

ON RACE AND PERSUASION*

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No one can seriously dispute that the elections of the forty-fourth and forty-fifth Presidents of the United States marked dramatic sea changes in the nation's self-image.¹ The 2008 election enabled us to declare ourselves post-racial.² Today, we appear to have moved away from a post-racial America to a post-factual (or post-truth) one.³ Of course, those who cast doubt on the existence of a post-racial America back in 2008⁴ might point out that we were post-factual all along. Did we believe the United States was what we longed for it to be rather than what it actually was? Did our emotions—whether they be guilt, anger, hope, or some strange combination of these—cloud our view of who we really are?

* This article is one of six written for CUNY Law Review's inaugural cross-textual dialogue. The author was invited to write a short piece in response to the following quotation: "When you say racism, they say: it could have been something else. Sometimes you just know when it is racism. It is as tangible as hitting a wall, that the problem is you; that part of you that makes you the person they do not want or expect, the part of you than makes you stand out from the sea of whiteness. Sometimes you are not sure. And you begin to feel paranoid. That is what racism does: it makes you question everything, the whole world, the world to which you exist in relation. Heterosexism and sexism are like that too: are they looking at me like that because of that? Is that why they are passing us over, two women at the table? You are not sure." Sara Ahmed, *Evidence*, FEMINISTKILLJOYS (July 12, 2016, 2:00 PM), <https://feministkilljoys.com/2016/07/12/evidence/> [<https://perma.cc/T39A-28S3>].

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¹ Of course, this is probably not the only significant change. In particular, dramatic policy reversals are anticipated under President Donald Trump. As of this writing, many of those promised reversals—e.g., the repeal of the Affordable Care Act—have not yet been realized. However, President Trump has already altered the federal government's stance on a number of issues, including environmental protection and especially immigration enforcement.

² See Adrien K. Wing, *Is There a Future for Critical Race Theory?*, 66 J. LEGAL EDUC. 44, 45 (2016).

³ This is a common observation. See, e.g., Buck Banks, *I Have My Facts, You Have Yours*, PENSITOREV. (Nov. 17, 2016), <http://www.pensitoreview.com/2016/11/17/i-have-my-facts-you-have-yours> [<https://perma.cc/9WPT-4S4B>]; Mat Johnson, *Looking Back with Gratitude on Obama, and His Optimistic Vision of America*, NPR (Jan. 18, 2017), <http://www.npr.org/2017/01/18/510269800/looking-back-with-gratitude-on-obama-and-his-optimistic-vision-of-america> [<https://perma.cc/9TAY-QJY6>]; Amy B Wang, *'Post-truth' Named 2016 Word of the Year by Oxford Dictionaries*, WASH. POST (Nov. 16, 2016), https://www.washingtonpost.com/news/the-fix/wp/2016/11/16/post-truth-named-2016-word-of-the-year-by-oxford-dictionaries/?utm_term=.b31e07ff1714 [<https://perma.cc/BZ9D-ZAL3>].

⁴ See, e.g., Reginald T. Shuford, *Why Affirmative Action Remains Essential in the Age of Obama*, 31 CAMPBELL L. REV. 503, 504-05 (2009).

Sara Ahmed talks about doubt;⁵ indeed, we seem to be living in a climate of doubt. Unreliable polls,⁶ fake news,⁷ photoshopped images,⁸ and tweets about hoaxes perpetrated by China⁹ (or scientists,¹⁰ or the media¹¹) add to the growing, solipsistic dread that truth is increasingly elusive.¹² Perhaps more accurately, what has become elusive is the belief that *any larger truths* are possible; we are left with finding our own small truths—those derived from our immediate experiences, emotions, and choices. It is no wonder that political pundits and journalists now lament the end of an era when facts used to matter.¹³

⁵ Sara Ahmed, *Evidence*, FEMINISTKILLJOYS (July 12, 2016), <https://feministkilljoys.com/2016/07/12/evidence> [<https://perma.cc/6QRD-CZ2M>].

⁶ See, e.g., Ozan Kuru, *What the Failure of Election Predictions Could Mean for Media Trust and Data Journalism*, MEDIASHIFT (Nov. 29, 2016), <http://mediashift.org/2016/11/136541/> [<https://perma.cc/8MHN-ANTQ>] (linking debates about polling with post-factual politics).

