

Bill of Rights in Action



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THE VOTING RIGHTS ACT OF 1965 AND THE U.S. SUPREME COURT



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President Lyndon B. Johnson shakes hands with the Rev. Martin Luther King Jr. at the signing of the Voting Rights Act of 1965.

IT TOOK 100 YEARS AFTER THE CIVIL WAR ENDED BEFORE CONGRESS PASSED A FEDERAL LAW EFFECTIVELY STOPPING VOTING DISCRIMINATION BASED ON RACE OR COLOR. THAT LAW, THE VOTING RIGHTS ACT OF 1965, WAS THE SUBJECT OF A SIGNIFICANT U.S. SUPREME COURT DECISION IN 2013: *SHELBY COUNTY V. HOLDER*.

Enacted following the Civil War, the 15th Amendment banned racial discrimination in voting (see “Amendment XV”). Protected by federal troops during Reconstruction (1865–1877), newly freed slaves in the South voted

in large numbers. African Americans were elected to serve in Congress and in state and local governments in the South. But when Reconstruction ended, white domination returned. Whites prevented African Americans from voting, and whites took control of state and local governments.

The Southern states passed laws that effectively prevented African Americans from registering to vote and from casting ballots. Many places in the South required citizens to pay a poll tax to vote, which poor African Americans could not afford to pay.

Many states and local governments set up additional barriers. Many required potential voters to pass a literacy test. Invariably, African Americans failed the test, while uneducated or illiterate whites passed it. Governments also enacted laws that allowed someone to vote if his grandfather was qualified to vote before the Civil War. In addition, they imposed moral character tests for voting or required a prospective voter to have existing voters vouch for him.

These discriminatory tests and devices along with violence, intimidation, and economic coercion prevented black citizens from voting in much of the South.

The Civil Rights Movement

Following World War II, the modern civil rights movement began. Massive ▶

Amendment XV (Ratified in 1870)

Section 1. The right of citizens of the United States to vote shall not be denied or abridged by the United States or by any State on account of race, color, or previous condition of servitude.

Section 2. The Congress shall have power to enforce this article by appropriate legislation.

THE 1960s

This edition of *Bill of Rights in Action* explores issues related to the 1960s. The first article looks at the Voting Rights Act of 1965, its success, and the 2013 U.S. Supreme Court decision striking down its extraordinary enforcement mechanism. The second article examines U.S. policy toward Cuba, which since the 1960s has meant no diplomatic relations and a trade embargo, but which seems to be changing. The last article looks at China’s turbulent Cultural Revolution of the 1960s.

U.S. History: The Voting Rights Act of 1965 and the U.S. Supreme Court
Government: Cuba at the Crossroads

World History: Mao Zedong and the Great Proletarian Cultural Revolution

Guest writer Gail F. Frommer, Esq., wrote the article on the Voting Rights Act. Our longtime contributor Carlton Martz wrote the other two articles.

and sprawling, the movement battled for equal rights in court, pushed Congress to pass civil rights legislation, and conducted peaceful protests, demonstrations, and boycotts. One goal of the movement was to gain voting rights for African Americans in the South.

After years of attempts to register voters and to get an effective federal voting rights act, a shocking episode in Selma, Alabama, led directly to the passage of a new voting law. A local campaign to register black voters had met fierce resistance from white officials and police. Prominent national civil rights leaders and civil rights organizations joined the campaign in January 1965. Protests led to massive arrests, including the arrest of the Rev. Martin Luther King Jr. The protests, arrests, and brutality of the police made national news.

The leaders of the Selma Voting Rights Movement called for a march from Selma to the state capitol in Montgomery, about 50 miles away. Their purpose was to draw attention to the need for federal voting-rights reform. On Sunday, March 7, 1965, about 600 marchers left downtown Selma and crossed the Edmund Pettus Bridge. Television cameras recorded what became known as “Bloody Sunday.” As the non-violent marchers left the bridge, they were brutally attacked by state troopers and local police, some on horseback, armed with bullwhips, night sticks, and tear gas. More than 50 marchers were injured. People everywhere witnessed the brutality that African-Americans faced when seeking the right to vote.

