regularly.”²³ According to police, “[t]hey were neat, well-mannered and, with one exception, liked by neighbors who had seen them grow up in the Williamsburg section of Brooklyn.”²⁴

Only Jack Koslow evoked something akin to a negative response from neighbors and friends. According to witnesses, even though Koslow was “well-read, thoughtful, [and] restrained,” (and had even studied Medieval history for a semester at New York University), he claimed to have “an abstract hatred and distaste for bums and vagrants.”²⁵ “[P]ark bums,” he explained to police “are no use to society and better off dead.”²⁶ Though such views might have turned popular opinion against an average teenager, Koslow’s erudition softened popular perceptions of his conduct. According to *Times* reporter Murray Schumach, Koslow resembled nothing less than “a modern Raskolnikov in a Brooklyn version of Dostoyevsky’s ‘Crime and Punishment,’” elevating his racist killing into a reenactment of high literature.²⁷

The “bookish” nature of the teens not only garnered public sympathy, but sparked a public inquiry into the causes of their crime. New York Assemblyman Edward S. Lentol, a popular public official, agreed to represent the boys, arguing that “society was to blame for the crime charged to the

17. *Id.*

18. *Id.*

19. *See* Schumach, *supra* note 6.

20. *Id.*

21. *Id.*

22. *Id.*

23. *Id.*

24. Schumach, *supra* note 6.

25. *Id.*

26. *Id.*

27. *Id.*

youths.”²⁸ “We are reaping the results,” he argued, “of our neglect of the problems of youth for the last twenty years.”²⁹ Lentol’s argument that society, not the boys, was to blame for Menter’s murder made the trial of the youths an inquiry not simply into their criminal tendencies, but the shortcomings of city services. Had the boys been “neighborhood bullies” or “pool hall loiterers,” noted the *Times*, their stories may not have generated the same kind of interest into how, precisely, “society” was responsible for their actions.³⁰

As society entered the case, however, public officials rushed to society’s defense, promising larger inquiries into the quality of city services, juvenile justice, and schools. A spokesman for the Board of Education confessed to being “baffled and disturbed” by the crime, promising that “[w]e are going to inquire both into the causes of this violence and the possible remedies.”³¹ Meanwhile, Kings County Judge Samuel S. Leibowitz ordered an investigation into Brooklyn Children’s Courts, which he claimed “were not curing, but encouraging young hoodlums.”³²

While city leaders looked into courts, schools, and youth services, psychiatrists emerged with shocking answers. During a public hearing on juvenile delinquency in New York in February 1955, a psychiatrist named Fredric Wertham argued that the brutal crimes committed by the four teens in Brooklyn the prior summer had in fact been caused by their interest in books but not the kind that newspapers had theorized.³³ All of the crimes committed by the boys in Brooklyn, argued Wertham, had been inspired by identical crimes described in “crime comics,” illustrated serials that appealed to teenagers.³⁴ Wertham even produced a whip identical to the one used by the boys in McCarren Park that he had ordered out of the back of a comic book.³⁵ Citing the burning and drowning of Menter, the beating of Ulrickson, and even the whipping of the two girls, Wertham declared that the sources of New York’s delinquency problem stemmed not from a lack of city services, but psychological harm caused by mass media, a problem that Wertham collapsed under the general rubric of “social psychiatry.”³⁶

Though the *Times* did not mention it, Wertham’s invention of social psychiatry had been the subject of some interest in New York for a while. As

28. Perlmutter, *supra* note 3.

29. *Id.*

30. Schumach, *supra* note 6.

31. Perlmutter, *supra* note 3.

32. *Id.*

33. Emma Harrison, *Whip, Knife, Shown as “Comics” Lures*, N.Y. TIMES, Feb. 5, 1955, at 17.

34. JAMES GILBERT, *A CYCLE OF OUTRAGE: AMERICA’S REACTION TO THE JUVENILE DELINQUENT IN THE 1950S* 92 (1986); Harrison, *supra* note 33.

