

RONALD REAGAN V. CRLA:

Politics, Power, and Poverty Law

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On Christmas Eve, 1970, Lewis Uhler, director of the California Office of Economic Opportunity, shared a confidential 283-page report with Governor Ronald Reagan that catalogued four years and 127 cases of alleged misconduct by the attorneys of the California Rural Legal Assistance (CRLA).¹ Created in 1966 during President Lyndon B. Johnson's War on Poverty, the CRLA had eleven small offices throughout California in which federally funded attorneys provided free legal services to the rural poor, including many Mexican-American farmworkers. These attorneys, Uhler charged, were out of control. According to his report, they had been supplying inmates of the San Quentin State Prison with "subversive literature." They had also violated 1968 grant restrictions by working on criminal cases and by providing legal counsel to the United Farm Workers

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¹ "Reagan, CRLA In Test: Governor Vetoes Legal Aid Funds, Charges Violations," *Long Beach Independent*, Dec. 27, 1970. Box 67, Folder 2. CRLA Records (M0750). Dept. of Special Collections and University Archives, Stanford University Libraries, Stanford, Calif.

Union. On a more trivial level, a CRLA attorney in a visit to a local high school had used the F-word in front of students. In another instance, an attorney had appeared barefoot in court. As a wild example, the report charged that, in an effort to defend juvenile delinquents, the CRLA had “spirited away” a fifteen-year-old girl to Tijuana, Mexico, so she could marry without parental consent.² To borrow Uhler’s words, “these represent only a few of the alarming examples of CRLA’s failure to accomplish its mission, comply with its grant conditions, or control the sometimes outrageous and irresponsible conduct of its employees.”³

On December 26, 1970, with the report in hand, Reagan exercised his prerogative as governor to block the CRLA’s annual funding package of \$1.8 million from the federal Office of Economic Opportunity (OEO), the entity from the Johnson era that administered War on Poverty programs. Explaining this decision, Uhler declared, “The failure of the CRLA has been so dramatically brought to this administration’s attention that there is no choice but to recommend the disapproval of CRLA funding.”⁴ Once the governor’s veto became official, Uhler, Reagan, and other members of Reagan’s administration looked ahead to the new year when, if all went as planned, the young poverty law agency would wither and die.

The matter was far from closed, however. While War on Poverty legislation gave governors authority to veto funding packages for federal programs in their states, the OEO in Washington retained authority to override such vetoes if it saw fit. Thus, Reagan and Uhler still had to convince Frank Carlucci, the new OEO director of the Nixon administration, that the veto and the report on which it was based were legitimate. They also had to prepare for the CRLA’s response to their charges. As soon as the report became public, dozens of attorneys whom they had slandered would present their version of the 127 cases. Given Uhler’s obviously one-sided accounts, the Reagan administration had to bank on some political favoritism from Carlucci and the conservative Nixon administration.

² See Lewis K. Uhler, “A Study and Evaluation of California Rural Legal Assistance, Inc, 1971.” Carton 78, Folder 24, CRLA Records, Stanford.

³ “Lack of Direction was Reason for CRLA Veto,” *Antioch Ledger*, Jan. 5, 1971. Box 67, Folder 2, CRLA Records, Stanford.

⁴ *Ibid.*

For the CRLA, the Uhler report brought intense scrutiny from the federal government as well as the imminent possibility of termination. If the Nixon administration wanted to dismantle or change federal programs from the Johnson era, Reagan's veto made it easy to do so. The CRLA, therefore, not only had to respond to Uhler's charges, but it also had to demonstrate that it was providing an essential service to impoverished citizens. Consequently, what should have been a regular refunding cycle became a fight for survival. In its four years of existence, the CRLA had fought — and won — several large lawsuits, including suits against the Reagan administration, on behalf of California's rural poor (hence Reagan's desire to be rid of the agency). This battle for survival, however, became one of the agency's most significant cases.

By defending itself, the CRLA defended, by extension, California farmworkers' access to the legal system and their ability to use the law to protect their civil rights. More broadly, in the fight for its own survival, the CRLA defended President Lyndon Johnson's idea that federal programs really could lift American citizens out of poverty. This idea directly challenged resurging conservative voices that called for state autonomy and a small federal government. This case represented a clash of political ideologies, as well as a power struggle between farmworkers and their federal allies on one hand and growers and their state allies on the other. The outcome would shape rural California society for decades.⁵

In the study of modern California farmworkers, scholars and popular society have paid far more attention to Cesar Chavez and the public protest

⁵ Reagan's battle with the CRLA has received limited scholarly attention. In 1972, Michael Bennett and Cruz Reynoso published a thorough, first-hand account of the CRLA's early legal strategy and self-defense; see Bennett and Reynoso, "California Rural Legal Assistance (CRLA): Survival of a Poverty Law Practice," *Chicana/o Latina/o Law Review* 1, no. 1 (1972): 1–79. During the next decade, other legal scholars examined the vulnerability of legal service agencies to political pressure; see: Jerome B. Falk and Stuart R. Pollak, "Political Interference with Publicly Funded Lawyers: The CRLA Controversy and the Future of Legal Services," *Hastings Law Journal* 24, no. 4 (1973): 599–646; Angela F. Turner, "President Reagan and the Legal Services Corporation," *Creighton Law Review* 15 (1982): 711–32. Overall, these articles do not fully examine the history of the CRLA and Governor Reagan's veto in the larger context of the War on Poverty and California farmworker history.

of the United Farm Workers Union (UFW) than to the CRLA.⁶ The CRLA was significant, however, because it gave farmworkers something that they had never had in the past two hundred years, regardless of union involvement — namely, free access to attorneys and, in turn, legal protection. From Native American workers on Spanish missions, to Chinese and Japanese immigrants, to Anglo-American transients (or “bindlemen”), to Mexican immigrants, farmworkers in California history were migrants, foreigners, minorities, or all of the above. As such, they lacked the full benefits of citizenship, including legal protection, and they were often treated, in historian Richard Street’s words, as “beasts of the field.”⁷ In the early 1900s, one journalist lamented, “California has passed laws for the protection of migratory birds, but it can not [*sic*] pass laws for the protection of migratory workers.”⁸ This lack of legal protection contributed to the poverty of all farmworker groups and to their powerlessness against racism, injustice, and violence. In the 1930s, Carey McWilliams concluded that “the exploitation of farm labor in California . . . is one of the ugliest chapters in the history of American industry.” He added, “time has merely tightened the system of [land] ownership and control and furthered the degradation of farm labor.”⁹

⁶ Scholarship on Chavez and the UFW has overshadowed the CRLA. Historians who have examined Chavez and the union include: Jacques Levy, Richard Jensen, John Hammerback, Miriam Pawal, Frank Bardacke, Matt García, and Randy Shaw. Shaw goes so far as to argue that the legacy of Chavez and the UFW set the course for virtually all social justice projects that followed. This argument and much of the scholarship often overlooks the parallel role of the CRLA. Indeed, scholar Ellen Casper’s 1984 dissertation, “A Social History of Farm Labor in California with Special Emphasis on the United Farm Workers Union and California Rural Legal Assistance” (Ph.D. diss., New School for Social Research, 1984), is one of the only book-length pieces of scholarship that gives the CRLA equal attention alongside the UFW; published as Ellen Casper Flood, “A Social History of Farm Labor in California with Special Emphasis on the United Farm Workers Union and California Rural Legal Assistance,” *California Legal History* 15 (2020): 293–516. See also Randy Shaw, *Beyond the Fields: Cesar Chavez, the UFW, and the Struggle for Justice in the 21st Century* (Berkeley: University of California, 2008), Preface and Introduction.