One witness was President Lyndon B. Johnson, who made passing civil rights legislation a priority. As a Texas Democrat, Johnson was uniquely able to stand up to the Southern Democrats in Congress, who opposed all civil rights legislation. A masterful politician who had controlled the Senate when he was its majority leader, Johnson was the right leader, at the right time, to push for passage of a federal voting rights law.

About a week after Bloody Sunday, President Johnson addressed a joint session of Congress and called for a voting-rights law. A bill was introduced in Congress. After extensive hearings and debates, Congress passed the Voting

Rights Act of 1965. Two days later, on August 6, 1965, Johnson signed the bill into law.

The Voting Rights Act of 1965

The Voting Rights Act of 1965 was not the first law to prohibit voting discrimination based on race or color — it was simply the most effective.

The Civil Rights Acts of 1957, 1960, and 1964 had outlawed voting discrimination based on race or color, but these statutes did not stop the pervasive voting discrimination against African Americans by state and local officials. These laws failed because they depended on lawsuits brought in federal court (by the U.S. attorney general or others) to stop the discrimination.

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It took years for federal courts to resolve a case. In the meantime, election cycles passed without justice. If the lawsuit was successful and a court ruled that an election test, rule, or procedure was discriminatory and could no longer be used, white officials simply replaced it with a new discriminatory measure. A new lawsuit would have to be brought, and the long cycle would begin again.

When Congress passed the Voting Rights Act (VRA), members of Congress knew the weaknesses of the prior civil rights acts. The VRA was designed to avoid these weaknesses.

Section 2 of the VRA expresses the fundamental principle that underlies the statute. In its original version, Section 2 stated:

No voting qualification or prerequisite to voting, or standard, practice, or procedure shall be imposed or applied by any State or political subdivision to deny or abridge the right of any citizen of the United States to vote on account of race or color.

Other provisions specifically prohibited some of the most heavy-handed discriminatory practices. For example, Section 11 banned state or local officials from willfully refusing to allow someone who is eligible to vote from registering to vote.

The VRA authorized civil and criminal penalties (fines and imprisonment) against any person who deprived others of their voting rights.

It empowered the U.S. attorney general to sue in federal court to enforce the provisions of the VRA, or to enforce the provisions of any statute protecting the 15th Amendment right to vote. These lawsuits would be more effective than the cases brought under earlier civil rights acts. For instance, when a suit was filed by the attorney general, the court could immediately order the discriminatory rule or test be suspended. The court could also order the state or locality not to change any of its election rules or practices until the court determined that the change was not discriminatory.

Section 2 of the VRA applied throughout the nation. It was permanent, with no expiration date.

Before passing the VRA, Congress held extensive hearings and found voluminous evidence of voting discrimination against African Americans. For almost 100 years, African Americans had been prevented from exercising electoral power by “an insidious and pervasive evil which had been perpetuated in certain parts of our country through unremitting and ingenious defiance of the Constitution.” Recognizing that lawsuits could not end discrimination, Congress provided exceptional remedies in Sections 4 and 5 of the VRA of 1965. These provisions targeted only certain states and localities and were set to expire in five years.

The Coverage Formula of § 4

According to the original version of the VRA, a state or locality is covered by Section 4 (and therefore subject to exceptional remedies) if it met **both** of these requirements:

1. It used a “test or device” on November 1, 1964. A “test or device” meant that to register to vote, people must pass a literacy test or a knowledge test, or establish that they have “good moral character” or have other registered voters vouch for their qualifications.

2. Less than 50 percent of the voting-age population was registered to vote on November 1, 1964 or less than 50 percent of the voting-age population voted in the presidential election of November 1964.

In 1965, six states met the coverage formula: Alabama, Georgia, Louisiana, Mississippi, South Carolina, and Virginia. (In 1975, three more states were added: Alaska, Arizona, and Texas.) In addition, a number of counties and cities were covered in other states, including states outside the South.

