Rated Progress: Robert F. Kennedy and the Desegregation of the 1951 Ralph J. Bunche Lecture

Andrew McCanse Wright

[It does not appear to us now, that there is any problem calculated to embarrass the University, unless the University should decide that it is necessary to create the issue itself by invoking an educational segregation policy which, as we shall attempt to point out later, is, in this instance, legally indefensible, morally wrong and fraught with consequence calculated to do great harm to the University.]

Introduction

Robert F. Kennedy is one of the most inspiring, controversial, and enigmatic figures in American history. During the height of the Cold War, including Vietnam, and the Civil Rights Movement, he served as United States Attorney

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* Associate Professor, Savannah Law School. University of Virginia, J.D.; Washington & Lee University, B.A. I am grateful to the editorial board of Savannah Law Review for including this Essay in its [Re]Integrating Spaces Colloquium issue. I conducted this research as an independent study under the supervision of Professor David Martin as part of a student effort to formally recognize Robert F. Kennedy on the campus of the University of Virginia School of Law. I very much appreciate Professor Martin’s guidance and mentorship. That recognition came to pass on March 4, 2000, when Ethel and Max Kennedy dedicated a Robert F. Kennedy bust at the Law School. I would also like to thank Caprice Roberts, Connie Stout Onken, Justin Iverson, and Meagan Rafferty for their support of this project.

† Letter from Robert F. Kennedy, President, Student Legal Forum, Univ. of Va. Sch. of Law, to Colgate W. Darden, President, Univ. of Va. (Mar. 8, 1951) (on file with the University of Virginia Special Collections Department, Presidential Papers, “Law School,” RG-2/1/2.581, Box 10) [hereinafter Letter from Kennedy to Darden]. By means of the letter, Kennedy demands that the school desegregate a proposed lecture by Dr. Ralph J. Bunche.
General (1961-1964), United States Senator (New York, 1965-1968), and Democratic Presidential Candidate (1968). Kennedy, at various times, was noted for his fierce anti-communism; his role as brother, confidant, and advisor to President John F. Kennedy; his war on organized crime; his execution of desegregation decrees in the South; his forceful advocacy for the victims of discrimination and the impoverished; and ultimately, his opposition to the Vietnam War. His life was cut short by his tragic assassination during the 1968 presidential campaign.

Following Kennedy’s death, historians have struggled to frame his place in history. As Attorney General, was he a newcomer to the struggle of disenfranchised blacks in the South? Did he reject his anti-communist record, including his stint as a committee counsel for Joseph P. McCarthy’s communist infiltration investigation, by opposing the Vietnam War? Was his career marked by maturation and gradual separation from the influence of his father, Joseph P. Kennedy? Did he not begin to empathize with the plight of impoverished coal miners, migrant workers, and inner city inhabitants until he had survived the excruciating pain of the 1963 assassination of his brother, President John F. Kennedy? None of these questions can be answered definitively. However, a revealing episode occurred before he assumed any of his positions of public leadership—during his tenure as a law student at the University of Virginia School of Law in Charlottesville, Virginia. In this story, one can see his trajectory evidenced even before he launched his public career. During the 1950-51 academic year, as President of the Student Legal Forum—a student organization devoted to bringing distinguished speakers to the Law School—Kennedy caused a firestorm by inviting noted diplomat and Nobel Peace Prize winner, Dr. Ralph J. Bunche, an African American, to speak at the University of Virginia (UVA).

I. Charlottesville in the Early 1950s

Residents of Charlottesville at the outset of the 1950s, like the rest of Virginia and much of the South, lived and worked under the legal regime of Jim Crow. Public schools, institutions of higher learning, public accommodations, restaurants, and public auditoriums were prohibited from intermingling whites and blacks.2 Black and white residents of Virginia were even prohibited from marrying one another.3

Similarly, seeking higher education at UVA was essentially a white-male endeavor. In the 1950-51 academic year, UVA enrolled its first black student when Gregory H. Swanson joined four other black students in the graduate

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2 See generally Virginius Dabney, Mr. Jefferson’s University: A History 480-83 (1988).
3 See, e.g., Va. Code Ann. § 20-57 (1960 Repl. Vol.) (“Marriages void without decree.—All marriages between a white person and a colored person shall be absolutely void without any decree of divorce or other legal process.”). Virginia’s anti-miscegenation statute was struck down on constitutional grounds in 1967. Loving v. Virginia, 388 U.S. 1 (1967) (holding such statutes violate the Equal Protection and Due Process Clauses of the Fourteenth Amendment).
Robert F. Kennedy and the Bunche Lecture

studies program at the Law School. Swanson was only admitted by means of a court order from the Fourth Circuit Court of Appeals. While the Law School admitted its first female student in 1920, women were not admitted to the undergraduate program until 1970. Virginia did not implement its “massive resistance” policy until the momentum of the Civil Rights Movement and associated legal decisions threatened segregation as a way of life.

The outset of the 1950s was also the heyday of civil rights “gradualism.” Hodding Carter, III recounts the tenor of the period immediately preceding the landmark 1954 school desegregation opinion, Brown v. Board of Education, and the massive resistance that ensued:

The decade from the conclusion of World War II to the Supreme Court desegregation decision of 1954 was in many ways a halcyon period for the exponents of gradualism in the handling of the South’s racial problems. The mass of white Southerners were opposed to any major, drastic change in the status of the Negro, as historically they had ever been; but there was nevertheless a growing measure of tolerance of those who sought to eliminate the more blatant forms of discrimination. This toleration existed only so long as the goals remained within the framework of segregation, but it was tolerance nonetheless.

