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“A Choice of Weapons”: The X-Men and the Metaphor for Approaches to Racial Equality

GREGORY S. PARKS* AND MATTHEW W. HUGHEY**

*Those who make peaceful revolution impossible will make violent revolution
inevitable.* – John F. Kennedy

INTRODUCTION

We are at a crossroads in American history when we as a nation must decide a path toward racial equality. It is a crossroads that we have come to in the past, primarily in the 1960s and 1970s (i.e., civil rights or black power, peace or violence, etc.). It is a narrative that has been told for decades in the comic book *The X-Men*. This comic book as well as its graphic novel series and collection of movies has long served as a metaphor for what has played out with regard to race on the American landscape. This article explores that metaphor and raises an important question: Which approach (peace or violence) was best, particularly in light of the current struggle for racial equality in the United States?

As a country, we are in the midst of a storm. It is a tempest born of decades, generations, and centuries of white supremacy. One of the current iterations and manifestations resulted, in part, from the killing of nine black worshipers in a Charleston, South Carolina church.¹ The storm is both cause and consequence of a

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1. On June 17, 2015, Dylann Storm Roof attended a prayer service at Emanuel African Methodist Episcopal Church. See Kevin Sack & Gardiner Harris, *President Obama Eulogizes Charleston Pastor as One Who Understood Grace*, N.Y. TIMES (June 26, 2015), http://www.nytimes.com/2015/06/27/us/thousands-gather-for-funeral-of-clementa-pinckney-in-charleston.html?_r=0 [<https://perma.cc/D892-T77S>]. There, Roof shot and killed nine African Americans, including senior pastor and state senator Clementa C. Pinckney, and injured at least one other person. Robert Costa, Lindsey Bever, J. Freedom du Lac & Sari Horwitz, *Church Shooting Suspect Dylann Roof Captured Amid Hate Crime Investigation*, WASH. POST (June 18, 2015), <https://www.washingtonpost.com/news/morning-mix/wp/2015/06/17/white-gunman-sought-in-shooting-at-historic-charleston-african-ame-church/> [<https://perma.cc/TF49-VU73>]. The killing, largely, prompted peaceful protests. See Abby Philip & Chico Harlan, *Hundreds March in Charleston, Columbia to Take Down Confederate Flag*, WASH. POST (June 20, 2015), https://www.washingtonpost.com/news/post-nation/wp/2015/06/20/hundreds-march-in-charleston-columbia-to-take-down-confederate-flag/?utm_term=.bfaea3aca7fe [<https://perma.cc/U259-9DUD>]. At a statehouse press conference on June 22, 2015, Governor Nikki Haley, flanked by elected officials of both parties, called for the flag to be removed by the state legislature, saying that while the flag was “an integral part of our past, it does not represent the future” of South Carolina. Amber Phillips, *The March Against the Confederate Flag Continued Thursday—This Time in*

black teenager going to the store for Skittles and a Snapple, only to die at the hands of a so-called community watchman.² It is the cause and consequence of a black

Congress, WASH. POST (May 19, 2016), <https://www.washingtonpost.com/news/the-fix/wp/2016/05/19/the-march-against-the-confederate-flag-continued-thursday-this-time-in-congress/> [https://perma.cc/G74M-64MP]. Eulogizing Rev. Clementa Pinckney on June 26, 2015, before nearly 6,000 congregants at the College of Charleston, President Barack Obama acknowledged that the shooting had catalyzed a broad movement, backed by Republicans and Democrats, to remove the flag from official public display. See DeNeen L. Brown & Greg Jaffe, *Obama Calls for Racial Understanding, Unity as Thousands Mourn S.C. Pastor*, WASH. POST (June 26, 2015), https://www.washingtonpost.com/politics/thousands-gather-to-mourn-the-rev-clementa-pinckney-in-charleston/2015/06/26/af01aaae-1c0c-11e5-ab92-c75ae6ab94b5_story.html [https://perma.cc/E23B-PT84]. The President said, “Blinded by hatred, [the gunman] would not see the grace surrounding Reverend Pinckney and that Bible study group, the light of love that shone as they opened the church doors and invited a stranger to join in their prayer circle.” *Id.* On July 6, 2015, the South Carolina Senate voted to remove the Confederate flag from display outside the South Carolina Statehouse. Elahe Izadi & Abby Phillip, *South Carolina House Votes to Remove Confederate Flag from Statehouse Grounds*, WASH. POST (July 9, 2015), https://www.washingtonpost.com/news/post-nation/wp/2015/07/09/south-carolina-house-votes-to-remove-confederate-flag-from-statehouse-grounds/?utm_term=.6158b04b6868 [https://perma.cc/HW2C-TD84]. The vote passed by a two-thirds majority on July 9; Governor Nikki Haley signed the bill that day. *Id.* On July 10, the Confederate flag was taken down for the last time. Stephanie McCrummen & Elahe Izadi, *Confederate Flag Comes Down on South Carolina’s Statehouse Grounds*, WASH. POST (July 10, 2015), https://www.washingtonpost.com/news/post-nation/wp/2015/07/10/watch-live-as-the-confederate-flag-comes-down-in-south-carolina/?utm_term=.7bc1d01c9257 [https://perma.cc/C6M9-9QG4].

2. Following the shooting of Trayvon Martin on February 26, 2012 by George Zimmerman, civil rights leaders “championed the case and demonstrators, many wearing hoodies, marched in Sanford, Miami and elsewhere to demand [police] action” to arrest Zimmerman. Lizette Alvarez & Cara Buckley, *Zimmerman Is Acquitted in Killing of Trayvon Martin*, N.Y. TIMES (July 14, 2013), <http://www.nytimes.com/2013/07/14/us/george-zimmerman-verdict-trayvon-martin.html> [https://perma.cc/Y4LE-Z5AQ]. Protestors gathered outside of police stations and in churches listening to NAACP leaders and other civil rights activists as they shouted, “I am Trayvon Martin.” Eric Liu, *Trayvon Martin and Making Whiteness Visible*, TIME (July 17, 2013), <http://ideas.time.com/2013/07/17/trayvon-martin-and-making-whiteness-visible/>. Many protestors failed to identify this issue presented in the Time article by Eric Liu. Becoming a political issue as the press surrounding this case grew, politicians and activists targeted governmental policy and lobbyist groups. U.S. Representative Bobby Rush of Illinois was escorted off the House floor when he wore a hoodie when addressing Congress on March 28, 2012. David A. Graham, *Politicians Who’ve Worn Hoodies to Protest the Trayvon Martin Shooting*, THE ATLANTIC (Mar. 28, 2012), <http://www.theatlantic.com/politics/archive/2012/03/politicians-whove-worn-hoodies-to-protest-the-trayvon-martin-shooting/255174/> [https://perma.cc/LV3R-M7GC]. Protestors also attacked the American Legislative Exchange Council that supported the “Stand Your Ground” legislation proposed by the National Rifle Association. Tom Hamburger, *Trayvon Martin Shooting Spurs Protests Against Companies with Ties to Legislative Group*, WASH. POST (Apr. 12, 2012), https://www.washingtonpost.com/politics/trayvon-martin-shooting-spurs-protests-against-companies-with-ties-to-legislative-group/2012/04/12/gIQAs8HuDT_story.html [https://perma.cc/H28Q-7EGT]. Upon George Zimmerman’s acquittal on July 13, 2013, protests erupted around the country as outraged

woman being pulled over in Texas by police only to be found dead in her cell days later.³ It is the cause and consequence of a black man being arrested, thrown in a police van, and taken for a “nickel ride” and ending up dead.⁴ It is the result of black

groups first gathered as peaceful vigils, but later turned violent. *See Protesters Gather in a Handful of Cities*, N.Y. TIMES (July 14, 2013), <http://www.nytimes.com/2013/07/15/us/protesters-gather-in-a-handful-of-cities.html> [https://perma.cc/8PEV-D6JP]. In Oakland, California protestors “broke windows and started small street fires” and later burned the American flag. *Id.* Using the same rhetoric employed when calling for the arrest of Zimmerman, protestors chanted in Sacramento “What do we want? Justice. When do you want it? Now. For who? *Id.* A banner behind speakers read, “No justice, no peace!” *Id.* These chants frightened politicians and the media as they expected race riots. *See id.* In the presence of police officers outside of the courthouse where Zimmerman was acquitted, protestors chanted peacefully. Alvarez & Buckley, *supra*. The Black Lives Matter movement ultimately emerged out of the aftermath of the Zimmerman verdict. *See* Sandhya Somashekhar, Kari Lydersen & Stefanie Dazio, *In D.C. and Across the Country, Protesters Call for ‘Justice’ for Trayvon Martin*, WASH. POST (July 20, 2013), https://www.washingtonpost.com/local/dc-news/in-dc-and-across-the-country-protesters-call-for-justice-for-trayvon-martin/2013/07/20/d0406184-f147-11e2-a1f9-ea873b7e0424_story.html [https://perma.cc/UL5J-KMWF].

3. The death of Sandra Bland, who was found hanged in a Texas jail cell on July 13, 2015, “provoked national outrage and drew the attention of the Black Lives Matter movement, with protestors linking Bland to other black suspects who died in confrontations with police or while in police custody.” *Texas Trooper Who Arrested Sandra Bland Officially Fired*, N.Y. POST (Mar. 2, 2016), <http://nypost.com/2016/03/02/texas-trooper-who-arrested-sandra-bland-officially-fired/> [https://perma.cc/DY6Q-U2JF]. Bland’s death had been publicized and protested by the Black Lives Matter movement as members linked her death to those of Michael Brown, Trayvon Martin, and Eric Garner. Jada F. Smith, *Echoing Calls for Justice of Million Man March, but Widening Audience*, N.Y. TIMES (Oct. 10, 2015), http://www.nytimes.com/2015/10/11/us/echoing-calls-of-justice-of-million-man-march-but-widening-audience.html?_r=0 [https://perma.cc/7P68-VYDK]. Fueling national debate, Bland’s death remains controversial as a grand jury declined to issue an indictment in connection to her death despite the suit filed by her family. Marina Koren, *No Indictment in the Death of Sandra Bland*, THE ATLANTIC (Dec. 22, 2015), <http://www.theatlantic.com/national/archive/2015/12/sandra-bland-texas-indictment/421599/> [https://perma.cc/L9FG-KM5Y]. Bland’s death has caused the black community to become even more skeptical of the police, as shown by the creation of the popular hashtag, “#IfIDieInCustody,” which “became a forum to express that skepticism and the fear of being disappeared into a jail.” David A. Graham, *Sandra Bland and the Long History of Racism in Waller County, Texas*, THE ATLANTIC (July 21, 2015), <http://www.theatlantic.com/politics/archive/2015/07/sandra-bland-waller-county-racism/398975/> [https://perma.cc/ZWP4-WAAZ].