⁷ Richard Steven Street, *Beasts of the Field: A Narrative History of California Farmworkers, 1769–1913* (Stanford: Stanford University, 2004), xv–xxv.

⁸ *San Francisco Bulletin*, Quoted in Street, *Beasts of the Field*, 526.

⁹ Carey McWilliams, *Factories in the Field: The Story of Migratory Farm Labor in California* (Boston: Little, Brown, 1944[1939]), 7; for a discussion of vigilantism against minority farmworkers, see 134–51.

The three decades preceding the 1960s witnessed even more tightening and degradation. During the Great Depression, Dust Bowl refugee families who were desperate for work flowed into the state. Despite John Steinbeck's tribute that "their blood [was] strong" and McWilliams' argument that *these* workers, as opposed to immigrants, were "American citizens familiar with the usages of democracy," they faced tremendous bigotry, poverty, exploitation.¹⁰ As with other farmworker groups, transience, along with poverty and prejudice, effectively barred them from using the legal system in their defense. As one Dust Bowl refugee said of California growers, "when they need us they call us migrants, and when we've picked their crop, we're bums and we got to get out."¹¹

The following decade, Mexican immigrants became the main source of labor because, as scholar Joon Kim argues, the California Farm Bureau Federation and the American Farm Bureau Federation had long recognized that these workers were easiest to deport once harvest season ended.¹² The state's trend toward temporary Mexican labor culminated in the Bracero Program, a bilateral agreement between the U.S. and Mexican governments. The program began during World War II when U.S. businesses needed Mexican workers to fill the jobs left by military recruits. However, as Miriam Pawal writes, "the agricultural industry found this new workforce so cheap and malleable that growers successfully lobbied to extend the program long after the veterans returned home."¹³ In the postwar years of agricultural expansion, tens of thousands of Bracero laborers entered California each year to weed, thin, and harvest the crops. To growers, they were ideal stoop laborers. They accepted low wages, lived

¹⁰ McWilliams, *Factories*, 306; John Steinbeck, *Their Blood is Strong* (San Francisco: Simon J. Lubin Society, 1938), 7–9, 20–23; During the mid-1930s, Steinbeck worked as a journalist, documenting the experiences of migrant workers in California. His real-life accounts of poverty, malnutrition, and death inspired his 1939 fictional masterpiece *The Grapes of Wrath*.

¹¹ John Steinbeck, *The Harvest Gypsies* (1936), in Eric Foner, *Voices of Freedom: A Documentary History*, vol. 2, 6th ed. (New York: W.W. Norton, 2020), 165 (163–65).

¹² Joon Kim, "California's Agribusiness and the Farm Labor Question: The Transition from Asian to Mexican Labor, 1919–1939" *Aztlan* 37, no. 2 (2012): 47–72.

¹³ Miriam Pawal, *The Crusades of Cesar Chavez: A Biography* (New York: Bloomsbury, 2014), 54–55. The term *bracero* was derived from *brazo*, the Spanish word for arm, reflecting the laborers' role as extra hands.

wherever their employers directed, came and went based on their employers' needs, and had virtually no legal recourse.¹⁴

Braceros, of course, were not the only labor source. Many growers and workers avoided the bureaucracy of the Bracero Program by using unauthorized channels for immigrant labor.¹⁵ Additionally, a third group of farmworkers included domestic Mexican Americans, many of whom had been born in the United States, spoke English, and saw themselves as different from temporary workers from Mexico. In rural California, Braceros, undocumented workers, and Mexican Americans competed for work, and many growers used Bracero laborers to break strikes, depress wages, and avoid negotiations with Mexican-American crews.¹⁶ For agribusiness, the Bracero Program helped create a golden age of labor; for workers, as Walter

¹⁴ Despite these deplorable conditions, hundreds of thousands of impoverished Mexican men signed up for the program year after year, enabling its longevity. In many cases, these men had been landless agricultural wageworkers or small, struggling farmers in rural regions, and the Mexican state's agricultural policies of the mid-twentieth century, which benefited large growers, marginalized them even more. For these men, work in the United States, even stoop labor, meant increased earnings and a sense of progress or modernity. The Mexican government embraced the Bracero Program because, as scholar Alexandra Délano notes, it represented a "safety valve . . . to muffle problems related to unemployment and social tension in the country, and guarantee the entry of dollars through remittances," which totaled \$200 million between 1954 and 1959. See Délano, *Mexico and its Diaspora in the United States: Policies of Emigration since 1848* (New York: Cambridge, 2011), 98; see also Deborah Cohen, *Braceros: Migrant Citizens and Transnational Subjects in Postwar United States and Mexico* (Chapel Hill: University of North Carolina, 2011), 11; Timothy Henderson, *Beyond Borders: A History of Mexican Migration to the United States* (Malden, Mass.: Wiley-Blackwell, 2011), 59–63, 88–90; Hiroshi Motomura, *Immigration Outside the Law* (New York: Oxford, 2014), 42.

¹⁵ See Ronald L. Mize and Alicia C. S. Swords, *Consuming Mexican Labor: From the Bracero Program to NAFTA* (North York: University of Toronto, 2011), 40; see also Motomura, *Immigration*, 38–40.

¹⁶ Throughout the 1950s, growers used Bracero workers to break the strikes of Mexican American–led organizations such as the National Farm Labor Union. Furthermore, as the work of Miriam Pawal illustrates, grower associations in collusion with state officials perfected the practice of hiring Braceros over domestic workers. See Pawal, *Crusades*, 52–62; see also See Ernesto Galarza, *Spiders in the House and Workers in the Field* (South Bend: University of Notre Dame, 1970); Dionicio Nodín Valdés, *Organized Agriculture and the Labor Movement Before the UFW: Puerto Rico, Hawaii, California* (Austin: University of Texas, 2014).

P. Reuther of the AFL-CIO argued, it used “poor Mexicans to still further impoverish poor Americans.”¹⁷

In the 1960s, federal policy began to interrupt agribusiness’s golden age. The industry’s use of cheap, transient labor fundamentally clashed with President Lyndon B. Johnson’s vision of a Great Society that beckoned its people toward “an end to poverty and racial injustice.”¹⁸ Furthermore, Johnson’s War on Poverty, with its aggressive spending on poverty-reduction programs, threatened to destabilize industries that relied on large numbers of poor workers. In rural California, two principles of the War on Poverty combined in the creation of the CRLA, which growers soon labeled “agriculture’s oldest antagonist.”¹⁹ The first idea held that the poor throughout the nation needed and deserved access to attorneys. The second involved the Johnson administration’s focus on migrant workers, especially Mexican-American farmworkers.