⁷ See, e.g., Steve Inskip, *A Finder's Guide to Facts*, NPR (Dec. 11, 2016, 8:25 AM), <http://www.npr.org/2016/12/11/505154631/a-finders-guide-to-facts> [<https://perma.cc/FGK5-LWEA>] (providing suggestions for how to tell the difference between fake and real news).

⁸ See, e.g., Saskia de Melker, *What Happens When Photoshop Goes Too Far?*, PBS NEWSHOUR (July 26, 2015, 2:47 PM), <http://www.pbs.org/newshour/bb/now-see-exhibit-chronicles-manipulated-news-photos/> [<https://perma.cc/4WXL-8WLD>] (discussing the history of photo manipulation in journalism).

⁹ See Louis Jacobson, *Yes, Donald Trump Did Call Climate Change a Chinese Hoax*, POLITIFACT (June 3, 2016, 12:00 PM), <http://www.politifact.com/truth-o-meter/statements/2016/jun/03/hillary-clinton/yes-donald-trump-did-call-climate-change-chinese-h/> [<https://perma.cc/Z7YW-CB4H>].

¹⁰ See, e.g., Paul B. Farrell, *Climate Science is a Hoax: Big Oil, GOP, God Say So*, MARKETWATCH (May 27, 2014, 9:45 AM), <http://www.marketwatch.com/story/climate-science-is-a-hoax-big-oil-gop-god-say-so-2014-05-22> [<https://perma.cc/PAN5-VB23>] (observing that the debate over climate change is cultural rather than scientific).

¹¹ See, e.g., Ravi Somaiya & Leslie Kaufman, *If a Story is Viral, Truth May Be Taking a Beating*, N.Y. TIMES (Dec. 9, 2013), <http://www.nytimes.com/2013/12/10/business/media/if-a-story-is-viral-truth-may-be-taking-a-beating.html> [<https://perma.cc/8W4J-M8R5>] (discussing the problematic nature of digital news).

¹² Ironically, this problem has emerged at a time when we have access to more facts about the world than ever. See, e.g., STANFORD HISTORY EDUC. GRP., *EVALUATING INFORMATION: THE CORNERSTONE OF CIVIC ONLINE REASONING 5* (2011), <https://sheg.stanford.edu/upload/V3LessonPlans/Executive%20Summary%2011.21.16.pdf> [<https://perma.cc/56JV-QHQQ>] (“Never have we had so much information at our fingertips. Whether this bounty will make us smarter and better informed or more ignorant and narrow-minded will depend on our awareness of this problem and our educational response to it. At present, we worry that democracy is threatened by the ease at which disinformation about civic issues is allowed to spread and flourish.”).

¹³ See, e.g., William Davies, *Opinion, The Age of Post-Truth Politics*, N.Y. TIMES (Aug. 24, 2016) <https://www.nytimes.com/2016/08/24/opinion/campaign-stops/the-age-of-post-truth-politics.html> [<https://perma.cc/7BJF-BAFD>] (warning that the focus on data over facts makes it harder to achieve consensus and breeds conspiracy theories); Daniel W. Drezner, *Why the Post-Truth Political Era Might Be Around for a While*, WASH.

But for racial minorities in the United States, this is nothing new. Our experiences, emotions, and choices were never a significant part of the truth (writ large) of America. While blacks were enslaved and dehumanized, raped and killed with impunity, weren't they nonetheless described as living contented, pastoral lives on the plantation?¹⁴ As American Indians were being exterminated—literally and culturally—didn't the history books say (with not a trace of irony) that they were being “saved”?¹⁵ Haven't hard-working immigrants from Central America long been portrayed as a drain on our economy and a threat to our identity?¹⁶ And Asian Americans treated with suspicion as foreigners and spies?¹⁷ The social condition of racial minorities in the United States has always been only a small truth, our own truth. To us, America was always somewhat post-factual.

It is perhaps a wholesome thing, after all, that this realization about America is now more broadly shared and acknowledged. To agree that the truth is complex, multi-faceted, and imbued with the personal is one way of moving away from the monolithic narratives that so readily discount the reality of our experiences. From this perspective, the apparent fracture of American consensus about

POST (June 16, 2016), https://www.washingtonpost.com/posteverything/wp/2016/06/16/why-the-post-truth-political-era-might-be-around-for-a-while/?utm_term=.a4397c78cc53 [<https://perma.cc/F76D-37XX>]; Christina Pazzanese, *Politics in a 'Post-Truth' Age*, HARV. GAZETTE (July 14, 2016), <http://news.harvard.edu/gazette/story/2016/07/politics-in-a-post-truth-age/> [<https://perma.cc/8EHE-7FXF>].