4. Creating further tension between the police and the community was the death of Freddie Gray in Baltimore on April 19, 2015. His death, surround by allegations of police brutality during his arrest on April 12, 2015, generated community outrage and protests. Following Gray’s death, protests on April 25, 2015 “paralyzed much of Baltimore for days, at one-point descending into rock-throwing and arson, and prompting the governor to summon the National Guard.” Richard Pérez-Peña, *Court Delays Officers’ Trials in Freddie Gray Case*, N.Y. TIMES (Feb. 18, 2016), <http://www.nytimes.com/2016/02/19/us/court-delays-officers-trials-in-freddie-gray-case.html> [https://perma.cc/Q5BG-CCPM]. Protests in other cities, including Philadelphia, originally peaceful, turned violent later in the evening aiming at

teenager being killed by a police officer after having, allegedly, stolen some cigarillos from a convenience store.⁵ It is the cause and consequence of a black man being choked to death by police for selling loose cigarettes.⁶ And the question that

attacking police officers, chanting slogans such as “Killer cops modern lynchers” and “Philly is Baltimore.” Jon Hurdle & Daniel E. Slotnik, *Clashes in Philadelphia as Freddie Gray Protest Nears Highway*, N.Y. TIMES (Apr. 30, 2015), <http://www.nytimes.com/2015/05/01/us/clashes-in-philadelphia-as-freddie-gray-protest-nears-highway.html> [https://perma.cc/6M35-Y5F6]. In New York, protestors marched with those in solidarity with those in Baltimore; however, two officers were assaulted, and those arrested were a “reaction to the behavior of the protesters who were blocking avenues and streets.” Benjamin Mueller & John Surico, *Over 140 Arrested as New Yorkers Protest the Death of Freddie Gray*, N.Y. TIMES (Apr. 30, 2015), <http://www.nytimes.com/2015/04/30/nyregion/hundreds-march-in-manhattan-to-protest-the-death-of-freddie-gray.html> [https://perma.cc/V4UX-JUMD].

5. In Ferguson, Missouri, following the death of Michael Brown at the hands of a police officer, the community was enraged. Protests turned to riots. Almost immediately, the aftermath of the announcement was violence. President Obama addressed the nation, urging peace and calm. Most networks carrying the remarks cut to a split screen—showing riots breaking out in the streets of Ferguson next to the president’s pleas. Dozens of storefronts were looted, some were burned to the ground. And at least one man, Deandre Joshua, was killed during the chaos.

Wesley Lowery, *It Has Been One Year Since a St. Louis Grand Jury Did Not Charge Darren Wilson for Michael Brown’s Death*, WASH. POST (Nov. 24, 2015), https://www.washingtonpost.com/news/post-nation/wp/2015/11/24/it-has-been-one-year-since-a-st-louis-grand-jury-did-not-charge-darren-wilson-for-michael-browns-death/?utm_term=.e59d7a4aea2e [https://perma.cc/R386-BNLY]. This sentiment was reiterated by Governor Jay Nixon, but he also conceded that “we will not get the healing that we all need if the only response from the public is just be quiet.” Brian Resnick, *Obama on Ferguson Police, Protests: ‘We All Need to Hold Ourselves to a High Standard’*, THE ATLANTIC, (Aug. 14, 2014), <http://www.theatlantic.com/politics/archive/2014/08/obama-on-ferguson-police-protests-we-all-need-to-hold-ourselves-to-a-high-standard/453369/> [https://perma.cc/7XAF-FUSD]. The chant “Hands up, don’t shoot,” performed with raised hands, was repeated as a version of what activists believe were Michael Brown’s last words. Nicholas D. Mirzoeff, *Ferguson Taught Us to Not Look Away*, TIME (Aug. 10, 2015), <http://time.com/3991745/ferguson-dont-look-away/>.

6. On July 17, 2014, Eric Garner died in Staten Island, New York, after New York City Police Department officer, Daniel Pantaleo, put him in a chokehold for about fifteen to nineteen seconds while arresting him. Billy Johnson, *Eric Garner’s Death Provokes Outrage a Year Later*, NEWSWEEK (July 17, 2015), <http://www.newsweek.com/eric-garners-death-provokes-outrage-year-later-354989> [https://perma.cc/CF5D-Z2J5]; Abby Ohlheiser, Elahe Izadi & Cameron Barr, *N.Y. Grand Jury Declines to Indict Officer in Death of Eric Garner, Igniting Protests*, WASH. POST (Dec. 3, 2014), https://www.washingtonpost.com/politics/2014/12/03/8dc55084-7b2b-11e4-84d4-7e896b90abdc_story.html [https://perma.cc/M6WE-YEE2]. The New York City Medical Examiner’s Office attributed Garner’s death to a combination of a chokehold, compression of his chest, and poor health. Al Baker, J. David Goodman & Benjamin Mueller, *Beyond the Chokehold: The Path to Eric Garner’s Death*, N.Y. TIMES (June 14, 2015), <http://www.nytimes.com/2015/06/14/nyregion/eric-garner-police-chokehold-staten-island.html> [https://perma.cc/X5PE-JGX4]. After the Staten Island grand jury failed to indict Pantaleo on December 3, New York City and San Francisco citizens gathered in protest. Justin

many ask, as they promote the notion that “Black Lives Matter,”⁷ is how best to bring about lasting change to the cycle. Noted author and public commentator, Ta-Nehisi Coates, put it best in his commentary on police brutality in the African American community and the uprisings in Baltimore after the murder of Freddie Grey: “Violence works. Nonviolence does too.”⁸ It is an age-old question within African Americans’ quest for social justice—one well-articulated in, of all places, American comic books.

The 1960s welcomed “a period of dramatic expansion of civil rights for African-Americans [sic],”⁹ and with the success of that movement, “the time was long overdue for African-Americans [sic] to have their own heroes.”¹⁰ By mid-decade, the world’s first black superhero would be created, the African King T’Challa, known as the hero “Black Panther.”¹¹ Black Panther was not African

Wm. Moyer, Abby Ohlheiser & Elahe Izadi, *Protests in Support of Eric Garner Erupt in New York and Elsewhere*, WASH. POST (Dec. 4, 2014), <https://www.washingtonpost.com/news/morning-mix/wp/2014/12/04/after-grand-jury-doesnt-indict-police-officer-who-choked-eric-garner-protests-erupt-in-new-york-and-elsewhere/> [https://perma.cc/89WL-GDHK]; Vivian Ho, Peter Fimrite & Kale Williams, *Oakland, S.F. Protesters Denounce Police Killing of Eric Garner*, SFGATE (Dec. 3, 2014), <http://www.sfgate.com/bayarea/article/Bay-Area-protesters-denounce-police-killing-of-5933671.php> [https://perma.cc/E2ZU-YEEV]. On December 5, thousands gathered in protest on the Boston Common, and then marched downtown, blocking traffic, in addition to staging “die-ins.” Travis Andersen, Evan Allen, Nestor Ramos & Jeremy C. Fox, *Thousands Protest Eric Garner Case in Downtown Boston*, BOS. GLOBE (Dec. 4, 2014), <https://www.bostonglobe.com/metro/2014/12/04/protest-planned-christmas-tree-lighting-common/875sx4ZA1JcHliKte9UyCJ/story.html> [https://perma.cc/YLW8-NTWL]. Protests also occurred in Chicago, Washington, D.C., Baltimore, Minneapolis, and Atlanta. See Colin Campbell & Jessica Anderson, *Demonstrators Interrupt Baltimore Monument Lighting Event*, BALT. SUN (Dec. 5, 2014), <http://www.baltimoresun.com/news/maryland/baltimore-city/bs-md-ci-morgan-protest-20141204-story.html> [https://perma.cc/J3UB-65FS]; Ben Gray, *Atlanta Protesters Rally Peacefully in Response to NYC Chokehold Death*, ATLANTA JOURNAL-CONSTITUTION (Dec. 3, 2014), <http://www.ajc.com/news/news/atlanta-protesters-rally-in-response-to-nyc-chokeh/njLKr/> [https://perma.cc/PRG9-U5JE]; Brandt Williams, *Protests Shut Down Part of I-35W for Over an Hour*, MPR NEWS (Dec. 4, 2014), <https://www.mprnews.org/story/2014/12/04/protesters-close-i35w> [https://perma.cc/TWR9-LFUZ].

7. See *Herstory*, BLACK LIVES MATTER, <http://blacklivesmatter.com/herstory/> [https://perma.cc/Y8VF-KXTN], for a history of the Black Lives Matter movement.

8. Ta-Nehisi Coates, *Barack Obama, Ferguson, and the Evidence of Things Unsaid*, THE ATLANTIC (Nov. 26, 2014), <http://www.theatlantic.com/politics/archive/2014/11/barack-obama-ferguson-and-the-evidence-of-things-unsaid/383212/> [https://perma.cc/6W2P-52C6].

9. Richard A. Hall, *The Captain America Conundrum: Issues of Patriotism, Race, and Gender in Captain America Comic Books, 1941–2001*, at 90 (Aug. 6, 2011) (unpublished Ph.D. dissertation, Auburn University), https://etd.auburn.edu/bitstream/handle/10415/2760/hall_richard_captain_america_dissertation_auetd_upload.pdf?sequence=2.