Johnson’s idea that the poor deserved attorneys built on the work of President John F. Kennedy. In June of 1963, in the wake of massive civil rights demonstrations and police brutality in the Alabama and other southern states, Kennedy had emphasized the need for “legal remedies” to racial injustice, and, to provide such remedies, he had called on Congress to enact civil rights legislation.²⁰ In addition to laws, Kennedy also recognized the need for lawyers. This same month, he created the Lawyers’ Committee for Civil Rights and invited 244 attorneys to the White House for an inaugural meeting. At the meeting, Vice President Johnson and Attorney General Robert Kennedy called on these lawyers to use the legal system to help American society put civil rights law into practice.²¹

¹⁷ Letter from Walter P. Reuther to President Lyndon Johnson, Oct. 27, 1964. Box 18: Labor (GEN LA 5, 10/1/1964); Folder: LA 5 Migratory Labor–Seasonal Labor 10/1/64–12/25/64. Lyndon Baines Johnson Presidential Library, Austin, Texas.

¹⁸ Lyndon B. Johnson, “Remarks at the University of Michigan,” May 22, 1964, in Bruce J. Schulman, *Lyndon B. Johnson and American Liberalism: A Brief Biography with Documents* (Boston: Bedford/St. Martin’s, 2007), 193 (192–96).

¹⁹ Don Razeo, “Agricultural Work is Unfit, CRLA Contends,” *California Farmer*, May 18, 1968. Box 65, Folder 6, CRLA Records, Stanford.

²⁰ “John F. Kennedy, Speech on Civil Rights, 1963,” in Eric Foner, *Voices of Freedom: A Documentary History*, vol. 2, 6th ed. (New York: W.W. Norton, 2020), 266.

²¹ See Michelle D. Bernard, *Moving America toward Justice: The Lawyers’ Committee for Civil Rights Under Law, 1963–2013* (Virginia Beach: Donning, 2013); Ann Garity Connell, *The Lawyers’ Committee for Civil Rights under Law: The Making of a Public*

Following Kennedy's assassination, Johnson continued to support the Lawyer's Committee. In a 1964 letter to committee leaders, he wrote, "I hope you will convey to all of the members . . . my personal interest in the work you are undertaking. Lawyers are uniquely qualified to play a leadership role in their communities in [the fight for civil rights] and I believe their active participation should be encouraged."²²

For Johnson, however, the Lawyers' Committee was only a first step. In his vision, all poor citizens, especially minorities, had to have access to attorneys in order to challenge injustices in an effective, nonviolent way. In 1965, the Department of Justice and the OEO organized a Law and Poverty Conference at which members of the American Bar Association discussed this goal. "Equal justice for every man is one of the great ideals of our society," declared future Supreme Court Justice Lewis F. Powell. "We also accept as fundamental that the law should be the same for the rich and for the poor. But we have long known that the attainment of this ideal is not easy." The challenge, Powell continued, is that "our system of justice is based in large part on advocacy — on battle, if you will, in which lawyers have replaced warriors. When there is no one to do battle for an individual, his chances of obtaining justice are lessened."²³ By the mid-1960s, the concept of legal services was not new, but existing agencies were few in number, understaffed, and underfunded. As Howard Westwood, an experienced poverty lawyer, argued in 1966, "no single step could be more effective in securing competent, hard-hitting representation [for the poor] than to get away from the pauper level of compensation for legal aid staffs."²⁴ The OEO under Johnson responded to this need by investing millions of dollars in over one hundred new or revitalized legal service agencies that began waging battles for poor

Interest Law Group (Washington D.C.: Lawyers' Committee for Civil Rights Under Law, 2003).

²² Letter from Lyndon Johnson to Mr. Bernard Segal and Mr. Harrison Tweed, Jan. 21, 1964. Box 41: Judicial-Legal Matters, Gen JL 6 12/6/67-1/20/69; Folder: JL 7 Lawyers-Legal Aid. LBJ Library.

²³ Lewis F. Powell, "The Response of the Bar," *American Bar Association Journal* 51 (Aug. 1965): 751.

²⁴ Howard C. Westwood, "Legal Aid's Economic Opportunity," *American Bar Association Journal* 52 (Feb. 1966): 129 (127-30).

individuals and groups.²⁵ The program quickly became, in the words of one journalist, “at once the most successful and controversial of the OEO operations.”²⁶

Of all the poverty law agencies, the CRLA was the largest and most controversial, and its client base reflected a second focus of the War on Poverty: migrant workers, most of whom were Mexican Americans. During Johnson’s first year in office, the federal government established this focus. As the OEO reported, “Cognizant of a situation wherein more federal money was being allocated for the feeding and care of migratory birds than for migratory humans in the United States, Congress specified in the EOA [Equal Opportunity Amendment] of 1964 that OEO was to implement programs for them.”²⁷ In the following years, federal authorities tried to fulfill this mandate, giving credence to the idea that, as one religious leader wrote to Johnson in 1965, “the *most* voiceless and voteless citizens in this land are migratory farm workers.”²⁸

Johnson’s personal interest in Mexican-American communities lent tremendous energy to this federal initiative. As a young man, he had worked as a teacher and principal in the “Mexican school” of Cotulla in southern Texas. Later, as an administrative aid to Congressman Richard Kleberg during the Great Depression, he witnessed the way that government aid could lift poor, rural communities to new levels of prosperity.²⁹ These experiences shaped his approach to the presidency.³⁰ As the work

²⁵ For a list of over 120 legal service agencies across the nation and their grant amounts, see “Justice: Report of the Legal Services Program of the Office of Economic Opportunity to the American Bar Association, Aug. 8–11, 1966,” 25–31; Box 41: Judicial–Legal Matters, Gen JL 6 12/6/67–1/20/69; Folder: “JL7 Lawyers–Legal Aid,” LBJ Library.

²⁶ Ridgeway M. Hall, Jr., “Advocates for the Poor: Legal Services, Inc.,” *The New Republic*, May 29, 1971. Box 45, Folder 8, CRLA Records, Stanford.

²⁷ Report, “The Office of Economic Opportunity During the Administration of President Lyndon B. Johnson, November 1963–January 1969,” 1969, 390–91; Box 1: Administrative History of the OEO, Volume 1; Folder: “Part 1: Narrative History,” LBJ Library.

²⁸ Rev. James L. Vizzard, “Meeting the Needs of Migrant Workers,” Nov. 17, 1964. Box 18: Labor, Gen LA 5, 10/1/1964; Folder: LA 5 Migratory Labor — Seasonal Labor 10/1/64–12/25/64. LBJ Library; emphasis in original.

²⁹ Robert A. Caro, *The Years of Lyndon Johnson: The Path to Power* (New York: Knopf, 1982), 166–73, 241–60.

³⁰ To be sure, Johnson was an insecure man who relished power, wealth, and recognition. However, he satisfied his desire for power and recognition by helping the

of Julie Leininger Pycior makes clear, Mexican-American communities formed a central part of Johnson's political thinking, and, while the relationship between the president and these communities was sometimes contentious, Johnson had a firm desire to use federal programs to help Mexican-American communities break cycles of poverty.³¹

One of the Johnson administration's first efforts to help these communities involved promoting and supporting Congress's decision to end the Bracero Program.³² As Johnson himself explained, "One of the goals of the Great Society is to guarantee all Americans the dignity and economic security that flow from the full use of their talents. The termination on December 31, 1964, of Public Law 78 [The Bracero Program] marked an important milestone in our efforts to find jobs for more Americans. It also signaled the end of a system that all too often ignored basic human values."³³ Another effort to help Mexican-American communities involved the creation in 1967 of the Inter-Agency Committee on Mexican American Affairs and the appointment as chairman of Vicente Ximenes, a civil rights leader from southern Texas. To the new committee, Johnson prescribed a mandate to "assure that Federal programs are reaching the Mexican Americans and providing the assistance they need" and to "seek out new programs that may be necessary to handle problems that are unique to the Mexican American community."³⁴

poor. Along with African-American communities, Mexican Americans were at the top of his list. See Robert Dallek, *Flawed Giant: Lyndon Johnson and His Times, 1961–1973* (New York: Oxford University, 1998), 6; see also, Caro, *Path to Power*, xiii–xxiii.