Bailout Procedure in § 4

Section 4 provided a “bailout” procedure for a state or locality to terminate coverage under the section’s formula. The state or locality would have to prove to a federal district court in the District of Columbia that it had not discriminated in voting, or had not used a specified discriminatory “test or device” (like a literacy test) in the preceding five years. The attorney general has the power to consent to the bailout.

Over the years as Congress amended, extended, and reauthorized the VRA, the basis for getting a bailout changed. After Congress’ last reauthorization in 2006, a state or locality applying for bailout must prove that it has not discriminated for the preceding 10 years. It must also show that it has taken affirmative steps to increase minority voter participation.

§ 5 Preclearance

Section 5 of the VRA provided that the states and localities covered by Section 4 would have to get approval from federal officials before changing any election law (such as voting qualifications, procedures, requirements, etc.). No change may take effect unless approved either by the U.S. attorney general or by a three-judge federal district court in the District of Columbia. Approval can be given only if the state or locality shows that the new law does not discriminate.

This legal requirement for obtaining approval is called “preclearance.” Preclearance is exceptional because it requires state and local officials to seek approval from federal authorities before changing their election laws. Ordinarily, under our Constitution, states and

localities have broad power to determine how to conduct their elections.

The Success of the VRA

The VRA of 1965 has been very successful — especially the remedies in Sections 4 and 5. The act has eliminated barriers to African Americans being registered to vote, turning out to vote, and having their votes counted. These are called “first generation barriers” to voting.

In the six states originally covered by Sections 4 and 5, the number of African-American elected officials increased by approximately 1,000 percent between 1965 and 2004. By the 2004 election, the rate of black voter turnout exceeded that of whites in five of the six states.

As more African-Americans voted, however, the U.S. Department of Justice (DOJ) accused state and local officials of finding ways to dilute the voting influence of African-Americans (and other minorities). The department took action against “second generation barriers,” which weaken the electoral power of minorities. Some examples of second-generation barriers are:

- Racial gerrymandering: drawing legislative or voting districts to prevent minorities from having a majority of voters in a district.
- Adopting a system of at-large voting instead of district-by-district voting in city or county elections. In at-large voting, everyone votes for all the candidates. It gives control of the election to the majority population.
- Situating a polling place so that it is inconvenient for minority voters but close to white voters.

Sections 4 and 5 have been used thousands of times to prevent discriminatory laws from taking effect. Between 1982 and 2006, the U.S. Department of Justice blocked more than 700 voting changes it considered discriminatory. In the same period, states and localities withdrew or changed 800 proposed laws that were in the preclearance process. Presumably, the proposed changes would not have been approved by the DOJ.

After holding hearings and voting, Congress extended the exceptional remedies in Sections 4 and 5 four times: in 1970 (for five years), in 1975 (for

seven years), in 1982 (for 25 years), and in 2006 (for 25 years). The Section 4 coverage was updated by adding references to voter registration and election participation in 1968. Signed into law by President George W. Bush, the 2006 Reauthorization Act did not change the coverage formula in Section 4 from what it had been in the 1975 and 1982 reauthorizations. It still referred to discrimination, voter registration, and voter turnout in the 1960s and 1970s.

Lawsuit Against §§ 4 and 5

Although each reauthorization of the VRA sailed through Congress on near unanimous votes, many jurisdictions covered by Sections 4 and 5 chafed at the federal intrusion into their elections. They complained that they had to “either go hat in hand to Justice Department officialdom to seek approval” of any changes in their procedures or “embark on expensive litigation in a remote judicial venue” to bail out of the coverage.

When it was first passed, and after each reauthorization, the VRA faced court challenges. Prior to the 2006 Reauthorization Act, the U.S. Supreme Court had upheld Sections 4 and 5 as a constitutional expression of Congress’ power under the 15th Amendment.

