

easy. Meanwhile, the large landlords who inspectors are more likely to go after may simply raise rents to pass on costs to tenants, resulting in displacement. When inspectors and building courts give homeowners extra time to bring their dwellings into compliance, that extends the process—which effectively becomes further punishment.

In the Conclusion, Bartram calls for policies that could “reshuffle the deck” and address these deeper injustices. Rent control regulations could prevent landlords from passing on the cost of violations. Housing choice vouchers could help protect tenants from rent hikes. Procedures in building court could be sped up.

*Stacked Decks* exposes the dynamics of a crucial but often unseen side of how housing in America is regulated. For sociolegal scholars, it shows how the duty to maintain property (Shoked, 2014) that exists on the books operates in action. This reveals that the progressive instinct to impose duties on owners can produce inequitable outcomes. The frontline workers who decide when to impose duties know this, and sometimes see nonenforcement as necessary to promote justice.

This important book should be of interest to scholars and students of housing, cities, and property. In addition, as extreme weather becomes the norm and makes our cities crumble ever faster, *Stacked Decks* will become essential reading for people concerned with urban climate justice.

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*An equal place: Lawyers in the struggle for Los Angeles*. By Scott L. Cummings. New York: Oxford University Press. 2021. 688 pp. \$49.95 hardcover

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Scott L. Cummings has written an encyclopedic account of the role lawyers have played in the campaigns of low-wage workers in Los Angeles between 1992 and 2008. The book traces how lawyers supported low-wage workers in five distinct campaigns: against sweatshop production in the garment industry, against the criminalization of day laborers and restrictions on their right to work, against redevelopment practices that produced low wage jobs, against big box store expansion that threatened the unionized grocery sector, and against the misclassification and subsequent barriers to unionization of truck drivers at the Los Angeles and Long Beach ports. These problems arose from the wave of deindustrialization and neoliberalization that remade the Los Angeles economy at the end of the 20th century.

The book is both a service to Los Angeles social movement history and a resource to better understand the role that lawyers can play in movements. Cummings describes two major critiques of lawyers in social movements: first that lawyers are not accountable to movements and may pursue strategies and ends that conflict with a movement’s goals, and second that legal strategies may not be effective in achieving movement goals. The cost of these shortcomings is political demobilization of movements and further concretization of the status quo.

Finding these critiques to reflect an incomplete vision of the role of lawyers in movements, Cummings argues instead for a *comparative institutional analysis*—a perspective that situates legal mobilization among other movement alternatives. This helps us see legal and political mobilization as “strategies that complement and conflict, shaping each other over time” (p. 5). This perspective

reflects Cummings' vision: that there is an approach to social movements in which lawyers and activists can work on equal terms.

Consider one example, that of the campaign against sweatshop labor conditions for garment workers in Los Angeles described in Chapter 2. Cummings traces how apparel manufacturers used contractors to put workers at a greater legal distance and make them less able to assert control over their working conditions. As Cummings puts it, the coalition's legal strategy directly challenged this, aiming to "make legal responsibility follow economic power" (p. 40). A broad coalition pursued worker and grassroots organizing, litigation, and policy advocacy, which culminated not only in successful litigation and public pressure, but perhaps most importantly, legislation that recognized apparel manufacturers as liable for the labor violations of their contractors. In this case, legal and political mobilizations appear mutually reinforcing.

The garment worker campaign did not achieve total victory—a recent Labor Department report found widespread wage theft and violations of labor law ongoing in Los Angeles' garment industry—but it is among the more successful campaigns surveyed in the book (US Department of Labor, 2023). But the losses, dead-ends, and frustrations detailed in the text are a necessary part of social movements. If the only campaigns attempted were sure winners, much would be left on the playing field. And even if movements are not successful in their ultimate goals, they might nevertheless lay productive foundations for future efforts, or contribute valuable lessons for future organizers. And because the text focuses on lawyers rather than activists in social movements, it may understandably not provide a full picture of the gains that these movements achieved. Texts such as Milkman et al. (2017) would be helpful accompaniments.

Cummings does not shy away from the reality that conditions for workers in Los Angeles today are still dramatically below what they should be. As he accounts for each campaign's successes and failures, Cummings devotes attention to contradictions and challenges facing movements. For example, Chapter 4 traces the use of Community Benefits Agreements (CBAs) to promote the labor and housing interests of low-wage workers facing displacement as a result of redevelopment. Those interests end up pitted against each other. Unions leveraged CBAs to promote union labor in development agreements, but those developments displaced existing working-class tenants and fueled gentrification. Today, the problem of low wage work intersecting with unaffordable housing has only grown more serious: a recent report notes that roughly one in 12 unhoused people in Los Angeles are employed in the fast-food industry (Flaming & Burns, 2023).

Compounding the above problems, Cummings notes that movements now face the challenge that developers can simply incorporate the expected costs of CBAs into their demands for public subsidies, meaning that any concessions developers make to the public could still end up being paid for by the public. This is just one example of the legal and political tools that corporate and political interests used to frustrate worker demands. To counter the local victories of movements, corporate and establishment interests circumvented local political processes, moved legal struggles to higher jurisdictions, tried to re-direct group-based claims towards individual and private forms of resolution, and prevented cities from engaging in regulation.

Considering these tactics in the context of Cummings' comparative institutional analysis, it is worth exploring whether the interests of lawyers supporting low wage workers would be served by an effort to build commensurate electoral power. That power could be used to prevent the incredible work detailed in this book from being subverted. By heading-off bad policy, keeping public officials accountable, and passing legislation expanding rights, corporate reaction might be disempowered.

In both practical and theoretical ways, the book's findings are relevant not just in Los Angeles but around the country, and not just for lawyers supporting worker organizing, but also for students of social movements, labor and workplace studies, and law and society. The chapter on day laborers can be productively put into conversation with broader literature on the immigrant rights movement and the forces of criminalization and suppression that it faces. The issues of worker misclassification and attempts to stifle union organizing that are present across multiple chapters are also visible across the country and are becoming central to the major labor struggles of the 2020s. And the

tension between vibrant and creative local legal mobilization and larger forces of corporate and political power show that what Los Angeles faces is just one case of the barriers workers around the country face when trying to achieve economic justice.

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