¹⁴ See, e.g., FREDERICK DOUGLASS, NARRATIVE OF THE LIFE OF FREDERICK DOUGLASS, AN AMERICAN SLAVE 12 (Boston, Anti-Slavery Office, 1845) (expressing shock that Northerners believe slaves sing because they are happy). Historian Kenneth Stampp describes the brutal reality of slavery: “A wise master did not take seriously the belief that Negroes were natural-born slaves. He knew better. He knew that Negroes freshly imported from Africa had to be *broken* into bondage; that each succeeding generation had to be carefully trained.” KENNETH M. STAMPP, THE PECULIAR INSTITUTION: SLAVERY IN THE ANTE-BELUM SOUTH 144 (1956) (emphasis added).

¹⁵ See Natsu Taylor Saito, *Tales of Color and Colonialism: Racial Realism and Settler Colonial Theory*, 10 FLA. A&M U. L. REV. 1, 36-37 (2014) (describing how mainstream history sanitized the federal government's genocidal policies against American Indians).

¹⁶ See, e.g., SAMUEL P. HUNTINGTON, WHO ARE WE? THE CHALLENGES TO AMERICAN IDENTITY 180, 221-51 (2004) (sounding an alarm against immigration from Latin America and Asia that threatens Anglo-American culture); Rhacel Salazar Parrenas, *Worthy Workers, Unworthy Humans: Immigrant Women and United States Immigration Policies*, 16 BERKELEY WOMEN'S L.J. 201, 201 (2001) (reviewing GRACE CHENG, DISPOSABLE DOMESTICS: IMMIGRANT WOMEN WORKERS IN THE GLOBAL ECONOMY 7 (2000)) (noting that the predominant image of immigrant women workers is as “[w]elfare cheats’ and ‘brood mares’”).

¹⁷ See Thomas W. Joo, *Presumed Disloyal: Executive Power, Judicial Deference, and the Construction of Race Before and After September 11*, 34 COLUM. HUM. RTS. L. REV. 1, 20-22 (2002).

who we are and where we ought to go from here may be nothing more than (1) an illusion born from a false premise about identity and unity, or (2) if real, the logical outcome of the growing strength of counter-narratives that clash against dominant views.

Of course, this shift presents its own challenges. There are two that I would like to briefly explore in this essay. The first is that in a post-factual setting, persuasion becomes that much more difficult—evidence will not sway the individual who wishes to believe the opposite.¹⁸ The second, related, concern is that emotion trumps (so to speak) reason—instead of hard evidence, the primary tool of persuasion becomes the emotional appeal.¹⁹ These are, indeed, especially serious issues for those of us in the law.

As to the first, however, I suspect that the problem is somewhat overblown. For example, the election of Donald Trump has escalated worries about the post-factual turn in politics.²⁰ Trump made many false claims during his campaign, and his victory has signaled to commentators that people will accept anything that confirms their preexisting beliefs.²¹ While I have no doubt that there were some who believed much of what Trump said, what was striking to me throughout the campaign was the fact that Trump supporters also indicated that they would vote for him even

¹⁸ In this sense, what Ahmed describes as “hitting a wall” is doubled. *See* Ahmed, *supra* note 5 (“Sometimes you just know when it is racism. It is as tangible as hitting a wall, that the problem is you; that part of you that makes you the person they do not want or expect, the part of you than makes you stand out from the sea of whiteness.”). People of color hit that wall when experiencing the racism in the first place, and hit it again when their story is disbelieved. Just as both are instances of racism, both may be understood also as a kind of post-factual problem in persuasion. The first reflects the inability to convince someone that racial hostility, suspicion, etc. is unwarranted because people of color are not in fact, by dint of race, inferior or threatening. The second is the inability to demonstrate, to another person’s satisfaction, that these confrontations with racists actually occur.