35. Harrison, *supra* note 33.

36. GILBERT, *supra* note 34, at 93; Harrison, *supra* note 33.

early as 1951, NAACP attorney Jack Greenberg had contacted Wertham to see if he might examine a group of black students at his Harlem clinic, assessing whether they had been harmed by segregated schools.³⁷ As with comic books, Greenberg suspected that segregation also possessed the potential to cause mass psychological harm, making the problem of Jim Crow a question of social psychiatry. This theory led Jack Greenberg to invite Wertham to testify in *Belton v. Gebhart*, the Delaware portion of *Brown v. Board of Education*.³⁸ “Gardening,” declared Wertham in *Belton*, “consists largely in protecting plants from blight and weeds, and the same is true of attending to the growth of children.”³⁹

II. CHANGING DEMOGRAPHICS AND CIVIL RIGHTS

That the NAACP relied on the same psychiatrist who analyzed Koslow, Mittman, and Lieberman for its trial in *Belton v. Gebhart* is significant for at least two reasons. First, Greenberg’s interest in Wertham indicates that the NAACP’s decision to rely on social science evidence in *Brown* was not necessarily a mistake, as constitutional scholars like Jack Balkin have argued, but may in fact have been a strategic move to align a formal constitutional claim with a popular cultural frame, in this case the social psychiatry of youth.⁴⁰ Second, even though the NAACP had good reason to frame their argument in terms of harm to youth in 1954, that cultural frame proved slippery, particularly as the number of juvenile delinquents like Koslow, Mittman, and Lieberman began to grow in cities like New York in the 1950s—and become less white.

From 1954—the year that Willard Menter was murdered—to 1964, the racial demographics of New York boroughs like Brooklyn changed dramatically.⁴¹ Due partly to massive in-migrations of African Americans from the South and Hispanic Americans from Puerto Rico, Brooklyn’s racial composition went from nearly all-white—and in the case of Williamsburg, all Jewish—to nearly all black and Hispanic, a transition accelerated by massive

37. BART BEATY, FREDRIC WERTHAM AND THE CRITIQUE OF MASS CULTURE 94–95 (2005); RICHARD KLUGER, SIMPLE JUSTICE: THE HISTORY OF *BROWN V. BOARD OF EDUCATION* AND BLACK AMERICA’S STRUGGLE FOR EQUALITY 441, 443 (rev. & expanded ed. 2004)

38. *Brown v. Bd. of Educ.*, 347 U.S. 483 (1954); *Belton v. Gebhart*, 87 A.2d 862 (Del. Ch. 1952); KLUGER, *supra* note 37, at 436, 444.

39. This quote was also published as the first line of Wertham’s book on comic books and delinquency. FREDRIC WERTHAM, *SEDUCTION OF THE INNOCENT* 2 (1954).

40. See Anders Walker, Essay, *Blackboard Jungle: Desegregation, Delinquency, and the Cultural Politics of Brown*, 110 COLUM. L. REV. 1911, 1924 (2010).

41. See, e.g., JAMES T. PATTERSON, *GRAND EXPECTATIONS: THE UNITED STATES, 1945–1974*, at 380 (1997); Howard Pinderhughes, *The Anatomy of Racially Motivated Violence in New York City: A Case Study of Youth in Southern Brooklyn*, 40 SOC. PROB. 478, 481, 483 (1993).

white flight to distant suburbs facilitated by ambitious freeway projects sponsored by New York planner Robert Moses.⁴²

As racial demographics changed, so too did popular perceptions of delinquency. One year after the *New York Times* portrayed Jack Koslow as Raskolnikov, Metro-Goldwyn-Mayer released a controversial film about juvenile delinquency in an urban setting eerily reminiscent of Brooklyn entitled *Blackboard Jungle*.⁴³ This time, however, the youths were not “bookish” devourers of high literature, but caricatures of the very “neighborhood bullies” and “pool hall loiterers” that residents of New York City had long feared—exacerbated by the fact that many of them were also black and Hispanic.⁴⁴ Though one of the black bullies—played by a young Sidney Poitier—ended up becoming the film’s hero, the movie sparked controversy for its frank portrayals of assault, battery, and attempted rape, all set to Bill Haley’s “Rock Around the Clock,” the first time that Hollywood incorporated rock ‘n’ roll into film.⁴⁵ For some, like Georgia Governor Ernest Vandiver, the movie represented a frightening documentary of what might happen were public schools to be integrated. “[A]n environment of switchblade knives, marijuana, stabbings, rapes, violence and blackboard jungles” declared Vandiver, would descend on the South were the Supreme Court’s ruling in *Brown v. Board of Education* to be enforced.⁴⁶ Other southern leaders agreed, including future Mississippi Governor and United States Representative John Bell Williams, who organized a formal inquiry into delinquency in desegregated schools in Washington, D.C., seeking a conclusion that integration heightened racial tension and accelerated juvenile crime.⁴⁷

