FROM EMMETT TILL TO TRAYVON MARTIN

The Persistence of White Womanhood and the Preservation of White Manhood

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Abstract

On February 26, 2012, George Zimmerman, a man of White American and Peruvian descent, shot and killed Trayvon Martin, a Black teenager who was walking back to the home where he was a guest in Sanford, Florida. For many, Trayvon Martin is this generation's Emmett Till, the fourteen-year-old Black boy who was lynched in Mississippi in 1955 for whistling in a White woman's presence. In fact, several scholars have highlighted similarities between the Till and Martin tragedies. One unexplored commonality is the manner in which defense counsel in both the Till and Martin trials used the trope of protecting White womanhood to get the jurors to psychologically identify and empathize with the defendants. Employing Multidimensional Masculinities Theory, this essay seeks to expose the role that the protection of White womanhood (and thus the preservation of White manhood) played in the killings of Till and Martin and in each of their killers' defense strategies at trial. It does so by offering a history of lynching; explaining how White men demonstrated their ownership of White women and their dominance over Blacks by using violence against Black men who threatened the social order; and revealing how the defense attorneys in both the Till and Martin cases manipulated and employed the narrative of the White male protector of White women to facilitate acquittals for their clients. In so doing, it analyzes the transcript from the Till trial, a transcript previously believed to be lost forever until the FBI discovered the transcript upon its re-opening and investigation of the Till murder and released the transcript in 2006. Finally, utilizing excerpts from the trial transcript in the Martin case, this essay reveals how the trope of protecting White womanhood shaped the outcome in the Martin case, even though the stock narrative of needing White female protection from purportedly dangerous Black men was not at all related to the claims about Martin or charges against Zimmerman. In so doing, this essay reveals (1) how White womanhood has been abstracted to encompass not only a specific woman in an incident and to include not only a "man's" home, but also to include broader spaces like gated communities, and (2) how that reality, coupled with the way that civil rights laws have made it harder for White men to bully Black men and the way that feminism has made it harder to subordinate women, has produced a new masculine anxiety for White men.

Keywords: Trayvon, Emmett, lynching, masculinities, White womanhood, White manhood, trial

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INTRODUCTION

At approximately 2:30 A.M. on August 28, 1955, two White men, John William Milam (J.W. Milam) and Roy Bryant, invaded the house of Preacher Moses Wright, an elderly Black man who was hosting Emmett Till, his fourteen-year-old grandnephew from Chicago, Illinois at his home in Leflore County, Mississippi. After hearing through the rumor mill that Till had allegedly hit on and wolf-whistled at Roy Bryant's wife, Carolyn Bryant, Milam and Bryant abducted the young Chicagoan with plans to teach him a good lesson, a lesson about his place in society as a Black person and their "superiority" over him as White people. In fact, Milam and Bryant's lesson would become Till's very last because the two White men would beat, maim, and torture Till so badly that when his body was discovered three days later, his father's ring, which Till wore during his trip to Mississippi, was the only *clearly* identifiable item on his person. Although Milam and Bryant admitted to kidnapping the young boy from his uncle's home, on September 23, 1955, an all-White and all-male jury in Tallahatchie County, Mississippi acquitted the two White defendants of the murder charge against them (Anderson 2015; Goldsby 1996; Harold and DeLuca 2005; Hudson-Weems 2006; Pollack and Metress 2008; Russell 2005; Tyson 2017; Whitfield 1988).

In her autobiography *Death of Innocence: The Story of the Hate Crime That Changed America*, Mamie Till-Mobley, the mother of Emmett Till, pondered the following:

I wonder how different things might have been if the laws and practices of Tallahatchie County had been different. . . . What if the law had allowed women to serve then? What if only one woman had been allowed on that jury? Even a white woman in Sumner, in Mississippi, in 1955 would have had to feel something for another woman who had felt what I did. Wouldn't she? A mother, someone who understood, as only a mother could, what it felt like to become a mother, what it must feel like to lose a child, a part of yourself. (Till-Mobley and Benson 2003, pp. 189-190)

Nearly fifty years later, in a case involving the killing of another Black teenager, Trayvon Martin, by George Zimmerman, who is of White American and Peruvian descent, a deceased Till-Mobley received, in some ways, an indirect answer to her questions.

As many have noted, the similarities between the Till and Martin slayings and trials are striking. Like Till, Martin was a young boy—only seventeen years old—and guilty of no crime when he was killed by Zimmerman on February 26, 2012. Furthermore, as with Till, Martin was killed in part because he was viewed as stepping out of his place. For Till, at least to those who justified his murder, 1 his stepping out of place involved talking to a White woman and then daring to whistle while in her presence. For Martin, his stepping out of place stemmed from his being a young Black man in a neighborhood in which Zimmerman viewed him as not belonging; it stemmed from what Professor Sheri Lynn Johnson (1983) calls racial incongruity, Martin's being Black in what Zimmerman viewed as a White neighborhood (Onwuachi-Willig 2017). Similarly, just as Milam and Bryant were acquitted of their murder of Emmett Till (in less than sixty-eight minutes), Zimmerman, Martin's killer, was found not guilty of both second-degree murder and manslaughter (Lawson 2012; Goldsby 1996; Turner 1995). Finally, much like with the murder of Till, Zimmerman's slaying of Martin inspired anger, and ultimately a movement, with Till's murder helping to galvanize the Civil Rights Movement after his mother courageously decided to publish photographs of his bloated and disfigured body and face in 7et magazine and held an open

casket funeral service, and with Martin's death igniting nationwide protest against Stand Your Ground Laws, racial profiling, and police brutality (Hall 2013; Lawson 2012; Hudson-Weems 2006). Ultimately, the verdict in the Martin case motivated and inspired the creation of the Black Lives Matter movement (Cullors 2018).

Just as there are striking similarities between the cases concerning the Till and Martin killings, there also are critical differences between the two cases. Most important are the differences between the contexts under which each killing occurred. Indeed, sociologist Elijah Anderson (2013) has argued that one key difference between the Till and Martin slayings is that Trayvon Martin's death did not occur under a strict Jim Crow regime and that George Zimmerman, as least as far as we know, is not a conscious Jim Crow-like racist. Moreover, unlike in the Till case, the jury in the Zimmerman murder trial did not consist of all White men, but instead of all women, five of whom were White and one of whom was Latina. Not surprisingly, much was made of the fact that the jurors were all women and were overwhelmingly White. Some individuals such as journalist Jessica Valenti (2013) initially hoped that the female jurors "would see this teenage boy [Trayvon Martin] shot dead in the street and think of their [own] children." Others such as Florida criminal defense attorney Jose Baez believed that an acquittal was essentially imminent once the nearly all-White female jury was chosen (African Globe 2013). In fact, Robert Hirschhorn, the jury consultant for Zimmerman's defense attorneys, explained that he wanted an all-female jury for Zimmerman because he believed that women "would more easily understand the fear [that] Zimmerman [claimed he] felt when he shot Trayvon Martin" and that women "would understand the position Zimmerman found himself in the night of the shooting" (Alcindor 2013). Ultimately, Hirschman was correct, as the nearly all-White female jury acquitted Zimmerman of both second-degree murder and manslaughter on July 13, 2013.

Although there were significant differences between racial inequities in 1955 and 2013 and between the reasonableness of the two juries' verdicts based on the evidence that was before them and the self-defense argument that Zimmerman put forth, Till-Mobley arguably received a response to her queries about the difference that a White female juror may have made to the outcome of the murder trial against Milam and Bryant through the Zimmerman verdict. At the very least, she received a glimpse into the enduring power of a narrative that had been employed more than half a century before to ensure the freedom of her son's killers: the narrative of protecting White womanhood. In fact, in her autobiography, Till-Mobley essentially answered her own questions about this potential difference by highlighting how a White woman was already at the center of the case concerning the murder of her son. Till-Mobley stated:

I wonder if a woman could have had much influence over the way things turned out. Then again, a woman did have influence over the whole thing, didn't she? In this case, a woman was at the very heart of it all, the accusation, the abduction, the acquittal. And, of course, the cause for celebration. (Till-Mobley and Benson, 2003, p. 190)

In other words, as Till-Mobley's words suggest, given how the narrative of protecting White womanhood has been employed as a means for preserving the benefits and privileges of White manhood, a White female juror in the Till case likely would have made no difference at all.

In making her point about the role that White women played in the death of her son and the ensuing murder trial, Till-Mobley highlighted an issue that was front and center in the Till case, but that has been too frequently ignored in the Trayvon Martin and George Zimmerman case: the role that the protection of White womanhood, or rather the excuse of protecting White womanhood, ultimately played in the Zimmerman trial verdict and in the preservation of White male dominance, even as Zimmerman himself was part-Latino. In this Essay, I bring this issue to the forefront of the Martin case by using Multidimensional Masculinities Theory to explicate and compare how the narrative of protecting White womanhood functioned in these two landmark trials. In so doing, I reveal how the Martin case, a case generally viewed as involving only racial issues, truly is this generation's Emmett Till case, as the trial concerning Martin's death similarly intertwined issues of race, White supremacy, womanhood, masculinity, and power, and it did so in ways that also enabled Martin's killer to run free. Indeed, in light of what Multidimensional Masculinities Theory reveals to us about the construction of manhood in our society, the ways in which identities are "co-constituted," and the manner in which context frames how identities are formed and interpreted, I contend that the fact that both the Till and Martin cases ended with the same trial outcome, despite the very meaningful differences between the facts of the two cases and the time periods under which the two killings and trials occurred, is no surprise.

Although the material and psychic benefits of Whiteness extend, and have been extended, to all Whites, there is also a gendered dimension to the property value of Whiteness (Harris 1993). In fact, the preservation of White womanhood as the province of White men has been critical to White men's sense of identity and authority (Welter 1966, 1977). Both historically and presently, the normative ideal of a man in our society has been a White, middle-class, heterosexual, and able-bodied man (Cooper 2009, 2010). Furthermore, part of what it means to satisfy this normative ideal of manhood is to maintain a superior posture over White women, men of color, and women of color; secure one's masculinity in the eyes of others, particularly those within one's status group; and "denigrate contrast figures," such as men of color, as a means of reinforcing differences in group power and maintaining the subordination of individuals in lower status groups (Cooper 2010, p. 18). Protecting White women such that they can be associated with or dealt with only by White men has functioned as a critical component of the psychic and material benefits of Whiteness that White men have sought to maintain (Welter 1966, 1977). For, such protection has not only enabled White men to maintain their dominance over White women and White children; it also has allowed White men to assert and maintain their dominance over Black people who have threatened the social order by employing violence against them to subdue them in the "honor" of White women (Feimster 2009; Ifill 2003; Jordan 2000, 2003).

I begin this essay by providing a brief explanation of Multidimensional Masculinities Theory and offering a brief history about the role that masculinity norms and the trope of protecting White womanhood played in lynching cases during the early decades of the twentieth century and the role that lynching played in maintaining the subordination of Blacks. Following that, I engage in an examination of the trial transcript for the Till murder trial, the FBI's investigation documents for the re-opening of the Till trial during the 2000s, and narrative accounts regarding the Till murder trial, to analyze how defense counsel for Milam and Bryant relied on the notion of protecting White womanhood, plus commonly understood norms about White masculinity, to obtain an acquittal for the two killers. Specifically, I parse the transcript from the trial of Milam and Bryant to show how the notion of protecting White womanhood and narratives about Milam and Bryant's roles as the protectors of Carolyn Bryant functioned together during the 1955 trial as an unofficial defense

to Till's murder and a means for protecting the southern system of segregation that worked to the benefit of Whites. In so doing, I explicate how masculinity norms in the Jim Crow South, as well as a desire to maintain the property value of White maleness in a post-Brown v. Board of Education era, motivated Milam and Bryant to confront, beat, and murder Till as a means of boosting their masculine esteem. Additionally, I explain how Milam and Bryant were also motivated to harm and murder Till as a means of protecting the property value of their Whiteness, particularly since they were poor White men whose Whiteness gave them an authority and status that their work and family reputation would not have otherwise given them (Onwuachi-Willig 2017). Thereafter, I examine segments of the trial transcript from the Zimmerman case and interviews of juror B37, the only one of the five White female jurors to speak publicly, to reveal how the trope of protecting White womanhood (and thus preserving White manhood) and the narrative of Zimmerman as a White male protector were successfully employed as a means of invoking sympathy for and identification with Zimmerman by the White female jurors, and ultimately, for ensuring a "not guilty" verdict from the all-female and nearly all-White jury in the Martin case. In so doing, I reveal how Zimmerman's precarious status as a renter and White Latino within a community that was becoming increasingly hostile to both renters and people of color contributed to his desire to volunteer for and serve as the White male protector for the Retreat at Twin Lakes, which is the neighborhood where Zimmerman rented a townhome and where he later killed Martin, who himself was a guest of a resident in the neighborhood (Onwuachi-Willig 2017). Additionally, using the work of Jeannie Suk, I show how White womanhood has been abstracted to encompass not only a specific woman who needs protection, but also to include broader spaces beyond one's own home such as an entire gated community. More so, I explain how this expanded space of protection, coupled with civil rights advancements that, to some extent, have made it harder for White men to terrorize Black men like Milam and Bryant terrorized Till and a women's rights movement that has made it more difficult to "possess" women, has produced a new masculine anxiety for White men.