In 1950, cracks were just beginning to form in the fortress walls of legal apartheid, especially with respect to law school education. On June 5, 1950, the United States Supreme Court decided two companion cases, Sweatt v. Painter and McLaurin v. Oklahoma State Regents for Higher Education, which cast doubt on the constitutionality of segregation policies then in force at UVA. The Sweatt case involved an African American who was denied admission to attend the University of Texas School of Law (UT) solely based on his race, at a time when there were no other law schools available to him in Texas. Texas scrambled to open a law school for black students in time for Sweatt to enroll the following semester. When Sweatt declined to enroll at the new law school, the courts

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4 See 192 Law Students Register for the First Year Class: New Students Greeted; Five Are Enrolled as Graduate Students, Va. L. Wkly., Sept. 28, 1950, at 1; see also DABNEY, supra note 2, at 379.
5 DABNEY, supra note 2, at 379.
7 DABNEY, supra note 2, at 491.
13 Sweatt, 339 U.S. at 631.
14 Id. at 632.
took up his case for admittance to UT.\textsuperscript{15} Finding that the proposed legal education program would be significantly inferior to the program at UT, the Supreme Court held that the Equal Protection Clause of the Fourteenth Amendment\textsuperscript{16} entitled Sweatt admittance into UT.\textsuperscript{17}

In \textit{McLaurin}, the Court held that once a public school system admitted an African American to a graduate school, it could not then segregate that student within the academic program.\textsuperscript{18} In compliance with the segregation requirement under Oklahoma law, the University of Oklahoma Graduate School had required an African American student to “sit apart at a designated desk in an anteroom adjoining the classroom; to sit at a designated desk on the mezzanine floor of the library, but not to use the desks in the regular reading room; and to sit at a designated table and to eat at a different time from the other students in the school cafeteria.”\textsuperscript{19} Ultimately, the Court held that the Equal Protection Clause of the Fourteenth Amendment required the African American student to “receive the same treatment at the hands of the state as students of other races.”\textsuperscript{20}

It was against this backdrop that Robert F. Kennedy and the other members of UVA’s Student Legal Forum decided to invite Dr. Bunche to address the University’s community. Dr. Bunche’s appearance stirred debate about both the legal effect of the \textit{McLaurin} case and the “gradualist” approach to civil rights.

\textbf{A. The Student Legal Forum}

The Student Legal Forum is a law student organization at UVA, still in existence, dedicated to bringing “dynamic speakers to Grounds to discuss high-profile legal issues, politics and other civic concerns of interest to law students and the university community.”\textsuperscript{21} Although dormant during World War II, “the Forum was reorganized in 1947 to present to the student body outstanding experts in the field of law and allied subjects.”\textsuperscript{22} Robert F. Kennedy was elected President of the Student Legal Forum on Monday, May 8, 1950.\textsuperscript{23} With the help of the Kennedy family’s contacts, and members of the family itself, the slate of speakers for the 1950-51 academic year was one of the most dynamic and controversial in the history of UVA Law.\textsuperscript{24} During that year, Kennedy brought a host of political leaders, journalists, and captains of industry to Charlottesville, including: New York Times journalist, Arthur Krock; Representative John F.

\begin{itemize}
  \item\textsuperscript{15} \textit{Id.}
  \item\textsuperscript{16} U.S. Const. amend. XIV.
  \item\textsuperscript{17} \textit{Sweatt}, 339 U.S. at 636.
  \item\textsuperscript{18} \textit{McLaurin}, 339 U.S. at 637.
  \item\textsuperscript{19} \textit{Id.} at 640.
  \item\textsuperscript{20} \textit{Id.} at 642.
  \item\textsuperscript{21} \textit{Student Organizations}, Univ. of Va. Sch. of Law, http://www.law.virginia.edu/html/students/studentorgs.htm#slf (last visited July 24, 2015).
  \item\textsuperscript{22} \textit{Student Legal Forum Names New Officers}, Va. L. Wkly., May 17, 1951, at 3.
  \item\textsuperscript{23} \textit{See Kennedy Elected}, Va. L. Wkly., May 11, 1950, at 1.
\end{itemize}
Kennedy; Ambassador Joseph P. Kennedy; Senator Joseph R. McCarthy; President Frank Folsom of the Radio Corporation of America; Supreme Court Justice William O. Douglas; former Assistant Attorney General Thurman Arnold; and, perhaps most remarkably, United Nations (U.N.) diplomat and Harvard Professor, Dr. Ralph J. Bunche.25

The customary treatment for the Forum’s visiting dignitaries was to have them stay at “the Farmington Country Club, or the Old Ivy Inn.”26 On the evening of a given lecture, “members of the Forum join their guests for cocktails and dinner before adjourning to Clark Hall.”27 In coming to Charlottesville, “[a]ll expenses incurred by guests . . . , including those of a wife, are paid by the Forum with money from the Dean’s Discretionary Fund.”28 In the segregated Charlottesville of the early 1950s, Kennedy and the other members of the Forum certainly tested the “customary” treatment of visiting lecturers by inviting Dr. Ralph J. Bunche, an African American, to speak to the University’s community.

B. The Invitation to Dr. Bunche

In the spring of 1950, after having been elected President of the Forum, Kennedy discussed possible lecturers for the upcoming year with one of his good friends, Endicott P. “Cottie” Davison. Davison recounted that: “Bobby and I were sitting around, wondering who we would bring down in the fall. ‘Hey,’ Bobby said, ‘Why not Ralph Bunche?’”29

Dr. Bunche was a highly esteemed and well-known diplomat who was then the Director of Trusteeship for the U.N.30 Dr. Bunche was born in Detroit, Michigan, in 1904.31 He held an AB from University of California, Los Angeles, an MA from Harvard University, and a PhD from Northwestern University.32 Dr. Bunche gained international repute when he served as the Principal Secretary to the U.N. Palestine Commission.33 When Count Bernadotte was

27 *Id.*. Third-year law students Charles B. Reeves, Endicott P. Davison, Robert M. Williams, Livingston Fairbank, Jr., and James C. Slaughter were the other members of the Student Legal Forum during Robert Kennedy’s tenure as its president. See id.
28 *Id.* at 3.
30 *See Bunche To Speak Later This Month For Legal Forum, Va. L. Wkly.*, Mar. 8, 1951, at 1.
31 *Id.*
32 *See id.*
assassinated, Dr. Bunche “advanced to the post of Mediator.”

For his efforts at bringing peace to Palestine, Dr. Bunche received “[n]o less than 40 medals and 20 honorary degrees.” Among them, Dr. Bunche became the first black recipient of the Nobel Peace Prize. During that year, Dr. Bunche was in the process of leaving Howard University, having just accepted a full professorship in Political Science at Harvard.

It is unclear precisely when Kennedy first contacted Dr. Bunche to speak at UVA. When he spoke in March 1951, the *Virginia Law Weekly* reported that Dr. Bunche had accepted the invitation to speak “late last Autumn.” Dr. Bunche was first mentioned as a speaker in the first regular meeting of the Student Legal Forum for the 1950-51 academic year. The Forum’s minutes, dated September 21, 1950, cite the meeting as having discussed the “[a]nnouncement of Ford & Thurman Arnold from Justice Department & problem of reservations. Also Ralph Bunche’s coming in March.” By November 15, 1950, Dr. Bunche was tentatively scheduled to speak on Thursday, March 25, 1951. However, at some later point, that date was crossed out in the minutes and the date March 29 was penciled in.