¹⁹ *See, e.g.*, Rhaina Cohen et al., *When It Comes to Politics and Fake News, Facts Aren’t Enough*, NPR: HIDDENBRAIN (Mar. 13, 2017, 9:00 PM), <http://www.npr.org/2017/03/13/519661419/when-it-comes-to-politics-and-fake-news-facts-arent-enough> [<https://perma.cc/Z6C8-DS7W>] (“[H]aving the data on your side is not always enough. For better or for worse, . . . emotions may be the key to changing minds.”); Wang, *supra* note 3 (reporting that the Oxford definition of post-truth is “relating to or denoting circumstances in which objective facts are less influential in shaping public opinion than appeals to emotion and personal belief”); Jess Zimmerman, *It’s Time to Give Up on Facts*, SLATE (Feb. 8, 2017, 5:56 AM), http://www.slate.com/articles/health_and_science/science/2017/02/counter_lies_with_emotions_not_facts.html [<https://perma.cc/JR3P-DCU7>] (“Engaging on the plane of belief, where lies live, means taking a break from trying to prove what’s factually accurate and talking instead about what feels meaningful in the heart.”).

²⁰ *See* Banks, *supra* note 3.

²¹ *See* Davies, *supra* note 13.

though, and even because, they *didn't* believe all of the things he said.²² These voters suggested that one should not confuse Trump's blustery campaign rhetoric and style with the actual policies that he would pursue once in office.²³ To them, apparent policy positions such as building a wall on the border and ordering mass deportations were only shared fantasies—a way of connecting between candidate and voter—but not a realistic option in immigration reform.²⁴ A strange way of thinking about one's candidate, to be sure; but it also complicates the assumption that Trump's victory means that his lies were actually believed or that his voters don't care about facts.²⁵

The related assumption about this last election is that angry white voters turned out to vote for Trump and that the results were the illegitimate product of emotion (e.g., racial resentment, economic fear) rather than reason.²⁶ Of course, politics has always been emotional.²⁷ What appears to be new is the notion that in

²² See, e.g., Jenna Johnson, *Many Trump Supporters Don't Believe His Wildest Promises—and They Don't Care*, WASH. POST (June 7, 2016), https://www.washingtonpost.com/politics/many-trump-supporters-dont-believe-his-wildest-promises—and-they-dont-care/2016/06/06/05005210-28c4-11e6-b989-4e5479715b54_story.html [https://perma.cc/J2VD-7RC8]; *The Trump Voters You Don't Know*, CHRISTIAN SCI. MONITOR (Nov. 17, 2016), <http://www.csmonitor.com/USA/Politics/2016/1117/The-Trump-voters-you-don-t-know> [https://perma.cc/TD9N-MQAW] (describing minority Trump voters who disbelieved Trump's racist rhetoric).

²³ *Id.*

²⁴ *Id.*

²⁵ See Sam Kriss, *The Biggest Political Lie of 2016*, SLATE (Aug. 31, 2016, 2:04 PM), http://www.slate.com/articles/news_and_politics/politics/2016/08/the_biggest_political_lie_of_2016.html [https://perma.cc/R45M-PKP9] (rejecting the notion that post-truth politics is new and arguing that fantasy has always been an essential aspect of politics).

²⁶ See, e.g., Philip Bump, *How Donald Trump Dominated Nevada, in One Word: Anger*, WASH. POST (Feb. 24, 2016), https://www.washingtonpost.com/news/the-fix/wp/2016/02/23/early-data-suggest-an-angry-nevada-electorate-that-should-favor-donald-trump/?utm_term=.d0ab9880f154 [https://perma.cc/4A8H-4CE9]; Jessica Chasmar, *Bill Clinton: Donald Trump Knows 'How to Get Angry, White Men to Vote for Him'*, WASH. TIMES (Dec. 19, 2016), <http://www.washingtontimes.com/news/2016/dec/19/bill-clinton-donald-trump-knows-how-to-get-angry-w/> [https://perma.cc/R98G-ST92]; Jeff Guo, *A New Theory for Why Trump Voters Are So Angry — That Actually Makes Sense*, WASH. POST: WONKBLOG (Nov. 8, 2016), https://www.washingtonpost.com/news/wonk/wp/2016/11/08/a-new-theory-for-why-trump-voters-are-so-angry-that-actually-makes-sense/?utm_term=.ce89ceaa4a50 [https://perma.cc/P5NC-X3S6]; Steven Rosenfeld, *Trump Elected President by Wave of Angry White Voters Across Upper Midwest and South*, ALTERNET (Nov. 9, 2016), <http://www.alternet.org/election-2016/trump-elected-president-wave-angry-white-voters-across-upper-midwest-and-south> [https://perma.cc/DQ3J-MXJH].