FROM MASCULINITIES TO MULTIDIMENSIONAL MASCULINITIES

Rooted in the disciplines of cultural studies, history, queer theory, and sociology, masculinities theory works to explain how the behavior of men is socially constructed. It recognizes that men often perform their gender in ways that will push others to view them as satisfying society's normative ideal of manliness or masculinity (Cooper 2009; McGinley and Cooper, 2013). Multidimensional Masculinities Theory is a subset of masculinities theory that incorporates Professor Kimberlé Crenshaw's theory of intersectionality and thus recognizes that identities mutually constitute one another (Crenshaw 1991; McGinley and Cooper, 2013). In other words, Multidimensional Masculinities Theory acknowledges, for example, that the meaning of race is shaped by the meaning of gender, the meaning of race is influenced by class, and the meaning of class is formed in part by gender. Under Multidimensional Masculinities Theory, there is not just one form of masculinity, but rather a multiplicity of masculinities, such as White, middle-class, heterosexual masculinity or poor, Black, gay masculinity (Cooper 2009; McGinley and Cooper, 2013; Mutua 2013). Moreover, there is a social hierarchy among the various forms of masculinities, with White, heterosexual, middle-class masculinity seated at the very top of the hierarchy (Cooper 2009; Mutua 2013). As Professor Michael Kimmel once explained, "Within the dominant culture,

the masculinity that defines white, middle-class, early middle-aged heterosexual men is the masculinity that sets the standard for other men" (Kimmel 1996, p. 30).

Because "[m]asculinities become hegemonic due to specific historical circumstances and are always subject to being dethroned," men, particularly men at or near the top of the masculinities hierarchy, are vigilant in performing acts that can thwart any upheaval of the existing status hierarchy (Cooper 2009, p. 687). As Professor Frank Rudy Cooper (2009, p. 677) has explicated, the principles of the "hegemonic masculinities school of thought" include (1) men's concern about how other men are viewing them, (2) a desire to win and maintain the respect of other men and realize the ideal for manhood, coupled with meaningful anxiety about how to do so; (3) a desire to dominate or maintain one's hierarchical position over other men; and (4) the repudiation and denigration of "contrast figures," such as men of color (McGinley and Cooper, 2013). In cultures of "honor"—which the post-Brown v. Board of Education White community in Mississippi arguably became due to Whites' unrelenting efforts to maintain the property value of Whiteness—the motivations for White men to engage in violent acts to protect their social and legal standing were enormous, especially for those on the margins of White society (Cooper 2009; Harris 1993; Onwuachi-Willig 2017). In these cultures of honor, "an insult [can] drastically reduce [an individual man's] social standing because an insult that goes unanswered suggests that its subject is unable or unwilling to protect himself, [and those whom he 'owns'], and thus, is less than manly" (Cooper 2009, p. 691). Make that man Milam or Bryant, a poor White man who was desperately clinging onto the notion that he was superior to all Blacks because of his Whiteness, and that man will engage in hypermasculine acts as a means of restoring his "honor" and compensating for his failure to achieve the normative ideal of manhood (Onwuachi-Willig 2017; Cooper 2009).

WHITE WOMANHOOD, LYNCHING, AND "PROTECTION"

From the post-Civil-War to the pre-Civil-Rights period, the preservation and protection of White women from Black men, who were (and are) continually portrayed as innately criminal, dangerous, and bestial, functioned as significant props in the broad-scale masculinity contests that White men ignited to reassert and maintain their status at the top of the racial and gender hierarchy (McGinley and Cooper, 2013). Indeed, for segregationists, the primary means for maintaining the supremacy of Whites, the value of Whiteness, and thus the power of White men was the prohibition of racial integration between Blacks and Whites, particularly through anti-miscegenation statutes and particularly between Black men and White women (Onwuachi-Willig 2013; Oh 2007; Mayeri 2006; Kennedy 2003; Harris 1993). White separatists focused primarily on regulating the relationships of White women and Black men (or what often turned out to be false claims of interactions between White women and Black men) in part because White women were a form of property under the control of White men (Feimster 2009; Wells 1991, reprint; Welter 1966; Welter 1977).

The most commonly used tool for protecting White men's property interest in White women was lynching. Although "[l]ynching in America began in revolutionary days to deal with problems along the frontier," it soon became an offense that was primarily and frequently committed against Blacks, beginning during Reconstruction and extending all the way into the mid-twentieth century (Ziglar 1988, p. 14). As the Equal Justice Initiative (2017) has explained, "terror lynchings' peaked between 1888 and 1940 and claimed the lives of African American men, women, and children who were forced to endure the fear, humiliation, and barbarity of this

widespread phenomenon unaided." Specifically, between the years 1882 and 1968, 4,742 lynchings occurred in the United States, and 3,445 or approximately 73% of those lynchings were of Blacks (Allen et al., 2000; Russell-Brown 2009; Tolnay and Beck, 1995; Tuskegee University Archives). When one limits the time period to only the most intense period of lynching from the years 1882 to 1930 and to the ten border and Deep South States, Blacks were the victims of 88%, or 2,462, of the 2,805 lynchings that occurred during that time and in those areas (Tolnay and Beck, 1995).

Following emancipation, numerous Black men and women were subjected to brutal and dehumanizing lynchings by White mobs in all regions of the United States (Allen *et al.*, 2000; Equal Justice Initiative 2017; Young 2005). Frequently, these lynchings involved extended forms of torture (Allen *et al.*, 2000; Jordan 2003). For example, the mob that lynched Charley Sheppard in Mississippi in 1929 burned him alive, but before they did so, they cut off his ears and stuffed his nose and mouth with mud to ensure that the fumes from the gasoline did not kill him because they wanted him to fully suffer before the fire killed him. Before that, the mob had poured gasoline only on Sheppard's legs so as to focus his suffering on his legs while they burned his extremities, and before they then turned to burn his private parts (Jordan 2003).

Often, lynchings of Blacks were huge spectacles for Whites—in fact, family events—for which businesses were closed and children were allowed to miss school (Allen et al., 2000; Feimster 2009; Russell-Brown 2009). By being a witness to this incredible brutality, White children learned the clear rules about racial hierarchy and segregation in society, which helped to ensure that yet another generation of Whites would work to maintain the racial status quo of White dominance (Cox 1945). It also was not uncommon for White spectators to bring food as part of these "celebrations," nor was it uncommon for individuals in the mob to take the body parts from the lynched victims as a keepsake or sell the parts to others as souvenirs (Raiford 2011; Young 2005; Ziglar 1988). For instance, among those in the angry mob that took the life of Sam Hose in 1899 were persons who paid twenty-five cents for pieces of bone from his body and ten cents for a piece of his cooked liver (Clarke 1998). Relatedly, photographs taken by participants and onlookers were remade into postcards and trading cards and shared widely as tokens to ensure memories of the lynchings (Garland 2005; Young 2005). For example, Joe Meyers, a White man, sent the following note on a lynching postcard that contained the charred image of Jesse Washington's body in May of 1916: "This is the Barbecue we had last night my picture is to the left with a cross over it your son Joe" (Garland 2005, p. 794). Similarly, the following letter was sent to Dr. J.W.F. Williams on a lynching postcard in 1910:

Well John—This is a token of a great day we had in Dallas, March 3rd, a negro was hung for an assault on a three year old girl. I saw this on my noon hour. I was very much in the bunch. You can see the Negro hanging on a telephone pole. (Garland 2005, p. 794)

Mostly, lynched Black bodies were left in the open for all to see as a display of White power and a warning to Blacks that any efforts in seeking and enforcing constitutional rights would be futile (Russell-Brown 2009; Ifill 2003; Jordan 2003, 2000; Allen *et al.*, 2000). All the while, police officers and other officials who were supposed to protect the public never interfered with these lynchings and, in fact, often facilitated them by readily handing over jailed Black individuals to angry mobs (Allen *et al.*, 2000; Jordan 2000).

Whites who participated in and supported lynchings offered numerous reasons for their actions, but the most frequently invoked excuse was rape and the protection

of what scholars have called "True Womanhood," also known as White womanhood (Barnard 1993; Welter 1977, 1966). Explaining the concept of True Womanhood, lawyer Amii Larkin Barnard asserted:

True Womanhood defined women as by nature physically delicate, intellectually weak and spiritually pure, thus making them naturally designed for a sheltered life outside the public sphere. The ideal of True Womanhood demanded purity, piety and deference to men. In return, a woman who behaved "like a lady" was sheltered from the harshness of the public sphere. True Womanhood commanded the protection of white ladies by white gentlemen (Barnard 1993, p. 2).

While, prior to emancipation, the protection of True Womanhood applied only to White women of higher socioeconomic classes, it quickly became applicable to all White women, regardless of class status, after emancipation—that is, so long as their alleged assailant was Black. After all, "[w]hat honorable white man would not heed the call to protect white womanhood and what self-respecting white woman would not deem herself worthy of protection?" (Feimster 2009, p. 51)

Unlike White women, Black women were deemed incapable of possessing True Womanhood and thus, just like during the antebellum period, they remained vulnerable to rampant acts of rape and sexual assault by White men, who never received punishment for their actions. Indeed, in her book *Crusade for Justice: The Autobiography of Ida Wells*, anti-lynching activist, Ida B. Wells, argued that the White men who were beating, torturing, and killing African American men were the same White men who had "created a race of mulattoes by raping and consorting with Negro women" (Wells 1991, reprint, p. 71). As historian Crystal Feimster (2009) explicates, "[b]y accusing black men of dishonoring white womanhood and at the same time raping black women, southern white men articulated, on the one hand, deep anxieties about what they understood as the consequences of forced 'social equality' and, on the other hand, a strong desire to maintain sexual dominance over black women" (p. 50).

A crucial component of lynchers' proffered excuse of protecting White womanhood was the myth of the Black rapist. As scholars have argued, the vicious stereotype of Black men as sexually aggressive savages who desire White women at any cost often served as a justification for lynching Black men (Allen *et al.*, 2000; Barnard 1993; Burrell 1993). Indeed, many White people "believed that Black men were of such limited virtue and intelligence that the crime of rape meant nothing to them" (Barnard 1993, p. 10).

That rape, or more broadly, the protection of White womanhood, was the usual defense that lynchers frequently invoked to explain their inhumane practices did not mean that rape was the actual identified reason behind the violent acts (Allen *et al.*, 2000; Cox 1945). Historian William Ziglar asserted that "34 percent was the highest estimate of cases where rape was even the alleged cause of a lynching" (Ziglar 1988, p. 15). Nevertheless, rape and the protection of White womanhood served as the most persuasive reasons for most White lynchers and spectators of lynchings. In his article *Lynching and the Status Quo*, sociologist Oliver Cox (1945) explained exactly why, stating:

There are two principal reasons why the accusation of rape is apparently the best available defense of lynching. In the first place, rape, especially when committed upon a child, is probably the most outrageous of crimes in modern society. Mob action against a rapist, then, tends to be excused in the mores. . . .

In the second place . . .[t]he belief that Negroes are surreptitiously using white women to 'mongrelize' the population produces a bitter sense of frustration, calling for practically unlimited violence against Negroes. It is principally on the latter score that the white ruling class has been able to corral the white masses for expressions of mob violence. Clearly a 'mongrelized' South will ultimately mean not only a non-segregated South but also a non-aristocratic South, the perennial nightmare of the Southern oligarchy (pp. 584-585).

Aware of the appeal of the protection of White womanhood as a reason for lynchings, the NAACP worked to dispel the myth of the connection between rape and this vile form of vigilantism (Raiford 2011). For instance, in a November 22, 1922, advertisement "Shame of America," which appeared in White-owned newspapers such as the *New York Times* and the *Atlanta Constitution*, the NAACP directly posed the question of whether rape was the reason for lynchings of Blacks. The advertisement read in relevant part:

Is Rape the "Cause" of Lynching?

Of the 3,436 people murdered by mobs in country, only 571, or less than 17 percent, were even accused of the crime of rape.

83 WOMEN HAVE BEEN LYNCHED IN THE UNITED STATES.

Do lynchers maintain that they were lynched for "the serial crime"?

AND THE LYNCHERS GO UNPUNISHED (Raiford 2011, p. 30).

Even more so, as the investigatory work of Ida B. Wells and others revealed, nearly all Black men accused of rape and other crimes or insults were not actually guilty (Coleman Jordan 2003, pp. 587-89, 595-96). Indeed, Wells discovered that, in many instances, Black men were lynched as a result of consensual relationships with White women. (Raiford 2011: Coleman Jordan 2003; Barnard 1993).

In other words, the real reason behind lynchings was the need for White men to reassert their dominance, manliness, and authority after slavery had been abolished and African Americans' freedom became a threat to Whites' way of life (Allen *et al.*, 2000). As Feimster (2009) and law professor and President and Director-Counsel for the NAACP Legal Defense Fund, Sherrilyn Ifill (2003) have argued, lynching emerged as a frequent retaliatory practice against African Americans as they sought to exercise greater political power and obtain social and economic power. Lynchings also became a means for White men to regulate the conduct of White women, Black men, and Black women. Specifically, White men utilized lynching as a tool for preventing and punishing interracial intimacy between Black men and White women (Allen *et al.*, 2000; Feimster 2009). As Feimster explains, "[w]eaving together fears about black political power and anxieties about miscegenation into a single design, southern whites converted black men's desires for economic and political equality into a desire for 'social equality,' which they then translated into a threat against white womanhood" (Feimster 2009, p. 51).