³¹ Julie Leininger Pycior, *LBJ and Mexican Americans: The Paradox of Power* (Austin: University of Texas, 1997), xiii–xvi.

³² In 1963, Kennedy had responded favorably to the call from the Catholic Church and labor unions to end the Bracero Program, but the program was entrenched. See Délano, *Mexico and its Diaspora*, 98.

³³ Letter from Lyndon B. Johnson to Reverend Cameron P. Hall, Apr. 17, 1965. Box 17: Labor (GEN LA 3 4/9/66); Folder: LA 5 Migratory–Seasonal Labor 11/22/63–6/2/65. LBJ Library.

³⁴ See Letter from Vicente T. Ximenes to Joseph Califano, Dec. 17, 1967. Box: 386 (Ex FG 686A); Folder FG 687 Interagency Committee on Mexican American Affairs (11/22/63–12/31/67). LBJ Library; see also Michelle Hall Kells, *Vicente Ximenes, LBJ's Great Society, and Mexican American Civil Rights Rhetoric* (Carbondale: Southern Illinois University, 2018).

In California, Johnson's interests in farmworkers and in attorneys came together in the creation of the California Rural Legal Assistance. In May of 1966, the agency received its first annual federal grant of \$1.27 million from the OEO, and, over the next six months, it began operating in eight field offices in El Centro, Santa Maria, McFarland, Salinas, Madera, Modesto, Gilroy, and Santa Rosa. Soon thereafter, the agency added an office in Marysville and established a central office in San Francisco.³⁵ Field offices corresponded to the highly productive agricultural valleys that were home to large numbers of rural poor: San Joaquin, Imperial, Sacramento, Salinas, Sonoma-Napa, and Santa Maria. To staff each office, CRLA directors recruited young lawyers who, in general, lacked experience but possessed talent and enthusiasm. In late 1966, the average age of a CRLA attorney was 30.5, and the average workday lasted more than fourteen hours.

Additionally, the CRLA hired bilingual community workers for each office, many of whom were former field workers. As CRLA directors explained, these individuals "were well acquainted with the problems and politics of rural California," and they could help the attorneys work with client communities. In its first six months, the CRLA handled 1,223 cases on behalf of approximately 1,650 clients. Many cases simply required legal advice and document preparation. Others involved court appearances.³⁶ As the agency became more widely known, demand for its services increased. In 1968, the central office lamented, "Every CRLA regional office has found that it is physically impossible to offer adequate legal services to all, or even a majority, of those who seek and are eligible for its services." This same year, the agency reported a potential clientele of some 577,000 people.³⁷

³⁵ In succeeding years, the CRLA opened offices in Arvin, Coachella, Delano, Fresno, Oxnard, San Luis Obispo, Stockton, Vista, and Watsonville. The Gilroy and McFarland offices were closed. See "Office Listing," California Rural Legal Assistance, Inc., <https://www.crla.org/office-listing> (accessed Jan. 20, 2020).

³⁶ "Report to the Office of Economic Opportunity and CRLA Board of Trustees on Operations of California Rural Legal Assistance, May 24, 1966–Nov. 23, 1966." Box 7, Folder 1, CRLA Records, Stanford; "A CRLA Casebook: Selected Clippings and Summaries of 1968 Cases." Box 28, Folder 1, CRLA Records, Stanford.

³⁷ "Report to the Office of Economic Opportunity and CRLA Board of Trustees on Operations of CRLA, Dec., 1967–Sep., 1968, in Support of Application for Refunding," 1968. Box 45, Folder 1, CRLA Records, Stanford.

While the CRLA served all sectors of the rural poor, approximately 50 percent of its clients were Mexican-American farmworkers, many of whom were migrants. CRLA attorneys recognized that farmworkers were the “largest and most cohesive group” of California’s rural poor, and they quickly became specialists in problems involving housing contracts, immigration status, agricultural employers, and welfare. Given the vast number of individual cases, however, CRLA directors instructed community workers to handle these matters whenever possible. Attorneys, they stated, should “strive to take cases which affect a large number of people, will result in an important change in the law, or will prevent or rectify a great hardship or injustice.”³⁸ As the lawyers followed these directions, they became, as one journalist observed, “ombudsmen for the poor,” not only representing “individual indigents in minor court actions,” but also “sue[ing] state and local governments on behalf of . . . large groups of [farmworkers].”³⁹

Overall, around 80 percent of attorneys’ time remained focused on day-to-day matters.⁴⁰ However, it was the other 20 percent, the large class-action cases, that marked CRLA attorneys as ombudsmen — and provoked the ire of growers and their government allies. In 1966, the lawyers of the McFarland field office issued formal complaints against the authorities of the nearby town of Wasco for providing the Mexican-American and African-American section of the town with unsanitary drinking water from an independent utility company, while the rest of the town enjoyed safe water from the municipal facility. If these administrative procedures did not yield results, the lawyers warned, “we will consider equity actions against the city of Wasco and damage actions . . . against the independent utility and the city.”⁴¹ With aggressive action of this kind, CRLA attorneys began shocking authorities who were not in the habit of worrying about or acquiescing to minority needs.

³⁸ “Report to the Office of Economic Opportunity,” 1966.

³⁹ “Poverty Law: Threat to the Ombudsmen,” *Time Magazine*, Chicago, Illinois, Nov. 7, 1969. Box 65, Folder 6, CRLA Records, Stanford.

⁴⁰ See Bennett and Reynoso, “CRLA: Survival,” 19.

⁴¹ “Report on Operations,” 1966. Box 7, Folder 1. CRLA Records, Stanford. Notably, while farmworkers received much of the CRLA’s attention, the agency also helped other minority groups. In 1966 and 1967, the Santa Rosa office worked on cases for the Pomo Indian tribe involving job training and land rights.

The following year, the agency locked horns with Governor Ronald Reagan in the first of several battles. In November of 1966, Reagan had trounced two-term incumbent Governor Edmund “Pat” Brown, arguing that Brown, who had supported President Johnson, was doing “more and more for those who desire to do less and less.”⁴² He had further articulated an anti-welfare response to the liberalism of LBJ’s War on Poverty. “We represent the forgotten American,” he wrote, “— that simple soul who goes to work, bucks for a raise, takes out insurance, pays for his kids’ schooling, contributes to his church and charity and knows that there just *‘ain’t no such thing as a free lunch.*”⁴³ Making good on his campaign promise, the new governor immediately took steps to remove 1.5 million people from California’s medical-assistance program. To his chagrin, the CRLA used litigation to prevent the removal.⁴⁴ Soon thereafter, the agency forced the governor to accept that there *was* such a thing as a free lunch — and it would be provided by his administration. Through its “hunger suits” from 1968 to 1970, the CRLA won victories that required the California Department of Agriculture to distribute surplus commodities to needy families and free milk to low-income school children, many of whom were Mexican American.⁴⁵ Again, Governor Reagan saw his policies thwarted.