Just as delinquency became a battle cry against *Brown*, so too did delinquency plague the urban North, further complicating popular perceptions—and newspaper coverage—of youth and schools. In 1957, for example, white parents in Brooklyn made headlines by resisting an NAACP-sponsored attempt to have a school district in Bedford Stuyvesant, a

42. See, e.g., PATTERSON, *supra* note 41, at 380; Owen D. Gutfreund, *Rebuilding New York in the Auto Age: Robert Moses and His Highways*, in ROBERT MOSES AND THE MODERN CITY: THE TRANSFORMATION OF NEW YORK 86, 91 (Hilary Ballon & Kenneth T. Jackson eds., 2007); Pinderhughes, *supra* note 41, at 481, 483.

43. BLACKBOARD JUNGLE (Metro-Goldwyn-Mayer 1955).

44. *Id.*

45. *Id.*; GILBERT, *supra* note 35, at 183.

46. Bruce Galphin, *Vandiver Vows to Stop Atlanta “Surrender” as 2,000 Cheer at Rally: Talmadge and Russell Skirt Issue*, ATL. CONST., Feb. 9, 1960, at 1.

47. *Investigation of Public School Conditions: Hearings Before the Subcomm. to Investigate Public School Standards and Conditions, and Juvenile Delinquency in the District of Columbia of the Comm. on the District of Columbia House of Representatives*, 84th Cong., 44–45 (1956).

predominantly black neighborhood, rezoned to incorporate white students.⁴⁸ Part of the hesitation, related the *Times*, resulted from increasing violence at integrated schools in the Bedford-Stuyvesant and Bushwick neighborhoods.⁴⁹ In November 1957, a special grand jury called to investigate violence in New York City's public schools garnered further newspaper coverage by calling for the assignment of police officers to patrol hallways after reports of fights between students during class time.⁵⁰ In January 1958, the principal of John Marshall Junior High School, an integrated Brooklyn school that had become the site of increasing disorder, including the rape of a female student in the school's basement, made the first page of the *Times* by jumping off the roof of his apartment building before being scheduled to testify before a Kings County grand jury investigating incidents on his campus.⁵¹

As suicides, rapes, and grand jury investigations made news, the tenor of the coverage changed, moving away from critiques of city services to attacks on ambitious efforts at liberal reform, including *Brown*. “[I would] hate to think what the metropolitan press would have done to us,” exclaimed Arkansas Governor Orval Faubus in a 1958 *New York Times* article, “if the Brooklyn school violence had happened in Little Rock. . . . [P]eople are not being told one-tenth of the trouble about racial problems outside the South.”⁵² On February 5, 1958, the *Times* reported on another segregationist's view of the Brooklyn violence, this time former Georgia Governor (and then-Senator) Herman Talmadge, who announced that the citizens of Georgia were “deeply sympathetic with the citizens of Brooklyn in the difficulties they are experiencing in maintaining the integrity and independence of their public schools.”⁵³ Talmadge even went so far as to suggest that “the President of the United States send Federal troops to Brooklyn to preserve order in the public schools there in the same manner that he did to force a new social order upon the public schools of Little Rock, Arkansas.”⁵⁴

While few took Talmadge seriously, the problem of keeping headlines focused on southern racism—not northern delinquency—proved to be part of a much larger challenge faced by civil rights leaders in the late 1950s.⁵⁵ In 1958,

48. Benjamin Fine, *City to Spur Integration by Building of 60 Schools*, N.Y. TIMES, Oct. 31, 1957, at 1.

49. See Lawrence Fellows, *Policeman for Each City School Urged by Brooklyn Grand Jury*, N.Y. TIMES, Nov. 26, 1957, at 1 (discussing a possible solution to “lawlessness in Brooklyn's public schools”).

50. *Id.*

51. Emanuel Perlmutter, *Head of School Beset by Crime Leaps to Death*, N.Y. TIMES, Jan. 29, 1958, at 1.

52. *Faubus Scores School Violence*, N.Y. TIMES, Feb. 1, 1958, at 10.

