

cessfully interweaves Kennedy's subsequent embrace of the black power, the New Left, and the predominantly white feminist movements. Making one of her most important contributions, Randolph demonstrates that while Kennedy never abandoned one struggle for another and served as a bridge between them, not only did she view "the Black liberation movement as the vanguard movement of the era," but more exceptionally she sought to extend its views and strategies to "primarily white feminist spaces" (125).

As portrayed in Randolph's book, Kennedy's influences on the black power and feminist movements are not only impressive, but transformative. Kennedy's views on black power strongly influenced Ti-Grace Atkinson and Gloria Steinem, two stalwarts of the women's liberation movement. She helped plan radical feminist protests, including one against the Miss America Pageant, and later helped found the National Black Feminist Organization. Her legal efforts in defense of radical activists were also striking. She defended black power leaders H. Rap Brown and Assata Shakur. In her defense of Valerie Solanas, she effectively framed the shooting of Andy Warhol Kennedy as an act of feminist resistance to male dominance. Kennedy was also a legal trailblazer, bringing in women who suffered from illegal abortions to testify as expert witnesses in the influential suit *Abramowicz v. Lefkowitz*. Randolph contends that Kennedy's key role in the reproductive rights fight has been all but forgotten by historians.

In Randolph's hands, Kennedy emerges not only as the energetic and dramatic activist she is known to have been, but as a significant ideological linchpin between the black power and feminist movements of the 1960s. To her credit, Randolph also recognizes that Kennedy's personality and strategies could be off-putting to some and infuriated others, including National Organization for Women leader Betty Friedan. Additionally, it was evident that Kennedy was often better at starting organizations or protests than she was at conforming to them or sticking with them. In sum, Flo Kennedy was a charismatic, intelligent, fun, and profoundly influential radical activist, and we are in Randolph's debt for this excellent biography.

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ANSLEY T. ERICKSON. *Making the Unequal Metropolis: School Desegregation and Its Limits*. (Historical Studies of Urban America.) Chicago: University of Chicago Press, 2016. Pp. xviii, 390. \$40.00.

These days most books on social policy are "argument" books. *Making the Unequal Metropolis: School Desegregation and Its Limits* is a case in point. Ansley T. Erickson deserves high praise for the depth of her research. But this reviewer demurs when it comes to her argument.

Erickson's book deals with school desegregation in Nashville, Tennessee. However, there are only passing references to the *Brown v. Board of Education of Topeka* decisions of 1954 and 1955 or to numerous Supreme Court holdings during the next decade, all of which were based on the principle that the Constitution forbade racial discrimination by the government but did not require

integration. This consensus was summed up in the Civil Rights Act of 1964: "'Desegregation' means the assignment of students to public schools and within such schools without regard to their race, color, religion, or national origin, but 'desegregation' shall not mean the assignment of students to public schools in order to overcome racial imbalance" (Title IV, Section 401b.).

Erickson takes exception to this definition and instead makes a case for what she calls "statistical desegregation"—that is, assigning students by race to create enrollments that correspond with the overall population ratios of large metropolitan areas. This sort of desegregation was achieved (for a while) after the Supreme Court, in a series of cases between 1968 and 1973, redefined the meaning of desegregation and required that students be assigned by race to achieve racially balanced school enrollments. Erickson favors this policy but acknowledges that court-ordered busing for racial balance did not efface substantial disparities in the average academic achievement of blacks and whites.

By 1971, Nashville-Davidson County had complied with the mandate of *Brown*. Students were no longer assigned on the basis of race. Instead, they were assigned, regardless of race, to the nearest neighborhood schools. This, however, led to a situation where different schools had different proportions of black and white students. According to Erickson, this imbalance was not entirely the result of geography, individual choices, or economic wherewithal. It was also influenced by state and local government policies with respect to highways, housing, and low-interest loans. By constructing highways, the state facilitated the flight of whites to the suburbs. Government-regulated banks also fostered racial separation by giving low-interest loans only to people who were deemed creditworthy. And local governments situated most of their public housing in predominantly black areas. Erickson mentions that residents in the projects initially found themselves in improved circumstances. Nevertheless, she maintains that government policies contributed to a racially imbalanced pattern of settlement, and she argues that court-ordered busing was justified as a remedy for policies that affected blacks and whites differently.

Essentially, Erickson makes a case for what constitutional lawyers once called "the *Keyes* presumption," a presumption that the Supreme Court established in a 1973 case that involved Denver, Colorado. This presumption held that if a government policy limited racial interaction to even a slight extent, then any racial imbalance that existed elsewhere in a jurisdiction was not adventitious. At the time, Justice Lewis F. Powell Jr. expressed profound misgivings over this idea, and eventually (in the 1990s and in 2007) the Supreme Court rejected the *Keyes* presumption.

In the meantime, however, schools in metropolitan Nashville (and many other places) were required to have racially balanced enrollments. A court order of 1971 required each Nashville school to have an enrollment that was 15 to 35 percent black and 65 to 85 percent white. After this policy touched off white flight, additional court orders in 1980 and 1983 extended the desegregation area

to all of Davidson County. As a result, Nashville achieved a degree of statistical desegregation that was unmatched by most American school districts.