10. *Id.* at 116 (citing BAADASSSS CINEMA: A BOLD LOOK AT 70’S BLAXPLOITATION FILMS (Minerva Pictures 2002)).

11. *Id.* at 92.

American, but an African monarch of the fictional sub-Saharan nation of Wakanda.¹² Though Black Panther was a superhero and fought alongside other heroes, he was very much “separate and unequal”; he was not *American*.¹³ In *The Secret Identity of Race: Exploring Ethnic and Racial Portrayals in Superhero Comic Books*, Lowery Anderson Woodall, III, asserts that Black Panther suffered from stifled sales not as a result of a lack of interest in racial storylines, but because of “a lack of authenticity.”¹⁴ Woodall described the Black Panther and other racially explicit characters as “too authentic in their representation of Otherness for white readers to accept them and not nearly authentic enough for many minority readers to see themselves spoken for in the panels.”¹⁵ In his “Otherness,” the Black Panther is “never black enough for minority readers” in a “system in which blacks have been able to formulate ‘ideas about “correct” and “incorrect” blackness.’”¹⁶ However, a character who began as the “personification of the black machismo aesthetic” in his debut issue was later devolved into the background in his “willingness to accommodate to the West,” as he joined the Avengers.¹⁷

By the end of the decade, *Captain America* introduced the world’s first African American superhero, The Falcon.¹⁸ The Falcon had only one ability: communication with his pet falcon, Red Wing.¹⁹ Though The Falcon became a major character throughout the 1970s, “the reader was always aware that the one with true superior abilities was the white hero.”²⁰ *Superman* and *Batman* did not include African Americans in their pages until the 1970s, though *Wonder Woman* introduced the character Nubia, the African Wonder Woman, in 1969.²¹

Asian, Latino, and Native Americans were only featured “when their place in public consciousness was raised to such a high level that publishers felt they had to comment.”²² For Asian Americans, that moment was Pearl Harbor.²³ Following World War II, the ever-changing discrimination against Asians in comic-book depictions is described by Woodall as a “hand[] off [of] the baton of hatred” from one Asian culture to another “with no perceptible changes in the manner in which

12. *Id.* at 114.

13. *Id.*

14. Lowery Anderson Woodall, III, *The Secret Identity of Race: Exploring Ethnic and Racial Portrayals in Superhero Comic Books* 152 (Dec. 2010) (unpublished Ph.D. dissertation, University of Southern Mississippi), <http://aquila.usm.edu/cgi/viewcontent.cgi?article=1509&context=dissertations>.

15. *Id.*

16. *Id.* at 154, 156 (quoting ALGERNON AUSTIN, *ACHIEVING BLACKNESS: RACE, BLACK NATIONALISM AND AFROCENTRISM IN THE TWENTIETH CENTURY* 49 (2006)).

17. *Id.* at 163, 166.

18. Hall, *supra* note 9, at 97 (citing BRADFORD W. WRIGHT, *COMIC BOOK NATION: THE TRANSFORMATION OF YOUTH CULTURE IN AMERICA* 237 (2001)).

19. *Id.* at 116.

20. *Id.*

21. *Id.* at 119 (citing email from Mark Waid to Richard Hall (March, 2009)); *Id.* (citing Francinne D. Valcour, *Manipulating the Messenger: Wonder Woman as an American Female Icon* 318 (2006) (unpublished Ph.D. dissertation, Arizona State University)).

22. Woodall, *supra* note 14, at 59.

23. *Id.*

the characters would be portrayed.”²⁴ The only notable Latino comic-book characters, The Hernandez Brothers, were represented with a blend of “sexuality and soap opera [. . .] [populated by] [. . .] realistic [. . .] full-blooded Latinas’ according to an article in Vibe Magazine.”²⁵ This representation reflected the “hyper-sexual imagery of other mediums attributed to Hispanics.”²⁶ In 1975, Marvel created a failed Hispanic character, Hector Ayala (“The White Tiger”), who lasted only six years before being retired.²⁷ Native Americans are included only under the “noble savage stereotype,” an image “suitable to be revered and remembered by liberalized White America.”²⁸ Arabs were once “forced to place the fate of their crude kingdoms in the able hands of Western warriors,” but evolved with modern prejudices to being criminalized “during periods of political unrest.”²⁹ Following a rise in Middle East tensions with the United States and leading up the Persian Gulf War, the comic-book Arabs became “the fiendish extermination of democratic values.”³⁰

Woodall asserts that “comic books explore the full triadic spectrum of racial relationships,” and each is highlighted by specific characters: One is the white who wants to be an “Other” (i.e., Batman). Bruce Wayne is the “epitome of white wealth and privilege,” but Woodall asserts that Wayne’s “acquaintance with upper-class white society . . . propels him towards a radical appropriation of racial Otherness as part of his crime fighting.”³¹ Another is the “Other” who wants to be White (i.e.,

24. *Id.* at 61.

25. *Id.* (quoting Elvis Mitchell, *iVaya Con Los Bros*, VIBE, Mar. 2001, at 100-01).

26. *Id.* at 62.

27. *Id.* at 63.

28. *Id.* at 64–65.

29. *Id.* at 66.

30. *Id.*

31. *Id.* at 10, 30. Contemporarily, there has been a striking narrative in the Batman comic, reflective of the moment that we are in (i.e., the Black Lives Matter moment). Last September, DC Comics released an issue of the famous Batman comic in which the “Caped Crusader” must investigate the killing of an unarmed black teenager, shot in the street by a policeman. Spencer Ackerman, *Batman Confronts Police Racism in Latest Comic Book*, THE GUARDIAN (Sept. 15, 2015), <https://www.theguardian.com/books/2015/sep/15/batman-confronts-police-brutality-in-latest-comic-book> [<https://perma.cc/74DB-XSLW>]. In the story, Batman prevents police officers from shooting a black boy in the back as he turned to run from them. *Id.* Author Scott Snyder used the Eric Garner news reports and incidents like it as inspiration for the comic’s plot. *Id.* The following December, in a new graphic novel based on the Batman character called Dark Knight III: Master Race, authors continued to deal with social issues stemming from police violence and race. Mo Barnes, *Black Lives Matter to Batman as He Takes on Bad Cops in New Comic Series*, ROLLING OUT (Dec. 3, 2015), <http://rollingout.com/2015/12/03/black-lives-matter-batman-takes-bad-cops-new-comic-series/> [<https://perma.cc/B777-DU3N>]. Comics that address the current social climate are not necessarily a new concept. However, readers may not be used to these particular issues being addressed so forwardly in the *Batman* series. Historically, the comic has dealt with police corruption and brutality as a general theme of the comic. Ackerman, *supra*. With the country’s recent increase of incidents involving police violence against blacks, particularly unarmed blacks, it is not surprising that the authors have begun to use their comics as a platform to address these highly controversial topics.

Superman). “Superman represents the ideal version of racial assimilation” to teach young immigrants the “skills they will require to succeed in their new lives as American citizens.”³² A third is the “Other” who is content in his/her “Otherness” (i.e., The Black Panther).³³ Black Panther demonstrates the “proud African heritage from which he derives his powers.”³⁴

Considering Woodall’s concept of “Otherness,” the mutants of Stan Lee’s *X-Men* represent opposing approaches in the battles for racial recognition, equality, and/or dominance. Mutants are a minority group born with supernatural powers—an inherent “Otherness.” Humans hate and fear the mutants. Some of that is because of their “Otherness.” Some of it is because of the existential threat that mutants pose to humans. For example, as mutant Magneto indicated: “The human race no longer deserves dominion over the planet Earth! The day of the mutants is upon us! The first phase of my plan shall be to show my power ... [sic] to make homo sapiens bow to homo superior!”³⁵

The X-Men serve as a buffer between these two conflicting groups with the goal to attain mutant equality through peaceful measures yet are also willing to fight for their cause.³⁶ The determination of one group to attain dominance versus the determination of another group to maintain its present dominance is reflective of a similar struggle between races in the larger culture.³⁷ Specifically, the methods in *X-Men* mirror those of the civil rights movement: Dr. Xavier and the X-Men represent the peaceful embrace of “Otherness,” as articulated via the integrationist movement;

Recently, these events of have given rise to the “Black Lives Matter” movement, a social movement in the United States that has gained much momentum in the last two years, especially among black youth. Comprised of citizens concerned with the recent incidents of police brutality against black men and women, those involved seek to bring these issues to the public’s attention in an attempt to stem this violence by increasing awareness concerning social justice and black Americans.

The plots of the aforementioned Batman comics draw stark parallels to recent incidents involving abuse of discretion and authority by police officers. In *Dark Knight III: Master Race*, a black teenager is almost shot in the back by officers as he turned and ran from them. Barnes, *supra*. The situation seems to reference the Michael Brown case incident in which an unarmed black teenager was shot and killed by a policeman as he ran from him. In *Batman Comic #44*, a young black boy is killed and left for dead while wearing an orange hoodie similar to the one that Trayvon Martin was found in. Ackerman, *supra*. One of the comic’s authors, Brian Azzarello, stated that he wants readers to form their own opinions about the serious issues raised by the comic’s plot. *Id.* By framing the issues as unjust and unfair, the authors of these comics echo the themes and concerns of those promulgating the Black Lives Matter movement. Both are acknowledging that there are serious flaws within the justice system that should be brought to the public’s attention and both are raising awareness about systematic racism in the United States.

32. Woodall, *supra* note 14, at 70.

33. *Id.* at 10.

34. *Id.* at 166.

35. RUSSELL W. DALTON, MARVELOUS MYTHS: MARVEL SUPERHEROES AND EVERYDAY FAITH 82 (2011).

36. *Id.*

37. *Id.*

Magneto and his army represent the more aggressive battle to strengthen “Otherness,” as promoted by the black militant/nationalist movements.

This article explores ways in which the *X-Men* comic has been used as a metaphor for racial discrimination in the United States and the best method for addressing such discrimination. In Part I, the authors provide a basic analysis of how the X-Men provide a metaphor for race, bias, and discrimination. In Part II, the authors parse the ideology and methods of Magneto, chief antagonist in the *X-Men*, as a metaphor for Malcolm X and the Black Power/Black Nationalist approach. In Part III, the authors parse the ideology and methods of Professor Xavier, chief protagonist in the *X-Men*, as a metaphor for Martin Luther King, Jr. and the civil rights movement approach. The authors conclude by speculating as to which approach would be best for African American advancement.