²⁷ Many political scientists have begun studying emotions in politics, noting its importance in all kinds of political behavior. See Simon Clarke et al., *The Study of Emotion: An Introduction*, in EMOTION, POLITICS AND SOCIETY 1, 9 (Simon Clarke et al. eds.,

2016, unlike in other years, emotion crowded out reason to such an extent that the expected outcome did not occur.²⁸ But attributing the unforeseeable political rise of Donald Trump to an angry horde of desperate and uneducated white voters²⁹ is, I think, both too easy and too dangerous. It is too easy because that view taps into the facile assumption that emotion and reason are opposed to one another. Theorists across many different disciplines have demonstrated that the relationship between emotion and reason is much more complex and that emotions are more often than not undergirded by reason.³⁰ While it is true that not all reasons behind emotions are good, this speaks to the illegitimacy of certain emotions rather than the irrationality of all emotions.³¹ In other words, there is nothing per se wrong with emotional voting.

This simplistic dichotomy is also dangerous because it undermines a progressive understanding of racial emotions. For one thing, it evades the actual problem in certain kinds of emotional voting – the kind that is driven by, say, white racial resentment. Rather than having the harder conversation about how such resentment may be groundless or misguided, the dichotomy allows us to stay within the zone of more comfortable generalizations (e.g., “It’s not that you have racist beliefs, but that you let your emotions undermine your judgment.”). Worse, a wholesale reference to “angry white voters,” without specificity about who they are and why they are angry, is an insinuation about a large group of people that stymies thoughtful discourse and breeds further hostility. While it would be naïve to believe that talking things through will solve the problem of racism, shame and exclusion are certainly

2006) (calling for a “a more complete and integrated rationalism” that takes emotions into account); *see also generally* G.E. Marcus, *Emotions in Politics*, 3 ANN. REV. POL. SCI. 221 (2000).

²⁸ *See, e.g.* Weston Williams, *Post-Truth: What Oxford’s Word of the Year Says About Modern Discourse*, CHRISTIAN SCI. MONITOR: THE CULTURE (Nov. 16, 2016), <http://www.csmonitor.com/The-Culture/2016/1116/Post-truth-what-Oxford-s-word-of-the-year-says-about-modern-discourse> [<https://perma.cc/VKV9-87PZ>] (emphasizing the pivotal role of emotional appeals in the 2016 U.S. Presidential election and the Brexit vote in England).

²⁹ *See, e.g.* Mona Chalabi, *Trump’s Angry White Men—And Why There Are More of Them Than You Think*, GUARDIAN (Jan. 8, 2016, 9:11 AM), <https://www.theguardian.com/us-news/2016/jan/08/angry-white-men-love-donald-trump> [<https://perma.cc/96H9-VCZR>] (explaining the motivations of a hypothetical working-class Trump voter).

³⁰ *See generally* Janine Young Kim, *Racial Emotions and the Feeling of Equality*, 87 U. COLO. L. REV. 437 (2016) (citing various researchers of emotion, including Sara Ahmed and Martha Nussbaum).

³¹ *See generally* Christopher Weber, *Emotions, Campaigns, and Political Participation*, 66 POL. RES. Q. 414 (2013).

more likely to exacerbate the conflict.³²

Another danger of the dichotomy is that it sweeps so broadly that it includes emotional behaviors that may well be justified. For example, “angry black voters” that support a candidate who promises to rein in stops and frisks or to establish more stringent anti-discrimination measures should not be dismissed as “emotional.” Yet when we talk about emotions in this way, we are indeed being unduly dismissive. Moreover, such ascriptions of irrational emotionality are more likely to stick to racial minorities and women who have been stereotyped as such for a very long time.³³ The point here is that this is not all-or-nothing; we have the wherewithal to evaluate emotions in such a way as to encourage dialogue, share ideas, and advance a more progressive understanding of race in our society.

I want to make one final observation about Sara Ahmed’s excerpt and the current discourse about post-factual America.³⁴ Both emphasize the negative emotions of race – especially the racial hatred of one group and the racial grief of another.³⁵ To be sure, race has been constructed around negative emotions.³⁶ How could it not? The story of race in America is a story of dire inequality. Racial hatred, anger, grief, and fear dominate our understanding of race. It is no wonder that racial discourse is so fraught and demands an inordinate amount of courage to engage.

