

ing the term “originalism” to nineteenth-century constitutional lawyers. That such errors rarely undermine the author’s claims points to another problem: at times, too much disjointed historical detail competes for the reader’s attention, with too little contribution to the argument. This is a chronic risk of the New Historicist method, which often draws connections among disparate events that are more aesthetic than causal. The author uses such connections to explore unresolved antinomies in liberal legal thought that he believes transcend time and place; but historically trained readers may wonder how much thought—even very abstract, formalist thought—ever transcends time and place.

**Guyora Binder**  
SUNY—Buffalo

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Mary Frances Berry, *My Face Is Black Is True: Callie House and the Struggle for Ex-Slave Reparations*, New York: Alfred A. Knopf, 2005. Pp. 314. \$26.95 (ISBN 1-4000-4003-5).

Mary Frances Berry has uncovered a valuable link for scholars interested in learning about the historical antecedents of the legal and political debates over slavery reparations in America. She has written an incredibly informative biography of Callie House, an early activist for reparations whose story has not been told until now.

In the contemporary debates over slavery reparations, one claim opponents make is that African Americans of the contemporary period have no standing to raise the issue of reparations on behalf of their enslaved ancestors, because the claims are too remote, the victims of slavery long dead. But Mary Frances Berry demonstrates why the reparations movement persists.

At the end of the Civil War, the newly freed, those who possessed living memories of enslavement, who had the best claims for reparations, found that their demands were ignored. The Freedman’s Bureau Act promised that the freed people would be eligible to receive not more than forty acres of land abandoned or taken from Confederate loyalists. They could rent with the option to purchase from the United States government.

But the government did not follow through and did nothing for the former slaves who were freed but given no financial resources to begin their lives anew. As for the old and infirm who spent years toiling away for the benefit of their white masters, they were destitute in their old age. White Civil War veterans routinely received pensions for their service, and a few black veterans did too. What was to happen to those who could no longer work to support themselves?

Callie House was born a slave in Tennessee. She was four years old at Emancipation in 1865 and emerged as a leader in the movement to petition the government for pensions, reparations for those once enslaved. Traveling throughout the South, she organized on behalf of the National Ex-Slave Mutual Relief, Bounty and Pension Association, made up of local chapters, self-help groups for mutual financial aid. The goal was to build a reparations movement as former slaves signed

petitions for pensions that could be submitted to Congress and then proposed as legislation.

In supporting former slaves freed by the 13th amendment, guaranteed equal protection of the law by the 14th, and the right to vote under the 15th, House focused upon the first amendment right of former slaves to petition their government for redress of grievances, remuneration for those whose forced labor enabled the South's wealth. Arguing that if the government could free the slaves, it could provide for them too, she became an organizer in the late 1890s. She explained to the former slaves that if they thought the cause was a good one, they could support the association in trying to get pension legislation passed.

Not only was her cause an unpopular one among more middle and upper class blacks, particularly those who followed Booker T. Washington's strategy of eschewing political activism combined with a focus on economic self-help, but the movement came under attack from the government. A hostile federal government opposed the ex-slaves' demand for pensions as a pipe dream, a scheme developed by House to defraud poor uneducated blacks who were urged to give the little they had for a program that would go nowhere. In the view of government officials, everyone, white as well as black, knew that reparations in the form of pensions would never be given to the former slaves. House was stirring up trouble, making ordinary blacks discontented and threatening anarchy. The federal government went on the offensive.

Because the movement for pensions was a national one, the U.S. Attorney General's office was able to undermine the movement by striking at the only means it had to organize, the mails. Members sent money through the mails, and the organizers used the mails to correspond with each other. Charging House and her compatriots with using the mails to defraud, the Postal Service denied them their mail and built a case the federal government could use in prosecuting House. Arrested in August 1916, she refused to plea bargain. Found guilty, she was sentenced to one year in prison in November 1917, but gained an early release for good behavior in January 1918.

Her imprisonment spelled the end of a movement organizing for a national pension remedy. But the local groups she helped found continued doing their mutual aid work, and into the 1930s, some of those who remembered the organization's early activism wondered whether a pension bill had ever been passed. However, the death of the movement did not spell the end of the reparations movement, signifying an ongoing debate among civil rights scholars and activists. What is the cause of current day racial inequality? Have civil rights gains meant to erase the effects of legalized discrimination in the past, and level the unequal playing field created by slavery, been enough to bring African Americans into full equality within American society?

**Bernie Jones**

University of Massachusetts, Amherst