

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

JOHN MELVIN ALEXANDER, et al.,)
)
Plaintiffs,)
) Case No. 03-CV-133 E(c)
v.)
)
THE GOVERNOR OF THE STATE OF)
OKLAHOMA(in his official capacity);)
THE CITY OF TULSA; THE CHIEF OF)
POLICE OF THE CITY OF TULSA (in his)
official capacity); THE CITY OF)
TULSA POLICE DEPARTMENT; and)
DOES 1 through 100, inclusive,))
)
Defendants.)
)
)

AMICUS BRIEF IN OPPOSITION TO MOTION TO
DISMISS ON BEHALF OF DEFENDANTS THE
STATE OF OKLAHOMA AND THE CITY OF TULSA

This is an historic lawsuit of particular to the University of Oklahoma's Ada Lois Sipeul-Fisher chapter of the National Black Law Student Association given that the rule of law was suspended for Black Oklahomans

INTRODUCTION

The violence heaped upon the African American citizens of the Greenwood District of Tulsa, Oklahoma, during and after the Race Riot of 1921 is virtually unprecedented in the history of race relations in America. When considering similar acts of violent repression perpetrated by other countries against their citizens, the federal courts have consistently tolled the statute of limitations to permit filing of suit. In the instant case, the State of Oklahoma (State") has admitted that it perpetuated a climate of discrimination that caused the Riot and continued,

through the State and City of Tulsa ("City") 's "conspiracy of silence," until passage of the 1921 Riot Reconciliation Act of 2001.

The rationale behind the statute of limitations—that at some point a legal controversy must come to an end so that defendant may have a fair opportunity to defend himself before memories fade and evidence becomes stale—is inapplicable in this case. To the contrary, the State and City buried contemporaneous evidence during the Riot and its aftermath, and only recently has there been sufficient evidence to bring suit. Having determined that the State and City both played a role in the Riot and having accepted moral responsibility for that role, neither the State nor the City can now escape their corresponding legal responsibility.

STATE AND CITY PARTICIPATION IN THE RIOT

Since its inception, the State of Oklahoma has adopted racial discrimination as an official policy; many municipalities, including Oklahoma City and Tulsa, followed suit.¹ Municipalities extended state-sponsored segregation through plainly unconstitutional racial zoning ordinances,² and racially restrictive covenants to "establish segregated residential pattern."³ Oklahoma City native Ralph Ellison, author of *Invisible Man*, wrote of his experience growing up in Oklahoma in the 1910s and 1920s that "Oklahoma was strictly segregated at the time, and Afro-Americans were strictly limited in their freedom to participate in the process of government."⁴ "As for me, I saw no hope in the law. . . . In our common usage, law was associated more with men than with statutes. Law-enforcement officers in our usage were 'Laws,' and many were men with reputations for being especially brutal toward Negroes."⁵

State and municipal sponsored segregation was more than a legislative matter: the state and municipal governments have, throughout the history of this state, participated in and

¹ See, e.g, Board of Education of Oklahoma City Public Schools, Independent School District No. 89 v. Dowell, 498 U.S. 237, 252-53 (1991) (Marshall, J., dissenting) ("When Oklahoma was admitted to the Union in 1907, its Constitution mandated separation of Afro-American children from all other races in the public school system.").

² See Alfred L. Brophy, Reconstructing the Dreamland: The Tulsa Riot of 1921 (2002).

³ Dowell, 498 U.S. at 253.

⁴ Ralph Ellison, Perspective of Literature, 766.

condoned acts of violence to ensure the repression of its African American citizens. The Oklahoma Commission to Study the Riot of 1921 ("Commission") found that state and local governments engaged in a variety of violent acts before, during, and after the Tulsa Race Riot of 1921 ("Riot"), and that:

In some government participated in the deed.
In some government performed the deed.
In none did government prevent the deed.
In none did government punish the deed.⁶

The Tulsa Race Riot of 1921 affected African Americans throughout the state, not only those in Greenwood. As the State acknowledges, it was designed to send a message to all African Americans with "the goal [of] to 'putting African-Americans in Oklahoma in their place' and to 'push down, push out, and push under' African-Americans in Oklahoma."⁷ The State explicitly accepts that it "ignored [its responsibilities] ever since [the Riot] rather than confront the realities of an Oklahoma history of race relations that allowed one race to 'put down' another race."⁸ The Commission has found that the City of Tulsa, conspired with it to suppress discussion of the Riot and actions seeking redress for damages suffered, and that the City, through its officials, is similarly culpable for the racially-motivated murder of up to 300 African Americans and the destruction of over 1,200 properties worth some \$20,000 million in 2003 dollars.