Wells, the NAACP, and the Black press continued to work to expose the falsity of the myth that lynchings were performed to protect the delicacy of White women in a variety of ways, including by revealing how White "ladies" frequently participated in the barbaric acts of lynching. After all, acknowledging White women's roles as active participants in lynchings as physical assailants, persons who cheered and

goaded mobs to be more violent and brutal, witnesses to the terrorizing behaviors of lynch mobs, and mothers who brought their children to lynchings directly challenged the notion of the fragile, delicate creatures that the idea of True Womanhood was designed to protect. Similarly, Wells and other anti-lynching activists helped to dispel the myth that lynchings occurred as a means of protecting White Womanhood by exposing that Black women, too, were lynched (Feimster 2009). Wells and other anti-lynching activists also worked to turn the purposes of the photographs and postcards of beaten, burned, and tortured lynched Black bodies that were used to demean, dehumanize, and trivialize Black people on their head, instead using such photographic evidence to stir the moral conscience of policymakers, politicians, and citizens who might feel forced to protest such violence when pushed to encounter it directly. In the end, despite the efforts of Wells and the NAACP in exposing the many horrors of lynching to policymakers and politicians, the U.S. Congress and Senate never passed the Dyer Anti-Lynching Bill, and the protection of White Womanhood and the preservation of White manhood have remained dominant features of American life (Raiford 2011).

THE UNABASHED ROLE OF PROTECTING WHITE WOMANHOOD AND PRESERVING WHITE MANHOOD IN THE EMMETT TILL MURDER TRIAL

Numerous scholars have explored the racial and gendered dynamics involved in the murder of Till and in the trial of Milam and Bryant. For example, in his book *A Death in the Delta*, historian Stephen Whitfield (1988) offers a compelling historical account of the gendered racism that motivated the murder of Till, its aftermath, the trial, and the ongoing complexities and challenges that the country faced with respect to racism and intersectional racism and sexism. Similarly, in his book *Emmett Till, The Murder That Shocked the World and Propelled the Civil Rights Movement*, Devery Anderson (2015) offers a thorough and comprehensive account of the murder of Till, its trials, and the FBI's renewed investigation of the murder during the 2000s; in so doing, he also explores the racial and gendered dimensions of the Till murder and trial. Most recently, in his book *The Blood of Emmett Till*, Timothy Tyson (2017) relays a provocative narrative about the Till murder and trial, one in which he reveals through Carolyn Bryant's own words that she lied during parts of her testimony, specifically that she lied when she claimed that Till grabbed her around the waist and shouted obscenities at her.

In this part of the essay, I build on the analyses of these scholars by using Multidimensional Masculinities Theory to better understand how race, class, and gender shaped Milam and Bryant's understanding of themselves as White men in Mississippi in 1955 as well as how they framed the two White men's performance of their race and masculinity as they kidnapped, tortured, and murdered Till. In so doing, I expose how White women have been used as pawns in White men's masculinity contests—contests engaged in as a means of preserving the racialized and gendered hierarchy in the United States—through the use of the excuse of protecting White womanhood from Black male threats; more so, I relay how the trope of protecting White womanhood was employed in the Till trial as a means of bolstering not just white supremacy, but more so, White male supremacy.

The Murder of Emmett Till and Its Precursors

On August 31, 1955, three days after J.W. Milam and Roy Bryant had kidnapped fourteen-old Emmett Till from his grand-uncle's home in Leflore County, Mississippi,

"Robert" Hodges, a young White male, discovered a disfigured and maimed body floating in the Tallahatchie River. Mississippi Delta residents knew that the body was Till's and that the murder had been committed by Milam and Bryant. After all, Milam and Bryant had admitted to kidnapping Till to bring him to Carolyn Bryant so she could tell them whether he was the boy whom she claimed accosted and assaulted her at one of their family's grocery stores, and Till had been missing since Milam and Bryant had kidnapped him. Despite this common knowledge, Milam and Bryant repeatedly denied harming and then murdering Till. Although the two men openly admitted to kidnapping the boy, they insisted that they released Till so he could walk home on his own.

There are many conflicting accounts about the events that purportedly motivated Milam and Bryant to kidnap and later murder Till. Indeed, there are even conflicting accounts about whether Till went into the store that Carolyn Bryant was working at on a dare from older boys whose respect and admiration he was trying to win over. Whether Till went in on a dare or not, the undisputed facts indicate that Till was trying to impress the other boys around him with stories and actions that could bolster their perceptions of his "manhood," including by showing the boys a picture of a white woman in his wallet (Anderson 2016).

In addition to different stories about the reasons for Till's entry into the store, there are differing accounts about what Till did once he was in the Bryant grocery store. At trial, Carolyn Bryant claimed that Till seized her hand as she held out her own hand to get money from him, that he asked her for a date, and that he then asked her whether she could "take it" (U.S. Federal Bureau of Investigation (FBI) Prosecutive Report 2006, pp. 40-41). She further testified that Till whistled at her and that she, frightened by Till's actions, ran out the store's front door to get her gun. Yet, according to the cousins and friends who had accompanied Till to Bryant's Grocery and Meat Market on that fated night, nothing unusual happened inside the grocery store that night. According to these young boys, no remarkable event took place until after Till had already left the store. They explained that Till was in the store for too short a period for Carolyn Bryant to be telling the truth. One witness declared that he witnessed Till buy his bubble gum without anything noteworthy occurring; others asserted that no remarkable event could have occurred inside the store because Till and his cousin "walked out [of the store] calmly" and did not appear "rushed" (U.S. FBI Prosecutive Report 2006, p. 43). While some witnesses told the FBI that Till had shown them a wallet-sized picture of a White woman and was dared by others to speak to Carolyn Bryant, all of the boys were adamant that Till never flirted, accosted, or assaulted Carolyn Bryant. One of the boys even questioned whether Carolyn Bryant would have held her hand out to get Till's money as she described because she, like most Whites, would have avoided any possibility of touching Till or having Till touch her. This particular witness explained that Carolyn Bryant always made a point of avoiding contact with Blacks, stating: "[W]hen you'd buy somethin', you know, she'd drop the money in your hand and she never would touch your hand or nothin', you know . . . She would never allow you to touch her hand" (U.S. FBI Prosecutive Report 2006, pp. 42-45).² In 2017, Carolyn Bryant finally admitted that the young boys were telling the truth in this regard (Tyson 2017).

Although none of the boys saw Till come onto or assault Carolyn Bryant and although, as we now know from Carolyn Bryant herself, Till never touched or accosted Carolyn Bryant, many of the boys stated that Till whistled as he exited the store. Maurice Wright, a cousin of Till, told reporters that Till, who had a speech impediment, "made a whistling sound when he got stuck on a word"

(Till-Mobley and Benson, 2003, p. 122). Noting that she had told Till to simply whistle when was having a hard time saying a word, Till-Mobley noted that the word "[b]ubble gum' would have given [Till] as much trouble in Money as the phrase 'Moon Pie' had once given him" (Till-Mobley and Benson, 2003, p. 122). One FBI witness asserted that "Till was whistling at a bad move by the checker player" (U.S. FBI Prosecutive Report 2006, p. 44). In his book *Simeon's Story: An Eyewitness Account of the Kidnapping of Emmett Till*, Simeon Wright, another cousin of Till, indicated that Till, who "was always joking around" and playing the clown to impress his new friends, whistled at Carolyn Bryant when she came out of the store to "get a laugh out of us or something" (Wright 2010, p. 51). Regardless of Till's intentions when he whistled, "[e]veryone knew Till's whistling was trouble so they ran for their car and left Money, Mississippi and went home to Moses Wright's house" (U.S. FBI Prosecutive Report 2006, p. 43).

Once the boys were in the car, Till begged everyone not to relay the incident, including his whistle, to his great-uncle Preacher Wright, and the boys never told Preacher Wright about the incident. Sadly, the boys' decision to keep Till's secret proved to be fatal for Till. For, as Simeon Wright later explained, "[i]f he had told Dad, [Preacher Wright" would have done one of two things: either he would have taken Bobo [Till] back to the store and made him apologize to Mrs. Bryant or he would have sent Bobo home as soon as possible. Either way, perhaps Bobo would be alive today" (Wright 2010, p. 52).

On August 28, 1955, despite pleas from Preacher Wright and his wife Elizabeth to let Till go in exchange for money, Milam and Bryant forcibly took Till from the Wrights' home. Milam and Bryant then gathered other White men, plus a couple of Black men who worked for Milam and who likely felt pressured to go along because they feared losing their jobs and feared Milam himself, to beat and maim Till before they eventually shot him, used barbed wire to tie a 74-pound gin fan to his neck, and rolled him into the Tallahatchie River.

Masculinities and the Trope of Protecting White Womanhood in the Emmett Till Case

Given the social mores that strongly prohibited even the mere suggestion of intimacy between Whites and Blacks—in this case, a White woman and a Black male child—Roy Bryant undoubtedly was offended and felt affronted as a result of the rumors about Till's whistling at his wife (Anderson 2016; Whitfield 1988). The fact that rumors about the alleged interaction between Till and Carolyn Bryant had spread across the community certainly heightened Bryant's desire to seek revenge and prove his manliness by defending his wife's honor and his honor as her "possessor" and as a White man. In other words, rumors about Till's stepping out of his place as a Black person by allegedly whistling at Carolyn Bryant intensified Bryant's need to engage in a "masculinity contest" with Till, even as Till was just a child, because unwritten Jim Crow custom dictated that he denigrate Till, "a contrast figure," in order to maintain and, indeed, enhance other White men's view of him (Cooper 2010, 2009). In essence, as Multidimensional Masculinities Theory reveals, Bryant, as a White man and particularly as a White man who was part of the working poor, felt compelled to prove to other White men, including his cousin Milam, who was known for keeping Blacks in their place, that he was sufficiently masculine. In fact, Bryant's desire to avenge his honor and restore his manliness was so strong that once Bryant was arrested, Milam made sure to get arrested, too, because he was worried that Bryant would not be able to "stick to the story" and would "run[] his mouth" and brag about the killing (U.S. FBI Prosecutive Report 2006, p. 91).

Moreover, the fact that Blacks in town had heard the rumor made it such that Bryant "needed," in the eyes of many White men and particularly in the eyes of his cousin Milam, to avenge the insult to his honor, along with his wife's honor (Cooper 2009, 2010; Onwuachi-Willig 2017; Whitfield 1988). Again, as Multidimensional Masculinities Theory suggests, Bryant must have felt the need to dominate contrast figures—here, Till and other Black males—in order to remind all Blacks of their subordinated position; to communicate to Blacks what he viewed as his and other Whites' racial superiority; to reinforce the understanding that White women belonged to White men and that Black men could not have White women; to make it clear to not just Till, but all other men, that Carolyn Bryant belonged to him; and to show other White men that he, like Milam, could keep Blacks in their proper place (Onwuachi-Willig 2017; Whitfield 1988). Indeed, as Milam's confession to journalist Bradford Huie (which included repeated expressions of anger at alleged suggestions by Till that he was good as any White man was) showed, both he and Bryant particularly wanted to punish Till for what they viewed as his consistent disrespect to them as "superior" White men (Cooper 2009; Onwuachi-Willig 2017). For instance, Milam expressed to Huie his anger about Till's failure to address him with "Yes, Sir" or "No, Sir" responses. After all, such responses and the deference they communicated were one of the few signs of "respect" that both Milam and Bryant received as part of the White working poor (Onwuachi-Willig 2017). In explaining Milam's resentment of Till's informal responses to him, Huie wrote:

Big Milam shined the light in Bobo's [Till's] face, said: "You the nigger who did the talking?"

"Yeah," Bobo replied.

Milam: "Don't say, 'Yeah' to me: I'll blow your head off. Get your clothes on" (Huie 1956).

Moreover, Milam proclaimed the following as he spoke of Till's alleged insistence that he was as good as Milam and Bryant were: "We were never able to scare him [Till]. They had just filled him so full of that poison that he was hopeless" (Huie 1956). In the end, Milam explained that he finally pulled the trigger to kill Till after Till demeaned his manhood and his sense of racial superiority by responding positively to the question, "You still as good as I am?" (Huie 1956; Onwuachi-Willig 2017; Whitfield 1988).

In short, by Mississippi "custom," Bryant "had" to take some action against Till to save face, prove his manliness, and preserve his precarious position as one of the White working poor in Mississippi's strict race, class, and gender hierarchy. This need, at least in Bryant and Milam's eyes, was all the more important because of the change in the racial hierarchy that many White Mississippians worried *Brown v. Board of Education*, which was decided just months before Till's death, would bring (Onwuachi-Willig 2017; Whitfield 1988). In the end, as a poor White man, Bryant's vengeance was just as much about maintaining the "psychological wage" of Whiteness that he and other poor White men clung onto as a means of uplifting their racial self-esteem as it was about bolstering his own masculine self-esteem (Cooper 2010, 2009; Du Bois [1935]1998, p. 700; Harris 1993).

During the next month, from September 19, 1955 to September 23, 1955, the state of Mississippi tried both Milam and Bryant on one count of murder each for Till's death. Although the State of Mississippi had also initially charged the two men

with kidnapping, it later decided to drop that charge (despite the fact that Milam and Bryant had already admitted to forcibly removing the boy from his uncle's home). Furthermore, although Blacks represented more than 63% of the residents in Tallahatchie County, the county in which the trial occurred, no Blacks were eligible to serve on the jury because service on a jury depended upon eligibility to vote, and no Blacks were registered to vote in that county. In fact, "none of the residents [of Tallahatchie County] could remember any blacks registered to vote there since the turn of the century" (Whitfield 1988, p. 35). Indeed, as other murders within Mississippi suggested, Tallahatchie County was no different than any other Mississippi county in this regard. For instance, the FBI's 2006 investigative report of the Till murder indicates that, just months before Till's death on May 7, 1955, a Black minister named Willie George Washington was shot to death in neighboring Humphreys County because he became the first African American to register to vote in that county. Similarly, Till's cousin Simeon spoke of how an African American man named Lamar Smith had been gunned down in Brookhaven, Mississippi, just a week before Till came to visit the Wrights because Smith had been trying to register Black residents to vote in that town. Simeon vividly noted, "As he [Smith] lay dying, he was still clutching some election leaflets in his hands. Smith refused to knuckle under or to be intimidated by the white mobs who threatened him" (Wright 2010, p. 10).