After Congress passed the 2006 Reauthorization Act, Shelby County, Alabama, sued U.S. Attorney General Holder in federal District Court in Washington, D.C. Shelby County asked the court to declare both Sections 4 and 5 unconstitutional. Officials in Shelby County saw the lawsuit as the only way it could avoid preclearance. It could not meet the conditions for a bailout because of its long history of voting discrimination. Shelby County is the home of Selma, where the Bloody Sunday march took place in 1965. Alabama had been covered continuously by Section 4.

The District Court ruled against Shelby County and upheld the 2006 Reauthorization Act. The court determined that Congress had gathered sufficient evidence of discrimination to justify the reauthorization. When the federal Court of Appeals for the D.C. Circuit also upheld the 2006 Reauthorization Act, the county appealed to the U.S. Supreme Court.

Shelby County v. Holder

In *Shelby County v. Holder* (2013), the U.S. Supreme Court held that Section 4, as reauthorized in the 2006 Act, is unconstitutional. The court expressly declined to decide whether Section 5 (preclearance) is constitutional.

Chief Justice Roberts wrote the court's opinion, joined by Justices Scalia, Kennedy, Thomas, and Alito. According to the court, the exceptional remedies of the VRA had to be justified by current information, but Congress had failed to update the formula in Section 4. It was therefore no longer constitutional.

The court emphasized the exceptional nature of the remedies in Sections 4 and 5, which depart from two basic constitutional principles. The first principle is federalism: "[T]he Framers of the Constitution intended the States to keep for themselves, as provided in the Tenth Amendment, the power to regulate elections." Yet the VRA

suspends all changes to state election law — however innocuous — until they have been precleared by federal authorities in Washington, D.C. . . . States must beseech the Federal Government for permission to implement laws that they would otherwise have the right to enact and execute on their own

The second principle is "equal sovereignty among the states."

[D]espite the tradition of equal sovereignty, the Act applies to only nine States (and several additional counties). While one State waits months or years and expends funds to implement a validly enacted law, its neighbor can typically put the same law into effect immediately, through the normal legislative process

Considering these two constitutional principles, the court stated that Section 4's coverage formula must be justified by a showing of current needs, but Section 4's formula is based on "decades-old data and eradicated [discriminatory] practices" from the 1960s and 1970s.

[A] statute's "current burdens" must be justified by "current needs," and any "disparate geographic coverage" must be "sufficiently related to the problem that it targets." . . . The

Amendment X (Ratified In 1791)

The powers not delegated to the United States by the Constitution, nor prohibited by it to the States, are reserved to the States respectively, or to the people.

coverage formula met that test in 1965, but no longer does so.

The court noted that the current problem is not the first-generation barriers to registering and voting, but the second-generation barriers (dilution of minorities' voting power). Although Congress held hearings before passing the 2006 Reauthorization Act,

Congress did not consider the record it compiled to shape a coverage formula grounded in current conditions. It instead reenacted a formula based on 40-year-old facts having no logical relation to the present day.

The court emphasized the purpose of the 15th Amendment:

The Fifteenth Amendment commands that the right to vote shall not be denied or abridged on account of race or color, and it gives Congress the power to enforce that command. The Amendment is not designed to punish for the past; its purpose is to ensure a better future. . . . To serve that purpose, Congress — if it is to divide the States — must identify those jurisdictions to be singled out on a basis that makes sense in light of current conditions. It cannot rely simply on the past.

The court stated its reluctance to invalidate a statute passed by Congress. But the court pointed out that it had expressed concern about the coverage formula in *Northwest Austin v. Holder*, a 2009 case. It concluded that Congress' failure to update Section 4's coverage formula left the court

no choice but to declare §4(b) unconstitutional. The formula in that section can no longer be used as a basis for subjecting jurisdictions to preclearance.

Justice Thomas joined the court's opinion, but wrote a separate concurring opinion. He wrote that the court should have decided that both Sections 4 and 5 are unconstitutional. He stated that the circumstances (pervasive voting dis-

crimination in parts of the nation) that justified the extraordinary provisions of Sections 4 and 5 no longer exist.