I. RACE AND THE MUTANT METAPHOR

The production of culture perspective focuses on how symbolic elements of culture are shaped by the systems within which they are created, distributed, and consumed.³⁸ Comics and comic characters can be understood as “cultural objects”³⁹ that resonate with the dominant ideologies and practices of the larger social order.⁴⁰ That is, cultural products must possess an “aura” of resonance that is not merely a private relationship between the cultural object and an individual. Rather, it must reflect a “public and cultural relation among object, tradition, and audience”⁴¹ that—in the case of the intersection of race and comic characters—resonates with dominant audiences’ understanding of race and reflects back to them racialized aspects of the “American character or experience.”⁴² As the sociologist Michael Schudson writes:

The relevance of a cultural object to its audience, its utility, if you will, is a property not only of the object’s content or nature and the audience’s interest in it but of the position of the object in the cultural tradition of the society the audience is a part of. That is, the uses to which an audience puts a cultural object are not necessarily personal or idiosyncratic; the needs or interests of an audience are socially and culturally constituted. What is “resonant” is not a matter of how “culture” connects to

38. Richard A. Peterson & N. Anand, *The Production of Culture Perspective*, 30 ANN. REV. SOC. 311, 311 (2004).

39. See WENDY GRISWOLD, *RENAISSANCE REVIVALS: CITY COMEDY AND REVENGE TRAGEDY IN THE LONDON THEATRE 1576-1980* (1986); see also Wendy Griswold, *The Writing on the Mud Wall: Nigerian Novels and the Imaginary Village*, 57 AM. SOC. REV. 709 (1992).

40. See Michael Schudson, *How Culture Works: Perspectives from Media Studies on the Efficacy of Symbols*, 18 THEORY & SOC’Y 153 (1989).

41. *Id.* at 170.

42. Wendy Griswold, *American Character and the American Novel: An Expansion of Reflection Theory in the Sociology of Literature*, 86 AM. J. SOC. 740, 749 (1981). Also, Michael Schudson writes that any given cultural object, as a valued symbol of representation, can come to have an “aura.” “The aura generates its own power and what might originally have been a very modest advantage (or even lucky coincidence) of a symbol becomes, with the accumulation of the aura of tradition over time, a major feature.” Schudson, *supra* note 40, at 170.

individual “interests” but a matter of how culture connects to interests that are themselves constituted in a cultural frame.⁴³

In this sense, recent scholarship on the relation between cultural objects and how people come to relate to those objects has emphasized how much objects become essential “equipment for living.”⁴⁴

One tradition focuses on how cultural events and structures, such as social rituals and the “collective effervescence”⁴⁵ produced by them, help to establish a collective identity and larger social order. Another stream of research emphasizes how the meanings of objects are solidified through their use to mark distinctive groups and group interests. In both these cases, cultural objects are enmeshed in processes of stabilization, in which the object (films, music, or in this case, comic characters) is simultaneously the determinate and producer of the social context in which it is embedded. Yet, the question remains, how do certain objects come to take on a particular “aura” and come to both reflect larger social relations and resonate with them?

Comics in general, and *X-Men* in particular, reside in the sweet spot between the imagined fantastic and the very material social problems they represent. That is, comic narratives rest on the depiction of a quasi-fictional world that is both escapist yet realist. Hence, Vincent Rocchio stated that the “contemporary status of race in mainstream American culture is intimately bound to the process of representations within and through the mass media.”⁴⁶ The rise of prominence between the two cultural logics of assimilationist racial strategies and nationalist agendas, and their unitary construction as a zero-sum game in race relations, provided the setting by which *X-Men* effectively binds racial meanings to fantastic/realist characters in a stable manner. In this sense, *X-Men* both resonates with and reflects the nation’s “raced ways of seeing.”⁴⁷ by providing provocative racial allegory that connects with the public’s preoccupation with the dominant book ends of assimilation and nationalism. The *X-Men* reflects Hollywood’s recognition of these bookends, as well as comic book publishers’ own realization that they must combat their own history of a racist, and white-washed comic book industry. Hence, successful comic representations must be designed to “reflect [the consumers’] tastes, interests, and attitudes . . . [and] reflect[] back to the consumer his or her own image”⁴⁸ given that “if cultural products do not articulate closely enough with their social settings,” then their audiences will see them as “irrelevant, unrealistic, artificial, and overly abstract.”⁴⁹

43. Schudson, *supra* note 40, at 169.

44. Cf. KENNETH BURKE, *THE PHILOSOPHY OF LITERARY FORM* (1941).

45. Cf. ÉMILE DURKHEIM, *THE ELEMENTARY FORMS OF THE RELIGIOUS LIFE* (Joseph Ward Swain trans., 1915).

46. VINCENT F. ROCCHIO, REEL RACISM: CONFRONTING HOLLYWOOD'S CONSTRUCTION OF AFRO-AMERICAN CULTURE (*THINKING THROUGH CINEMA*) 4 (2000).

47. Cf. Darnell Hunt, *Raced Ways of Seeing*, in *CULTURAL SOCIOLOGY* 120-29 (Lyn Spillman ed., 2002).

48. DIANA CRANE, *THE PRODUCTION OF CULTURE* 47 (1992).

49. ROBERT WUTHNOW, *COMMUNITIES OF DISCOURSE* 3 (1989).

Most will agree that popular entertainment is a tool employed to reflect, criticize, and shape social issues that plague our society. This influence is utilized in every type of entertainment medium, including comic books. The original creators of the *X-Men*, writer Stan Lee and artist Jack Kirby, stated that the dominant theme of the narrative is to condemn prejudice.⁵⁰ Launched in 1963, the *X-Men* narrative has a particular focus on the portrayals of race and gender issues that mirrored both the issues expressed through the civil rights movement and the feminist movement from the perspective of the disenfranchised and marginalized. Moreover, the *X-Men* narrative continues to be a metaphor that transcends race and gender, especially for those who reside on what Enrique Dussell calls the “underside of modernity.”⁵¹ This includes the prejudice LGBTQ-identified people face to the grips of geopolitical neocolonialism. Thus, Marvel’s *X-Men* franchise has been described as having a “minority metaphor,” fueling the debate among fans as to which approach is most likely to result in equality.⁵²

As repeatedly confirmed by the various creators of the *X-Men* franchise, the central theme of the narrative is the condemnation of prejudice and varied forms of social and political supremacy. In an interview with the *Rolling Stone* magazine in 1971, Stan Lee stated:

[T]he more I realize that people are to some degree affected by what we write, the more I’m aware of the influence we have, the more I worry about what I write. . . . I think the only message I have tried to get across is for Christsake don’t be bigoted. Don’t be intolerant.⁵³

The tone, theme, and characterizations of the narrative shift over time in order to reflect the creative team’s intentions for the series, which is the message of inclusion, as well as their comments on the current prejudicial issues. The first comic, *The X-Men #1* published in September of 1963, establishes the themes of oppression, discrimination, and prejudice suffered at the hands of the dominant group, and an ongoing clash between “normal” humans and the “abnormal” mutants.⁵⁴ At its inception, the creators decided that the X-Men were about more than a Cartesian drama of “good versus evil,” but about tackling relevant issues of prejudice, race, bigotry and the condemnation of both personal hate and systemic oppression. The creators envisioned and subsequently invoked the mutant metaphor to address these current social issues.

As analyzed in *X-Men and the Mutant Metaphor*, although the franchise itself was not originally inclusive of people of color, often adopting stereotypes when it designed to create a minority character, the narrative addresses the dominant racial issue in our society through the “mutant metaphor,” thereby functioning as an

50. JOSEPH J. DAROWSKI, X-MEN AND THE MUTANT METAPHOR 34 (2014).

51. See generally ENRIQUE DUSSEL, THE UNDERSIDE OF MODERNITY: APEL, RICOEUR, RORTY, TAYLOR, AND THE PHILOSOPHY OF LIBERATION (Eduardo Mendieta ed. & trans., 1996).

52. DAROWSKI, *supra* note 50, at 34.

53. Robin Green, *Marvel Comics: Fact Front*, ROLLING STONE (Sept. 16, 1971), <http://www.rollingstone.com/culture/features/face-front-19710916> [https://perma.cc/59S7-DGFR].

54. *The X-Men #1*, X-MEN COMICS 1 (Marvel Comics Sept. 1963).

“informing metaphor.”⁵⁵ Not surprisingly, for many readers, Marvel’s *X-Men* comic book franchise bore comparison to the civil rights movement. In particular, the two most prominent mutant leaders in the *X-Men* narrative, Professor Charles Xavier and Magneto, metaphors for civil rights leaders Martin Luther King Jr. and Malcolm X, respectively.

As a caveat, however, as Mikhail Lyubansky argues in *Prejudice Lessons from the Xavier Institute*, the Magneto/X and Professor X/King parallel is not altogether accurate.⁵⁶ First, unlike mutants, African Americans do not have superpowers to stop their own oppression.⁵⁷ While this may be an obvious point to some, we feel obliged to state this point given recent media portrays of African Americans as “magical” and social scientific research that illumines how many whites today believe that people of color are superhuman.⁵⁸ For instance, a recent set of studies investigated the superhumanization—the attribution of supernatural, extrasensory, and magical mental and physical qualities to humans—to blacks.⁵⁹ Across the studies, researchers showed the phenomenon at both a conscious⁶⁰ and subconscious level among whites.⁶¹ Further, they show a belief that black superhumanization leads to the perception that blacks feel less pain than whites.⁶²

Second, unlike Martin Luther King Jr., Professor Xavier does not advocate for mutant rights, but instead focuses on peaceful integration and protecting a world that discriminates against them from evil mutants, thus invalidating other perspectives like Magneto’s.⁶³ Third, unlike Malcolm X, who advocated for African Americans to arm themselves in self-defense in response to violence when the law fails to protect them,⁶⁴ Magneto focuses more on world domination rather than mutant rights.⁶⁵ Fourth, the series turns on presumptions of racial essentialism, whereby the two “races” (mutants and humans) are biologically and genetically distinct, thus possessing distinct and immutable differences. Such a construction dovetails with both historical understandings of racial groups as essentially different and

55. DAROWSKI, *supra* note 50, at 34.

56. Mikhail Lyubansky, *Prejudice Lessons from the Xavier Institute*, in *THE PSYCHOLOGY OF SUPERHEROES: AN UNAUTHORIZED EXPLORATION 75* (Robin S. Rosenberg & Jennifer Canzoneri eds., 2008).