⁵ Id. at 767-68.

⁶ Report of the Oklahoma Commission to Study the Riot of 1921 ("Commission Report") at 19.

⁷ 74 Okl. Stat. Ann. §8000.11.

⁸ 74 Okl. Stat. Ann. §8000.16.

Despite the concurrence in and acknowledgment of the facts establishing their complicity in the Riot and its consequences, the state and municipality have failed to abide by the recommendation of the Commission, and refuse to provide redress to the plaintiffs in this lawsuit, many of whom who are direct victims of a Riot that killed between 100-300 African American men, women, and children, and resulted in the looting and destruction of their property. In so doing, Defendants have only perpetuated the divisions that were solidified during and after the Riot. Our community cannot achieve racial reconciliation and move forward, together, in the common purpose of bettering the lives of all the citizens of Oklahoma, without education about the past coupled with restitution or reparations to the victims of the Riot and their descendants.

I. FACTUAL BACKGROUND

After the Civil War, African Americans and others migrated to Oklahoma—often known simply as “the territory,”—seeking economic opportunity. For many African Americans, Oklahoma was a “promised land”: its promise was not only freedom, but equality in a territory that whites had yet to discover and in which African and Native Americans mixed and met as equals.⁹ Soon, however, white Southerners also arrived in the territory and started to replicate the society and the hierarchy they had known. After Oklahoma gained statehood in 1907, African Americans faced increasing discrimination at the hands of white settlers. The Oklahoma legislature engaged in persistent and ultimately successful attempts to prevent blacks from voting and to maintain unequal, segregated schools. The Oklahoma courts’ failed to abide by even rudimentary standards of due process and in the lynching that took place while law enforcement officials looked the other way—when they were not supervising it.

African Americans who violated the etiquette of segregation were subjected to violence at the hands of the white citizenry, on many occasions through the action or inaction of the state. The Oklahoma State Legislature found that of the 24 individuals lynched in Oklahoma between 1911 and 1921, before 1921, 23 were

⁹ See, e.g., Scott Ellsworth, Death in a Promised Land (1982); Brent Staples, When Racial Discrimination Is Not Just Black and White, N.Y. Times (September 12, 2003) §A at 30.

African Americans.¹⁰ Also common at the time were what was known as "nigger drives," to remove African Americans from cities. After African Americans were driven out, cities established informal "sun down" laws. They placed notices in prominent places notifying African Americans that they could not remain in the city after dark.

For example, in the early 1920s the signs Norman, Oklahoma, where the University of Oklahoma is situated, was one of those places where violence and social norms prevented blacks from living there. It was known as a "sun down town,"-a town with signs placed prominently announcing, "Nigger, Don't Let the Sun Go Down on You in This Town."¹¹ In Dewey in August 1918, twenty families were burned out of their homes.¹² During the attempted prosecution of the people responsible, the state's prosecutor had to file a motion to disqualify the county judge for bias. Subsequently, with a new judge, evidence was developed that "the Mayor knew of [the riot] and that he refused to act, but excused him on the ground of incompetence."¹³

¹⁰ 74 Okl. Stat. Ann. §8000.1.

¹¹ *See Norman Mob after Singie Smith Jazz*, BLACK DISPATCH 1 (February 9, 1922).

¹² *Warrants Issued Today for Burning Negro Homes*, DAILY OKLAHOMAN 4 (Aug. 27, 1918) (noting that "Many of the men for whom warrants were served are prominent in the community....").

¹³ A.O. Harrison, County Attorney, Washington County, to C.C. Hammond, State Fire Marshall (October 3, 1918), Oklahoma State Archives. On the riot more generally, see A.J. Smitherman to R.L. Williams (Aug. 13, 1918), Williams Papers, Oklahoma State Archives. I am indebted to Alex Ewing who alerted me to these citations.