During the murder trial against Milam and Bryant, counsel for Milam and Bryant primarily relied on the defense that the prosecution could not prove that the discovered body was in fact the body of Till. Still, as one ploy for obtaining acquittals for their clients, defense counsel also invoked, as an emotional defense, the excuse of protecting White womanhood, and specifically protecting the womanhood of Carolyn Bryant. Defense counsel accomplished this task primarily through Carolyn Bryant's testimony. Although the prosecution objected to the admission of Carolyn Bryant's testimony and Judge Curtis Swango, Jr. excluded her testimony on the ground that it was irrelevant, Judge Swango allowed defense counsel to actually proffer Carolyn Bryant's testimony as a means of preserving the record, and her testimony occurred in open court before a packed courtroom. In the end, although Carolyn Bryant's testimony was never officially put before the jury in the case, there is no reason to think that those who heard her sensationalized testimony in open court did not tell the twelve, White male jurors, who were never sequestered during the trial, about it (Whitfield 1988).

Defense counsel's tactic of invoking the protection of White womanhood as an unofficial defense to the murder proved to be a brilliant strategic move on their part, as most White Mississippians, particularly men, understood how the social norms of Mississippi society "required" Bryant to take some action in defense of his wife, his property, and his honor. Even more so, they were ready to reward Milam and Bryant for fulfilling their role as White male protectors of "their" woman—in this case, Carolyn Bryant.

In invoking the "defense" of protecting White womanhood at trial, defense counsel first began by creating an image of Carolyn Bryant as a young, delicate, and beautiful White woman—a loving mother who was responsible for carrying on the race. Most of all, they painted a picture of Carolyn Bryant as a White mother who was in need of protection by a White man, despite the fact that she was the one passing by the boys to get the gun out of her car on the night of Till's alleged transgressions towards her (U.S. FBI Prosecutive Report 2006; Whitfield 1988). Defense counsel began to create this image of Carolyn Bryant as a delicate White mother and wife by first posing questions that highlighted Carolyn Bryant's small stature, a stature that reinforced the notion that she would need a big, strong,

White man to protect her. This colloquy between Carolyn Bryant and one defense attorney, C. Sidney Carlton, was as follows:

MR. CARLTON

What is your name, please, ma'am?

MRS. ROY BRYANT

Mrs. Roy Bryant.

MR. CARLTON

You are the wife of one of the defendants in this case, the defendant Roy Bryant, is that right?

MRS. ROY BRYANT

Yes, sir.

MR. CARLTON

How old are you, Mrs. Bryant?

MRS. ROY BRYANT

Twenty one.

MR. CARLTON

And how tall are you?

MRS. ROY BRYANT

Five feet, two inches.

MR. CARLTON

How much do you weigh, Mrs. Bryant?

MRS. ROY BRYANT

One hundred and three pounds.

MR. CARLTON

Do you have any children?

MRS. ROY BRYANT

Yes.

(U.S. FBI Prosecutive Report 2006, p. 258).

Thereafter, Milam and Bryant's defense attorneys worked to set the background for that night to show why the protection of White Womanhood was particularly salient on the night that Till purchased his bubble gum from the Bryants' grocery store. Specifically, they had Carolyn Bryant testify about how she was alone in the store that night, with only her sister-in-law, the sister-in-law's two children, and her own two children above in the store apartment. When asked later about "the reason for Mrs. Milam and the children being there with [her]," Carolyn Bryant responded, "So I wouldn't be alone" (U.S. FBI Prosecutive Report 2006, p. 276). With this response, Carolyn Bryant not only shored up an image of a scene where a delicate White woman

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would need protection; she also implicitly revealed that her husband, who was on trial for murder, was a good White male protector. After all, he, knowing that he would be out of town, had made appropriate arrangements to ensure that his wife would not be completely alone with their children on that evening. Carolyn Bryant also proffered testimony about how the incident occurred at night, a setting that reinforced the sense that there were dangerous elements, specifically Black male "criminals," around her. Indeed, that colloquy proceeded in the following manner:

MR. CARLTON

Mrs. Bryant, on Wednesday evening or Wednesday night, the 24th day of August, 1955, did anyone—who was in the store with you that night?

MRS. ROY BRYANT

No one.

MR. CARLTON

You were alone in the store at that time?

MRS. ROY BRYANT

Yes.

MR. CARLTON

Was there anyone in the living quarters at the rear of the store? . . . Who was back there?

MRS. ROY BRYANT

Mrs. Milam and her two children and also our two children.

MR. CARLTON

Did any incident occur in that store on that evening which made an impression on you?

MRS. ROY BRYANT

Yes.

MR. CARLTON

And what time of the evening was that?

MRS. ROY BRYANT

Was that before or after dark?

MR. CARLTON

After dark.

(U.S. FBI Prosecutive Report 2006, pp. 265–266).

From there, defense counsel pushed Carolyn Bryant toward the heart of her testimony: the alleged encounter with Till during which she claimed he accosted and touched her. Carolyn Bryant began with the statement: "This nigger *man* came in the store and he stopped there at the candy case" (U.S. FBI Prosecutive Report 2006, p. 266). In so doing, Carolyn Bryant helped to create an image of Till as a

man who could do her harm, not as a child who was buying candy. Following a few questions about the setting in the store, Bryant testified about the first time that Till allegedly touched her in the store:

MRS. ROY BRYANT

I held my hand out for his money. . . . My right hand.

MR. CARLTON

Will you show the Court how you held your hand out?

MRS. ROY BRYANT

I held my hand out like this (demonstrating by holding out her hand). . . .

MR. CARLTON

And did he give you the money?

MRS. ROY BRYANT

No.

MR. CARLTON

What did he do?

MRS. ROY BRYANT

He caught my hand.

MR. CARLTON

Will you show the court just how he grasped your hand?

MRS. ROY BRYANT

Like this (demonstrating with her hand [that he purportedly grabbed all of her fingers]). . . .

MR. CARLTON

And was that a strong grip or a light grip that he had when he held your hand?

MRS. ROY BRYANT

A strong grip.

U.S. FBI Prosecutive Report 2006, p. 258).

From there, Carolyn Bryant showed, through her words, that she acted like a respectable White woman, one who would be worthy of protection, by resisting Till in every way she could. She also, in so testifying, invoked the stereotype of the Black male rapist who desires White women and who will seek to attain them at any cost. In other words, Carolyn Bryant's words functioned as verification for White jurors that Black men "were so excessively masculine as to be bestial" and that Till, despite his age, was sexually aggressive (Cooper 2009, p. 690). Continuing from the point at which Till allegedly had a strong grip on Carolyn Bryant's hand, the exchange between defense attorney Carlton and her proceeded in the following manner:

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MR. CARLTON

And will you show the Court what you did? How did you get loose?

MRS. ROY BRYANT

Well, I just jerked it loose, like this (demonstrating). . . .

MR. CARLTON

And it was with that much difficulty that you got your hand loose?

MRS. ROY BRYANT

Yes.

MR. CARLTON

Just what did he say when he grabbed your hand?

MRS. ROY BRYANT

He said, "How about a date, baby?"

MR. CARLTON

When you freed yourself, what happened then?

(U.S. FBI Prosecutive Report 2006, pp. 268–269).

At that point, Carolyn Bryant proceeded to tell Carlton, in response to question after question, that she tried to get away from Till but he "he caught [her] at the register," that he grabbed her around the waist, and that he asked "What's the matter, baby? Can't you take it?" before she was finally able to free herself. Carolyn Bryant continued by asserting that Till told her "You needn't be afraid of me" and that he used an unprintable word in propositioning her (U.S. FBI Prosecutive Report 2006, pp. 270-272).

From there, she reached her most sensational testimony, testimony that was designed to show that Till wanted to cross a line that no respectable and God-fearing Black man or boy would want to cross in Mississippi or elsewhere, and that Till had no intentions of giving up on crossing that line. This testimonial exchange read:

MR. CARLTON

Did he say anything after that one unprintable word? And what was that?

MRS. ROY BRYANT

Well, he said—well—"with white women before."

MR. CARLTON

When you were able to free yourself from him, what did you do then?

MRS. ROY BRYANT

Then this other nigger came in the store and got him by the arm.

MR. CARLTON

And what happened then?

MRS. ROY BRYANT

And then he told him to come on and let's go.

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MR. CARLTON

Did he leave the store willingly or unwillingly?

MRS. ROY BRYANT

Unwillingly.

MR. CARLTON

How did the other negro[sic] get out of the store then? How did they leave?

MRS. ROY BRYANT

He had him by the arm and led him out.

MR. CARLTON

Were there any white men in the store at the time this occurred?

MRS. ROY BRYANT

No.

MR. CARLTON

When he went out the door, did he say anything further after he made these obscene remarks?

MRS. ROY BRYANT

Yes. He turned around and said, "Good-by[sic]."

MR. CARLTON

And when he got out the door, what did you do? . . . What did you go to your car for?

MRS. ROY BRYANT

For my pistol.

MR. CARLTON

Did he say or do anything at that time?

MRS. ROY BRYANT

He whistled and then came out in the road.

(U.S. FBI Prosecutive Report 2006, pp. 270–274).

Finally, although Milam and Bryant's defense counsel did not make a comparison of Carolyn Bryant's size and Till's size immediately, they eventually brought up Till's size to contrast it with Carolyn Bryant's toward the end of her testimony. At this point, Carolyn Bryant was explaining how terrified she was, stating that she "was just scared to death" (U.S. FBI Prosecutive Report 2006, p. 275). By asking questions that reminded others of Till's comparatively bigger size to Carolyn Bryant, the defense attorneys readily invoked the stereotype of the dangerous and threatening Black man, despite the fact that Till was just a child, a mere fourteen years old. This trial interaction between Carlton and Carolyn Bryant continued in this manner:

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MR. CARLTON

Tell us what size *man* he was.

MRS. ROY BRYANT

He was about five feet, six inches tall.

MR. CARLTON

And that is about four inches taller than you are, right?

MRS. ROY BRYANT

Yes.

MR. CARLTON

And how much would you say he weighed?

MRS. ROY BRYANT

Around one hundred and fifty pounds.

(U.S. FBI Prosecutive Report 2006, p. 274).

By bringing forth this testimony about Till's size, defense counsel actually pushed the jury and other spectators toward forgetting that Till was just a child. Till's size, coupled with responses to additional questions about whether any White men were in or near the store—no, they were not—and about the number of "Negroes" outside the door—"eight or nine"—set the stage for precisely the type of scene for which White spectators could imagine a White woman especially needing White male protection.

Indeed, defense counsel ended with a question that must have been intended to relay the very reasons why the White jurors were expected to engage in jury nullification and acquit Milam and Bryant for murdering the young boy: that Till was a Northerner who represented a threat to the southern way of life. Indeed, Till, the Northerner, represented exactly the kind of Black who threatened to disrupt long-standing social norms, a Black who might openly believe and assert that Blacks and Whites actually could be intimate with one another. Carolyn Bryant's allegation that Till tried to take sexual liberties with her when there were no White men around to protect her only made the young boy appear to be a greater threat. Such questioning went as follows:

MR. CARLTON

Did he talk with a southern or northern brogue?

MRS. ROY BRYANT

The northern brogue. . . .

MR. CARLTON

Did you have any white men anywhere around there to protect you that night?

MRS. ROY BRYANT

No.

(U.S. FBI Prosecutive Report 2006, p. 276).

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In the end, after he was acquitted, Milam, one of Till's murderers, made it clear in his confession in a 1956 *Look* magazine article (for which he was paid a large sum of money) that the purported protection of White women was the driving force behind his actions. He proudly proclaimed:

What else could I do? . . . I like niggers—in their place—I know how to work 'em. But I just decided it was time a few people got put on notice. As long as I live and can do anything about it, niggers gonna stay in their place. Niggers ain't gonna vote where I live. If they did, they'd control the government. They ain't gonna go to school with my kids. And when a nigger gets close to mentioning sex with a white woman, he's tired o' livin'. I'm likely to kill him. Me and my folks fought for this country, and we got some rights. I stood there in that shed and listened to that nigger [Till] throw that poison at me [Till's alleged talking back], and I just made up my mind. 'Chicago boy,' I said, 'I'm tired of 'em sending your kind down here to stir up trouble. Goddam you, I'm going to make an example of you—just so everybody can know how me and my folks stand" (Huie 1956, emphasis added).

Similarly, the 1956 *Look* magazine article revealed how Milam and Bryant viewed their actions as protecting the Southern way of life, for which racial segregation among the Black men and White women was key, and exposed how both men viewed Till as a representation of a threat to their "rights" and their way of life. It is worth noting that Till's murder occurred under exactly the types of circumstances that sociologist Oliver Cox (1945) explained formed the background for lynching activity in his seminal article entitled *Lynching and the Status Quo*: under a "growing belief among whites in the community that Negroes are getting out of hand—in wealth, in racial independence, in attitudes of self-assertion especially as workers; or in reliance upon the law" (1945, p. 577). In this instance, the slaying of Till and the trial against Milam and Bryant took place approximately a year after the U.S. Supreme Court issued its decision in *Brown v. Board of Education*, a decision from which many White Mississippians were still reeling and actively resisting as the ultimate threat to their segregated way of life (Whitfield 1988; Onwuachi-Willig 2017).