57. *Id.* at 85.

58. See Matthew W. Hughey, *Cinethetic Racism: White Redemption and Black Stereotypes in “Magical Negro” Films* 56 *SOC. PROBLEMS* 543 (2009).

59. Adam Waytz, Kelly Marie Hoffman & Sophia Trawalter, *A Superhumanization Bias in Whites’ Perceptions of Blacks*, *SOC. PSYCHOL. & PERSONALITY SCI.* (Oct. 8, 2014), <https://static.squarespace.com/static/51e3f4ede4b053e5f0062efd/t/5474ac44e4b097793d2a00a0/1416932420769/a-superhumanization-bias.pdf> [<https://perma.cc/4VWC-HY3D>].

60. *Id.* at 2–5.

61. *Id.* at 5–6.

62. *Id.*

63. See, e.g., DALTON, *supra* note 35, at 82.

64. Malcolm X, *The Ballot or the Bullet*, <https://www.youtube.com/watch?v=7oVW3HfzXkg> [<https://perma.cc/U54K-HDAW>].

65. See DAROWSKI, *supra* note 50, at 34.

biologically incompatible, as well as a more contemporary resurgence of beliefs in racial essentialism in our postgenomic era.⁶⁶

However, despite these inaccuracies in the analogy, the *X-Men* creative team used the mutant metaphor to reveal the detrimental effects of systemic oppression and interpersonal bigotry for all of society, as well as the effects of the competing approaches to racism and racial inequality. In the story of the *X-Men*, Professor Charles Xavier is the leader of the X-Men, a superhero force comprised of mutants whose defining motto is “to fight to protect a world that hates and fears them.”⁶⁷ Despite the fact that the mutants, like minorities, are the victims of hate, Professor Xavier advocates the peaceful emancipation of his people and the integration of the two “species.”

II. MAGNETO AND MALCOLM X

To equate Magneto with Malcolm X’s philosophy and methodology may be oversimplifying or overreaching, as there were several other prominent civil rights leaders who did not view integration as a viable means for racial equality. When Marvel debuted the *X-Men* in 1963, Magneto was simply portrayed as a supervillain who advocated that the mutants were the obvious superior race and the rightful rulers of the world. It is not until later in the series in *The Uncanny X-Men #199* from November 1985, that we learn of Magneto’s past as a Holocaust survivor.⁶⁸ Nonetheless, Magneto is portrayed predominately as a sympathetic mutant leader “whose motivations you can understand while disagreeing with his methods.”⁶⁹

Having lost his family to the Holocaust and having survived the concentration camps himself, Magneto knows firsthand the dangers of prejudice, racism, nationalism, and fear. He witnessed how a *Herrenvolk* white supremacist state can begin with mere rhetoric, when once embraced and not vehemently resisted, can lead to internment and genocide. Magneto explains that he fights so a similar fate does not befall mutantkind.⁷⁰ The *X-men* creative team employs the revelation of Magneto’s past to illustrate the fact that his fears are not unfounded and do indeed possess historical precedent.⁷¹

The parallels between Magneto’s and Malcolm X’s life are strikingly similar. In a general sense, Malcolm had been born to a people that had long-suffered dehumanization and degradation.⁷² His father had been murdered by the Ku Klux Klan, and his mother placed in a psychiatric facility.⁷³ At a young age, by a white school teacher, Malcolm was instructed that he could not grow up to be a lawyer but

66. For recent debates about the revival of racial essentialist logic in both layperson and academic discourse, see ANNALS AM. ACAD. POL. & SOC. SCI. (Sept. 2015); BRITISH J. SOC. (Mar. 2015); ETHNIC & RACIAL STUD. (Aug. 2014); ISIS (Dec. 2014); PLOS MED. (Sept. 2007); SOC. STUD. SCI. (Oct. 2008); and SOC. THEORY (Sept. 2014).

67. DAROWSKI, *supra* note 50, at 6.

68. *Id.* at 32.

69. *Id.* at 31.

70. *Id.* at 32.

71. Lyubansky, *supra* note 56, at 79.

72. See HALEY & MALCOLM X, *supra* note 64.

73. *Id.*

rather something much more menial.⁷⁴ Ultimately, after turning to a life of crime, he embraced the ideology and eschatology of the Nation of Islam.⁷⁵ Among its doctrine, nothing underscored Malcolm's worldview more than the inherent nature of whites and blacks.

The founder of the Nation of Islam, Wali Fard Muhammad, was believed to be God in the flesh.⁷⁶ He and his successor, Elijah Muhammad, taught that the original inhabitants of the earth were black and that white people were evil incarnate, the devil, created by a scientist named Yakub.⁷⁷ In essence, Elijah Muhammad taught

74. *Id.* at 38.

75. *Id.* at 158.

76. *Id.* at 164.

77. Herbert Berg, *Mythmaking in the African American Muslim Context: The Moorish Science Temple, the Nation of Islam, and the American Society of Muslims*, 73 J. OF THE AM. ACAD. OF RELIGION 685, 691–92 (2005); see also ELIJAH MUHAMMAD, MESSAGE TO THE BLACK MAN IN AMERICA (1997). According to Nation of Islam eschatology, the black man has been on Earth for seventy-eight trillion years and was self-created as a divinity; in essence, the black man was god. The center of early civilization was Mecca, Saudi Arabia. Importantly, by creating white people, black people were the true “gods” who owned the earth and were supposed to rule over whites. At the age of six, while playing with two pieces of steel, Yakub discovered they had a magnetic attraction. He then told his uncle: “Uncle, when I get to be an old man, I am going to make a people who shall rule you.” MUHAMMAD, *supra*, at 112. It is said to have been at that moment that Yakub first came to the realization that he would create an evil race designed to destroy his own people. Later in life, Yakub was believed to have been examining a germ in a microscope. During the observation, Yakub came to the realization that there were two separate men inside of him. One man was black and the other was brown. Yakub deduced that if he could separate the two men, he could eventually graft the brown germ into a white germ. This white germ could be used to create a race of weaker white people. *Id.*

Yakub's methods caused such concern that his followers were persecuted and arrested for their beliefs. However, the efforts of the authorities were largely futile because, “[a]s they began making arrests of those who believed the teaching, the officers would go back and find, to their surprise, others still teaching and believing in it.” *Id.* at 113. Soon the authorities had arrested so many of Yakub's followers that the jails were all filled. The King of Mecca arranged to speak to Yakub to put an end to the unrest in the community caused by the arrests. Yakub told that King that if the King gave Yakub everything he needed to start a new civilization, Yakub would move his followers out of Mecca. Fearful of Yakub, the King agreed to his plan. Consequently, Yakub and his followers were able to leave Mecca and start a new community on an island in the Aegean Sea. Yakub and 59,999 of his followers settled on an island called Pelan. *Id.* at 114. There, Yakub continued to use his secretive eugenics program to create whiter, more evil people who could rule the Earth. Yakub was chosen to be King of Pelan and he ordered the doctors and nurses on the island to help him continue to breed white people. The doctors were instructed to forbid black people from marrying one another. Only brown people could marry and bear children. If black children were born, Yakub had them killed. Eventually, only white children were allowed to live. Because the white children were born as a result of Yakub's lies and murder, they became “by nature liar[s] and murderer[s].” *Id.* at 116. Over the course of 600 years, Yakub was able to breed a race of malicious white people. *Id.*

Yakub returned to Mecca with his race of white people and tried to upset the peace in the city. After just six months in Mecca, the white race had the black people at war with one another unable to get along. The King knew that the trouble in Mecca was caused by the presence of

that black people and white people were fundamentally different.⁷⁸ White people were incapable of love and friendship, while black people had a “heart of gold, love and mercy.”⁷⁹ Because the black people were so loving and forgiving, they were able to be deceived by the white race that eventually enslaved them.⁸⁰ During the time in which they were enslaved, the righteous black people were taught by the whites to practice Christianity.⁸¹ Elijah Muhammad believed it was his mission to guide black people back to the practice of Islam.⁸²

The appeal of the teaching of the Nation of Islam to blacks was obvious, as it provided “[a] history that reversed the traditional account of the European and African contributions to civilization was a source of pride, inspiration, and revolutionary ideas to African Americans.”⁸³ Especially during the 1950s and 1960s when the Nation of Islam was at its most prominent point, many African Americans felt that the racist behavior of whites was evil and uncivilized.⁸⁴ By embracing the Nation of Islam and rejecting Christianity—which taught blacks to “turn the other cheek” in the face of violence and discrimination—the Nation of Islam was seen as a way for blacks to fight back against racist ideologies and practices.⁸⁵

The black-race-as-god theology of the Nation of Islam finds similar application in the *X-Men* saga, particularly amongst those that follow Magneto. In *X-Men 2*, Magneto says to Pyro, “You are a god among insects. Never let anyone tell you different.”⁸⁶ In *X-Men: First Class*, the mutant Erik Lehnsherr asks, “This society won’t accept us. We form our own. The humans have played their hand, now we get ready to play ours. Who’s with me?”⁸⁷ And in *Ultimate X-Men 5: Killing Fields*, Magneto states, “No wonder we call ourselves homo superior.”⁸⁸

the white people so he ordered them to be driven away at gunpoint. The whites eventually settled in Europe. The soldiers from Mecca patrolled the borders of Europe to keep the white people contained. *Id.* at 117–18. During their time in Europe, the white people began to lose their civilization and became savages. Some members tried to graft themselves back into members of the black nation, but the closest they came was “what you call the gorilla.” *Id.* at 119. According to Elijah Muhammad’s teachings, “all of the monkey family are from this 2000 year history of the white race in Europe.” *Id.* After 2,000 years of watching the white people live as savages, Moses appeared to civilize the white population. *Id.* at 120. However, Moses had great difficulty controlling the evil white people and they continued to subdue the other living creatures of the Earth.