The Riot was part of a culture of discrimination against African Americans sponsored by state and local government. Many whites explained the Riot was the result of increasingly aggressive attitudes of African Americans, who sought "social equality" following their service in World War I. The Riot was an attempt to perpetuate segregation upon an "uppity" African American population and hark back to the antebellum past. Other whites linked the Riot to demands for equal treatment by people only recently removed from slavery.

The O Commission, ascertained the causes and consequences of the Riot. The Oklahoma State Legislature accepted those findings, which linked the Riot to racial violence throughout Oklahoma. The Commission's findings determined that:

"The root causes of the Riot reside deep in the history of race relations in Oklahoma and Tulsa which included the enactment of Jim Crow laws, acts of racial violence (not the least of which was the 23 lynchings of African-Americans versus only one white from 1911) against African-Americans in Oklahoma, and other actions that had the effect of 'putting African-Americans in Oklahoma in their place' and to prove to African-Americans that the forces supportive of segregation possessed the power to 'push down, push out, and push under' African-Americans in Oklahoma."

During the Riot, state and local officials were directly implicated in the racially discriminatory violence. On the evening of May 31, 1921, a white mob, many of whom were drunk, participated in the worst race riot in America's history: The Mayor of the City of Tulsa, acting under color of law and with the assistance of the Tulsa Chief of Police, deputized and armed some of the white citizens of Tulsa, many of whom were part of

the drunken mob. The deputized white citizens, acting under color of law, terrorized and brutalized the African American residents of Greenwood.

The Mayor also deputized local units of the National Guard which, along with the white Chief of Police and his deputies, killed African American residents of Greenwood. The white mob then looted the empty buildings before burning Greenwood to the ground. State and city officials deployed a machine gun to fire on African American residents of Greenwood. They used airplanes for reconnaissance and to attack the African American Greenwood residents, shooting at them and dropping one or more incendiary devices. These acts resulted in the mass destruction of property located in Greenwood, as well as the unlawful killing of hundreds of African American residents of Greenwood. In the course of the Riot, state and city officials unlawfully detained African American residents of Greenwood, forcing many of them to work in captivity in conditions deliberately designed to be reminiscent of slavery.

According to the State of Oklahoma legislature:

The documentation assembled by The 1921 Riot Commission provides strong evidence that some local municipal and county officials failed to take actions to calm or contain the situation once violence erupted and, in some cases, became participants in the subsequent violence which took place on May 31 and June 1, 1921, and even deputized and armed many whites who were part of a mob that killed, looted, and burned down the Greenwood area.¹⁴

¹⁴ Id. at §8000.1.3

The staggering cost of the Riot included the deaths of an estimated 100 to 300 persons, the vast majority of whom were African-Americans, the destruction of 1,256 homes, virtually every school, church and business, and a library and hospital in the Greenwood area, and the loss of personal property caused by rampant looting by white rioters. Nonetheless, there were no convictions for any of the violent acts against African-Americans or any insurance payments to African-American property owners who lost their homes or personal property as a result of the Riot.¹⁵

In the aftermath of the Riot, the State of Oklahoma and the City of Tulsa impeded the African American Riot survivors' attempts to rebuild their lives. Local officials attempted to block the rebuilding of the Greenwood community by adopting zoning restrictions to Greenwood that rendered reconstruction of the destroyed dwellings prohibitively expensive. When the zoning regulations were declared unlawful, the City of Tulsa refused to pay any restitution to the African American survivors of the Riot: the only restitution paid was to white gun-shop owners whose business had been looted. After the City of Tulsa refused to help the victims of this act of terrorism, many of the African American victims remained housed in tents through the fall and into the winter of 1921.

The State of Oklahoma and the City of Tulsa acted, in the wake of the Riot, to suppress all talk of the Riot as well as the survivors' attempts to seek legal redress. Efforts to seek relief from the court system were unsuccessful and futile. While some African Americans filed lawsuits at the time, over 100 of them were dismissed before even receiving a hearing in the State

¹⁵ Id. at §8000.1.3

Of Oklahoma's courts. Of the two cases that were heard by the Court, one, filed by Mabel Allen, was dismissed before the jury deliberated, and the Oklahoma Supreme Court dismissed the other on appeal.