TRAYVON MARTIN AND THE HIDDEN FUNCTION OF PROTECTING WHITE WOMANHOOD IN A PURPORTEDLY POST-RACIAL ERA

Because Martin was killed just six years ago in 2012, fewer scholars have analyzed his killing and the trial of Zimmerman in academic literature. The few who have written about the case have focused on the racism underlying both Martin's death and Zimmerman's acquittal, and to the extent they have centered on the racialized and gendered aspects of the case, they have focused on the way in which race and gender generally function together to label Black males as criminally dangerous. For instance, in her article *Vulnerability's Ambivalent Political Life: Trayvon Martin and the Racialized and Gendered Politics of Protection*, Professor Katie Oliviero (2016) examines "how sociolegal frameworks such as stand-your-ground laws combine with racialized and gendered presumptions of violence to acknowledge some forms of precarity and write others out of existence" (p. 3). In so doing, she explains "how racialized and gendered discourses of threat" function along with Stand Your Ground laws and "handgun availability" to "ensure that when white shooters kill Black individuals, juries [will be] four times more likely to view their actions as permissible than if the victim were white" (Oliviero 2016, p. 10). Similarly, in his article *The Legal Murder of Trayvon Martin and New York*

City Stop-and-Frisk Law: America's War Against Black Males Rages On, sociologist Owen Brown, Jr. (2013) analyzed the Martin killing and trial as evidence of the demonization and labeling of Black men as "inherently violent and dangerous" (p. 258). The only scholar to explicitly center on racialized and gendered dimensions of the Martin case is Professor Camille Gear Rich (2014), who paid homage to a seminal work of Professor Angela Harris by employing Harris's insights on masculinity to explore the ways in which Martin and Zimmerman performed their identities as men, including as men of color, during their encounter and to expound upon her theory of "marginal whiteness" through an analysis of Zimmerman's rejection of "his role as a Latino in the socially constructed racial hierarchy" (pp. 1047). Even Gear Rich, however, does not examine the Martin case against the backdrop of the excuse of protecting White womanhood (and thus White manhood), either historically or currently. Additionally, she reads Martin's action in a way that is not in line with the actual facts. Specifically, she argues that Martin's actions were rooted in "his own rebellious version of masculinity" because he chose not to run even when counseled by his female friend, Rachel Jeantel; yet, Martin did indeed follow the advice of Jeantel by running from Zimmerman, who ignored the directives of the 911 operator and chased after Martin (CNN Trayvon Martin Shooting Fast Facts 2016).

In this part of the essay, I build on the insights of these past scholarly works by detailing how Zimmerman's desire to win the respect of others in his neighborhood and to overcome both his disfavored status as a renter and Latino led him to volunteer to serve as a White male protector of the community through the role of neighborhood watch captain. In so doing, I also explicate how these desires by Zimmerman created the context in which he regularly denigrated contrast figures—specifically, Black males—and in which he chased after and confronted Martin, as well as the context in which he ultimately shot and killed Martin in preservation of his adopted "White" masculine self-esteem as soon as he perceived he was losing the fight between them. Also, I note how Zimmerman may have been operating under a new masculine anxiety for White men because of the ways that White womanhood had been expanded to include not only a specific woman in a family or in one's home, but all White women in communities like the Retreat at Twin Lakes. This shift, coupled with the increased obstacles in reining in both Black men and White women due to the civil rights and women's rights movements, may make White men feel like they are being assailed from both sides, thus making White masculinity more fragile.

The Killing of Martin and Its Precursors

Soon after turning seventeen in February of 2012, Trayvon Martin travelled from Miami Gardens, Florida, to visit and stay with his father, Tracy Martin, at the townhome of Tracy's then-girlfriend Brandy Green in the Retreat at Twin Lakes neighborhood in Sanford, Florida (Bloom 2014). Martin's father had brought him to Sanford to prevent the teenager, who had been suspended for having a baggie with marijuana residue, from using his time away on suspension unproductively by simply hanging out with friends in Miami. That night, while Tracy Martin and Brandy Green went on a dinner date, Martin and Green's fourteen-year-old son, Chad Joseph, stayed at Green's townhome (Bloom 2014; Onwuachi-Willig 2017).

At approximately 7:15 p.m. on February 26, 2012, Martin was walking from the local 7-11 to Green's home in the Retreat at Twin Lakes, the gated community where both Green and Zimmerman rented townhomes. Because of the rain that night, Martin decided to put on the hood of his black hoodie as he walked back to Green's home and talked to his friend Rachael Jeantel on the phone (Botelho 2012).

At the same time, Zimmerman, who had volunteered to serve as captain of the gated subdivision's neighborhood watch program, was driving to Target in his car (Kuruvilla 2013). Although Zimmerman had taken a four-month course at the local's sheriff's department, stating "I hold law enforcement officers in the highest regard" in his application, Zimmerman had not yet achieved his goal of becoming a police officer (Jonsson 2012). Indeed, Zimmerman had not only previously lost a job as a security guard for being too aggressive; he also had previously been rejected for a police officer job that he applied for in the Prince William County Police Department (Lysiak and Kennedy, 2012; Winter et al., 2013). In the Retreat at Twin Lakes neighborhood, however, Zimmerman was able to take on his desired role of serving and protecting those whom he saw as belonging to his community when he helped to initiate a neighborhood watch program and then volunteered to serve as the program's captain (Onwuachi-Willig 2017). To form the neighborhood watch program, Zimmerman and his collaborators worked with the Sanford Police Department, and they set up the program precisely because many of the neighborhood's White residents had grown nervous about the spate of burglaries and break-ins that were occurring after the downturn in the economy, a downturn which resulted in the value of the townhomes in the Retreat at Twin Lakes dropping from \$250,000 to less than \$100,000 and that had led to the vacancy of many townhomes due to foreclosures and moves from the neighborhood (Onwuachi-Willig 2017). In fact, some neighbors had become so distressed about the break-ins that they spoke of responding violently to any possible intruders. As one resident explained, "People were freaked out. It wasn't just George calling the police . . . we were calling police at least once a week" (Francescani 2012). The resident further asserted:

There was definitely a sense of fear in the neighborhood after all of this started happening, and it just kept on happening. It wasn't just a one-time thing. It was every week Our next-door neighbor actually said if someone came into his yard he would shoot him. If someone came into his house he would shoot him. Everyone felt afraid and scared (Francescani 2012).

Just like Milam and Bryant whose working poor class status placed them in "penalty status," "the condition of already having something about [their] identity that makes [their] masculinity suspect," Zimmerman, too, was in penalty status at the Retreat at Twin Lakes because of his status as a renter and as someone who was part-Latino because the Retreat at Twin Lakes community had become increasingly hostile to the increasing numbers of renters and people of color in the community (Cooper 2010, p. 22; Onwuachi-Willig 2017). In a period of rapidly declining home values and rising crime rates, White residents in the neighborhood began to see people of color, especially Black men and boys, and renters as the source of the problem, even though only two of the neighborhood's reported 44 burglaries, attempted break-ins, and suspected break-ins were confirmed to have involved either Black men or boys (Bloom 2014; Onwuachi-Willig 2017). As a result, Zimmerman had extra incentive to reinforce his masculine self-esteem by trying to live up to "the idealized masculinity" of a "heterosexual, white, and upper-middle-class" man by placing himself in the role of neighborhood watch captain (Cooper 2010, p. 22). By doing so, Zimmerman took on the role of White male protector, performing his identity in ways that made him—that even would have made a Black man—an honorary White (Carbado and Gulati 2013; McGinley and Cooper 2013; Onwuachi-Willig 2017; Rich 2014). Additionally, as a man in penalty status who thus needed to engage in "compensatory subordination,"

Zimmerman frequently engaged in actions that denigrated contrast figures (Cooper 2010). For instance, Zimmerman, whose frequent calls to 911 previously centered only on incidents like troublesome dogs in the neighborhood, began to make regular calls to 911 about suspicious persons in the area, with every single one of those suspicious persons being Black and male (Onwuachi-Willig 2017). Indeed, Zimmerman, who claimed to know everyone in the neighborhood, made routine calls about Black men and boys in the neighborhood, including those who lived in the Retreat at Twin Lakes. For example, on April 22, 2011, Zimmerman called the police to simply report the presence of an elementary school "black male about '7-9' years old, four feet tall, with a 'skinny build' and short black hair" within the neighborhood (Matthew DeLuca 2012).

Moreover, on the night of the killing, Zimmerman, who was on prescribed medications for anxiety and insomnia, had his own reasons for feeling anxious on the day of the killing. Just the night before, his wife Shellie had left him following a big fight, which itself may have chipped away at Zimmerman's sense of manliness. On the night that Zimmerman killed Martin, his wife Shellie was staying at her parents' house (Kuruvilla 2013). Indeed, one of the first things that Zimmerman did after the shooting and killing Martin was ask a witness, Joe Manalo, to call his wife Shellie to tell her he "[j]ust shot someone" (Chiaramonte 2013).

That night, when Zimmerman first spotted Martin in the rain, he called 911 to report Martin as a suspicious person. The exchange between Zimmerman and the 911 operator proceeded in relevant part:

Zimmerman: Hey, we've had some break-ins in my neighborhood, and there's a real suspicious guy—it's Retreat View Circle. The best address I can give you is 111 Retreat View Circle. This guy looks like he's up to no good, or he's on drugs or something. It's raining and he's just walking around, looking about.

Dispatcher: Okay, and this guy is he White, Black, or Hispanic?

Zimmerman: He looks Black.

Dispatcher: Did you see what he was wearing?

Zimmerman: Yeah. A dark hoodie, like a grey hoodie, and either jeans or sweat-pants and white tennis shoes. He's [unintelligible] he was just staring....

Dispatcher: Okay, he's just walking around the area....

Zimmerman: ...looking at all the houses (Zehnder 2012).

After discovering that Zimmerman, a stranger, was staring at him, Martin, a guest in the gated community, told his friend Jeantel that a "creepy ass cracker" was looking at him and following him (Sloane and Winch, 2013). Soon thereafter, Martin told his friend Jeantel that he was going to try to lose the strange man during his walk home (Politan and Baldwin, 2013). Worried that the unknown man—Zimmerman—could be a rapist, Jeantel told Martin to run, and Martin began to run away from Zimmerman.

At that point, Zimmerman told the 911 operator that Martin was running. The 911 operator responded, "He's running? Which way is he running?" and then the following colloquy took place:

Zimmerman: Down towards the other entrance to the neighborhood.

Dispatcher: Which entrance is that that he's heading towards?

Zimmerman: The back entrance . . . fucking [coons/goons/punks—Unclear].

Because Zimmerman began to breathe heavily, the 911 operator realized that Zimmerman was running after Martin, so he asked Zimmerman whether he was following Martin. The exchange between Zimmerman and the 911 operator went as follows:

Dispatcher: [Hearing heavy breathing by Zimmerman] Are you following him?

Zimmerman: Yeah.

Dispatcher: Okay, we don't need you to do that (Zehnder 2012).

Despite being instructed by the 911 operator to not run after Martin, Zimmerman, who was carrying his gun, continued to chase Martin. Additionally, although Wendy Dorival, the neighborhood watch liaison for the Sanford Police, had previously instructed Zimmerman and other neighborhood watch volunteers not to carry any guns and to not to act as "vigilantes" by taking action into their own hands when surveilling the neighborhood, Zimmerman also failed to comply with those directives, bringing a gun along with him (DeGregory 2012). Zimmerman's gun likely gave him a greater sense of security that he could handle himself if his chase somehow turned into a fight, the definitive masculinity contest (Cooper 2009, 2010; DeGregory 2012). Indeed, without his gun, Zimmerman may have never even tried to chase after Martin at all (Cooper 2009, 2010).

Ultimately, Zimmerman ended up confronting Martin when Martin was just a dozen or so houses away from Green's home where he was a guest (Bloom 2014). At that time, Jeantel heard Martin ask: "Why are you following me?" Then, she heard a voice say, "What are you doing around here?" After that, Jeantel heard what she believed was another person pushing Martin to the ground and Martin's phone falling to the ground. She also heard what she described as "wet grass sounds." Then, she heard Martin screaming: "Get off! Get off!" For a short while longer, Jeantel heard arguing in the background; then, the phone line went dead (Sloane and Winch, 2013).

Only Martin and Zimmerman actually know what happened after that point, but none dispute that Zimmerman shot and killed Martin during their struggle. Martin had nothing on him but his cellphone, an Arizona watermelon juice cocktail, a bag of Skittles, \$40.15 in cash, a cigarette lighter, and some headphones (Bruce 2014). Martin laid dead in the grass, several feet from the concrete sidewalk that Zimmerman claimed Martin was banging his head on before he shot and killed Martin (Bloom 2014).

Like in the Till case, Zimmerman was prosecuted by the State for the death he caused—in this case, Zimmerman was charged with second-degree murder for Martin's death. Unlike in the Till case, where defense counsel unabashedly relied on the notion of protecting White womanhood to help free their clients, Zimmerman's defense attorneys utilized the concept in a more subtle way, and they did so only at the very end of the trial. Because no White woman played any role in the interaction between Martin and Zimmerman, the role of the protection of White womanhood was, to many, an unexpected tactic used by the defense.

But after several weeks of trial, Zimmerman's defense counsel Mark O'Mara introduced this notion of protecting White womanhood through the testimony of Olivia Bertalan, a White woman who had lived in Zimmerman's neighborhood and whose house had been broken into by two Black teenagers when she was home alone with her nine-month-old baby son two years prior. That this testimony by Bertalan was even admitted at trial is strange given that the only connection between the robbers of Bertalan's home and Trayvon Martin was that they were all Black teenagers, and nothing more (Bloom 2014).