But here, too, we miss some of the smaller truths if we assume that this is all there is to racial emotions. Beyond these conflicts of inequality, there are communities built on love, solace, and even joy. Black nationalist movements often engendered fear in the

³² See Heather C. McGhee, Opinion, *I’m Prejudiced, He Said. Then We Kept Talking*, N.Y. TIMES (Dec. 10, 2016), <https://www.nytimes.com/2016/12/10/opinion/sunday/im-prejudiced-he-said-then-we-kept-talking.html> [https://perma.cc/Y9NL-H5N6].

³³ Ian Burkitt, *Social Relationships and Emotions*, 31 Soc. 37, 49-51 (1997).

³⁴ See Ahmed, *supra* note 5.

³⁵ Since Trump’s victory, there has been an increase in reports of hate crimes and harassment. See Melanie Eversley, *Post-Election Spate of Hate Crimes Worse than Post-9/11, Experts Say*, USA TODAY (Nov. 12, 2016, 12:46 AM), <http://www.usatoday.com/story/news/2016/11/12/post-election-spate-hate-crimes-worse-than-post-911-experts-say/93681294> [https://perma.cc/JH8X-CAVL]. In addition, there have been multiple stories about people crying and grieving after Election Day. See, e.g., Cindy Atoji Keene, *A New Kind of Grief—Post-Election Trauma*, BOS. GLOBE (Nov. 19, 2016), <https://www.bostonglobe.com/business/2016/11/18/new-kind-grief-post-election-trauma/tNigxxFdJjDR0PDhmDs3vM/story.html> [https://perma.cc/8LYE-G9HZ] (describing how people are calling grief counselors to cope with the election results).

³⁶ Elsewhere, I have argued that the paradigmatic emotions of race are negative ones such as anger, fear, and disgust. See Kim, *supra* note 30, at 448-62.

white mainstream by their militant challenge to the status quo, but they were also focused on service to and development of the black community.³⁷ Soon after 9/11, and again after the Trump campaign's proposal of a Muslim registry, Japanese American organizations quickly rallied together to stand with Muslim Americans who would be targeted en masse as national security threats.³⁸ Indeed, these kinds of racial alliances are that much more precious because of the negative experiences and emotions that minorities so often experience outside of them. Moreover, these are not irrational emotions—the brighter side of racial hatred.³⁹ On the contrary, they are born from common experiences of subordination that create a sense of kinship, and a belief in “linked fate,” among individuals and groups.⁴⁰ These kinships, actual and constructed (but not fictive), offer a safe harbor from the conflicts that racial identity can generate – a place where there is *benefit* of the doubt. And sometimes, the emotions of love and sympathy that characterize such kinships can provide the means to collective action against injustice.

My hope is that in these uncertain times of anger and grief, we keep this other side of race in mind as well and remain open to the possibility of discourse, persuasion, and solidarity. Dialogues like this one organized by the CUNY Law Review serve an especially important function today, and I am grateful for the opportunity to participate in this endeavor.

³⁷ See, e.g., Tommie Shelby, *Two Conceptions of Black Nationalism: Martin Delany on the Meaning of Black Political Solidarity*, 31 POL. THEORY 664, 665 (2003) (observing that among the salient goals common to nationalist movements are the cultivation of racial solidarity and self-love).

³⁸ See Matt Stevens & Rong-Gong Lin II, *Talk of a Registry for Muslims Has Japanese Internment Survivors Asking: 'Can't They See What's Wrong?'*, L.A. TIMES (Nov. 18, 2016, 3:00 AM), <http://www.latimes.com/local/lanow/la-me-ln-japanese-internment-2016-11-17-story.html> [<https://perma.cc/EA6R-GHJH>].

³⁹ But see, e.g., Randall Kennedy, *My Race Problem*, ATLANTIC (May 1997), <https://www.theatlantic.com/magazine/archive/1997/05/my-race-problem/376849/> [<https://perma.cc/42H5-WQQD>] (suggesting that black racial solidarity is equivalent to white nationalism).

⁴⁰ See Evelyn M. Simien, *Race, Gender, and Linked Fate*, 35 J. BLACK STUD. 529, 529-30 (2005).