Almost as destructive as the physical devastation was the social and cultural devastation visited primarily on African Americans, but poisoning relations between all races in Oklahoma even to this day. The state's court and educational systems, as well as local government across the state, were particularly implicated in this effort. The legislature of the State Of Oklahoma, which adopted many of the Riot Commission's findings by statute in 2001, made specific reference to the "'conspiracy of silence' surrounding the events in Tulsa of May 31-June 1, 1921, and their aftermath." According to the legislature:

Perhaps the most repugnant fact regarding the history of the 1921 Riot is that it was virtually forgotten, with the notable exception of those who witnessed it on both sides, for seventy-five (75) years. This 'conspiracy of silence' served the dominant interests of the state during that period which found the riot a 'public relations nightmare' that was 'best to be forgotten, something to be swept well beneath history's carpet' for a community which attempted to attract new businesses and settlers.

The conspiracy of silence fell particularly hard on African American citizens throughout Oklahoma. Even those that fled Tulsa to other parts of the state were not allowed to speak of their experiences, and were not believed when they did. Many of the survivors and their families suffered a deep psychological

scarring, as one of the purposes of the Riot and its aftermath—which lingers to this day throughout the African American community in Oklahoma—was to diminish the sense of security of all African Americans, to place them in a subservient condition, and to enforce a racial caste system that privileged whites and disadvantaged and demeaned African Americans. Many of the Riot survivors are still hesitant to talk about the events surrounding the Riot and its aftermath. Many of them still believe that the state and municipal government will punish them for discussing openly what happened during the Riot. Where one part of the community remains silenced, there can be no discussion of racial reconciliation in Oklahoma, and the stunted conversation on race that caught Justice Marshall's attention in Dowell as recently as 1991 is perpetuated from one century to the next.

The Riot Commission found that, to this day, Oklahoma, and in particular, Tulsa, remains racially divided. The Oklahoma state education system is still in the process of transforming itself from a problematic history of discrimination, see e.g., Sipuel v. Oklahoma, 332 U.S. 631 (1948); Dowell, 498 U.S. at 252-54 (Marshall, J., dissenting) (describing enforced segregation in state education continuing at least through the 1970s) into embracing the full diversity of all its citizens. The state institutions, especially the universities should be at the forefront of this process.

Most importantly from an educative perspective, the State continues to give the impression that the Nation Guardsmen were

there to protect the residents of Greenwood, when in fact Guardsmen fought the residents through the night, using a truck-mounted machine gun as part of the assault, and participated in the burning, and looting as well as the unlawful arrest and detention of thousands of African Americans based only on their race.

The legislature, in adopting the Commission's findings recognized that reconciliation begins through knowledge of the past, followed by acceptance of the past, and finally atonement through compensation to the survivors and their heirs. The Commission drew upon testimony of a large number of Oklahomans, both African American and white, in compiling its record. The Defendants refuse to make restitution for their actions prior to and during the Riot, and in perpetuating a "conspiracy of silence" after the Riot until the creation of the Commission itself.

The 48th Oklahoma Legislature in enacting the 1921 Riot Reconciliation Act of 2001 concurs with the conclusion of The 1921 Riot Commission [T]his response recognizes that there were moral responsibilities at the time of the riot which were ignored and has been ignored ever since rather than confront the realities of an Oklahoma history of race relations that allowed one race to 'put down' another race.

II. Statute of Limitations Issues

The law is clear that where "extraordinary circumstances" are present, as in the instant case, statutes of limitations must be tolled, often for extremely long periods of time. See Bodner v. Banque Paribas, 114 F. Supp. 2d 117, 135 (E.D.N.Y. 2000);

Rosner v. United States, 231 F. Supp. 2d 1202, 1209 (S.D. Fla. 2002). The Tulsa Race Riot is unprecedented in terms of the severity of violence used by American state and local government on civilians during the last century. The Riot bears comparison with the various acts genocide visited under the name of "ethnic cleansing," in which a religious or ethnic minority is targeted for extinction or violent relocation. Wherever such genocidal acts have occurred—during the Holocaust in France, in Myanmar, Argentina, and the Philippines—American courts have tolled the statute of limitations premised upon the inability of the victims to file suit due to the extraordinary circumstances they faced — dispersal, the non-availability of the bodies evidencing the atrocities, or the factual unavailability of the courts.