Furthermore, that this key testimony from Bertalan concerned an invasion into the sacred space of the home had important gendered dimensions to it. As legal scholar Jeannie Suk has explained, the "true' man rhetoric [of self-defense law] . . . importantly valorized the man's role as protector of his home and his family" as well as defined the woman as the subordinate to be protected, at all costs, by that man within the home. More so, as Frank Rudy Cooper has detailed, "[e]mpirical research demonstrates that men are more likely to enter masculinity contests when confronted in their home" (Cooper 2010). Although the struggle between Zimmerman and Martin did not occur inside Zimmerman's actual home, it occurred within a "home of sorts" for Zimmerman. With the expansion of selfdefense law, and particularly the Castle doctrine in Florida, the home is no longer the only place where a man had no a duty to retreat. That space of no retreat has now been expanded to include "premises near the home and to the general public space" (Suk 2008, pp. 244–265), an expansion that likely increases the anxiety that expected protectors may feel because it increases their "responsibility" and makes it harder for them to fulfill their idealized form of masculinity. In the narrative that Zimmerman's defense attorneys presented to the jury through Bertalan, Zimmerman served as the "White" male protector for the expanded home of the Retreat at Twin Lakes neighborhood (McGinley and Cooper 2013).

Looking at the trial testimony of Bertalan, it is important to note that her testimony eerily followed a similar trajectory to the testimony of Carolyn Bryant in the trial against her husband for Till's murder. Like Carolyn Bryant, Bertalan explained that she was home alone while her husband was away at work and, by implication, not there to protect her. Noting that she alone was taking care of her infant son, Bertalan set the frame necessary for invoking a sense of her vulnerability as a White woman without a White man present to protect her. Then, Bertalan described the actual break-in of her, stating:

I was home on a Wednesday with my son. He was, I think, nine months at the time. And I heard someone ring my doorbell repeatedly. So I went to check upstairs because I didn't have a peephole. And I saw two young African-American guys ring my doorbell repeatedly, and they kept on looking up at the window.

And I called my mom because I didn't know what to do. And they left. Then after a while I went back upstairs to check one more time. And they were walking in front of my house. One came towards my house. And I called my – I was on the phone with my mom at the time, and I started crying. And I called the police.

They broke into my house. I heard some bangs downstairs. The dispatcher told me to grab any weapon I had – because I had my son in my arms. He had woken up – and just prepare to use it if I had to. The guy was – I was locked in my son's bedroom. And he was shaking the doorknob trying to get in. And I was sitting there with a pair of rusty scissors and my son in one arm. And they – the police

came and they ended up leaving (State of Florida, Plaintiff v. George Zimmerman, Defendant, Circuit Court of the Eighteenth Judicial Circuit, Trial Testimony Excerpt of Olivia Bertalan, pp. 5–6).

Given the frightening nature of any home invasion, Bertalan's testimony was gripping, but what came next was even more critical: the identification of Zimmerman as one of Bertalan's, and more so, the neighborhood's, White male protectors. For, while Zimmerman's attorneys indicated that they put Bertalan on the witness stand to show Zimmerman's frame of mind when he followed Martin, they also put her on the stand because they desired to present another image of Zimmerman, an image of Zimmerman, not as the failed wannabe cop and an emasculated man, but rather as "the face of compassion—a neighbor of consummate graciousness and low-key gallantry" and a real man—a real White male protector of White women—who could protect his community home (Fausset 2012).

At that point, Bertalan testified about how George Zimmerman came to her house to speak with her about her experience as a victim of a break-in, gave her his phone number so she could call him for help, spoke to her about twenty times regarding the incident, and discussed with her their shared belief that one of the two Black teenagers lived near the back of the entrance to their gated community. Thereafter, Bertalan and Mark O'Mara, one of Zimmerman's defense attorneys, engaged in the following colloquy, where Bertalan expressed her great appreciation for Zimmerman's help as well as Zimmerman's desire to protect and take care of her, even through his own wife:

MR. O'MARA:

Q. When Mr. Zimmerman came to you to talk to you about having been victimized by a home invasion, did you consider that strange?

OLIVIA BERTALAN:

A. No.

MR. O'MARA:

Q. Were you appreciative of his efforts to help you out?

OLIVIA BERTALAN:

A. Very.

MR. O'MARA:

Q. Tell me about that.

OLIVIA BERTALAN:

A. We were terrified when this happened. And when we came home after – we were having car troubles, and we came home. And he was just saying that he wanted to make sure we were okay. We weren't home, my sister was, and she didn't answer the door because she was scared because what had gone on. So I was just appreciative that he was offering his hand and had told me I could spend time with his wife if I needed to go somewhere during the day because I was so afraid. . . .

MR. O'MARA:

Q. Matter of fact, did Mr. Zimmerman, after the homeowners association that started neighborhood watch, did he bring to you a lock to help you with the sliding glass door?

Angela Onwuachi-Willig

OLIVIA BERTALAN:

A. Yes, he did.

MR. O'MARA:

Q. Did you consider that weird or unusual or strange?

OLIVIA BERTALAN:

A. No. I was very appreciative.

(State of Florida, Plaintiff v. George Zimmerman, Defendant, Circuit Court of the Eighteenth Judicial Circuit, Trial Testimony Excerpt of Olivia Bertalan, pp. 16–19).

When it came time to describe the perpetrators of the crime in her home, Bertalan offered a vague description of the "persons" who had been identified as threats to the safety of the neighborhood, and thus her and Zimmerman's community home. In so doing, Bertalan specified only that the two burglars were Black, male, and young. Her exchange with O'Mara proceeded as follows:

MR. O'MARA:

Q. You described the people that you saw at your residence?

OLIVIA BERTALAN:

A. I believe so.

MR. O'MARA:

Q. You described them as two people as opposed to one?

OLIVIA BERTALAN:

A. Yes.

MR. O'MARA:

Q. As males?

OLIVIA BERTALAN:

A. Yes.

MR. O'MARA:

Q. As black?

OLIVIA BERTALAN:

A. African-American, yes.

MR. O'MARA:

Q. As teenagers?

OLIVIA BERTALAN:

A. Yes. I said they looked young.

(State of Florida, Plaintiff v. George Zimmerman, Defendant, Circuit Court of the Eighteenth Judicial Circuit, Trial Testimony Excerpt of Olivia Bertalan, pp. 16–19).

As the research of psychologists, Jennifer Eberhardt, Valerie Purdie, Phillip Atiba Goff, and Paul Davies has shown, Bertalan's mere mention of the presence of Blacks was enough to invoke the thought of criminality and violence in the jury, leading the jurors to implicitly think of Martin as dangerous and Bertalan and her community as in need of protection from such dangerous, Black, male criminals (Eberhardt, et al., 2004). Similarly, Bertalan's description of the crime reinforced perceptions of Martin as a thug—as a criminal. Again, as psychologists Eberhardt, Purdie, Goff, and Davies have explained, not only may "[t]he mere presence of a Black man . . . trigger thoughts that he is violent and criminal," just simply "thinking of crime can trigger thoughts of Black people" (Eberhardt et al., 2004, p. 687).

After Bertalan identified Blackness and maleness as the commonality between Martin and the teenagers who had previously broken into her house, defense counsel O'Mara made a point of highlighting exactly whom Zimmerman was protecting—Bertalan and other "White" members of his neighborhood—and exactly whom Zimmerman was protecting his neighbors from—dangerous, young Black men and boys. Continuing with the narrative of Zimmerman as the protector of what White residents largely perceived as a "White" neighborhood, O'Mara argued that Martin "match[ed] the description" of the alleged criminals in the neighborhood, which again consisted of just these three words: young, Black, and male. During his closing argument, O'Mara asserted:

So, in my quest to prove that [Zimmerman's] innocent beyond a reasonable doubt, he is on his way to Target and he sees somebody that was suspicious. So does he jump out of his car, and pull through his weapon, track him down, shoot him in cold blood? No. He does what he was called to do. He calls nonemergency. No big deal, not an emergency. But he did tell you of course in the statements at least, and you know because it's in those reports that at that very same house, maybe coincidentally Trayvon Martin, was burglarized a few weeks before with a window open and the door unlocked through the back. Is it inappropriate for that to become a concern to somebody who is concerned about his neighbors? . . .

So, looking at the question of whether or not my client is completely innocent, probably innocent. What did he do? He stayed on the phone. Cursed. Yes, definitely cursed and he cursed towards those people. Maybe including Trayvon Martin, by the way – at least to him, maybe – *because he did match the description*, *unfortunately*. And that's just maybe happenstance.

We'll talk more about that, too.

So, he calls it in and stays on the phone, like he's supposed to. That's what you're supposed to, describe him. Think he's black, after being asked (CNN Coverage of the George Zimmerman Trial 2013, pp. 482–84, emphasis added).

Then, in a rather astounding move, O'Mara ended his closing by explicitly invoking the stereotype of the muscle-bound Black buck. Showing jurors a photo of a shirtless (and sexualized) Martin with toned muscles, O'Mara loudly proclaimed that the photograph in his hand captured the real person whom Zimmerman encountered on the night of Martin's death, even though Martin looked nothing at all like he appeared in that photograph on the night of his altercation with Zimmerman. This move by O'Mara was important for two reasons. First, it was critical because it revealed a racial caricature of a Black man: the Black, oversexed buck; as the research of Eberhardt, Purdie, Goff, and Davies has revealed, images of "highly stereotypical Blacks [are] the most likely to trigger thoughts of crime" (Eberhardt et al., 2004, p. 688). Second,

O'Mara's use of the picture with a shirtless Martin worked to age Martin, an act which intensified the already biased way in which Black boys are viewed as "'less childlike' than their [White] peers" (Goff et al., 2014, p. 526). What O'Mara's use of the shirtless Martin did was transform Martin from the child he was—a child who was fifty pounds lighter than Zimmerman, even as he was four inches taller than Zimmerman—to a full, grown, muscled man; in essence, the image of the shirtless, toned Martin stood in stark contrast to the prosecution's picture of the baby-faced Martin (Pitts 2017). In other words, just as the defense attorneys in the Till case bolstered the image of fourteen-year-old Till, who was buying bubble gum, as a full-grown man who was not in need of protection by highlighting Till's relative weight, fifty pounds heavier, and relative height, four inches taller, when compared to Carolyn Bryant, O'Mara made efforts to paint Martin, who was both twelve years younger and fifty pounds lighter than Zimmerman, as a full-grown, adult man—in fact, as more manly than Zimmerman, whom by the time of trial, was more than 100 pounds heavier than Martin (Pitts, Jr. 2017). Specifically, O'Mara asserted the following:

Relative physical abilities. That's what you have to look at to determine in a self-defense case. . . . [A]bout two months, three months before Trayvon Martin passed away. That's what he looked like. He's a young kid, nice kid actually [said in sarcastic tone], you look at the picture, not bad.

Take a look at it. Because this is the person and this is the person that George Zimmerman encountered that night. This is the person who all of the evidence was attacked, or attacked George Zimmerman, broke his nose or something close to it. And battered him on something, and the state now may say, oh, maybe it was a – and no intent to hurt there by Trayvon Martin because it was just coincidence that he was bashing his head on something hard. It was a drain box. Really? C'mon. Really? Those injuries (CNN Coverage of the George Zimmerman Trial 2013, pp. 482–484)

In essence, O'Mara hinted, through his sarcasm, that Martin, a Black teenager with strong body tone, could not be a nice kid and that, more so, Martin had the "natural," relative advantage in physical ability against Zimmerman, even though he was much smaller than Zimmerman. Indeed, O'Mara moved from this visual of Martin as a not-so-nice kid to marking Martin, not Zimmerman, as the aggressor in their battle, even though it was Zimmerman who initiated the whole tragedy by chasing after a fearful Martin. O'Mara continued:

You know I (INAUDIBLE). You've seen this before, it was out of this darkness that Trayvon Martin decided to stalk, I guess, plan, pounce, I don't know. All I know is that when George Zimmerman is walking back to his car, out of the darkness, be it bushes or darkness or left or behind, or somewhere, Trayvon Martin came towards George Zimmerman. Out of this (CNN Coverage of the George Zimmerman Trial 2013, pp. 482–484).

Finally, O'Mara underscored the stereotype of the dangerous young Black male, drilling in the image of Martin as a threatening Black *man*, as opposed to a teenager, who could turn a sidewalk and his mere fists into deadly weapons; O'Mara also sold the image of Zimmerman as a man who simply had to defend and protect himself (and others) by shooting "the angry" Martin to kill him. In so doing, O'Mara worked to equalize in the minds of the jurors their fight—a masculinity contest—which

would have normally appear unbalanced—with Zimmerman's gun outweighing Martin's fists and with Zimmerman himself outweighing Martin. O'Mara did so by again downplaying Martin's age and by transforming the environment around Martin to turn it into Martin's weapons. Specifically, O'Mara proclaimed that Martin was not just "an unarmed teenager with nothing but skittles" and stressed that Martin's fist and the concrete sidewalk had become his potentially deadly weapons (CNN Coverage of the George Zimmerman Trial 2013, p. 495). O'Mara's statement read in relevant part:

One piece of evidence that my client attacked Trayvon Martin. Landed one blow for that matter. Did anything to justify in any form or fashion the onslaught of injury perpetrated upon him by no one other that Trayvon Martin. He actually had something else, because George Zimmerman was in fact armed with a firearm. We know that. We know he had a right to have it. And then it was said how many times was it said that Trayvon Martin was – now, I'll be held in contempt if I drop this, so I'm not going to do some drama and drop it on the floor and watch it roll around. But that's cement. That is a sidewalk. And that is not an unarmed teenager with nothing but skittles trying to get home. That was somebody who used the availability of dangerous items from his fist to the concrete to cause great bodily injury. Great bodily injury against George Zimmerman. The suggestion by the state that that's not a weapon? That that can't hurt somebody in that that can't cause great bodily injury? Is disgusting (CNN Coverage of the George Zimmerman Trial 2013, p. 495).