The agency made even more enemies in the fall of 1967 when it used a lawsuit to end the Bracero Program for good. Although the federal government had officially ended the program in 1964, it had struggled to resolve growers’ complaints of labor shortages. As a result, Secretary of Labor Willard Wirtz had been authorizing the importation of foreign labor (mostly Mexican) on a case-by-case basis for nearly three years. While some labor shortages did exist, California growers often exaggerated their severity because they preferred to import cheap Bracero laborers rather than

⁴² See Report by Marianne Means, Oct. 15, 1966. Box: 33 EX PL-ST 5 (6/15/64–9/30/64); Folder: PL/ST 5 (9/8/66–4/8/67), LBJ Library; see also Lou Cannon, *Governor Reagan: His Rise to Power* (New York: Public Affairs, 2003), 3–9, 160–61.

⁴³ “The Republican Party and the Conservative Movement,” *National Review*, Dec. 1, 1964; emphasis in original, quoted in, Cannon, *Governor Reagan*, 132.

⁴⁴ “See “Poverty Law: Threat to the Ombudsmen.”

⁴⁵ See Ron Taylor, “CRLA Creates Shock Waves in Hunger-Fighting Lawsuits,” *Fresno Bee*, May 24, 1970. Box 65, Folder 6, CRLA Records, Stanford; see also, “Suit Settled: More Free Milk for State’s Kids,” *San Francisco Chronicle*, March 17, 1970. Box 65, Folder 3, CRLA Records, Stanford.

negotiating with and hiring domestic Mexican-American workers.⁴⁶ The CRLA exposed this strategy in 1967 by suing the Department of Labor in federal court for authorizing the entry of 8,100 Mexican workers for California growers. As the attorneys charged, these growers had not only overlooked Mexican-American workers, but they had actively discouraged the domestic workers by refusing to offer them minimum wages and written contracts and by “excluding [them] from local housing in order to retain such housing for braceros.”⁴⁷

At first blush, a suit against specific growers may have seemed more logical than a suit against the Department of Labor, which, during this time, was a fellow ally of farmworkers. In general, however, the CRLA demonstrated a proclivity for suing the entity in the highest position of authority. Plus, the agency surely foresaw less resistance from the Department of Labor than from California’s agricultural industry. It was correct. In response to the CRLA’s suit, Secretary Wirtz quickly rescinded the authorization for more Braceros and told California growers to hire the domestic workers. In an effort to subvert Wirtz’s instructions, the Madera Union School District postponed the first day of school so that high school students could work in the fields. The CRLA nipped the plan in the bud by suing the school board and several employers.⁴⁸

These growers and their allies were irate. Congressman B. F. Sisk wrote to the president, threatening to “take this matter to the Congress unless the intractable positions of the Department of Labor and OEO are reversed.” “I cannot stand idly by while the Federal Government kicks my farmers around,” he added.⁴⁹ Similarly, Senator George Murphy stated that, “the

⁴⁶ See Letter from W. Willard Wirtz to James B. Utt, July 12, 1965. Box 18: Labor (GEN LA 5 10/1/1964); Folder: LA 5 6/24/65–8/26/65. LBJ Library.

⁴⁷ “Braceros in California: Summary of the CRLA Brief to the Department of Labor,” Sep. 19, 1967. Carton 174, Folder 4, CRLA Records, Stanford. CRLA lawyers further charged that growers’ blanket requirement that all employees be able to lift sixty pounds discriminated against domestic female workers, who, according to state law at the time, could only be required to lift twenty-five pounds. By the late 1960s, approximately one-third of all field workers were female, but many growers preferred the all-male ranks of the Braceros. The CRLA in this and other cases helped protect the rights of Mexican and Mexican-American women who wished to work in the fields.

⁴⁸ See Letter from Congressman Bernie Sisk to Lyndon Johnson, Sep. 22, 1967. Box 19: Labor (GEN LA 5 8/27/65); Folder: LA 5 6/11/67–1/31/68. LBJ Library.

⁴⁹ *Ibid.*

citizens of California have been horrified by the spectacle of CRLA lawyers, paid by their tax dollars, going to court against the Secretary of Labor . . . also paid by the taxpayers, in an action which will inevitably result in losses to farmers and higher food prices to American consumers.”⁵⁰

Neither Secretary Wirtz nor the OEO were intimidated. In fact, the OEO began to encourage aggressive litigation like that of the CRLA. In 1968, it required all legal service agencies in the nation to demonstrate, as a condition for refunding, a history of not only “routine legal services,” but also of “law reform,” which it defined as any “innovative [legal work] designed to make a substantial impact on more than an individual client and the cycle of poverty.”⁵¹ The CRLA preferred the term “impact cases” to “law reform” because it was not really reforming the law, but rather using the law to help large groups. But regardless of terminology, the agency led the way in this endeavor.⁵² This same year, the American Bar Association and the National Bar Association named the CRLA the nation’s outstanding legal services program, and OEO director Donald Rumsfeld increased its budget by \$200,000.⁵³

Many officials admired the CRLA’s impact cases because they led to social change. The suit against the Department of Labor, for example, involved much more than 8,100 workers from Mexico. Namely, it challenged on a legal basis California’s tried-and-true practice of glutting the labor market and pitting different farmworkers groups against each other. Likewise, it sought to ensure jobs and decent wages for the state’s Mexican-American farmworkers. In so doing, the lawsuit attacked the entrenched and racist notion that Mexicans and Mexican Americans were uniquely suited to low-paying stoop labor. As Senator Murphy had stated three years earlier in his defense of the Bracero Program, “You have to remember that Americans can’t do [field work]. It’s too hard. Mexicans are really good at that. They are built low to the ground, you see, so it is easier for them to

⁵⁰ U.S., Congressional Record—Senate 90th Congress, 1st Session, (Sep. 28, 1967), quoted in Bennett and Reynoso, “CRLA: Survival,” 8.

⁵¹ Memo from Burt W. Griffin, [OEO National Director of Legal Services Program], “Priorities and Policies on Refunding,” Oct. 1, 1968. Carton 75, Folder 8, CRLA Records, Stanford.

⁵² See Bennett and Reynoso, “CRLA: Survival,” 3.

⁵³ See “CRLA Background,” in “The CRLA Commission Hearings.” Carton 21, Folder 49, CRLA Records, Stanford.

stoop.”⁵⁴ The War on Poverty espoused a fundamentally different vision for labor and laborers in the United States, and in California CRLA litigation forced this vision, to an extent, on politicians such as Senator Murphy and Governor Reagan.⁵⁵ Speaking of the agency’s lawsuits, conservative journalist Amity Shlaes writes, “These were not mere thorns in the governor’s side. They were body blows.”⁵⁶ Indeed they were, but they were also blows against racialized poverty in rural California.