Extraordinary circumstances are present when defendants' acts cause a breakdown or suspension of the rule of law sufficient to disrupt society to such an extent that filing suit is impossible. This is particularly the case when defendants' acts are directed in part or in whole against the plaintiffs. For example, the Ninth Circuit has held that when plaintiffs fail to file suit "out of intimidation and fear of reprisals," the statute of limitations is tolled. Hilao v. Estate of Marcos, 103 F.3d 767, 773 (9th Cir. 1996). Similarly, federal courts in Florida and New York have tolled the statute of limitations when defendants engaged in an act of violence that repressed or dispersed the plaintiffs' community, see Bodner, 114 F. Supp. 2d at 135 (holding that "the Holocaust, World War II, and the subsequent

diaspora of the French Jewish community constitute extraordinary circumstances, " warranting equitable tolling); see also Rosner, 231 F.Supp.2d at 1209 ("the brutal reality of Holocaust, and the resulting extraordinary circumstances that Plaintiffs were forced to endure" meant that "for the majority of Plaintiffs, the years following World War II were particularly difficult" and warranted equitable tolling of the statute of limitations).

Tolling is particularly appropriate where "there is no functioning judiciary," Doe v. Unocal Corp, 963 F. Supp. 880, 897 (C.D. Calif. 1997) (currently under appeal to Ninth Circuit en banc), or "effectively, no relief was or could be granted by the . . . courts [or] . . . given the pervasiveness of the [government's] reign of terror," the courts themselves were complicit in denying relief. Forti v. Suarz-Mason, 672 F. Supp. 2d 1531, 1549 (N.D. Calif. 1987) (superceded by statute on other grounds Papa v. United States, 281 F.3d 1004, 1012 (9th Cir. 2002)). Tolling will also be granted where there is a breakdown of the court system, for example because of the "effective dependence of the judiciary" upon those who engage in intimidation. Hilao v. Estate of Marcos, 103 F.3d 767, 773 (9th Cir. 1996).

The Riot was part of a deliberate policy and practice, established as early as 1907 and pursued by the State of Oklahoma and various municipal governments and officials, to engage in or condone lynchings, "nigger drives," and "sun down laws." By the time of the Riot, the rule of law no longer applied to the

African American citizens of Oklahoma, and in particular, Tulsa. The decade prior to the riot saw violence against African Americans steadily increase. Finally culminating in the killing of up to 300 African Americans in Tulsa and the rendering homeless and property-less of a further 8,000 to 10,000, many of whom fled Tulsa never to return, others of whom spent the fall and winter in tented refugee camps run by the American Red Cross. While white businessmen were able to use the courts to redress their losses, the courts in Oklahoma were factually unavailable to African Americans, unless they could tie their interests to those of whites. That was impossible for those seeking redress for the looting and burning inflicted by the rioters.

The equities requiring tolling are particularly strong in this case: the state and municipal government engaged in an act of terrorism that killed hundreds of African Americans, destroyed hundreds of residences, and reduce a whole community numbering almost 10,000 people to refugee status. Unlike other terrorist acts perpetrated against Americans, the terrorists remained in the community, constituting a majority and controlling state and municipal offices, including the courts. Furthermore, defendants State and City acknowledge that, after the Riot, they engaged in a "conspiracy of silence" designed to stifle further dissent from the African American residents of Greenwood.

The Riot—by the State's own admission—stands out in American history of one of the worst examples of state-sponsored violence against an African-American community. The State

Commission's own findings, incorporated by Statute, determined that because of the actions and inactions of government officials, as many as 300 African-Americans were killed; 1,256 African-American residences and businesses were burned to the ground; and that approximately \$16,752,600 (in 1999 dollars) of property was destroyed.¹⁶ (Complaint, ¶¶31 and 524). Public officials literally handed the white mob the firearms and ammunition used to kill and attack the African-American community of 10,000 residents,¹⁷ (Complaint, ¶525d, 485); forcibly removed, arrested and detained almost all of Greenwood's residents¹⁸ (Complaint, ¶525e); and even joined in on the looting and burning of almost every building in the Greenwood community.¹⁹ (Complaint, ¶525g). Maurice Willows, the Director of the local Red Cross, stated that "all that fire, rifles, revolvers, machine guns, and inhuman bestiality could be done with 35 city blocks with its 10,000 Negro population, was done." (Complaint, ¶ 502).

Many survivors were not allowed to speak of their experiences and were not believed if they did. (Complaint, ¶ 33). The State's own Commission Report conceded, "The 1921 riot is, at once, a representative historical example and a unique historical event. It has many parallels in the pattern of past events, but it has no equal for its violence and its

¹⁶ 74 Olk. St. Ann. § 8000.1.2, 8000.1.3 (West 2002).