Thereafter, O'Mara built on the image he had created of an armed and dangerous Black *man*, not teenager, to portray Martin as an angry and menacing, Black threat who responded irrationally to a simple inquiry by Zimmerman about what Martin was doing in the neighborhood. In so doing, O'Mara again relied on racialized perceptions about place, with Zimmerman being anointed as a proper authority, the neighborhood watch captain who was questioning a strange man and who was focused on protecting those within his home community, while Martin, despite being a guest of a resident in the neighborhood, was portrayed as an out-of-place stranger who failed to respond rationally to Zimmerman, rather than the frightened teenager he actually was that night. Specifically, O'Mara declared:

Even if we presume Rachel Jeantel was completely accurate in whichever version of what she first heard happen, you want to believe, what she said was that George Zimmerman said what are you doing around here? Let's just for a moment presume that we had that on audio tape. Let's say they recorded a phone call, and you heard her voice – you heard George Zimmerman's voice on the tape that said, what are you doing around here? What did you hear Mr. Root say about that? The only expert that talks about the evolution of force tell us? Well, you say something like that? I might say, whatever I want, or who are you to ask? Or what do you mean? Or get out of my face. But Dennis Root didn't say the appropriate response is to break somebody's nose. Did he? Did he suggest that that was even near the spectrum of violence allowed, the spectrum of force allowed in a situation like that?

Unfortunately, you know, there was some anger and hostility, and ill will and spite maybe that night. It just had nothing to do with George Zimmerman – well, that's not true. It had something to do with George Zimmerman. He was the victim of it. Because you can't look at those pictures and say that what was visited upon George Zimmerman was not evidence of ill will or spite and hatred (CNN Coverage of the George Zimmerman Trial 2013, p. 495).

Highly regarded criminal defense attorney Mark Geragos noted that this narrative about Martin was critical to the defense's success and that Bertalan was one of the two most important witnesses during the trial. Geragos explained: "What was masterful by the defense is . . . [t]hey made those jurors want to help George and they - I thought that that one witness besides the detective, the one witness who talked about the black males trying to get into her house, that resonated with this jury. . . . [T]hat plays into the archetype of what, you know, I hate to say it, the kind of racial archetype of black males as predators" (Anderson Cooper 360, Interview of Zimmerman Juror B37, p. 4). In part because the jury consisted of all women, and nearly all White women at that, defense counsel's work in playing on the archetype of Black male predators proved to be particularly powerful (Brown, Jr. 2013; Eberhardt et al., 2004). This strategy by defense counsel was successful in part because it relied not only on stereotypes of dangerous Black men, but also on a trope that had survived and thrived for more than a century: the protection of White womanhood. Indeed, O'Mara, a criminal defense attorney who had frequently defended young Black men on trial, likely knew of and understood how strongly Blackness is associated with criminality and violence and how powerful and enduring the trope of protecting White womanhood from dangerous Black men is.

After the trial, in an interview with CNN's Anderson Cooper, Juror B37, a White woman, and the only White female juror to speak about the trial, revealed just how right Geragos was and, more so, just how impactful the idea of protecting White womanhood may have been to the outcome in the Zimmerman trial. In response to a question about whether she bought the tale that Zimmerman was a rogue wannabe cop, Juror B37 spoke of George Zimmerman with warmth, stating:

I think he's overeager to help people, like the lady who got broken in and robbed while her baby and her were upstairs. He came over and offered her a lock for her back sliding glass door. I mean, you have to have a heart to do that and care to help people (Anderson Cooper 360, Interview of Zimmerman Juror B37, p. 21).

Additionally, she described Zimmerman as a protector "whose heart was in the right place" and who simply got carried away in trying to shield his community home from additional harms. She specifically stated:

I think George Zimmerman is a man whose heart was in the right place, but just got displaced by the vandalism in the neighborhoods, and wanting to catch these people so badly that he went above and beyond what he really should have done. But I think his heart was in the right place. It just went terribly wrong (Linder 2013).

Indeed, Juror B37's words reveal just how much she bought into the notion of Martin as a potential threat to the community; for, she parroted back the notion that Martin's mere presence and walking in the neighborhood were suspicious. She proclaimed, "Anybody would think anybody walking down the road, stopping and turning and looking – if that's exactly what happened — is suspicious. . . ." (Linder 2013). Finally, speaking of Martin, Juror B37 described him, rather than Zimmerman, who was 12 years older than Martin, as the angry person who should have walked away and deferred to the appropriate authority figure, Zimmerman, even as she admitted that Zimmerman never should have followed Martin in the first place. She explained, "I think George got in a little bit too deep, which he shouldn't have been there. But Trayvon decided that he wasn't going to let him scare him . . . and

I think Trayvon got mad and attacked him" (Linder 2013). In other words, rather than seeing Martin as the frightened boy that he likely was that night, Juror B37 saw him more as the Black criminal whom O'Mara implied he could be and whom she had been taught, perhaps for most of her life, to fear (Brown, Jr. 2013: Eberhardt et al., 2004). She also clearly saw Zimmerman as the man whom she had been taught should protect her and the womanhood of other women like her. Indeed, this trope of protecting White womanhood had revealed its effectiveness long before it was invoked in the form of Bertalan's testimony and the narrative of O'Mara and other defense counsel at trial. For, during jury selection for the Zimmerman trial, and just days before the actual trial began, jury panel member 81, a middle-aged White housewife, had already invoked a similar defense for Zimmerman, stating: "I think George was just trying to protect his neighborhood" (Anderson Cooper 360, Interview of Zimmerman Juror B37, p. 21).

CONCLUSION

For many African Americans, Trayvon Martin became this generation's Emmett Till. This essay works to provide a partial frame for understanding why the deaths of these two Black teenagers have been linked together in so many individuals' minds. Although there are important differences between the circumstances and the actual trials of the killers in the 1955 Emmett Till case and the 2012/2013 Trayvon Martin case, there are also key similarities that center on race, racism, gender, and masculinity. One of those similarities is the way in which defense counsel for the killers in both cases invoked racial stereotypes about dangerous Black men and the trope of White women in need of protection by White men against these dangerous Black "criminals" during the two trials. To expose and explicate this shared commonality in defense counsel's deployment of the narrative of protecting White womanhood in both the Till and Martin trials, this essay relies on and applies insights from Multidimensional Masculinities Theory to the facts of each case. In so doing, it details and explains how the trope of protecting White womanhood has historically been employed as a justification for violence against Black people, particularly Black men; how manhood and manliness were constructed and displayed in both the Till and Martin killings and trials; and how the myth of needing to protect White womanhood was utilized and has continued to be utilized as an important means for preserving the power of White manhood. More so, this essay shows how the expansion of the sphere in which White men can or must protect White women has made White masculinity more fragile. Now that White womanhood has become abstracted such the protection of White women no longer lands in any one person or home, but instead lands on entire communities, particularly gated communities which "are often especially vigilant about excluding people who [are perceived as being] racially out of place," the idealized form of White masculinity has become harder to achieve (McGinley and Cooper 2013). Plain and simple, it is harder to protect the whole White community than to protect, or even rein in, one's own wife or daughters and any Black men or boys perceived as a threat to them. This reality, coupled with the intersection of race and gender civil rights, may be creating greater anxiety for White men and thus may be making White masculinity more fragile.

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NOTES

- 1. Although Milam and Bryant were acquitted, I refer to Till's killing as a murder based on Milam's confession in William Bradford Huie's article in Look Magazine in 1956 and based on the findings in the U.S. Federal Bureau of Investigation Report from 2006. See Fed. BUREAU OF INVESTIGATION, PROSECUTIVE REPORT OF INVESTIGATION CONCERNING EMMETT Louis Till et al. 89-92 (2006), http://vault.fbi.gov/Emmett%20Till%20; William Bradford Huie, The Shocking Story of Approved Killing in Mississippi, PBS: Am. Experience, http://www.pbs.org/wgbh/amex/till/sfeature/sf_look_confession.html (last accessed Jan. 19, 2017). Milam's confession made it clear that the killing of Till constituted murder. In "[m]ost state criminal statutes, and the Model Penal Code, distinguish murder from manslaughter on the basis of whether the actor intended to kill his victim" without justification or excuse, and "[a]n actor has 'intent' to kill when he either wants to kill or knows he is killing" (Michaels 1985). By Milam's own admission, he and Bryant wanted and intended to kill Till, and there is no chance that their reasons for doing so were neither justified or excused by law. Under this definition, Zimmerman's killing of Martin is not as easily classified as murder. The evidence in his case did not suggest that Zimmerman left his car with an intent to kill Martin or that Zimmerman had engaged in premeditated actions when he and Martin began their struggle. At trial, Zimmerman claimed self-defense. There, the primary issue was whether Zimmerman reasonably believed Martin's actions were going to cause him great bodily injury or death and whether Zimmerman reasonably believed that his use of physical force was necessary to defend himself from Martin. Unlike with Milam, Zimmerman never confessed to the elements of murder.
- 2. The young boys' account in this regard was later confirmed as true in 2017 when Carolyn Bryant herself finally confessed to lying about Till touching her and speaking obscenities to her (Tyson 2017).

REFERENCES

- African Globe: Black News, Politics, and Information (2013). Zimmerman Gets All Female, All White Jury. June 24 http://www.africanglobe.net/headlines/george-zimmerman-female-white-jury/ (accessed December 31, 2015).
- Alcindor, Yamiche (2013). Zimmerman Consultant Wanted All-Female Jury. *USA Today*, July 18. http://www.usatoday.com/story/news/nation/2013/07/17/zimmerman-trayvon-martin-jury-consultant-killing-sanford/2530151/ (accessed December 31, 2015).
- Allen, James, and Hilton Als, Congressman John Lewis (Foreword), and Leon Litwack (2000). Without Lynching Photography in America Sanctuary. Santa Fe, NM: Twin Palms Publisher.
- Anderson, Devery S. (2015). Emmett Till: The Murder That Shocked the World and Propelled the Civil Rights Movement. Jackson, MS: University of Mississippi Press.
- Anderson, Elijah (2013). Emmett and Trayvon: How Racial Prejudice Has Changed in America in the Last Sixty Years. *Washington Monthly*, January/February. (accessed December 31, 2015).">accessed December 31, 2015).
- Anderson Cooper, 360, CNN.COM (2013). Interview of Zimmerman Juror B37, Anderson Cooper, Jeffrey Toobin, Isha Sesay. July 16, 4.
- Tuskegee University Archives, Lynching, Whites & Negroes, 1882-1968 <archive.tuskegee.edu/archive/bitstream/handle/123456789/511/Lyching%201882%201968.pdf?sequence=1&isAllowed=y> (accessed September 3, 2018).

- Barnard, Amii Larkin (1993). The Application of Critical Race Feminism to the Anti-Lynching Movement: Black Women's Fight Against Race and Gender Ideology, 1892–1920. *UCLA Women's Law Journal*, 3(0): 1–38.
- Bloom, Lisa (2014). Suspicion Nation: The Inside Story of the Trayvon Martin Injustice and Why We Continue to Repeat It. Berkeley, CA: Counterpoint Press.
- Botelho, Greg (2012). What Happened the Night Trayvon Martin Died. CNN.Com, May 23, http://www.cnn.com/2012/05/18/justice/florida-teen-shooting-details/ (accessed December 31, 2015).
- Brown, Jr., Owen (2013). The Legal Murder of Trayvon Martin and New York City Stop-and Frisk Law: America's War Against Black Males Rages On. *Western Journal of Black Studies* 37(4): 258–269.
- Bruce, Teresa M. (2014). Terrorism Du Jour: How the Trayvon Martin Case Exposes an Endemic Regime of Fear That Keeps Black Males and Females of All Colors in a State of Subjugation. *UCLA Women's L.J.*, 21: 1–51.
- Burrell, Darci E. (1993). Myth, Stereotype, and the Rape of Black Women. *UCLA Women's Law Journal*, 4(1): 87–99.
- Carbado, Devon, and Mitu Gulati (2013). Acting White? Rethinking Race in Post-Racial America. London, England: Oxford University Press.
- Chiaramonte, Perry (2013). Witness Describes Zimmerman's Injuries, Phone Call to Wife. *FoxNews.com*, June 28. http://www.foxnews.com/us/2013/06/28/zimmerman-defense-grills-witness-for-second-day/ (accessed March 29, 2015).
- Clarke, James W. (1998) Without Fear or Shame: Lynching, Capital Punishment and the Subculture of Violence in the American South. *British Journal of Political Science*, 28(2): 269–289.
- CNN.COM (2013). CNN Coverage of the George Zimmerman Trial, Live Coverage of the George Zimmerman Trial: Don Lemon, Mark Nejame; Jeffrey Toobin, George Howell, compiled July 12, 2013, 495.
- CNN Library (2013). Trayvon Martin Shooting Fast Facts, CNN.com, February 7, 2016 http://www.cnn.com/2013/06/05/us/trayvon-martin-shooting-fast-facts (accessed September 3, 2018).
- Cooper, Frank Rudy (2010). Masculinities, Post-Racialism and the Gates Controversy: The False Equivalence Between Officer and Civilian. *Nevada Law Journal*, 11: 1–43.
- Cooper, Frank Rudy (2009). "Who's the Man?": Masculinities Studies, Terry Stops, and Police Training. Columbia Journal of Gender and Law, 18: 671–742.
- Cox, Oliver C (1945). Lynching and the Status Quo. *Journal of Negro Education*, 14(4): 576–588. Crenshaw, Kimberlé (1991). Mapping the Margins: Intersectionality, Identity Politics, and Violence Against Women of Color. *Stanford Law Review* 43(6): 1241–1299.
- Cullors, Patrisse (2018). On Trayvon's Birthday, We Remember His Life and Why We Fight for Black Lives. *NBCNews.com Think*, February 5 https://www.nbcnews.com/think/opinion/trayvon-martin-s-birthday-we-remember-his life-why-we-ncna844711> (accessed on March 28, 2018).
- DeLuca, Matthew (2012). Did Trayvon Martin Shooter Abuse 911? *Daily Beas*, March 22, 2012, http://www.thedailybeast.com/articles/2012/03/23/did-trayvon-shooter-abuse-911.html (accessed on March 26, 2018).
- DeGregory, Lane (2012). Trayvon Martin's Killing Shatters Safety Within Retreat at Twin Lakes in Sanford, *Tampa Bay Times*, Mar. 26, http://www.tampabay.com/news/humaninterest/trayvonmartins-killing-shatters-safety-within-retreat-at-twin-lakes-in/1221799 (accessed on
- Du Bois, W. E. Burghardt ([1935] 1998). Black Reconstruction In America: An Essay Toward A History Of The Part Which Black Folk Played In The Attempt To Reconstruct Democracy In America, 1860–1880. Meridian 5th edition.
- Eberhardt, Jennifer, Valerie Purdie, Phillip Atiba Goff, and Paul Davies (2004). Seeing Black: Race, Crime, and Visual Processing. *Journal of Personality and Social Psychology*, 87(6): 876–893.
- Equal Justice Initiative (2017). Lynching in America: Confronting the Legacy of Racial Terror (3rd edition).
- Fausset, Richard (2012). How Trayvon Martin Gunman Aided Neighbor After a Break-In. *Los Angeles Times*, March 28 http://articles.latimes.com/2012/mar/28/nation/la-na-nn-george-zimmerman-friend-20120328 (accessed December 31, 2015).
- Feimster, Crystal N. (2009). Southern Horrors: Women and the Politics of Race and Lynching. Cambridge, MA and London, UK: Harvard University Press.
- Francescani, Chris (2012). George Zimmerman: Prelude to a Shooting, *Reuters*, April 25 http://www.reuters.com/article/2012/04/25/us-usa-florida-shooting-zimmermanid-USBRE83O18H20120425 (accessed March 27, 2018).