Opponents hit back. In 1967, Reagan urged Murphy to add a regulation in Congress that would prevent OEO legal agencies from suing government entities. Murphy tried to do so but the regulation did not pass.⁵⁷ The following year, under pressure from conservative politicians in Congress, the OEO prohibited legal agencies from accepting criminal cases.⁵⁸ Also in 1968, the California Office of Economic Opportunity, with support from the regional OEO office, mandated that the CRLA could not provide legal aid to the United Farm Workers Union.⁵⁹ With this restriction, the state OEO prevented the formation of a powerful farmworker coalition.⁶⁰

While they succeeded in placing some restrictions on the CRLA, Murphy, Reagan, and other opponents could not prevent the agency’s attorneys from working as ombudsmen. In 1969, these attorneys participated in lawsuits against the U.S. Department of Agriculture regarding growers’ liberal

⁵⁴ See Ruben Salazar, “Murphy Statement,” in *Border Correspondent: Selected Writings, 1955–1970* (Berkeley: University of California, 1995), 153.

⁵⁵ To use Pierre Bourdieu’s theory of social distinctions, the agency endowed farmworkers with social and cultural capital by allying them with credentialed, no-cost attorneys. The CRLA’s bilingual staff catalyzed this attorney–farmworker relationship. Thus, in the legal realm, the agency removed the social and economic distinctions that had historically kept farmworkers from weighing in on policy. Many politicians resisted this change. See Pierre Bourdieu, *Distinction: A Social Critique of the Judgement of Taste*, translated by Richard Nice (Cambridge: Harvard University, 1984), 12–13, 114–15.

⁵⁶ Amity Shlaes, *Great Society: A New History* (New York: Harper Collins, 2019), 358.

⁵⁷ See Hall, “Advocates for the Poor.”

⁵⁸ See CRLA Memo from M. Michael Bennett to all directing attorneys, Dec. 31, 1968. Box 45, Folder 2, CRLA Records, Stanford.

⁵⁹ Ibid. See also Letter from Joe P. Maldonado (acting regional OEO Director) to James Lorenz (CRLA Director), Nov. 2, 1968. Box 45, Folder 2, CRLA Records, Stanford.

⁶⁰ After all, Cesar Chavez and the UFW spent tremendous time and energy defending themselves in court from grower coalitions. CRLA attorneys could have helped them immensely.

use of the pesticide DDT.⁶¹ They specifically emphasized the consequences of DDT exposure for pregnant mothers, especially those who worked in the fields.⁶² In many ways, this case laid the legal groundwork for the environmental justice movement in rural California.⁶³ In 1969, the CRLA also sued the California Board of Education for its practice of placing farmworker children in classes for the “mentally retarded” because they did not understand English. This lawsuit eventually forced the board to administer IQ tests in Spanish, move thousands of farmworker children into regular classes, and begin bilingual education programs.⁶⁴ With this victory, farmworker families took a significant step in breaking the cycle of poverty.

As the agency continued winning cases, political opposition intensified at all levels. In 1970, the chairman of the San Joaquin Valley School Board verbalized the feelings of some officials regarding the CRLA’s effort to protect farmworkers’ right to education. “We’ve built this Valley to what it is and we’ve gotten to where we are because there’s cheap labor around,” he stated. “When you come in talking about raising the educational vista of the Mexican-American . . . you’re talking about jeopardizing our economic survival. What do you expect, that we’ll just lie down and let you reformers come in here and wreck everything for us?”⁶⁵ Another shade of opposition

⁶¹ See Luke W. Cole and Sheila R. Foster, *From the Ground Up: Environmental Racism and the Rise of the Environmental Justice Movement* (New York: New York University, 2001), 221 n. 32; see also Julie Sze, “Denormalizing Embodied Toxicity: The Case of Kettleman City,” in *Racial Ecologies*, eds. Leilani Nshime and Kim D. Hester Williams (Seattle: University of Washington, 2018), 111.

⁶² *Ibid.* See also “CRLA Press Release: July 27, 1969.” Box 65, Folder 1, CRLA Records, Stanford.

⁶³ The environmental justice movement, which, in name, began in the 1980s, addressed minority communities’ disproportionate exposure to waste facilities and other toxic hazards, such as pesticides. The CRLA contributed immensely to this movement through its practice of “environmental poverty law,” i.e. poverty law that addressed environmental injustice. See Luke W. Cole, “Empowerment as the Key to Environmental Protection: The Need for Environmental Poverty Law,” *Ecology Law Quarterly* 19, no. 4 (1992): 620–21, 635–36, 641; Ralph Santiago Abascal and Luke W. Cole, “The Struggle for Environmental Justice: Legal Services Advocates Tackle Environmental Poverty Law,” *Clearinghouse Review: Journal of Poverty Law* 29, no. 4 (1995).

⁶⁴ See Mary Ellen Leary, “Children Who Are Tested in an Alien Language: Mentally Retarded?” *The New Republic*, May 30, 1970. Box 65, Folder 6, CRLA Records, Stanford.

⁶⁵ See Fundraising letter from Alberto Saldamando to California communities, 1982. Box 279, Folder 1, CRLA Records, Stanford.

emerged as people questioned the logic of a government agency that paid attorneys to sue other parts of the government. As Fred Marler, Jr. of the California Senate wrote in 1970, “There is certainly a need for legal services for those who cannot afford them but . . . CRLA’s activities have resulted in the taxpayer financing lawsuits against himself, a situation which I don’t believe should be allowed to continue.”⁶⁶ Though logical, this perspective failed to appreciate the fact that CRLA lawsuits represented virtually the first time farmworkers had exercised their voice to shape policy in rural California.

As the decade drew to a close, Johnson’s decision to step down and the election of Richard Nixon, a conservative politician and former California senator, augured well for those who wished to be rid of the CRLA. In 1969, George Murphy tried to set Reagan up for a decisive victory by rallying the Senate to remove the federal OEO director’s authority to override governors’ vetoes. On the Senate floor, Edward Gurney of Florida accused OEO attorneys of “agitation,” and Barry Goldwater of Arizona stated that they were “inciting trouble.” Building on such sentiments, Murphy added an amendment to a poverty-law bill that gave governors absolute veto power.⁶⁷ The 1969 Murphy amendment, as it became known, passed in the Senate, but, fortunately for the CRLA, it was defeated in the House.

Reagan attacked anyway. For years, he had wanted to cut the CRLA’s funding, but because of the Johnson administration’s support of the agency, this move had not been possible.⁶⁸ Under Nixon, however, Reagan trusted that things would be different. If the Murphy amendment had passed, a governor’s veto would have created a perfect storm for the CRLA, but since it had not, the governor had to hope that the OEO under Nixon would take his side. To make a convincing case for a veto, Reagan enlisted the aid of Lewis Uhler, the ultra-conservative director of the California Office of Economic Opportunity, to discredit the CRLA and, by extension, the entire OEO legal services program.

⁶⁶ Letter from Fred W. Marler, Jr. to Governor Ronald Reagan, Dec. 18, 1970. Carton 29, Folder 16. CRLA Records, Stanford.

⁶⁷ “Poverty Law: Threat to the Ombudsmen.” See also Hall, “Advocates for the Poor.”

⁶⁸ See CRLA Press Release, Jan. 17, 1967. Box 65, Folder 1, CRLA Records, Stanford; see also Hall, “Advocates for the poor.”