¹⁷ Commission Report at 11.

¹⁸ Commission Report at 12.

¹⁹ Commission Report at 11.

completeness.”²⁰ (Complaint, ¶ 34). For one of the most vibrant African-American communities in America, affectionately called the “Negro Wall Street,” (Complaint, ¶446-47), to be completely destroyed overnight by a state-sanctioned mob of up to 20,000 (Complaint, ¶ 499), was even in the racially divided Southwest of 1921 an extraordinary event. Given the extraordinary circumstances Plaintiffs were in shortly after the Riot and its aftermath, they could not reasonably have been expected to file suit just two years later.

Furthermore, such acts not only repressed the Greenwood community, but dispersed many of its members. Some victims of the Riot—including many of the Plaintiffs—were so afraid they fled from Tulsa, never to return again. (Complaint, ¶ 3, 9). Even after the Riot, 8,000 - 10,000 African-American families were left homeless and denied the opportunity to rebuild their homes and businesses. (Complaint, ¶ 10, 23, 503).

Equitable tolling also permits the limitations period to be tolled when, as here, the defendants actively concealed or ignored the relevant facts surrounding the history of that repression, see Bodner, 114 F. Supp. 2d at 135-36 (“deceptive and unscrupulous deprivation of both assets and of information substantiating plaintiffs’...rights to these assets.”); Rosner, 231 F.Supp.2d at 1209 (“the Government essentially turned a deaf ear to Plaintiffs’ repeated requests for information about their property.”)

²⁰ 18 Commission Report at 19.

Defendants engaged in a conspiracy of silence so successful that even the Mayor of the City of Oklahoma did not know of the Riot: "I was born and raised here, and I had never heard of the riot."²¹ Here, the State of Oklahoma created a Commission to Study the Tulsa Race Riot of 1921 in large part precisely to discover hidden or suppressed facts surrounding the Riot that could not otherwise have been discovered by Plaintiffs. (Complaint, ¶ 528). The Report of the Oklahoma Commission to Study the Tulsa Race Riot of 1921 revealed information never before made available to the public, leading the Commission itself to describe the Report as a "tower of new knowledge" that enabled "visions never seen before."²² (Complaint, ¶ 528). Specifically, the Commission conceded that its Report:

[i]ncluded . . . records and papers long presumed lost, if their existence had been known at all. Some were official documents, pulled together and packed away, years earlier. . . . Pages after pages laid [sic] open the city commission's deliberations and decisions as they affected the Greenwood area. Overlooked records from the National Guard offered overlooked perspectives and illuminated them with misplaced correspondence, lost after-action reports, obscure field manuals, and self-typed accounts from men who were on duty at the riot."²³ (Complaint, ¶ 528).

The third prong of the extraordinary circumstances test has also been met. The State itself reopened the issue of culpability for the Riot by its creation of the 1921 Commission. In these circumstances the limitations period should be equitably

²¹ Jonathan Z. Larsen, "Tulsa Burning", Civilization, IV, I (February/March 1997 at 46-55.

²² Commission Report at 8

tolled because the purpose underlying the statute of limitations as a statute of repose is not served here. The rationale behind the statute of limitations — that at some point a legal controversy must come to an end so that defendant may have a fair opportunity to defend himself before memories fade and evidence becomes stale — is inapplicable in this case. To the contrary, contemporaneous evidence was buried and unavailable during the Riot and its aftermath, and only until recently has there been sufficient evidence to bring suit. Having determined that the State and City both played a role in the Riot and having accepted moral responsibility for that role, neither the State nor the City can now escape their corresponding legal responsibility.

²³ Commission Report at 8.

III. CONCLUSION

The extraordinary and quasi-genocidal acts of the state and city authorities require that the statute of limitations be tolled in this case. For the state to move forward in its slow but steady project of racial reconciliation, it is vital that both the city and the state admit their legal responsibility in this case, or have the court rule upon the merits as a means of healing the terrible state of race relations that last into twenty-first century Oklahoma.

Such a course is particularly appropriate when the court system and educational system are especially implicated in suppressing attempts to obtain redress for the riot and present the truth about what happened.

DATED: _____