53. *2 Senators Clash on City's Schools*, N.Y. TIMES, Feb. 5, 1958, at 16.

54. *Id.*

55. See PATTERSON, *supra* note 41, at 411.

for example, Martin Luther King, Jr. sought to draw publicity to the southern struggle for civil rights by publishing *Stride Toward Freedom*, a personal memoir of the Montgomery Bus Boycott.⁵⁶ From May 1957 to May 1959, King and A. Philip Randolph organized mass “prayer pilgrimages” that drew thousands to Washington, D.C., commemorating the Supreme Court’s decision in *Brown v. Board of Education*.⁵⁷

Despite such efforts, national interest in the southern freedom struggle dozed until February 1960, when African American students at the Agricultural and Technical College of North Carolina in Greensboro staged a wave of sit-in demonstrations, immediately capturing the attention of the national media.⁵⁸ Thanks in part to newspaper coverage, black students across the South quickly began holding similar demonstrations, sparking the first region-wide protest campaign since *Brown*.⁵⁹ Indeed, for civil rights scholars like David J. Garrow, the sit-ins marked the decisive beginning of a new direct action phase of the civil rights movement, one that would last through 1968.⁶⁰

Critical to direct action was non-violence.⁶¹ So long as black demonstrators remained non-violent, their protests retained a higher likelihood of winning popular support, partly because they instigated what Leo Kuper has called “Embarrassment of the Rulers.”⁶² Such embarrassment stemmed from the fact that the demonstrators frequently had to endure violent white reactions—a recurring theme that lent the civil rights demonstrations a Christ-like quality. Ann Moody, a black activist, described a student sit-in at a Woolworth’s in Jackson, Mississippi in 1960:

We bowed our heads and all hell broke loose. A man rushed forward, threw Memphis from his seat, and slapped my face. Then another man who worked in the store threw me against the adjoining counter.

Down on my knees on the floor, I saw Memphis lying near the lunch counter with blood running out of the corners of his mouth.⁶³

56. MARTIN LUTHER KING, JR., *STRIDE TOWARD FREEDOM: THE MONTGOMERY STORY* (1958).

57. JAMES H. LAUE, *DIRECT ACTION AND DESEGREGATION, 1960–1962: TOWARD A THEORY OF THE RATIONALIZATION OF PROTEST* 71 (David J. Garrow ed., Martin Luther King, Jr., and the Civil Rights Movement Ser., 1989); PATTERSON, *supra* note 41, at 411.

58. LAUE, *supra* note 57, at 76.

59. *Id.* at 76–77. While the Montgomery Bus Boycott of 1955–1956 might also be framed as a grassroots movement, the sit-ins proved to be the first truly mass movement in that they comprised a wave of related protests across the entire South. *Id.*

60. David J. Garrow, *Series Editor’s Preface to LAUE, supra* note 57, at xiii, xiii.

61. *See* LAUE, *supra* note 57, at 6–7.

62. *Id.* at 6.

63. ANN MOODY, *COMING OF AGE IN MISSISSIPPI* 265–66 (1976).

Black activist John Lewis recalled a similar scene in Nashville:

It was a Woolworth in the heart of the downtown area, and we occupied every seat at the lunch counter, every seat in the restaurant, and it did happen. A group of young white men came in and they started pulling and beating primarily the young women. They put lighted cigarettes down their backs, in their hair, and they were really beating people.⁶⁴

That white attackers included youths, as Lewis noted, reframed segregationist frames of delinquency as a problem stemming not from racial minorities but errant whites, embarrassing white leaders. Arch-segregationist James Jackson Kilpatrick wrote in an embarrassed tone in 1960:

Many a Virginian must have felt a tinge of wry regret at the state of things as they are, in reading of Saturday's "sitdowns" by Negro students in Richmond stores. Here were the colored students, in coats, white shirts, ties, and one of them was reading Goethe and one was taking notes from a biology text. And here, on the sidewalk outside, was a gang of white boys come to heckle, a ragtail rabble, slack-jawed, black-jacketed, grinning fit to kill, and some of them, God save the mark, were waving the proud and honored flag of the Southern States in the last war fought by gentlemen. *Eheu!* It gives one pause.⁶⁵

Kilpatrick's lament underscored the power of non-violence to stir embarrassment among southern whites, particularly when white teenagers acted like "neighborhood bullies" and "poolhouse loiterers," losing them sympathy at the national level. However, precisely because perceptions of non-violence hinged on superlative black behavior in the face of churlish white conduct, headlines capturing bad black behavior in other contexts jeopardized movement gains, even if they had nothing whatsoever to do with segregation or the South. This became painfully clear in New York City in 1964, when black teenagers engaged in a wave of subway assaults.