78. MUHAMMAD, *supra* note 77, at 122.

79. *Id.*

80. *Id.* at 125.

81. 2 ELIJAH MUHAMMAD, THE SUPREME WISDOM 16 (1957).

82. *See generally id.*

83. Berg, *supra* note 77, at 694.

84. *Id.*

85. *Id.*

86. X-MEN 2 (Twentieth Century Fox Film 2003).

87. X-MEN: FIRST CLASS (Twentieth Century Fox Film 2011).

88. *Ultimate X-Men 5: Killing Fields*, X-MEN COMICS (Marvel Comics June 2001).

Moreover, the confrontational stance of militarism that framed the Nation of Islam and Black Nationalist movement is also emphasized in the mutant followers of Magneto. Indeed, Malcolm X noted:

There's new thinking coming in. There's new strategy coming in. It'll be Molotov cocktails this month, hand grenades next month, and something else next month. It'll be ballots, or it'll be bullets. It'll be liberty, or it'll be death. The only difference about this kind of death—it'll be reciprocal.⁸⁹

Elsewhere, Malcolm X underscored the urgency of the time and the consequences for restricting African Americans' ability to bring about racial equality via traditional democratic means: "If we don't do something real soon, I think you'll have to agree that we're going to be forced either to use the ballot or the bullet. It's one or the other in 1964. It isn't that time is running out—time has run out!"⁹⁰

In the movie *X-Men: First Class*, Magneto states matter-of-factly, "Peace was never an option,"⁹¹ and in *X-Men, Vol. 2, #3*, he states, "Farewell, my old friend. Whatever comes, I and mine will not go like lambs to the slaughter—but like tigers!"⁹² In many respects, Magneto is a sympathetic character whose rationale the reader can understand. However, while readers are permitted to side with either approach, there are signs that the creators of the series endorse the integrationist approach. This is illustrated by the characterization of Magneto as a villain and the leader of the "The Brotherhood of Evil Mutants."⁹³ For the creators of the X-Men narrative, Magneto represents both the threat and consequence of prejudice, bigotry, systemic oppression, and both *de jure* and *de facto* exclusionary tactics. First, to

89. MALCOLM X, MALCOLM X SPEAKS: SELECTED SPEECHES AND STATEMENTS 32 (George Breitman ed., 1965).

90. *Id.* at 25.

91. X-MEN: FIRST CLASS, *supra* note 87.

92. Chris Claremont & Jim Lee, *Fallout*, X-MEN 3 (Vol. 2) (Marvel Comics Dec. 1991). In many respects, this point is consistent with Harlem Renaissance poet, Claude McKay's conception of doomed resistance in his poem, "If We Must Die":

If we must die—let it not be like hogs
Hunted and penned in an inglorious spot,
While round us bark the mad and hungry dogs,
Making their mock at our accursed lot.
If we must die—oh, let us nobly die,
So that our precious blood may not be shed
In vain; then even the monsters we defy
Shall be constrained to honor us though dead!
Oh, Kinsmen! We must meet the common foe;
Though far outnumbered, let us show us brave,
And for their thousand blows deal one deathblow!
What though before us lies the open grave?
Like men we'll face the murderous, cowardly pack,
Pressed to the wall, dying, but fighting back!

Claude McKay, *If We Must Die*, POETS.ORG, <https://www.poets.org/poetsorg/poem/if-we-must-die> [<https://perma.cc/D3QE-HL9S>].

93. DALTON, *supra* note 35, at 82.

illustrate the evil consequences of prejudice and bigotry by the dominant group, Trask, the creator of the army of Sentinels that track and capture innocent mutants, realizes in the end that “[i]n my ignorance, in my fear, I created an evil far greater than the menace it was built to destroy!”⁹⁴ Trask also exclaims, “Beware the fanatic! Too often his cure is deadlier by far than the evil he denounces!”⁹⁵ Furthermore, Magneto’s reactionary thesis serves as a cautionary tale for those who would continue to oppress people based on social categories such as race, gender, or sexuality, amongst others.

Second, even though the Black Nationalist approach, as depicted by the use of Magneto’s tactics, is portrayed as an understandable response to the evils of prejudice and bigotry, Magneto’s prejudice is seen as creating more evil and inequality instead of forming a more peaceful, if separate, existence for mutant-kind. Magneto is portrayed as one result of the strain of prejudice: fighting hate with hate only results in all becoming monsters. For instance, in *The X-Men #16*, during a battle between the X-Men and Magneto, Magneto, at the last minute, restrains from killing X-Man Kitty Pryde (a.k.a. Sprite, Ariel, and finally Shadowcat) due to her young age (fourteen) and retreats, remarking that “hatred of humanity has made him into a monster.”⁹⁶ In this way, Magneto’s character illustrates the destructive consequences of his path and any type of so-called “reverse-racism.” Furthermore, Stan Lee, in a *Rolling Stone* interview in 1971, went on to argue that, “If you’re a radical, don’t think that all of the conservatives have horns.”⁹⁷ What he seemed to mean was that one should not believe that all people are prejudiced and that none are willing to accept a more inclusive approach. By labeling Magneto’s approach as evil and destructive, the creative team seems to portray Professor Xavier’s integrationist approach as more palatable approach and philosophy because it is both peaceful and unthreatening to the dominant group’s autonomy, standing, or way of life, not to mention the social order and status quo.

III. PROFESSOR XAVIER AND MARTIN LUTHER KING, JR.

Mutant superiority and separatism is consistently juxtaposed against Charles Xavier’s (Professor X’s) stance on mutant/human differences as neutral differences rather than hierarchical qualities of superiority and inferiority, as well as Professor Xavier’s stance on peaceful resolution of disagreement. For example, in *X-Men: First Class*, Erik Lehnsherr, Magneto’s character, speaks apologetically towards Charles Xavier: “Us turning on each other, it’s what they want. I tried to warn you, Charles. I want you by my side. We’re brothers, you and I. All of us together, protecting each other. We want the same thing.”⁹⁸ But in response, Xavier replied, “My friend, I’m sorry, but we do not [want the same thing].”⁹⁹ Xavier’s school of thought draws from the reservoir of racial Civil Rights tactics emphasized by Martin Luther King, Jr. (e.g., love and non-violence).

94. DAROWSKI, *supra* note 50, at 40.

95. DALTON, *supra* note 35, at 82.

96. DAROWSKI, *supra* note 50, at 64.

97. Green, *supra* note 53.

98. X-MEN: FIRST CLASS, *supra* note 87.

99. *Id.*

To understand King's attempt to utilize non-violence as a tool for social change, it is important to consider the work of Mahatma Gandhi, as Dr. King drew inspiration from Gandhi and his commitment to social justice through non-violence.¹⁰⁰ In explaining the concept of non-violence, Gandhi used the Gujarati words “*satya*” and “*agraha*”; the former translates to “truth” and the latter to “taking, firmness, seizing, or holding.”¹⁰¹ Gandhi wove the two words together to form “Satyagraha,” a blended term that would come to define his notion of “non-violence.” Because “Satyagraha” translated to “truth” or “love-force,” and Gandhi believed that “truth” was a synonym for “God,” *satagraha* came to mean “the way of life of one who holds steadfastly to God and dedicates his life to Him.”¹⁰² Because Gandhi believed absolute truth was a task that only God could achieve, he noted that a seeker of “truth” must be guided by the Sanskrit word “*ahimsa*,” meaning non-violence.¹⁰³ To Gandhi, *ahimsa* (or, as translated, loving an opponent to a point of not wishing her or him any harm) was the approach all should take in order to achieve desired social change.¹⁰⁴ Behind Gandhi's beliefs stood truth and love, truth as an end and love as the means to achieving this end with the hope of finding real social change. Gandhi believed that love (non-violence) was the path to truth and truth, the path to social change.

In his Nobel Peace Prize Speech in 1964, Dr. King spoke of non-violence and love as a means to social change, highlighting Gandhi's struggles in India:

Civilization and violence are antithetical concepts. Negroes of the United States, following the people of India, have demonstrated that nonviolence is not sterile passivity, but a powerful moral force which makes for social transformation. Sooner or later all the people of the world will have to discover a way to live together in peace, and thereby transform this pending cosmic elegy into a creative psalm of brotherhood. If this is to be achieved, man must evolve for all human conflict a method which rejects revenge, aggression and retaliation. The foundation of such a method is love.¹⁰⁵

Dr. King cited Gandhi's work several times, believing that “the Christian doctrine of love operating through the Gandhian method of nonviolence was one of the most potent weapons available to the Negro in his struggle for freedom.”¹⁰⁶ Dr. King saw non-violence not only as a religious concept, but also as a moral principle, a principle that promotes treating others the way you would like to be treated. In his work *Stride Toward Freedom*, Dr. King defined non-violence to include six fundamental principles: (1) non-violence is a way of life for courageous people; (2) non-violence seeks to win friendship and understanding; (3) non-violence seeks to defeat injustice not people; (4) nonviolence holds that suffering can educate and transform;

100. Paul Banahene Adjei, *The Non-Violent Philosophy of Mahatma Gandhi and Martin Luther King Jr. in the 21st Century: Implications for the Pursuit of Social Justice in a Global Context*, 3 J. GLOBAL CITIZENSHIP & EQUITY EDUC. 80, 84 (2013).

101. *Id.* at 83

102. M.K. GANDHI, NON-VIOLENT RESISTANCE (SATYAGRAHA) iii (1951).

103. *Id.* at 41.

104. *See id.* at 84.