The Dissent

Justice Ginsburg wrote the dissenting opinion, joined by Justices Breyer, Sotomayer, and Kagan. They would have upheld the 2006 reauthorization of Sections 4 and 5. The dissenters' main argument is that the reauthorization of Sections 4 and 5 is a matter for Congress to decide, not the court. The 15th Amendment gives Congress power to enforce it with "appropriate legislation."

[T]he Constitution vests broad power in Congress to protect the right to vote, and in particular to combat racial discrimination in voting. This Court has repeatedly reaffirmed Congress' prerogative to use any rational means in exercise of its power in this area.

The dissent emphasized that the court should defer to Congress.

The Court has time and again declined to upset legislation of this genre unless there was no or almost no evidence of unconstitutional action by States. . . . No such claim can be made about the congressional record for the 2006 VRA reauthorization. Given a record replete with examples of denial or abridgment of a paramount federal right, the Court should have left the matter where it belongs: in Congress' bailiwick.

According to the dissent, the court ignored the extensive fact-finding by Congress. For example, the Katz study reported to Congress on all the Section 2 lawsuits between 1982 and 2004.

Although [Section 4] covered jurisdictions account for less than 25 percent of the country's population, the Katz study revealed that they accounted for 56 percent of successful §2 litigation since 1982. . . . Controlling for population, there were nearly *four* times as many successful §2 cases in covered jurisdictions as there were in noncovered jurisdictions. . . . The Katz study further found that §2 lawsuits are more likely to succeed when they are filed in covered jurisdictions than in noncovered jurisdictions. . . . From these findings — ignored by the

Court — Congress reasonably concluded that the coverage formula continues to identify the jurisdictions of greatest concern.

The dissent recognized that real progress has been made in voting rights, but argued that Congress had a lot of evidence that Section 4 coverage should continue.

Volumes of evidence supported Congress' determination Throwing out preclearance when it has worked and is continuing to work to stop discriminatory changes is like throwing away your umbrella in a rainstorm because you are not getting wet.

As to the doctrine of equal sovereignty among the states, the dissent argued the court was misusing and expanding it. In prior cases, that doctrine simply meant that states had to be admitted to the Union on equal terms.

The dissent concluded with a lament about the court's decision.

The sad irony of today's decision lies in its utter failure to grasp why the VRA has proven effective. The Court appears to believe that the VRA's success in eliminating the specific devices extant in 1965 means that preclearance is no longer needed. . . . With that belief, and the argument derived from it, history repeats itself. The same assumption — that the problem could be solved when particular methods of voting discrimination are identified and eliminated — was indulged and proved wrong repeatedly prior to the VRA's enactment. Unlike prior statutes, which singled out particular tests or devices, the VRA is grounded in Congress' recognition of the "variety and persistence" of measures designed to impair minority voting rights. . . . In truth, the evolution of voting discrimination into more subtle second-generation barriers is powerful evidence that a remedy as effective as preclearance remains vital to protect minority voting rights and prevent backsliding.

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What's Next?

The court's opinion only affected Sections 4 and 5 of the VRA. Section 2 (prohibiting voting discrimination based on race or color and protecting minority-language voters) is still enforceable by lawsuits filed in federal court.

The court's opinion suggests that Congress may pass a valid Section 4 if the new coverage formula is based on current conditions and targeted to current problems of discrimination (such as second generation barriers to voting). A bipartisan proposal has been introduced in both houses of Congress to update the Voting Rights Act. As of April 2015, the bills have not advanced to be considered.

Following the *Shelby County v. Holder* decision, many jurisdictions that used to be subject to preclearance have put new voting laws into effect, such as laws requiring voters to show an approved photo-ID before voting. State officials point out that these laws are similar to those of other states and

their purpose is to prevent fraud at the polls. Opponents argue that fraud is not a widespread problem and the laws' purpose is to suppress minority voting. The Department of Justice has filed lawsuits in some jurisdictions to overturn the new laws as discriminatory. Some of the lawsuits have succeeded, and others are still pending.