Reagan's plan to defund the CRLA perpetuated a history of gubernatorial opposition to federally mandated civil rights reform.⁶⁹ In 1957, Governor Orval Faubus of Arkansas tried to defy President Dwight D. Eisenhower's executive order to desegregate Little Rock Central High School.⁷⁰ Six years later, Governor George Wallace notoriously blocked the Foster Auditorium of the University of Alabama in resistance to the Kennedy Administration's court-ordered desegregation.⁷¹ It would be unfair to lump Reagan into the same category as these incorrigibly racist and confrontational governors. His opposition to the War on Poverty appears ideological and political, rather than racial. With respect to California's Mexican-American communities, however, Reagan nonetheless resisted federal initiatives that sought to grant them greater civil rights. His effort to defund the CRLA was his most concerted effort in this regard.

His plan moved forward swiftly. In the fall of 1970, Uhler distributed a "CRLA Questionnaire" to thousands of California communities and legal firms with the explanation that the state OEO was evaluating the agency and wanted to be "as thorough as possible." Far from thorough, however, the evaluation had a mere eight questions, each of which seemed designed to dig up dirt. Question 5 asked: "Are CRLA members in your community involved, on behalf of CRLA, in community activities of an activist or political nature? If yes, please explain or give details." Question 7 asked if the CRLA had represented individuals in criminal court or individuals whose income passed the poverty line.⁷² While such questions bespoke a smear campaign more than a professional evaluation, they helped Uhler write the 283-page report that catalogued 127 cases of alleged misconduct by CRLA

⁶⁹ Admittedly, the main motive behind the federal government's previous efforts to address racial discrimination was a desire to avoid embarrassment on the international stage. In the context of the Cold War, U.S. leaders touted their nation as a beacon of democracy, while at home the experience of minorities was anything but democratic. See Mary L. Dudziak, "Brown as a Cold War Case," *Journal of American History* 91 (June 2004): 32–42.

⁷⁰ See Karen Anderson, *Little Rock: Race and Resistance at Central High School* (Princeton: Princeton University, 2010).

⁷¹ See E. Culpepper Clark, *The Schoolhouse Door: Segregation's Last Stand at the University of Alabama* (New York: Oxford University, 1993).

⁷² "California Office of Economic Opportunity: Evaluation of the California Rural Legal Assistance Program." Carton 29, Folder 14, CRLA Records, Stanford.

attorneys. Uhler shared the report with Reagan on Christmas Eve. Forty-eight hours later, the governor had issued his veto.

The secrecy of the report and the swiftness of the veto raised questions about due process, for neither Reagan nor Uhler gave the CRLA an opportunity to see and respond to the cases of alleged misconduct before the veto was issued.⁷³ In hindsight, it appears that the governor wanted to stay one step ahead of the CRLA. Given the lack of transparency, CRLA director (and future California Supreme Court Justice) Cruz Reynoso called the veto a “deliberate scheme on the part of the governor to sabotage CRLA.”⁷⁴ The following month, however, Uhler had to release his report to the public, and when he did CRLA attorneys started working. Typewriters did not rest until the agency had provided its own version of the 127 cases — along with 3,000 pages of evidence. According to the CRLA, 119 of the charges were false, four were slanderous lies, and six discussed attorney misconduct that the CRLA had already corrected.⁷⁵

Returning to some of Uhler’s specific charges, the attorneys provided ample evidence that they had indeed visited inmates of the San Quentin State Prison but had not distributed literature. Never had a CRLA attorney appeared barefoot in court. While the agency had accepted criminal cases, it had done so prior to the 1968 grant conditions which established this limitation. In the case of the F-word, a CRLA attorney had been giving a lecture on free speech, and, as an example, he had written “F*ck Vietnam” on the chalkboard (asterisk and all). Regarding the fifteen-year-old, she was already married when she came to the CRLA for legal aid.⁷⁶ In every case, it appeared that Uhler had omitted details or fabricated accusations in what CRLA attorneys called a baseless “hatchet job.”⁷⁷

⁷³ See Cruz Reynoso et al., in “United States Office of Economic Opportunity: Memorandum of Fact and Law in Support of Immediate Refunding of California Rural Legal Assistance, Inc.” Box 45, Folder 6, CRLA Records, Stanford.

⁷⁴ “Uhler Denies Reagan ‘Out to Get’ CRLA,” *Berkeley Gazette*, Dec. 29, 1970. Box 67. Folder 2. CRLA Records, Stanford. Ironically, Reynoso and Uhler had been classmates at UC Berkeley School of Law.

⁷⁵ “CRLA’s Answer to Uhler Report.” Carton 27, Folder 7, CRLA Records; see also “Report on California State Economic Opportunity Office, Mar. 8, 1971.” Carton 75, Folder 6, CRLA Records, Stanford.

⁷⁶ “Report on California State Economic Opportunity Office, Prepared by CRLA,” Mar. 8, 1971. Carton 75, Folder 6, CRLA Records, Stanford.

⁷⁷ “CRLA Report to Office of Economic Opportunity, Jan. 13, 1971.” Carton 75, Folder 18. CRLA Records, Stanford.

Nevertheless, the new OEO director in Washington, the conservative Frank Carlucci, did not override the veto. But neither did he uphold it. As he told a colleague, “I’d hate to base a veto on that report.”⁷⁸ Finding a middle ground, Carlucci formed a “high-level commission” of three state supreme court justices, and he assigned them “to complete a full and impartial review of the [CRLA].” Notably, all three appointees had been Republicans before their appointment as supreme court justices had necessitated political neutrality.⁷⁹ The commission’s final report, it was understood, would serve as the basis for Carlucci’s final decision to either support Governor Reagan or override his veto. In the meantime, Carlucci decided to refund the CRLA only through July 1971, which would give the commission time to conduct the investigation.

This temporary funding, as many saw it, left the CRLA “in death row status.”⁸⁰ While Carlucci insisted that this temporary measure did not amount to a “phase out or transition grant,” many believed that the agency’s days were numbered. After all, it would come as no surprise if Carlucci and Nixon decided to discontinue controversial programs from the Johnson era. For his part, Governor Reagan assumed this would be the case. In February, he smugly stated that he was “very pleased and gratified” that the federal OEO had upheld his veto, and he announced a plan to replace the CRLA with “a more responsible” and “professional” program called “Judi-Care,” which would operate through local bar associations.⁸¹ In reality, Judi-Care was designed to help individual clients but avoid impact cases, especially suits against the government.⁸² Meanwhile, the CRLA prepared meticulously, almost desperately, for the federal investigation.

Reagan’s confidence, it turned out, was premature. After arriving in California, the federal commissioners made it clear that they would conduct a thorough and impartial investigation — and they would use Uhler’s report as

⁷⁸ “Carlucci Opinion of CRLA Cited,” *Oakland Tribune*, Apr. 27, 1971. Box 158, Folder 13, CRLA Records, Stanford.

⁷⁹ “The CRLA Commission Hearings.” Carton 21, Folder 49. CRLA Records.

⁸⁰ “CRLA Press Release,” June 29, 1971. Carton 66, Folder 21, CRLA Records, Stanford.

⁸¹ “California: CRLA Compromise,” *San Francisco Sunday Examiner & Chronicle*, Feb. 7, 1971. Box 158, Folder 11, CRLA Records, Stanford.