As Dr. Bunche’s proposed lecture drew nearer, however, the Forum began to encounter problems arranging for his visit. First, there was the problem of accommodations for Dr. Bunche. Farmington Country Club and the Old Ivy Inn would be unavailable to Dr. Bunche due to, in the common parlance of the time, his “color qualification.” One must wonder how Kennedy sidestepped what had to be a sensitive issue with one of the foremost world diplomats. Evidence of a solution can be found in Dr. Bunche’s letter, dated February 16, 1951, concerning scheduling arrangements for his trip to Charlottesville. In it, Dr. Bunche thanks Kennedy for his efforts: “Mrs. Bunche and I appreciate your kind offer of hospitality. However, since this will, unfortunately, have to be a rather

34 Id.
35 Id.
36 See id.
37 See id.
38 Bunche To Speak Later This Month For Legal Forum, supra note 30, at 1.
39 See Minute Book of the Student Legal Forum 31 (Sept. 21, 1950) [hereinafter Minute Book] (on file with the University of Virginia School of Law Special Collections Department, Student Legal Forum Papers, RG 200-78, Box 2). These minutes were presumably taken by Charles B. “Charlie” Reeves in his capacity as the Forum’s Secretary. See Extracurricular Survey, supra note 26.
40 Minute Book, supra note 39, at 31.
41 See id. at 35 (Nov. 15, 1950).
42 See id.
43 See, e.g., Bunche Warns of USA Isolationism in Cabell Address: Noted Negro Mediator Speaks on Prospects for World Peace, Va. L. Wkly., Apr. 5, 1951, at 1. Farmington Country Club, of which Kennedy was a member, “did not accept blacks as either members or guests.” David & David, supra note 29, at 58. As a private club, Farmington was able to remain ‘white only’ long after the Civil Rights Act of 1964 integrated public restaurants and accommodations, which led to intense controversy at the University of Virginia in the late 1960s and early 1970s. See Dabney, supra note 2, at 480.
hurried trip in view of my extremely heavy work-load I shall be returning to New York the same night.”44 Dr. Bunche’s response suggests that Kennedy and his wife, Ethel, had offered to host Dr. and Mrs. Bunche at their home, thereby avoiding the embarrassment of segregated public accommodations. Dr. Bunche’s speedy return to New York mooted the issue.

Second, Dr. Bunche accepted the invitation to speak at the University with the condition that the audience would be integrated.45 The Law School’s administration informed Kennedy that the University had balked when it caught wind of Kennedy’s plan to desegregate the audience attending the Bunche lecture. According to the account in Bobby Kennedy: The Making of a Folk Hero:

Bobby and Cottie were summoned to the dean’s office. He looked frustrated.

“He told us that under Virginia law, the mixing of blacks and whites was prohibited in public places, such as movie theaters, concert halls and auditoriums,” Cottie Davison remembers. “Still, he said he wouldn’t oppose Bunche’s appearance if we could get the leadership of the student body, the student government council, to back us and, in addition, could get the approval of the Board of Visitors, the university’s governing body.”46

According to Kennedy’s schoolmate, E. Barrett Prettyman, Jr., “Bunche refused to speak unless the audience was desegregated, because as a black man he refused to ever address segregated audiences . . . The university wasn’t willing to make an exception. Bobby was determined to set things right.”47 Another schoolmate, George Tremblay, remembered that “Bobby was really furious about the university’s hesitation on the Bunche lecture. I think he simply couldn’t believe that they were unwilling to provide him with a desegregated audience.”48

This was not the first time that Kennedy had been exposed to, and enraged by, segregation policy at UVA. As a football player at Harvard, Kennedy had been a friend and teammate of Chester “Chet” Pierce, the first black football player on Harvard’s squad.49 In October 1947, Harvard was scheduled to make a road trip to Charlottesville to play UVA at Scott Stadium.50 Harvard struggled with UVA to allow Pierce to play in the game.

When the game was scheduled the year before, Harvard’s athletic director, Bill Bingham, had informed the University of Virginia that

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44 Letter from Ralph J. Bunche, Director, Dep’t of Trusteeship, United Nations, to Robert F. Kennedy, President, Student Legal Forum, Univ. of Va. Sch. of Law (Feb. 16, 1951) (on file with the University of Virginia School of Law Special Collections Department, Student Legal Forum Papers, RG 200-78, Box 1, “B” Correspondence).
45 See DAVID & DAVID, supra note 29, at 57.
46 Id.
47 O’DONNELL, supra note 24, at 66.
48 Id.
49 See id. at 9.
50 See id. at 36-37.
Harvard had a black player, whom they intended to bring with them. . . . But a few weeks before the game, University of Virginia officials called Bingham and told him not to “bring that black boy” with them. Bingham was furious; he informed the officials that Harvard had every intention of bringing Pierce and intended for him to play. “It was all or none,” Wally Flynn recalls. “Either he was playing or we were not going.”

The Virginia players themselves had taken a vote, and they had agreed unanimously that Harvard should bring Pierce and that he should play. But University of Virginia officials, wary of breaking the segregation barriers, were worried about how the crowd would react to seeing a black player on their field being treated as an equal.51

Harvard defiantly took Pierce on the road trip, where he became the “first black man to play on a southern gridiron” before an audience of some 25,000 spectators.52 Unfortunately, Robert Kennedy had a broken leg at the time and had to listen to the game on the radio from the confines of the Varsity Club in Cambridge, Massachusetts.53

After Kennedy’s conversation with the Law School’s administration, and given his previous experience with segregation at UVA, Kennedy mobilized other members of the Forum to fight the segregation policy.

II. Robert Kennedy’s Effort to Desegregate the Bunche Lecture

First, Kennedy brought the matter up with the Student Advisory Council.54 Cottie Davison recounted the meeting:

So we went to the student council and they all thought it was a great idea until it came to sign a resolution saying so. Then many balked. They were for the most part southerners, some of whom were interested in political careers, and they didn’t want their names tainted with the possibility that they had cooperated in bringing a black to the University of Virginia.