105. Martin Luther King, Jr., Nobel Peace Prize Acceptance Speech (Dec. 10, 1964).

106. MARTIN LUTHER KING, JR., STRIDE TOWARD FREEDOM 71 (1958).

(5) non-violence chooses love instead of hate; and (6) non-violence believes that a universe is on the side of justice.¹⁰⁷ For the purposes of this article, the rest of the discussion will focus on the fifth principle: King's philosophy of choosing love instead of hate as a method of bringing about social change.

Dr. King believed the principle of love was at the core of non-violence.¹⁰⁸ In spite of its common definition, Dr. King did not invoke sentimental emotion when he spoke of "love," but rather clung to the understanding and goodwill that the foundation of love requires. When Dr. King spoke about love, he referenced the Greek testament's word for love, *agape*. In the Greek language, *agape* translates to understanding, and redeeming goodwill for both friends and enemies.¹⁰⁹ Promoting love while experiencing merciless hatred eventually strips hatred's effect and, with it, the abuser's power. Dr. King believed that love was an essential component in non-violent protest because it was a weapon that his opponent could not control or take away from him. To King, *agape* love defeats hatred. Dr. King highlighted the battling forces in the following excerpt of his book *Where Do We Go From Here*: "Darkness cannot drive out darkness: only light can do that. Hate cannot drive out hate: only love can do that. The beauty of nonviolence is that in its own way and in its own time it seeks to break the chain reaction of evil."¹¹⁰

In his book *Stride Toward Freedom*, Dr. King urged nonviolent resisters to follow the teachings of Gandhi and say:

We will match your capacity to inflict suffering with our capacity to endure suffering. We will meet your physical force with soul force. We will not hate you, but we cannot in all good conscience obey your unjust laws. Do to us what you will and we will still love you. Bomb our homes and threaten our children; send your hooded perpetrators of violence into our communities and drag us out on some wayside road, beating us and leaving us half dead, and we will still love you. But we will soon wear you down by our capacity to suffer. And in winning our freedom we will so appeal to your heart and conscience that we will win you in the process.¹¹¹

To define the principle of non-violent love over hatred more transparently, Dr. King set out narrow sub-categories for his readers, including:

Nonviolence resists violence of the spirit as well as of the body.
 Nonviolent love gives willingly, knowing that the return might be hostility.
 Nonviolent love is active, not passive.
 Nonviolent love does not sink to the level of the hater.
 Love for the enemy is how we demonstrate love for ourselves
 Love restores community and resists injustice.

107. *Id.* at 90–95.

108. MARTIN LUTHER KING, JR., *Nonviolence and Racial Justice*, in VI THE PAPERS OF MARTIN LUTHER KING, JR. 118, 121 (Clayborne Carson et al. eds., 2000).

109. *Id.*

110. MARTIN LUTHER KING, JR., *WHERE DO WE GO FROM HERE* 65 (1968).

111. KING, *supra* note 106, at 213.

Nonviolence recognizes the fact that life is interrelated.¹¹²

In short, King's non-violence movement and/or philosophy on love was one of peaceful action. Dr. King preached the celebration of the spiritual force of love and the embrace of its unifying power to his followers.¹¹³ Until the end, Dr. King held that love and the grace of God had the power to change a prejudiced mind "from the valley of hate to the high mountain of love."¹¹⁴

IV. CHOOSING AN APPROACH

Mistakenly, integrationism and black power are often juxtaposed as two opposing poles in civil rights ideology.¹¹⁵ It is more accurate to view these ideologies as discrete points on a spectrum of philosophies for achieving civil rights. This spectrum ranges from the original, conservative "legalism" approach pursued in the early era of the civil rights movement¹¹⁶ through the radical, militant black power of the 1970s.¹¹⁷ Integrationism falls somewhere in the middle of the spectrum.

While this article is primarily concerned with the relationship between integrationism and black power, it is critical to understand integrationism as a "militant" reaction to the early era of legalism. In criticizing this approach, Martin Luther King, Jr. discouraged reliance on the courts alone.¹¹⁸ He advocated the use of nonviolent direct action as a militant movement, as opposed to the legalist approach of working within the system to effect change.¹¹⁹ Part of integrationism's success was its location as a "middle" ground whereby it appealed to a cross section of mainstream American culture in the 1960s.¹²⁰

Similarly, black power, while pervasive throughout African American history, gained prominence in the late 1960s and early 1970s as a reaction to integrationism. Black power ideology was more militant, abandoning the position of nonviolence in favor of self defense.¹²¹ It, however, never gained the popularity or social prominence of integrationism because of its exclusionary philosophy that isolated whites and black moderates, effectively prohibiting their participation.¹²²

112. Martin Luther King, Jr., *Principles of Nonviolence*, <http://www.cpt.org/files/PW%20-%20Principles%20-%20King.pdf> [<https://perma.cc/G7Z3-MWYZ>].

113. *See id.*

114. Martin Luther King, Jr., *The Death of Evil upon the Seashore*, Sermon at the Service of Prayer and Thanksgiving, Cathedral of St. John the Divine (May 17, 1956).

115. Gary Peller, *Race Consciousness*, 1990 DUKE L.J. 758, 826 (1990).

116. *Id.* at 837.

117. Daryl Michael Scott, *How Black Nationalism Became Sui Generis*, FIRE!!!, Summer/Winter 2012, at 6, 20.

118. Cass R. Sunstein, *What the Civil Rights Movement Was and Wasn't (with Notes on Martin Luther King, Jr. and Malcolm X)*, 1995 U. ILL. L. REV. 191, 199 (1995); *see also* Peller, *supra* note 115, at 828.

119. Peller, *supra* note 115, at 828.

120. *See* Brandon M. Lofton, *Fifty Years After Brown, the Civil Rights Ideology and Today's Movement*, 29 N.Y.U. REV. L. & SOC. CHANGE 719, 725 (2005).

121. *See* Scott, *supra* note 117, at 34.

122. Peller, *supra* note 115, at 835.

The culmination of these factors led to the current state in which many regard integrationism as our “national civil rights policy.”¹²³ Many scholars question its continued effectiveness as adapted in modern society.¹²⁴ Some go so far as to assert the need for a new civil rights ideology.¹²⁵ However, to craft an effective new ideology, it is critical to examine the respective successes and failures of the integrationism and black power movements.

Integration “is as a set of beliefs that recognizes the limitations of our society’s equality norm (a commitment to enforcing race-neutral, antidiscrimination in governmental decision-making).”¹²⁶ The foundation of this ideology is that (i) black identity and American identity are analogous, (ii) freedom is defined as full equality with white citizens, and (iii) the American promises of liberty, as articulated in the founding documents, can address the challenges of black communities.¹²⁷ In other words, the American ideals, when fully realized by African Americans, will lead to freedom and equality.

Integrationism as an ideology attracted widespread support from both middle class blacks and liberal whites. Because of its widespread appeal, the leaders of the integration movement were able to effectively build a coalition of support that resulted in the end of formalized segregation. Several facets of integrationism led to its appeal for various groups. First, it focused on individuals and the universality of the human experience, as opposed to essentializing groups of people (whites) as defined by particular characteristics.¹²⁸ Similarly, it recognized that segregation also resulted in the essentialization of blacks as a group and inherently devalued them leading to individual and communal lack of confidence and denial of self-respect.¹²⁹ In addition, because integrationism rejected essentialization as an ideology, all forms of essentialization were considered problematic. This enabled whites to join the coalition while rejecting black power as a form of essentialization equivalent to white supremacy.¹³⁰ As stated by one scholar, “integrationists needed to reject black nationalists because of the threat that they posed to the cultural self-identity of both the black middle class moderates and the white upper class liberals.”¹³¹

The integrationism movement also successfully managed to use widely accepted American ideals to highlight the hypocrisy of denying rights to African Americans. Freedom from desperate conditions was not a creation of the Civil Rights movement.¹³² It is the abstract principle on which the very notion of Americanism is founded. Civil rights leaders capitalized on that ideal leading to its resurgence as a

123. See Michelle Adams, *Integration Reclaimed: A Review of Gary Peller’s Critical Race Consciousness*, 46 CONN. L. REV. 725, 729, 735 (2013).

124. See Peller, *supra* note 115, at 758; see also John A. Powell, *An Agenda for the Post-Civil Rights Era*, 29 U.S.F. L. REV. 889, 906–07 (1995).

125. See Powell, *supra* note 124, at 906–07.

126. Adams, *supra* note 123, at 735.

127. Lofton, *supra* note 120, at 727.

128. See Sunstein, *supra* note 118, at 207.

129. See *id.* at 197.

130. See Peller, *supra* note 115, at 788.

131. *Id.* at 822.

132. Sunstein, *supra* note 118, at 195.

means of gaining social equality for African Americans in the 1960s.¹³³ MLK even went so far as to propose a Bill of Rights for the disadvantaged.¹³⁴

Finally, as it became clear that attempts to achieve “equal” facilities were failing, the Integrationist movement shifted focus to attack the notion of “separate” facilities.¹³⁵ They argued, as famously noted in *Brown v. Board of Education*,¹³⁶ that separate facilities are inherently unequal. As a result, white politicians could no longer systemically disadvantage black facilities in terms of funding and other social benefits.¹³⁷ When the advantaged and disadvantaged groups are spatially integrated it becomes more difficult to strategically disadvantage one group or another as they are inherently intertwined.¹³⁸ While this principle works in theory, modern scholars challenge its effectiveness because it has not been fully implemented and has suffered notable legal attacks, such as the dismantling of the key provision of Section 4 of the Voting Rights Act in *Shelby County v. Holder*.¹³⁹ and the white social and political backlash against the past half century’s struggle for human rights. Complete institutional integration remains an unattained social goal.¹⁴⁰

Despite its successes, a number of shortcomings of integrationism led to the rise of black power as a movement and the unfulfilled promise of racial equality in modern society. First, the core beliefs of civil rights ideology as confined to the American legal and political philosophies ultimately proved too narrow to adequately address the complexities of desegregation.¹⁴¹ This is evinced by the continuation of de facto segregation.¹⁴² Because American institutions were created by white people, it has proven impossible as yet for African Americans to achieve equality via systems that they had no hand in creating.¹⁴³ As legally buffered and socially enforced, many American institutions are inherently oppressive, and therefore, African Americans cannot obtain equality via these mechanisms.¹⁴⁴

The courts are one example of an institution that has failed to assist African Americans in achieving full equality. In striking down many affirmative action plans, judicial and policy decision makers have relied on the interests of “disadvantaged whites,” not the interests of African Americans in obtaining access to social and economic resources.¹⁴⁵ The only recourse for African Americans under the integrationism ideology, which defers to the American principles of justice and liberty and is enforced by the courts, is to criticize the reasoning and decisions of the

133. *See id.*

134. *Id.*

135. *See Adams, supra* note 123, at 746.