CONCLUSION: "GANGS BEAT AND ROB ON UPPER MANHATTAN SUBWAYS"

On July 17, 1964, a gang of "[a]bout 15 youths, including several girls," boarded a New York City subway car occupied by Julian Zalewski, a fifty-seven-year-old actor heading south from the Columbia-Presbyterian medical Center on 168th street.⁶⁶ The youths, who were black, boarded Zalewski's car at Harlem's 125th street, robbed him, and then exited on 116th after Zalewski

64. VOICES OF FREEDOM: AN ORAL HISTORY OF THE CIVIL RIGHTS MOVEMENT FROM THE 1950S THROUGH THE 1980S 58 (Henry Hampton et al. eds., 1990).

65. James Jackson Kilpatrick, Editorial, *The Sitdowns*, RICHMOND NEWS LEADER, Feb. 22, 1960 (emphasis in original); see also ROBERT WEISBROT, FREEDOM BOUND: A HISTORY OF AMERICA'S CIVIL RIGHTS MOVEMENT 29 (1990).

66. *Gangs Beat and Rob 2 Riders on Upper Manhattan Subways*, *supra* note 7.

shouted for help in his “best theatrical voice.”⁶⁷ The robbery came on the heels of other crimes, including the stabbing of a “17-year-old white youth,” by “five Negro youths,” on May 30, the vandalism of a car by “20 young hoodlums” on May 31, and the gang-robbery of a white male by “six Negro teen-agers” on a southbound subway on July 17, only fifteen minutes after Julian Zalewski had been surrounded at 125th Street.⁶⁸

Though reminiscent of the crime spree engaged in by Koslow, Mittman, and Lieberman in 1954, roving attacks by black teenagers on New York subways in 1964 garnered little of the same sympathy. Indeed, some of the harshest criticism of the attacks came from black civil rights leaders themselves. In a story that garnered a front page headline in the *Times*, NAACP executive secretary Roy Wilkins issued a blistering attack on the teenage “hoodlums” involved in the robberies and assaults.⁶⁹ Blasting the teenagers as “punks,” “foul-mouthed smart alecks,” and “Harlem and Brooklyn morons,” Wilkins expressed fear they were “undoing the work of hundreds of Negro and white sit-in youngsters,” “selling out school board fights in scores of cities,” and “cutting and slashing at the race’s self-respect.”⁷⁰ Wilkins’s laments underscored the extent to which negative headlines jeopardized civil rights advances, even as they sounded a dramatic counter-note to the effusion of concern for Koslow, Lieberman, and Mittman ten years before. Though some—like CORE leader James Farmer—did express concern for the black youth, Wilkins dismissed them out of hand, declaring structural concerns over jobs, housing and schools, to be little more than “threadbare excuses to cover up pure, unadulterated, vicious crime.”⁷¹

What might we conclude from such calumny? Headline trials, and headlines in general, may be even more important than Professor Friedman implies, operating not simply as lenses into society at any given moment, but engines of political change. In the case of civil rights during the 1950s and 1960s, this was certainly the case.⁷² Though the movement required courageous leaders and grassroots support, media coverage proved critical in swaying popular opinion for or against federal involvement.⁷³ That national leaders like Roy Wilkins feared negative press enough to come out publicly against black youth in New York City in 1964 points to the salience of headlines generally in the struggle for civil rights.

67. *Id.*

68. *Id.*

69. *Wilkins Denounces Negro “Hoodlums”*, *supra* note 7.

70. *Id.*

71. *Id.*

72. *See, e.g.*, DAVID J. GARROW, *PROTEST AT SELMA: MARTIN LUTHER KING, JR., AND THE VOTING RIGHTS ACT OF 1965* (3d prtg. 1979) (discussing the headlines surrounding the Voting Rights Act of 1965 and the importance of Dr. King’s protest in Selma, Alabama).

73. *See id.* at 163, 168.