Bobby was livid. “You’re all gutless,” he bellowed at the student leaders. “You’re willing to go ahead with this idea but you’re afraid to let anyone know your backing it!”55

According to this account, the Student Advisory Council took up the question and decided that, “while it would not officially approve the resolution, it would not interfere either.”56

51 Id. at 37.
52 Id.
53 Id.
54 The Student Advisory Council was the student governing body within the Law School, and was the predecessor in interest to the Student Bar Association currently in place. See Extracurricular Survey, supra note 26, at 1.
55 Id. at 57-58.
56 Id. at 58.
Next, Kennedy turned his attention to the University’s oversight body, the Board of Visitors. He drafted a remarkable five-page letter to UVA President Colgate W. Darden dated March 7, 1951. President Darden had become UVA’s President in the spring of 1947, after having served in the Virginia House of Delegates, the U.S. House of Representatives, and as Governor of Virginia. Because Darden had served as an elected official in Virginia during the Jim Crow Era, it is likely that Kennedy did not expect a particularly sympathetic audience.

In his letter, Kennedy employed a mixture of legal and moral argument. The letter, in both style and substance, reveals much about Kennedy as a young, third-year law student. Kennedy began the letter by voicing student support for the measure.

The purpose of this communication is to place before you the unanimous and strongly held views of the Student Legal Forum concerning its invitation to Dr. Ralph Bunche to lecture at the University of Virginia, an invitation which carries the overwhelming support of the student body. (See Resolution of Student Advisory Council, attached hereto.)

The University did not retain minutes of the Student Advisory Council meeting that addressed the Bunche controversy. However, Kennedy’s letter tends to cast doubt on the earlier account from Cottie Davison that the Student Advisory Council members, in the end, refused to endorse the resolution. It is possible that Kennedy and the members of the Council hammered out some language that allowed him to claim the “overwhelming support of the student body” without ever receiving a formal endorsement.

In the second paragraph of his letter, Kennedy attempted to allay concern that the Forum was trying to embarrass the University while trumpeting Dr. Bunche’s credentials as merely one in a series of distinguished lectures:

At the outset permit us to say that at no time did we consider the invitation one calculated to embarrass the University of Virginia. Quite the contrary it is our belief that it is calculated to redound to the great credit of the University. It is hardly necessary to recall that through his activities with the United Nations Dr. Bunche is internationally known and respected, that he is a Nobel peace prize winner and that he has

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57 See Letter from Kennedy to Darden, supra note 1.
58 See DABNEY, supra note 2, at 379.
59 In fact, the Fourth Circuit’s order requiring the University of Virginia to admit Mr. Swanson was “an outcome said on good authority to have been in full accord with President Darden’s wishes.” Id.
60 See Letter from Kennedy to Darden, supra note 1.
61 Id.
62 In addition, President Darden’s papers contained in the University of Virginia’s Special Collections archives did not contain the Resolution alluded to in Kennedy’s letter.
63 Id.
64 Id.
accepted a position as Professor of Government at Harvard University. The invitation to him was one of a series of invitations and acceptances which have included a former Ambassador to the Court of St. James and a Supreme Court Justice.\textsuperscript{65}

Kennedy wrote his most forceful paragraph next:

Ever since its inception the lectures sponsored by the Student Legal Forum, while primarily designed for law students, have been open to the public at large. At no time did it occur to us that it would be possible or desirable to have Dr. Bunche lecture under any other arrangement. Indeed it did not appear to us then, and does not occur to us now, that there is any problem calculated to embarrass the University, unless the University should decide that it is necessary to create the issue itself by invoking an educational segregation policy which, as we shall attempt to point out later, is, in this instance, legally indefensible, morally wrong, and fraught with consequences calculated to do great harm to the University. There is no question but that Dr. Bunche will feel compelled to cancel his engagement if an educational segregation policy is invoked.\textsuperscript{66}

Kennedy then argued that the segregation policy is regularly disregarded and unenforced. Furthermore, he predicted the attendance numbers for the audience would not be so large as to stir up excessive controversy:

That it is unnecessary and unwise to create the issue follows from the simple fact that the lecture series is not calculated to attract any extraordinary number of people. The subject of his lecture (not yet decided upon) will undoubtedly treat an abstract subject in the manner customary in University circles. It is scheduled for Easter Monday. It is not likely that more than 30 or 40 representatives of the colored race will be present in an audience estimated at 300 to 400. In a recent lecture attended by approximately 200 people four negroes, including Mr. Swanson, attended. No segregation was invoked and no issue was presented. Many similar instances could be cited including, we are informed, the experience of the Institute of Public Affairs, where even “formal” segregation has been discontinued, the meetings of the Virginia Social Science Association, conventions held by many adult education groups, the much publicized Town Meeting of the Air held in Cabell Hall last spring, etc. No issues have been raised in any of these instances and we are confident a similar experience would result from Dr. Bunche’s academic lecture, despite his renown and claims to distinction.

\textsuperscript{65} Id.
\textsuperscript{66} Id. at 1-2.
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Clearly therefore no issue should be raised unless there are compelling moral, legal or other policy reasons for doing so.\footnote{Id. at 2-3.}

It is interesting to note that Kennedy vastly underestimated the attendance of Dr. Bunche’s lecture, which ended up being reported as 1500.\footnote{Bunche Warns of USA Isolationism in Cabell Address, Va. L. Wkly., Apr. 5, 1951, at 1.} It would be difficult to tell whether this was an intentional underestimation designed to calm nervous University administrators or a genuine miscalculation of community interest in Dr. Bunche’s lecture. Either way, if Kennedy’s representations were correct about the average attendance at Forum events, Dr. Bunche’s lecture generated significantly greater interest.

In addition, Kennedy specifically mentioned that Mr. Swanson, the University’s only black student, attended the last lecture without incident. His reliance on the \textit{McLaurin} case, as he set forth below, probably rested, in large part, on Mr. Swanson’s enrollment as a graduate student in the Law School.

Next, Kennedy addressed the moral ramifications of the segregation policy, but attempted, at least superficially, to soften the didactic tone to which many moral arguments are susceptible:

We do not wish here to argue the moral issue. At the same time we would like to register our strong conviction, reinforced by our belief in the issues presented by the last war in which most of us fought, and by our belief in the principles to which this country is committed in the Bill of Rights and the United Nations Charter, that action which would result in the cancellation of Dr. Bunche’s lecture appears to us morally indefensible.