DISCUSSION & WRITING

1. What is the 15th Amendment? Why do you think it was enacted?
2. How did Southern states in the Jim Crow era prevent African Americans from voting?
3. How did the Voting Rights Act get enacted? How does it work? Why did it work so well?
4. What was the ruling in *Shelby County v. Holder*? What was the argument of the court? The dissent?
5. What has been the effect of the ruling so far? Do you think Congress should pass a new reauthorization law? Explain.

ACTIVITY: Rehearing of *Shelby County v. Holder*

Imagine that the U.S. Supreme Court has decided to rehear the *Shelby County v. Holder* case. In this activity, students will role play attorneys and members of the U.S. Supreme Court and argue and decide the case. The court will decide this issue: **Did Congress have the power under the Constitution to enact the 2006 Reauthorization Act?**

1. Form groups of three. Assign one person in each group the role of attorney for Shelby County, attorney for the Department of Justice, or justice of the Supreme Court.
2. Regroup so that all Shelby County attorneys are together, DOJ attorneys are together, and justices of the Supreme Court are together. The attorneys should develop arguments for their side and the justices should create questions to ask both sides. To develop arguments and questions, use the material in the article including the sidebars.
3. When the groups are ready, return to the original groups of three. The justice in each group should allow each side to speak and can ask questions of each side.
4. When the presentations in each group are over, the justice should stand.
5. Each justice should vote and explain his or her reasons.
6. Debrief with a discussion of the strongest arguments that students made.

Each student should do the following writing activity: Imagine you are a Supreme Court justice assigned to write the opinion for the court, stating how you think the case should be decided. The opinion should have the following:

- a. A statement of the facts.
- b. The issue before the court (see above).
- c. Your decision.
- d. Your reasoning behind your decision. This should be the bulk of your opinion. Cite evidence from the article (including sidebars), refute arguments that the other side makes, and make clear why your decision is the right one.

When you finish, check it carefully. Look for grammar and spelling mistakes. Read it aloud to yourself and others to make sure it flows.

Standards Addressed

VRA

National High School Civics Standard 18: Understands the role and importance of law in the American constitutional system and issues regarding the judicial protection of individual rights. (3) Knows historical and contemporary events and practices that illustrate the absence or breakdown of the rule of law (e.g., . . . interfering with the right to vote . . .).

National High School Civics Standard 25: Understands issues regarding personal, political, and economic rights. (5) Knows major documentary sources of personal, political, and economic rights such as . . . court decisions.

National High School Civics Standard 28: Understands how participation in civic and political life can help citizens attain individual and public goals. (5) Understands the importance of voting as a form of political participation.

National High School U.S. History Standard 29: Understands the struggle for racial and gender equality and for the extension of civil liberties. (4) Understands significant influences on the civil rights movement

National High School U.S. History Standard 31: Understands economic, social, and cultural developments in the contemporary United States. (5) Understands major contemporary social issues and the groups involved.

California History-Social Science Standard 11.10: Students analyze the development of federal civil rights and voting rights. (2) Examine and analyze the key events, policies, and court cases in the evolution of civil rights (6) Analyze the passage and effects of civil rights and voting rights legislation (e.g., . . . Voting Rights Act of 1965) . . . with an emphasis on equality of access to . . . the political process.

California History-Social Science Standard 12.5: Students summarize landmark U.S. Supreme Court interpretations of the Constitution and its amendments. (2) Analyze judicial activism and judicial restraint and the effects of each policy over the decades (4) Explain the controversies that have resulted over changing interpretations of civil rights

Common Core Standard WHST.9-10.11-12.1: Write arguments focused on *discipline-specific* content.

Common Core Standard WHST.11-12.1.b: Develop claim(s) and counterclaims fairly and thoroughly, supplying the most relevant data and evidence for each while pointing out the strengths and limitations of both claim(s) and counterclaims in a discipline-appropriate form that anticipates the audience's knowledge level, concerns, values, and possible biases.