136. 347 U.S. 483, 495 (1954) (“Separate educational facilities are inherently unequal.”), *supplemented by* 349 U.S. 294 (1955).

137. *See Adams, supra* note 123, at 746.

138. *Id.* at 749.

139. *See* 133 S. Ct. 2612 (2013).

140. *Id.* at 750.

141. Lofton, *supra* note 120, at 722.

142. *See Adams, supra* note 123, at 732.

143. *See* Lofton, *supra* note 120, at 731–33; *see also* Peller, *supra* note 115, at 779.

144. Lofton, *supra* note 120, at 731–33.

145. *See id.* at 742.

courts.¹⁴⁶ As a result, the law as an institution maintains the existing racial hierarchy by giving it the appearance of legitimacy and neutrality while it is effectively operating under biased norms.¹⁴⁷

Under this model, “racially-neutral” society, where everyone is given an equitable opportunity to succeed, is defined under white social norms.¹⁴⁸ As a result, differences in outcomes are taken as reflecting real differences in ability, characterizing African Americans as unqualified.¹⁴⁹ This categorization appears fair and justified because society accepts that the norms under which institutions operate as unbiased, when in reality they reflect the normative white discourse by which they were created.¹⁵⁰ Thus, integration has not been achieved; integration stands for equal access to resources, not equal access to operate within a system defined by white social norms.¹⁵¹

Unlike integrationism, black power has been a pervasive force throughout history. Classical black power is the foundation for arguing for a sovereign African-American state.¹⁵² However, the movement morphed in response to the integrationism ideology of the 1960s and reemerged as the modern black power commonly recognized and characterized as “black power.”¹⁵³ The modern black power movement rejected integrationism’s reliance on American social norms.¹⁵⁴ It conceived an African-American identity that reclaimed their history and culture as opposed to capitulating to the larger white, American culture.¹⁵⁵

Arguably the most significant feature of the black power movement was the reclamation of a uniquely African-American cultural identity. One effect of this reclamation is fostering individual and communal self worth.¹⁵⁶ Rather than viewed as “other,” the black power movement created a space where African Americans were valued for their unique social experiences.¹⁵⁷ This is one reason that the movement gained prominence in response to the universalism or co-option of white social norms many viewed as quintessential to integrationism.

Some find the principal failure of black power was its lack of effective coalition building.¹⁵⁸ It was, characteristically, an exclusionist movement primarily supported by northern, urban, poor African Americans.¹⁵⁹ Whites were holistically rejected.¹⁶⁰ In fact, association with whites was viewed as a form of race treachery.¹⁶¹ Black

146. *Id.* at 743.

147. *Id.* at 745.

148. *See* Lofton, *supra* note 120, at 746–47.

149. Peller, *supra* note 115, at 807.

150. Lofton, *supra* note 120, at 746–47.

151. *See* Adams, *supra* note 123, at 745.

152. *See* Scott, *supra* note 117, at 7.

153. *Id.*

154. Lofton, *supra* note 120, at 750.

155. *Id.*

156. *See* Sunstein, *supra* note 118, at 197.

157. *See id.*

158. *See* Peller, *supra* note 115, at 835.

159. *See Id.* at 832.

160. *See Id.* at 835.

161. *See Id.* at 833.

nationalists also rejected the black middle class because of their alliance with whites and their achievement of socio-economic status via white institutions.¹⁶² Finally, much of the Black Power movement was patriarchal and sexist, as well as homophobic and heteronormative.¹⁶³ Women and LGBTQ-identified people were precluded from realistic participation and male domination was viewed as an essential part of “authentic black culture.”¹⁶⁴

Another contributing factor to black power’s relative lack of popularity was its essentialization and dehumanization of both the white and black communities.¹⁶⁵ Malcolm X frequently referred to the heterogeneous white community as “the oppressors” and “the white man,” resulting in a less than human depiction.¹⁶⁶ In contrast, African Americans were portrayed as a community of “the oppressed.”¹⁶⁷

Finally, while black power was able to craft a movement around the destruction of white power and social domination, it “lacked a realistic program for achieving racial equality.”¹⁶⁸ In other words, it had a program for breaking down institutions but not for rebuilding a nation consistent with its vision. One critic of the movement asserted that it shifted the focus of the civil rights movement away from a meaningful discourse over effective strategy and tactics.¹⁶⁹ Further, once there was widespread commitment to a fluid, race-neutral regime, the idea of an African-American society or “nation” was diametrically opposed to the dominant ideology.¹⁷⁰ As a result of its isolationism and failure to construct a definition of the post-civil rights era that resonated with a majority of society, black power enjoyed a relatively brief period of popular appeal and has since waned in societal acceptance.

CONCLUSION

Today, a colorblind version of integrationism, in the normative ideology of civil rights society, has pledged itself to a non-race conscious version of integration.¹⁷¹ While historically integration was not analogous to “colorblindness,”¹⁷² modern understanding of a racially-neutral society is equivalent to a racially-blind society. As a result, many civil rights scholars agree that it is time to reevaluate the tools and strategies for combating the status quo of disparate social conditions between races.¹⁷³

162. *Id.* at 834.

163. But see HUEY NEWTON, *The Women’s Liberation and Gay Liberation Movements, in TO DIE FOR THE PEOPLE* 153 (Toni Morrison ed., 2009), for a discussion of notable exceptions, such as Huey P. Newton and the Black Panther Party as the first race-based civil rights era organization to embrace LGBTQ people.

164. Peller, *supra* note 115, at 819.

165. *See id.* at 818.

166. Sunstein, *supra* note 118, at 206–07.

167. *See* Peller, *supra* note 115, at 819.

168. Adams, *supra* note 123, at 743; *see also* Scott, *supra* note 117, at 31.

169. Adams, *supra* note 123, at 743.

170. *Id.* at 752.

171. *See* Peller, *supra* note 115, at 773.

172. *See id.* at 777.

173. *See* Adams, *supra* note 123, at 731; *see also* Powell, *supra* note 124, at 906–07.

In the context of the X-Men, as is often discussed vis-à-vis African American's quest for racial justice and social equality, the question arises: Which approach (peace or violence) is best? Noted African-American actor and Civil Rights activist, Ossie Davis, may have provided the clearest and most well-reasoned articulation of the choice. He noted Malcolm X forced white America's hand. They had to choose between him and what they perceived he stood for—hate and violence—and Martin Luther King, Jr. and what he stood for—love and mere social equality.¹⁷⁴

To choose Professor Xavier over Magneto or Martin over Malcolm—and their respective approaches to equality and justice—was and is a false choice.¹⁷⁵ While the symbol of an out-stretched hand has gained the most currency, as it probably should, it seems only possible given threat of a clenched fist.¹⁷⁶ Indeed, Frederick Douglas put it best when he stated:

If there is no struggle there is no progress. Those who profess to favor freedom and yet deprecate agitation, are men who want crops without plowing up the ground, they want rain without thunder and lightning. They want the ocean without the awful roar of its many waters.

This struggle may be a moral one, or it may be a physical one, and it may be both moral and physical, but it must be a struggle. Power concedes nothing without a demand. It never did and it never will. Find out just

174. *Eyes on the Prize II: America at the Racial Crossroads 1965 to 1985* (PBS television broadcast 1990). In his words, Ossie Davis noted:

[W]e wanted to show the world that we had no evil intentions against anybody. We just wanted to be included. But they also understood that America, in spite of our reassurances, would be frightened and hesitant to open the doors to Black folks. So Malcolm as the outsider as the man they thought represented the possibilities of violence was the counter that they could use. They would say to the powers that be, "Look here's Martin Luther King and all these guys. We are nonviolent. Now outside the door if you don't deal with us is the other brother, and he ain't like us. You going to really have hell on your hands when you get to dealing with Malcolm. So it behooves you, White America, in order to escape Malcolm, to deal with us."

HENRY HAMPTON & STEVE FAYER, *VOICES OF FREEDOM* 163 (1991).

175. Even Martin Luther King, Jr., himself, noted:

We are deeply in need of a new way beyond the darkness that seems so close around us. . . . We must be prepared to match actions with words by seeking out every creative method of protest possible. . . . Every man of humane convictions must decide on the protest that best suits his convictions, but we must all protest.

Martin Luther King, Jr., *Beyond Vietnam—A Time to Break Silence* (Apr. 4, 1967).

176. As Nation of Islam leader, Minister Louis Farrakhan recently articulated, white people will only begin to listen to black concerns through true threat of violence against whites:

As long as they [whites] kill us [blacks] and go to Wendy's and have a burger and go to sleep, they'll keep killing us. But when we die and they die, then soon we're going to sit at a table and talk about it! We're tired! We want some of this earth or we'll tear this goddamn country up!

Louis Farrakhan, *Re-claim, Re-pair, Re-form, Re-produce—Reparations Now*, Morgan State University (Nov. 22, 2014).

what any people will quietly submit to and you have found out the exact measure of injustice and wrong which will be imposed upon them, and these will continue till they are resisted with either words or blows, or with both. The limits of tyrants are prescribed by the endurance of those whom they oppress.¹⁷⁷

This theme—the utility of violence and nonviolence as counterbalances—is age-old in African American's quest for social equality and civil rights and is still reverberating today.

177. Frederick Douglass, *West India Emancipation, Speech Delivered at Canandaigua, New York (Aug. 4, 1857)*, in 2 *THE LIFE AND WRITINGS OF FREDERICK DOUGLASS* 437 (Philip S. Foner ed., 1950).