We are fully sensitive to the many delicate problems posed by the race issue, and we are fully aware of the restraints which wisdom imposes on hasty and ill-considered action. At the same time we are constrained to believe that in the field of University education the moral position advocated above has become and is now generally accepted.\footnote{Letter from Kennedy to Darden, supra note 1, at 3.}

Moving from the moral to the legal, Kennedy argued that any Virginia segregation law, as applied in this context, has been foreclosed by the United States Supreme Court.

We believe this position is also reflected in the law and that there is no legal compulsion to invoke segregation in an instance such as that presented by Dr. Bunche’s proposed lecture. It is axiomatic that the “law” of Virginia is to be interpreted in light of Supreme Court decisions and it “exists” only insofar as it conforms to those decisions. The only fair inference to be drawn from the celebrated [\textit{McLaurin}] case is that where the University of Virginia offers a public lecture open
to citizens of the State, it cannot require that colored citizens in
attending these addresses be seated in a segregated area.\(^{70}\)

Mixed into this passage is Kennedy’s assertion that it was “axiomatic” that
states must comply with orders of the Supreme Court.\(^{71}\)

Kennedy continued with a student self-government argument, which was
probably his weakest line of attack. If the University perceived the activity to be
illegal, it certainly could not justify that activity taking place on its property in
the name of student freedom:

It may, indeed, be plausibly argued, as Harvard has done, that the
Student Legal Forum is simply a student group and what it does is
primarily a matter for that group. The University under a general policy
of substantial freedom of student action, is not compelled to interfere
and in the interest of developing a sense of student responsibility
prefers not to interfere.

We do not believe it necessary to invoke this argument, however,
as it appears certain that the Virginia law is in accordance with our
statement of it. And it is unnecessary, we feel, to await some specific
Virginia court decision on the point for the simple reason that the
Supreme Court has spoken. (A statement of the McLaurin case and a
brief discussion of the legal issue is attached hereto.) To sum up, we beg
leave to suggest that a decision not to invoke segregation is more
rational under the circumstances, than one to invoke it.\(^{72}\)

Unfortunately, the original legal brief on *McLaurin*, prepared by the Law
School’s Dean, F.D.G. Ribble,\(^{73}\) was not available for purposes of this Essay.
However, it is easy to imagine that Mr. Swanson’s enrollment at the University
substantially supported the position that *McLaurin* precluded the segregation of
the audience for the lecture.

In his last line of argument, Kennedy pointed to the Cold War struggle as a
justification for the Bunche lecture to be integrated.

We have previously suggested that the failure to invoke an illegal
segregation policy is not likely to create any issue of consequence. On
the other hand the invocation of such a policy is, we believe, calculated
to harm the University, the Commonwealth of Virginia and, because of
its propaganda potential, the United States.

Publicity attending Dr. Bunche’s lecture is necessarily limited in its
appeal. Publicity attending the cancellation of his lecture is not so

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\(^{70}\) *Id.* at 3-4.

\(^{71}\) *Id.* States’ rights advocates have long challenged that assumption, and that
thinking gained steam during the era of massive resistance and the Southern Manifesto,
which were but a few years off.

\(^{72}\) *Id.* at 4.

\(^{73}\) *See* Letter from Dean F.D.G. Ribble, Hardy C. Dillard & Charles O. Gregory,
Univ. of Va., to President Colgate W. Darden 1 (Mar. 8, 1951) [hereinafter Ribble,
Dillard, and Gregory Letter] (on file with the University of Virginia Special Collections
Department, Presidential Papers, “Law School,” RG-2/1/2.581, Box 10).
limited. The implications are obvious. At a time when the United States
is battling a daily propaganda war with Russia, the racial issue would
probably be spread across the headlines in its most damaging aspect.
We believe the results would be catastrophic. They should not be risked
unless there are compelling moral or legal reasons for doing so. In this
instance, as we have attempted to point out, reasons of policy not only
do not require it, they emphatically require that the lecture be held in
the normal way.74

Looking back on Kennedy’s career anti-communism, it is not surprising to see
him reference the “daily propaganda war with Russia.” It also, with a slightly
different bent, complemented Dr. Bunche’s internationalist justification for civil
rights in the United States.75

Finally, Kennedy closed his letter as follows:

We respectfully request therefore that we be permitted to go through
with the invitation in the usual manner, as in the instance of other
distinguished Americans who have participated in our series.

Respectfully submitted,

ROBERT F. KENNEDY
Pres. of Student Legal Forum76

Kennedy’s letter was delivered to President Darden with a cover letter signed by
Dean F.D.G. Ribble, and Professors Hardy Cross Dillard and Charles O.
Gregory. The letter, dated March 8, 1951, read as follows:

Dear Mr. President:

It occurred to us that it might prove helpful to you to know that
Mr. Kennedy and other representatives of the Student Legal Forum
have solicited our opinion with respect to the position they have taken
regarding their invitation for Dr. Bunche. While our concurrence was
not specifically sought we do concur generally in the views expressed in
their communication to you. We were requested to give a brief
statement as to the implications of the McLaurin case. This was drafted
at their specific request by one of us (Ribble) and is agreed to by the
others.77

As noted by the Minutes of the Board of Visitors meeting addressing the
Bunche lecture, these letters proved convincing to President Darden.78

74 Letter from Kennedy to Darden, supra note 1, at 4-5.
75 Bunche Warns of USA Isolationism, supra note 68, at 1, 3.
76 Letter from Kennedy to Darden, supra note 1, at 5.
77 Ribble, Dillard, and Gregory Letter, supra note 73, at 1.
78 Minute Book of the University of Virginia Board of Visitors 184 (Mar. 9, 1951) (on
file with the University of Virginia Special Collections Department).
A. Board of Visitors Consideration

Two days after the letter was delivered, on March 9, 1951, the Board of Visitors held their regularly scheduled meeting in which they discussed Dr. Bunche’s appearance before the Student Legal Forum.79 The Minutes revealed that President Darden made a presentation in favor of desegregating the audience attending Dr. Bunche’s lecture,80 explaining that “the chairman of the group” (Robert Kennedy) had been to see him. The Minutes recorded that “[President Darden] believes the Supreme Court decision opens such meetings to mixed groups without segregation.”81