Nevertheless, Erickson writes, “Nashville gave up on desegregation” when the Supreme Court’s decisions of the 1990s allowed a return to neighborhood schools (293–294). “After decades of out-desegregating most American school systems, Nashville moved much closer to the segregated mean” (295). Nashville-Davidson County returned to racially imbalanced neighborhood schools for elementary students, and to large, comprehensive high schools where there were racially disproportionate enrollments in both advanced academic studies and vocational education.

Erickson laments this turn away from court-ordered, racially balanced integration. She notes that the test scores of black students improved during the 1970s and 1980s, when court-ordered integration was in vogue, but the scores of blacks have dipped since then. Erickson suggests that this decline was due to a loss of “social learning via desegregation” (212). But David Armor and other scholars have noted that during the 1970s and 1980s the test scores of black students in racially concentrated districts improved as much as those of blacks who were attending integrated schools. In the 1990s, moreover, the retrogression occurred among both integrated and concentrated black students.

Currently, the racial achievement gap is about the same as it was when *Brown* was decided in 1954 (when 85 percent of blacks scored below the median for whites on IQ tests). This gap in academic proficiency is one of the most comprehensively documented facts in American educational history. In 1998, for example, Christopher Jencks and Meredith Phillips reported that the typical black student scored “below 75 percent of American whites on most standardized tests” and “on some tests . . . below more than 85 percent of whites” (“The Black-White Test Score Gap: An Introduction,” in *The Black-White Test Score Gap* [1998], 1). Writing in 2003, Stephan Thernstrom and Abigail Thernstrom reported that in 1999 the average math score of America’s black students was “at the 14th percentile” (*No Excuses: Closing the Racial Gap in Learning* [2003], 20).

Jencks and Phillips cited poverty as the primary cause of the racial gaps, while the Thernstroms placed additional emphasis on bad attitudes and bad schools. Erickson might agree—although, as noted, her emphasis is on government policies that fostered racial separation. Like most historians and social scientists, Erickson says nothing about sociobiology.

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KENNETH ROBERT JANKEN. *The Wilmington Ten: Violence, Injustice, and the Rise of Black Politics in the 1970s*. Chapel Hill: University of North Carolina Press, 2015. Pp. 246. \$30.00.

Kenneth Robert Janken does not mince words when it comes to sharing his thoughts about the prosecution and

imprisonment of ten Wilmington, North Carolina, civil rights and black power activists in the 1970s. The very first sentence in *The Wilmington Ten: Violence, Injustice, and the Rise of Black Politics in the 1970s* reads: “The case of the Wilmington Ten amounts to one of the most egregious instances of injustice and political repression from the post–World War II black freedom struggle” (1). And he is right.

The story of the Wilmington Ten begins ostensibly in February 1971, when black students at Wilmington’s recently desegregated New Hanover High School walked out in protest over unfair and unequal treatment. School officials, aided by brutal police and rampaging white vigilantes, crushed the boycott. Over the course of the next year, the state prosecutor, assisted by the U.S. Bureau of Alcohol, Tobacco and Firearms, conspired to punish the leaders of the boycott and the broader freedom movement, resulting in ten activists being tried and convicted on trumped-up arson charges and sentenced collectively to almost three hundred years in prison.

Janken chooses to begin the story much earlier, in 1898, when whites in Wilmington staged a coup d’état, ousting blacks from local government and driving many out of the city. He agrees with those who suggest that the race riot produced “reticence, caution, fear, and conservatism” among African Americans, stifling “political expression” for generations, while at the same time emboldening whites (5). Janken explicates the “1898 mentality” in his introduction (5). Although brief, his analysis helps make clear why black student activism disturbed whites (and some blacks) so deeply, and why whites resorted to deadly violence so quickly.

Janken’s first chapter puts the 1971 school boycott in contemporary context, explaining the myriad problems black students, teachers, and administrators faced in formerly all-white schools. Contrary to the usual narrative of school desegregation, educational inequity and unfair treatment did not suddenly disappear when black schools were shuttered and white schools were integrated. The chapter also shows clearly the depth and breadth of white intransigence. City and school officials preached racial civility but were unyielding in their support of racial inequality and completely accommodating to racial terror groups.

When the boycott ended, the activists who would become the Wilmington Ten kept organizing. Chapter 2 explores the broader social movement they put together over the course of the next year. Janken displays a keen understanding of social movement development, offering insightful assessments of the strengths and weaknesses of leaders and movement organizations, and explaining the fragile process of coalition-building. Janken also argues convincingly that as the local movement took shape, a new kind of black electoral politics emerged, one that embraced radical activists, including black nationalists. At the same time, he points out that the movement created the infrastructure that supporters of the Wilmington Ten would soon need to free members of the group.

The government effort to frame local movement leaders for crimes they did not commit as punishment for