- Garland, David (2005). Penal Excess and Surplus Meaning: Public Torture Lynchings in Twentieth Century America. *Law and Society Review*, 39(4): 793–834.
- Gear Rich, Camille (2014). Angela Harris and the Racial Politics of Masculinity: Trayvon Martin, George Zimmerman, and the Dilemmas of Desiring Whiteness. *California Law Review*, 102: 1027–1052.
- Goff, Phillip Atiba, and Matthew Christian Jackson, Brooke Allison Lewis Di Leone, Carmen Marie Culotta, and Natalie Ann DiTomasso (2014). The Essence of Innocence: Consequences of Dehumanizing Black Children. *Journal of Personality and Social Psychology*, 106(4): 526–545.
- Goldsby, Jacqueline (1996). The High and Low Tech of It: The Meaning of Lynching and the Death of Emmett Till. *Yale Journal of Criticism*, 9(2): 245–282.
- Hall, Anthony (2013). A Stand for Justice—Examining Why Stand Your Ground Laws Negatively Impact African Americans. Southern Regional Black Law Students Association Law Journal, 7(1): 95–112.
- Harold, Christine, and Kevin Michael DeLuca (2005). Behind the Corpse: Violent Images and the Case of Emmett Till. *Rhetoric and Public Affairs*, 8(2): 263–286.
- Harris, Cheryl (1993). Whiteness as Property. Harvard Law Review, 106(8): 1707-1791.
- Hudson-Weems, Clenora (2006). Emmett Till: The Sacrificial Lamb of the Civil Rights Movement. Bloomington, IN and Milton Keynes, UK: AuthorHouse.
- Huie, William Bradford (1956). The Shocking Story of Approved Killing in Mississippi. *Look*, January 24, http://www.pbs.org/wgbh/amex/till/sfeature/sf_look_confession.html (accessed December 31, 2015).
- Ifill, Sherrilyn A. (2003). Creating a Truth and Reconciliation Commission for Lynching. *Law and Inequality*, 21(1): 263–311.
- Johnson, Sheri Lynn (1983). Race and the Decision to Detain a Suspect. *Yale Law Journal*, 93(2): 214–258.
- Jonsson, Patrik (2012). Who Is George Zimmerman, and Why Did He Shoot Trayvon Martin? Christian Science Monitor, March 24 https://www.csmonitor.com/USA/2012/0324/Who-is-George-Zimmerman-and-why-did-he-shoot-Trayvon-Martin> (accessed March 26, 2018).
- Jordan, Emma Coleman (2000). Crossing the River of Blood Between Us: Lynching, Violence, Beauty, and the Paradox of Feminist History. *Journal of Gender, Race, and Justice* 3(1): 545–580.
- Jordan, Émma Coleman (2003). A History: Reparations for What? New York University Annual Survey of American Law, 58(4): 557–613.
- Kennedy, Randall (2003). Interracial Intimacies: Sex, Marriage, Identity, and Adoption. NewYork, NY: Vintage Books.
- Kimmel, Michael S. (1996). *Manhood in America: A Cultural History*. London, England: Oxford University Press.
- Kuruvilla, Carol (2013). George Zimmerman's Estranged Wife Speaks Out: My Ex Is a Ticking "Time-Bomb." New York Daily News, November 18 http://www.nydailynews.com/news/national/george-zimmerman-estranged-wife-speaks-ticking-time-bomb-article-1.1525912 (accessed December 31, 2015).
- Lawson, Tamara (2012). A Fresh Cut in an Old Wound—A Critical Analysis of the Trayvon Martin Killing: The Public Outcry, the Prosecutor's Discretion, and the Stand Your Ground Law. *University of Florida Journal of Law and Public Policy*, 23(2): 271–310
- Linder, Douglas O. (2013). The George Zimmerman Trial: Comments of Jurors, *Famous Trials* http://www.famous-trials.com/zimmerman1/2316-zimmermanjurycomments (accessed on March 27, 2018).
- Lysiak, Matthew, and Helen Kennedy (2012). George Zimmerman Lost Job as Party Security Guard For Being Too Aggressive, Ex-Co-Worker Says, *N.Y. Daily News*, March 29 http://www.nydailynews.com/news/national/george-zimmerman-lost-job-party-securityguard-aggressive-ex-co-worker-article-1.1053223#xzz1qc4ntlnk> (accessed March 26, 2018).
- Mayeri, Serena (2006). The Strange Career of Jane Crow: Sex Segregation and the Transformation of Anti-Discrimination Discourse. *Yale Journal of Law and Humanities*, 18(2): 187–272.
- McGinley, Ann, and Frank Rudy Cooper (2013). Identities Cubed: Perspectives on Multidimensional Masculinities Theory. *Nevada Law Journal*, 13: 326–340.
- McGinley, Ann, and Frank Rudy Cooper (2013). How Masculinities Distribute Power: The Influence of Ann Scales. *Denver University Law Review*, 91: 187–210.
- Michaels, Alan C. (1985). Defining Unintended Murder. *Columbia Law Review*, 85: 786: 811. Mutua, Athena (2013). Multidimensionality Is To Masculinities What Intersectionality Is To Feminism. *Nevada Law Journal*, 13: 341–367.
- Oh, Reginald (2007). Regulating White Desire. Wisconsin Law Review, 2007(2): 463–488.

- Oliviero, Katie (2016). Vulnerability's Ambivalent Political Life: Trayvon Martin and the Racialized and Gendered Politics of Protection. *Feminist Formations*, 28(1): 1–32.
- Onwuachi-Willig, Angela (2013). According to Our Hearts: Rhinelander v. Rhinelander and the Law of the Multiracial Family. New Haven, CT and London, England: Yale University Press.
- Onwuachi-Willig, Angela (2017). Policing the Boundaries of Whiteness: The Tragedy of Being "Out of Place" from Emmett Till to Trayvon Martin. *Iowa Law Review* 102(3) 1113–1185.
- Pitts, Jr., Leonard (2017). Trayvon Martin, Five Years Gone, Was Innocent, But America Is Anything But. *Seattle Times*, February 26 https://www.seattletimes.com/opinion/trayvon-martin-five-years-gone-was-innocent-but-america-is-anything-but/ (accessed on March 27, 2018).
- Politan, Vinnie, and Brooke Baldwin (2013). Continuing Zimmerman Trial Coverage; Trayvon Martin's Girlfriend Testifies. *CNN.COM*, June 26, 3–7.
- Pollack, Harriett, and Christopher Metress (2008). Emmett Till in Literary Memory and Imagination. Baton Rouge, LA: Louisiana State University Press.
- Raiford, Leigh (2011). Imprisoned in a Luminous Glare: Photography and the African American Freedom Struggle. Chapel Hill, NC: University of North Carolina Press.
- Russell, Margaret M. (2005). Reopening the Emmett Till Case: Lessons and Challenges for Critical Race Practice. *Fordham Law Review*, 73(5): 2101–2132.
- Russell-Brown, Katheryn (2009). *The Color of Crime*. New York City, NY and London, England: New York University Press.
- Sloane, Amanda (2013). Zimmerman Jurors All Women: Does It Matter? *HLNTV.com*, June 24 http://www.hlntv.com/article/2013/06/21/george-zimmerman-trial-female-jurors-trayvon-martin (accessed December 31, 2015).
- Sloane, Amanda and Graham Winch (2013). Key Witness Recounts Trayvon Martin's Final Phone Call. *CNN*, June 27 http://www.cnn.com/2013/06/26/justice/zimmerman-trial (accessed on November 12, 2018).
- State of Florida, Circuit Court of the Eighteenth Judicial Circuit, in and for Seminole County, Florida, Before the Honorable Debra S. Nelson, Judge of Court (2013). Plaintiff v. George Zimmerman, Defendant, Trial Testimony Excerpt of Olivia Bertalan, July 10, 2013, 16–19.
- Suk, Jeannie (2008). The True Woman: Scenes from the Law of Self-Defense. *Harvard Journal of Gender and Law*, 31(2): 237–275.
- Till-Mobley, Mamie, and Christopher Benson (2003). Death of Innocence: The Story of the Hate Crime That Changed America. New York, NY: Random House.
- Tolnay, Stewart E. and E. M. Beck (1995). A Festival of Violence: An Analysis of Southern Lynchings, 1882–1930 Champaign, IL: University of Illinois Press.
- Turner, Ronald (1994–1995). Remembering Emmett Till. *Howard Law Journal* 38(2): 411–431. Tyson, Timothy B. (2017). *The Blood of Emmett Till*. (New York, NY: Simon and Schuster).
- U.S. Federal Bureau of Investigation (2006). Prosecutive Report of Investigation Concerning Roy Bryant—Deceased; John William Milam, also known as J.W. Milam—Deceased; Leslie F. Milam—Deceased; Melvin L. Campbell—Deceased; Elmer O. Kimbrell—Deceased; Hubert Clark—Deceased; Levi Collins, also known as, Too Tight Collins—Deceased; Johnny B. Washington—Deceased; Otha Johnson, Jr, also known as Oso—Deceased; Emmett Louis Till—Deceased—Victim; Civil Rights Conspiracy, Domestic Police Cooperation, Jackson, Mississippi. http://vault.fbi.gov/Emmett%20Till%20 (accessed December 31, 2015).
- Valenti, Jessica (2013). Fear and Consequences: George Zimmerman and the Protection of White Womanhood. *The Nation*, July 16 http://www.thenation.com/blog/175299/fear-and-consequences-george-zimmerman-and-protection-white-womanhood (accessed December 31, 2015).
- Wells, Ida B. (1991 reprint). Crusade for Justice: The Autobiography of Ida B. Wells. Chicago, IL: University of Chicago Press.
- Welter, Barbara (1977). Dimity Convictions: The American Woman in the Nineteenth Century. Athens, OH: Ohio University Press.
- Welter, Barbara (1966). The Cult of True Womanhood, 1820–1860. American Quarterly, 18(2): 151–174.
- Whitfield, Stephen J. (1988). A Death in the Delta: The Story of Emmett Till. Baltimore, MD: Johns Hopkins University Press.
- Winter, Tom, James Novogrod, and Tracy Connor (2013). Prosecutors: George Zimmerman Applied to Be a Police Officer, *CBSNews.com*, June 5 http://usnews.nbcnews.com/news/2013/06/05/18779269-prosecutors-georgezimmerman-applied-to-be-a-police officer-(accessed March 26, 2018).

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- Wright, Simeon (with Herb Boyd) (2010). Simeon's Story: An Eyewitness Account of the Kidnapping of Emmett Till. Chicago, IL: Lawrence Hill Books.
- Young, Harvey (2005). The Black Body as Souvenir in American Lynching. *Theatre Journal* 57(4): 639–57.
- Zehnder, Isabelle (2012). George Zimmer's 911 Call Transcribed. Examiner. Com, Mar. 24. http://www.examiner.com/article/george-zimmerman-s-911-call-transcribed#ixzz1qGhAp7XZ (accessed December 31, 2015).
- Ziglar, William L. (1988). The Decline of Lynching in America. *International Social Science Review*, 63(1): 14–25.