Mr. Thomas Benjamin Gay, the managing partner of the powerhouse Richmond law firm then-named Hunton, Williams, Anderson, Gay & Moore,82 responded to President Darden’s presentation.83 “Mr. Gay stated that he did not think we should change the present policy for this lecture.”84 However, Mr. Gay added, “the Board might wish to establish some general policy for the future concerning the handling of public lectures at the University.”85 Ultimately, while “[n]o formal resolution was adopted . . . it was the sense of the Board that Mr. Gay’s suggestion concerning this lecture should be followed.”86

B. Dr. Bunche’s Address

On Monday, March 26, 1951, Dr. Bunche addressed “an audience of 1500 in Cabell Hall.”87 Given the “sense” of the Board of Visitors that the segregation policy should apply to the Bunche lecture, it is unclear how it came to pass that Dr. Bunche spoke to a fully integrated group merely two weeks later. That Dr. Bunche came to Charlottesville suggests that he was assured that the segregation

79 Id.
80 Id.
81 Id.
82 Anne Hobson Freeman, The Style of a Law Firm: Eight Gentlemen from Virginia 124 (1989). Mr. Gay had a lifelong association with the University of Virginia. He was a 1906 graduate of the Law School. Id. at 105. In addition to his service on the Board of Visitors, he also directed the University of Virginia Law School’s Endowment Fund until his death in 1983 at age ninety-eight. Id. at 128. Incidentally, while he served on the Board of Visitors, he chaired the search committee responsible for hiring Darden as President of the University. DABNEY, supra note 2, at 268.
83 Minute Book of the University of Virginia Board of Visitors, supra note 78, at 184.
84 Id.
85 Id.
86 Id.
87 Bunche Warns of USA Isolationism, supra note 68, at 1. If this report of the attendance is accurate, it shows that Dr. Bunche generated significantly more interest than any of the other Student Legal Forum lecturers. In his letter to President Darden, Kennedy argued that “the lecture is not calculated to attract any extraordinary number of people.” Letter from Kennedy to Darden, supra note 1, at 2. C. Matthew Burtner, a current Professor of Music at the University of Virginia (the author’s cousin), expressed serious doubts that Cabell Hall, even in its 1950s configuration, could hold more than 750 people.
policy would not be invoked. In addition, numerous accounts of the lecture describe it as fully integrated.88

Dr. Bunche began his remarks with a stinging attack against the proponents of isolationism. Both the Virginia Law Weekly and the Charlottesville Daily Progress quoted Dr. Bunche as saying isolationism had “come out of hiding and even became respectable again.”89 He added, “such counsel could only lead us down a suicidal path.”90

Dr. Bunche’s remarks stood in vivid contrast to the isolationist views espoused by Kennedy’s father, former Ambassador to Great Britain, Joseph P. Kennedy. Only three months earlier, the Virginia Law Weekly headline blared “Joseph P. Kennedy Advocates U.S. Withdrawal From Korea in Fifth Legal Forum Speech.”91 In that speech, Ambassador Kennedy was quoted as saying: “An Atlas, whose back is bowed and whose hands are busy holding up the world, has no arms to lift to deal with his own defense. That is our present posture.”92

Dr. Bunche next moved to the issue of race relations in the United States. Dr. Bunche, as one of the most esteemed U.S. diplomats, refracted his discussion of race through the lens of foreign policy.93 “Too often we swear by democracy more vigorously than we live by it. We cannot have two brands of democracy, a pure or first quality brand for export and an imperfect factory-quality for home consumption.”94 Dr. Bunche went on to say that the vast masses of Asia and Africa cannot be converted to democracy qualified by color.95

Dr. Bunche finished the speech on a note of optimism at the ability of the U.S. to overcome its racial apartheid: “‘But no problem is too great for the American people to solve,’ he asserted, urging a strength of determination so deep that it will be capable of raising an abnormal effort to correct these aberrations.”96 Speaking to the pace of social change, namely the common calls for gradualism, Dr. Bunche remarked, “no one has ever been known to enjoy a

89 Bunche Warns of USA Isolationism, supra note 68, at 1; see also Isolationism is Suicidal Path, Bunche Tells Student Forum, Daily Progress, Mar. 27, 1951, at A1.
90 Bunche Warns of USA Isolationism, supra note 68, at 1.
92 Id.
93 Looking back on the Civil Rights Movement now principally evokes images of a domestic struggle, such as the Freedom Riders, Brown v. Board of Education, strife at Ole Miss and the University of Alabama, Selma, and lunch counter sit-ins. It is easy to forget that one of the principal arguments of the Movement was the reputation and standing of the United States vis-à-vis the world. Kennedy himself had argued against the University’s segregation policy on the grounds that negative publicity would harm the U.S. in its “propaganda war” with Russia. Letter from Kennedy to Darden, supra note 1, at 5. At that time, domestic civil rights were a hot topic in American foreign policy circles.
94 Bunche Warns of USA Isolationism, supra note 68, at 1.
95 Id.
96 Id. at 1, 3.
right posthumously." Interestingly, it was this final remark, which sparked further controversy about the speech.

III. Reaction To The Address

The local media neither mentioned the controversy leading to the integration of the audience nor the fact that it was integrated. In fact, the only contemporaneous source that noted the segregation issue was a blurb in a Walter Winchell column. The content of Dr. Bunche’s lecture, however, stirred up a controversy between the Virginia Law Weekly and certain quarters of its readership on the acceptable rate of racial progress.

The Virginia Law Weekly published an editorial criticizing Dr. Bunche’s comments on racial progress in its April 5, 1951 issue. The editorial began with a complimentary tone, stating: “The University Community was privileged to hear Dr. Ralph J. Bunche a week ago Monday when the Student Legal Forum, through its able president Robert F. Kennedy, presented another in a long line of eminent speakers.” It continued:

Dr. Bunche’s talk was simple, humorous, and free of the grimness of purpose sometimes identified with members of minority groups. But on one expression we were not clear. Speaking of the gradual approach toward racial democracy, he said that no one has ever been known to enjoy a right posthumously. If Dr. Bunche meant that the approach should be more revolutionary than evolutionary, we must respectfully disagree.

The Law Weekly editorial is a classic example of the gradualist school of thought referred to in Hodding Carter’s work. Apparently, the Law Weekly editorial staff did not mind abstract rhetoric about racial progress, but bristled at the suggestion that it was not progressing fast enough.