Common Core Standard WHST.11-12.1.c: Use words, phrases, and clauses as well as varied syntax to link the major sections of the text, create cohesion, and clarify the relationships between claim(s) and reasons, between reasons and evidence, and between claim(s) and counterclaims.

Cuba

National High School World History Standard 44: Understands the search for community, stability, and peace in an interdependent world. (2) Understands rates of economic development and the emergence of different economic systems around the globe (e.g., systems of economic management in communist and capitalist countries . . .). (14) Understands how specific countries have implemented social and cultural changes. . . .

National High School U.S. History Standard 27: Understands how the Cold War . . . influenced domestic and international politics. (1) Understands U.S. foreign policy from the Truman administration to the Johnson administration (e.g., . . . Kennedy's response to the Bay of Pigs and the Cuban Missile crises . . .).

National High School U. S. History Standard 30: Understands developments in foreign policy and domestic politics between the Nixon and Clinton presidencies. (5) Understands the influence of U.S. foreign policy on international events from Nixon to Clinton (e.g., the U.S. role in the evolving political struggles in . . . Latin America; foreign policy in the post-Cold War era; . . . how human rights has been used in American foreign policy).

National High School Civics Standard 22: Understands how the world is organized politically into nation-states, how nation-states interact with one another, and issues surrounding U.S. foreign policy. (3) Understands the major foreign policy positions that have characterized the United States' relations with the world (e.g., isolated nation, imperial power, and world leader). (6) Understands how and why domestic politics may impose constraints or obligations on the ways in which the United States acts in the world (e.g., long-standing commitments to certain nations, lobbying efforts of domestic groups, economic needs).

California History-Social Science Standard 10.9: Students analyze the international developments in the post-World War II world.

California History-Social Science Standard 11.9: Students analyze U.S. foreign policy since World War II. (3) Trace the origins and geopolitical consequences (foreign and domestic) of the Cold War and containment policy, including. . . The Bay of Pigs Invasion. . . Latin American Policy.

California History-Social Science Standard 12.9: Students analyze the origins, characteristics, and development of different political systems across time, with emphasis on the quest for political democracy, its advances, and its obstacles. (5) Identify the forms of illegitimate power that twentieth century . . . Latin American dictators used to gain and hold office and the conditions and interests that supported them.

Common Core Standard WHST.9-10.11-12.1: Write arguments focused on *discipline-specific* content.

Common Core Standard SL.9-10.11-12.1: Initiate and participate effectively in a range of collaborative discussions (one-on-one, in groups, and teacher led) with diverse partners on grades 9–10/11–12 topics, texts, and issues, building on others' ideas and expressing their own clearly and persuasively.

Common Core Standard SL.11-12.4b: Plan and present an argument that: supports a precise claim, provides a logical sequence for claims, counterclaims, and evidence; uses rhetorical devices to support assertions . . . ; uses varied syntax to link major sections of the presentation to create cohesion and clarity; and provides a concluding statement that supports the argument presented.

Cultural Revolution

National High School World History Standard 43: Understands how post-World War II reconstruction occurred, new international power relations took shape, and colonial empires broke up. (6) Understands factors that influenced political conditions in China after World War II

National High School World History Standard 44: Understands the search for community, stability, and peace in an interdependent world. (14) Understands how specific countries have implemented social and cultural changes (e.g., . . . what the Cultural Revolution meant for Chinese people in the late 1960s . . .).

California History-Social Science Standard 10.9: Students analyze the international developments in the post-World War II world. (4) Analyze . . . political and economic upheavals in China (e.g., . . . the Cultural Revolution . . .).

Common Core Standard RH.6-10.1: Cite specific textual evidence to support analysis of primary and secondary sources. . . .

Common Core Standard SL.9-10.11-12.1: Initiate and participate effectively in a range of collaborative discussions . . . with diverse partners on grades 9–10 topics, texts, and issues, building on others' ideas and expressing their own clearly and persuasively.

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VRA

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Cuba

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