In the next issue, the Law Weekly published a letter to the editor from Grasty Crews, II, which took issue with the editorial. Mr. Crews wrote that the

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97 Id. at 3.
98 Bunche Warns of USA Isolationism, supra note 68, at 1; Isolationism is Suicidal Path, supra note 89, at A1.
99 See Scrapbook of the Student Legal Forum, clipping of Walter Winchell column (undated) (on file with the University of Virginia School of Law Special Collections Department, Student Legal Forum Papers). In the column, Winchell wrote: Robert [Kennedy’s] . . . latest feat was persuading Dr. Ralph Bunche to address the student body of the Univ. of Virginia . . . Young Kennedy’s job is to get distinguished people as guests—and although Virginia has a segregation law—the Univ. prexy [sic] forgot it . . . The Univ. president and Dr. Bunche paid tribute to Bob, “a young student with no axe to grind—a true liberal.”

Id.
101 Id.
102 Id.
103 Hodding Carter, III, supra note 10, at 11-12.
“rationale of your criticism of Dr. Bunche in last week’s editorial was unsound.” According to Mr. Crews, “the rate of progress, it seems to me, is of the very essence [sic] in any sociological development.” He then placed the current racial dilemma in a historical context:

Unless it is to bog down in the revolution which you so correctly abhor, the rate must constantly increase; that is to say, not only much we progress, but we must progress faster and faster. The reason is, that each new step forward brings more fully to the consciousness of the underdogs, whether they be the French citizenry of the 18th Century or Negro Americans of today, the realization the fact that they have been the underdogs, and each new step forward brings into clearer vision and makes yet the more desirable the goal which they seek.

Another letter to the editor was printed in the following issue, dated April 26, 1951. Frank D. Daniel, MD, like Mr. Crews, criticized the editorial board’s distinction between “evolutionary” and “revolutionary” change. Dr. Daniel began his letter by suggesting that the only difference between the etymologies of the two words was a “mater [sic] of time.” He noted that “[w]hile revolutions are sometimes violent there is no violence implied in the word revolution.”

Then, Dr. Daniel turned his attention to his perception of the effects of calls for gradualism:

It seems to me that the chief obstacle to progress in race relations is this attitude, held by so many people today, that we must go slow, that we must let time bring about these changes and any effort to hasten the occurrence of the changes in our pattern of living is ill-advised. These people seem to think that if all persons fold their hands complacently and wait, time along will bring about the evolution. . . . It is the current modern acceptable pattern of white supremacy.

Dr. Daniel closed his letter by returning to the specter of violence raised by the Law Weekly’s editorial:

Dr. Bunche, both in the main body of his talk and in the closing remarks on democracy, made it quite plain that non-violent settlement was his objective and the objective he wants for all the world. But he does not mean that social changes should be neglected. He is advocating that every American do all the he can here and now to bring an end to the social injustices which are now inflicting on a tenth of our citizens.
In its May 3, 1951 issue, the Law Weekly printed a portion of a letter from Dr. Bunche in which he responded to the paper’s criticism of his lecture. Just above the inset of the printed portion of Dr. Bunche’s letter, there was an editor’s note. In it, the Law Weekly wrote that “[o]ne important part of his speech was misinterpreted in this editorial. At the request of the Law Weekly, Dr. Bunche was kind enough to restate his position at greater length, and correct a misinterpretation which the Law Weekly sincerely regrets. The relevant portion of his letter is, therefore, reproduced below.”

With regard to “gradualism” I said:

“We must face the facts honestly. Those who may have found comfort in the concept of gradualism on the assumption that time, seen as an inexorable solvent, would eliminate the problem, now find that time has caught up with us. Today, our country needs desperately its maximum strength–its maximum manpower, unity and moral leadership. But in this very hour, our resources of manpower are squandered in racial strife and racial barriers to employment, our unity is disrupted by racial and religious animosities, and our prestige and moral leadership in the world suffer from the contradictions between the democratic ideals we proudly profess and the domestic practices of which we cannot boast. These contradictions have already cost us prestige, good will and more lives than we need to lose on far-off battlefields. In the future these costs in the lives of fine American boys–white, black, brown, yellow, and red–could be far greater, for the same reason.”

I then went on to say:

“We must strive by our deeds to convince watchful peoples everywhere that we not only profess democracy, but that we deeply believe in it, and that it is applicable and good for all peoples, whatever their color or creed.”

“To me, it seems that this is no superhuman or impossible task for my country. It does not require that people of different colors or creeds must begin to clasp each other into their bosoms. It requires no revolution, beyond a psychological one. It does require a substantial change in the attitudes of many of our citizens and our legislators. This is nothing new for America. Within the past century we have seen radical changes in the attitude of Americans toward many groups in the country–toward the Irish, the Scandinavians, the Polish, the Italians, the Germans, the Chinese, the Latin-Americans, the English and the American Indians. We have even seen Baptists and Methodists begin to speak to each other.”

In this connection, I pointed out that if members of a disadvantaged minority group usually appear to be impatient, this

115 Id.
116 Id.
should be understood in terms of the inevitable thinking of the individual, “since no one has ever been known to enjoy a right posthumously.”

Since this latter statement referred specifically to the impatience of the individual, there was no basis for a sweeping deduction that a ‘revolutionary’ approach was being advocated.

Incidentally, I do not agree that “the rate of progress is secondary.”

Sincerely yours,
RALPH J. BUNCHE

Dr. Bunche’s letter ended the controversies surrounding his lecture at the University of Virginia.

A. Later Encounters and Reflection

Thus far, there has not been much recorded interaction between Robert F. Kennedy and Dr. Ralph Bunche after the 1951 lecture. Over a decade later, however, reformers argued over which of the two should receive the Democratic nomination to run for Senator Kenneth B. Keating’s soon-to-be-vacated seat. At the time, Kennedy was Attorney General of the United States and Dr. Bunche Under Secretary General of the United Nations. Kennedy emerged the candidate after a period of indecisiveness, winning the 1964 election. He would reunite with Dr. Bunche at least once more in 1966 at a dinner in New York—Bunche left that dinner impressed with Kennedy’s potential for the future.

Kennedy’s time in Charlottesville, and the controversy surrounding Dr. Bunche’s letter, blossomed into lifelong working and personal relationships with Dean Ribble and Professors Dillard and Gregory. As Attorney General, Kennedy solicited the three to found and serve on the School Board of the Prince Edward County Free Schools. The Free Schools were integrated private schools designed to combat the public school closures brought by Virginia’s policy of massive resistance.

After Robert F. Kennedy was assassinated on June 4, 1968, UVA Law School Dean Hardy Cross Dillard delivered a memorial tribute at the request of the University’s President. Dean Dillard’s delivery of the speech authorizing the memorial, the Robert F. Kennedy Memorial Scholarship granted to students

117 Id.
118 David & David, supra note 29, at 231-33.
119 Id. at 233.
121 See Letter from U.S. Att’y Gen. Robert Kennedy to Dean F.D.G. Ribble, Univ. of Va. (Nov. 21, 1963) (on file with the University of Virginia Special Collections Department, Ribble Papers); Letter from U.S. Att’y Gen. Robert Kennedy to Dean F.D.G. Ribble (May 15, 1964) (on file with the University of Virginia Special Collections Department, Ribble Papers).
122 Dabney, supra note 2, at 426.
with a record of and interest in public service, evidenced the enduring relationship between the two.

Later in life, Kennedy himself pointed to the Bunche lecture controversy as a personal awakening. In a December 4, 1964 interview conducted by famed New York Times columnist, Anthony Lewis, Kennedy responded to a series of questions about the birth of his “awareness of the situation of the Negro in this country.” He responded:

I might say that I went—if I get into my part—that I went down to law school at the University of Virginia, where we had a Negro in our class. I guess he was the first Negro.

. . . .

. . . . I became head of the Student Legal Forum, which invited visitors in. I invited Ralph Bunche to come down. There was tremendous opposition to that in my own group and in the law school. Then, also, I said that he had to speak to a desegregated audience, so there was a split in our own group about that. Finally, I went to the president of the university, [Colgate] Darden. And he gave approval to it. It was the first time they had had a Negro speak to a desegregated audience, I guess, certainly at the law school or the college—he spoke under the aegis of the college—and, I think, in that part of Virginia.

That Kennedy would point to these events as important to his understanding of the challenges facing black America indicates that the Bunche visit had an appreciable effect on him (apart from any lack of precision or accuracy of Kennedy’s recollection of the details of the Bunche lecture controversy).

B. Legacy

In 2011, sixty years after Dr. Bunche’s historic lecture at the University of Virginia, Attorney General Eric Holder delivered commencement remarks to the University’s graduating law students. During that speech, Holder retold the story of a young Robert Kennedy sitting in the same spot his audience then occupied. Holder reflected on the passion with which Kennedy pursued his position as President of the Student Legal Forum:

Now, he easily could have avoided controversy, and politely explained to Dr. Bunche that such a thing would be impossible—that it was well beyond his power or control—and that, regrettably, the invitation would have to be withdrawn. He could have bent to

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123 Robert F. Kennedy, Interviews with Anthony Lewis (with Burke Marshall Present), in Robert Kennedy in His Own Words: The Unpublished Recollections of the Kennedy Years 66 (Edwin O. Guthman & Jeffrey Shulman eds., 1988).

124 Id. at 68 (brackets in original).

125 Eric Holder, Att’y Gen. of the United States, Commencement Remarks at the University of Virginia School of Law (May 22, 2011).
Robert F. Kennedy and the Bunche Lecture

custom—and to state law—and moved on to the next distinguished name on his list of potential speakers.

That course of action might have been consistent with the easygoing, feet-up-on-the-table image that the young Bobby Kennedy maintained among his classmates and professors. But that is not the Robert Kennedy we know from history—the brave, outspoken man who fought to integrate the University of Alabama; who helped to calm a city, and to heal a nation, in the wake of Dr. King’s assassination; the man who stood up to the Mob; spoke out against apartheid, and traveled to the poorest corners of this country to shine a light on the needs of—and this nation’s obligations to—America’s most vulnerable citizens.

Before he became known for his courage and compassion, his dedication to principle, and his stubborn determination to do what is right—Robert Kennedy exhibited the first flashes of these traits right here, at the University of Virginia, as he worked to bring Dr. Bunche to Charlottesville and to meet his conditions.126

He then told the story of Kennedy’s fight to integrate the audience and allow Dr. Bunche to lecture at the University. By the day of the talk, every seat in Cabell Hall was filled and, for the first time, nearly a third of those seats were filled by African Americans.127 Holder was many times a successor to Robert Kennedy in his position as Attorney General of the United States, emphasizing that point in his closing remarks:

As you pursue your own passions—and work to fulfill your collective responsibilities—I hope, in the spirit of Robert Kennedy—your famous predecessor, and mine—that you will dare greatly; that you will question what is accepted and change what is objectionable; that you will root out injustice in all its forms; and that you always will remember the truth of his enduring words: “The future is not a gift. It is an achievement.”128

Conclusion

Ultimately, Dr. Bunche’s lecture was a segregation policy aberration. The University of Virginia promptly returned to its policy of segregated audiences at public lectures, which it did not abandon until much later.129 As Dr. Bunche “[i]ncidentally” noted in the last line of his letter published by the Law Weekly, proponents of racial justice do not agree that “the rate of progress is secondary.”130 Ironically, Robert F. Kennedy’s fight to integrate Dr. Bunche’s

126 Id.
127 Id.
128 Id.
129 See generally, DABNEY, supra note 2, at 480-83 (describing the slow progress of desegregation at the University through examples of isolated progressive incidents spanning two decades).
130 Of Dive-Bombers, supra note 100, at 2.
lecture served as only one mutation in UVA’s evolutionary creep toward racial
equality.

In the final analysis, the legacy of the controversy surrounding Dr. Bunche’s
lecture to the Student Legal Forum is open to interpretation. One question
observers of University history must ask is: What effect did Dr. Bunche and
Kennedy have on the hearts and minds of members of the University’s
community as it stood on the brink of the Civil Rights Movement? In addition,
observers of Kennedy must seek to understand in what manner this early fight
for racial justice reverberated throughout the career of someone who ultimately
became one of our nation’s most forceful advocates of civil rights. Robert F.
Kennedy’s efforts to desegregate the Bunche lecture were merely the beginning
of a life—cut far too short by an assassin’s bullet—devoted, in large measure, to
bringing racial justice to America. As historical commentators continue to
evaluate his life, his efforts as a young, third-year law student should not be
forgotten.
APPENDIX

Dean F.D.G. Ribble (left), University of Virginia School of Law, with Robert F. Kennedy (center), President of Student Legal Forum, presenting Dr. Ralph J. Bunche (right) and his topic, “The United Nations and Prospects for Peace,” March 26, 1951.131