⁸² See “Study Shows It Would be More Costly Than CRLA,” *Sacramento Bee*, Feb. 26, 1971; see also Ron Taylor, “Judicare in Place of CRLA,” *Fresno Bee*, Feb., 1971. Box 158, Folder 11, CRLA Records, Stanford.

a starting point. From late April through early June, they held hearings in multiple cities, including San Francisco, Salinas, El Centro, and Soledad, and they heard nearly two hundred witnesses and examined hundreds of documents.⁸³ As they did so, it became increasingly evident that Uhler's charges were baseless.

The greatest indication of falsehood was Uhler's inability to substantiate his own claims. In the first hearing in San Francisco on April 26, Justice Robert Williamson, head of the commission, asked Uhler: "Will you accept the responsibility to present and examine witnesses [and to] offer and lay foundations for evidence . . . and furnish counsel?" A lawyer by trade, Uhler responded with a vague, "It is well understood we will provide all possible assistance." Justice Williamson was not satisfied. "Answer yes or no," he said twice. Finally, Uhler declared, "we cannot perform or participate in the form outlined by those questions." Now, even less satisfied, Williamson stated that if Uhler was not prepared to substantiate his report, the hearings would proceed without his participation. Uhler walked out. He later told reporters that he and Reagan were "standing solidly behind our report," but that it was never his intention to present witnesses or evidence. "What is the point of retracing a report on which a veto has been sustained?" he asked flippantly.⁸⁴

Uhler seemed to be the only one who did not understand the importance of evidence. As one writer summarized, "Mr. Uhler is in the position of a prosecuting attorney who insists on a conviction but refuses to present his case."⁸⁵ Because of the Reagan administration's lack of cooperation, one judge appointed to the panel resigned and another was appointed in his stead. A different judge criticized the governor's office for not "accepting its responsibility to call witnesses and present other evidence in support of its many and serious charges." In any criminal or civil case, the CRLA pointed out, "the unwillingness of the accuser to defend his charges would spell the instant conclusion of the proceedings."⁸⁶

⁸³ See "Before the Office of Economic Opportunity Commission on California Rural Legal Assistance, Inc: Closing Memorandum of the CRLA." Carton 75, Folder 16, CRLA Records, Stanford.

⁸⁴ Lee Fremstad, "Uhler Refuses CRLA Case Challenge," *Sacramento Bee*, April 26, 1971. Box 158, Folder 13, CRLA Records, Stanford.

⁸⁵ "Editorial: U.S. Says 'Prove it,' Reagan's Team Can't," *San Luis Obispo Telegram Tribune*, May 7, 1971. Carton 29, Folder 2, CRLA Records, Stanford.

⁸⁶ "The CRLA Commission Hearings." Carton 21, Folder 49. CRLA Records. Stanford.

Feeling some embarrassment, Governor Reagan first tried to smooth things over by publicly correcting Uhler and promising the state's presence, participation, and full support in the hearings.⁸⁷ Yet Reagan had no more evidence than Uhler did. Once the commission began reviewing the charges, Reagan claimed that there had been a "misunderstanding" and that he had expected the commission to gather its own evidence against the CRLA. His complaint yielded nothing. Given his office's lack of evidence, any testimony against the CRLA would have to come from witnesses who voluntarily chose to participate. By contrast, the CRLA had a long and well-organized list of witnesses and documents in its defense. As the table turned, one CRLA attorney confidently observed that the main question now was "how forcefully . . . the commission is going to reject and repudiate [Uhler's] charges."⁸⁸

In his deferential biography of Reagan, Lou Cannon suggests that the governor simply responded to a report that he had been given. Cannon points out that Uhler, a former member of the John Birch Society, had more extreme political views than the governor and that the two men were not close. In fact, Uhler had only joined the Reagan administration earlier in 1970.⁸⁹ While Reagan may not have known Uhler well, the idea that he did not realize the false and inflammatory nature of the report ignores his crescendoing conflict with the CRLA. In a way, too, it underestimates his intelligence. If the governor had even just glanced at the report (it was Christmas, after all) he would have known that it was concocted. The fact that the report came out right when the OEO was renewing federal grants, and that Reagan seized on it immediately, suggests that the governor had planned a way to get rid of the CRLA. In fact, the agency later charged that Reagan had brought Uhler into his administration for the precise purpose of helping him take down the CRLA, which was highly plausible.⁹⁰

⁸⁷ "The State and the CRLA Hearings," *Los Angeles Times*, Apr. 20, 1971. Box 158, Folder 13, CRLA Records, Stanford.

⁸⁸ "Reagan, Uhler Are Strangely Reticent Toward Inquiry Into CRLA Charges," *Sacramento Bee*, Apr. 28, 1971. Box 158, Folder 13, CRLA Records, Stanford. See also, "Fremstad, 'Uhler Refuses CRLA Case Challenge.'"

⁸⁹ See Cannon, *Governor Reagan*, 369–70.

⁹⁰ See Fundraising letter from Alberto Saldamando to California communities, 1982. Box 279, Folder 1, CRLA Records, Stanford.

Relying on Uhler, however, proved unwise. As additional evidence, the San Francisco Bar Association appointed several lawyers to investigate his report. These attorneys first pointed out that in August of 1970 the CRLA had undergone a week-long evaluation by a team of attorneys and other professionals appointed by the OEO. The team had “warmly endorsed” the agency’s activities and recommended refunding for the next year. In comparison to this evaluation, Uhler’s report, which he wrote just two months later, was “misleading at best and false at worst.” The lawyers added, “the Uhler Report is filled with half-truths, misrepresentations, misunderstandings, and recriminations. Some of its mistakes would be hilarious were the repercussions not so serious.”⁹¹

The repercussions would indeed be great. In the commission’s hearings and in the public debates that paralleled them, it became clear that at stake in the case was not only the legal protection of the rural poor but also the power of the state government. Regarding legal protection, hundreds of individuals and organizations wrote the governor’s office to express their support of the CRLA, including churches, unions, clubs, businesses, teachers, and other residents.⁹² “In the past, poor people had little opportunity to use the courts to enforce [their] rights,” wrote one resident. “They lacked money or organization to engage attorneys. Under the Rural Legal Assistant program they now enjoy the same opportunity that affluent citizens and powerful corporations or associations have always enjoyed.”⁹³

Other individuals applauded the CRLA’s success in restoring Mexican Americans’ trust in America’s promise of justice for all. During the late 1960s, as disillusioned minority groups around the nation turned to riots and other forms of violent protest, the presence of the CRLA in eleven offices across the state of California encouraged farmworkers to trust in the law and not resort to violence. As Mario Obledo, general counsel of the Mexican American Legal Defense Fund, declared during one of the commission’s hearings, “For many years, the migrant was without legal

⁹¹ *Barrister’ Bailiwick*, February 1971, 3, 5. Carton 66, Folder 9, CRLA Records, Stanford.

⁹² See the letters of support in Box 25, Carton 23, and Carton 24. CRLA Records, Stanford.

⁹³ See “Improve Legal Aid, Don’t Ban It,” *Santa Barbara News Press*, Dec. 15, 1970. Carton 23, Folder 25, CRLA Records, Stanford.

services. [He] had disrespect for the law and [he] didn't have faith in the judicial system. . . . The only way he knew the courts . . . and the lawyers was when he was a defendant in a criminal case." Then, Obledo continued, "the CRLA came along and [migrants] found out that they could . . . resort to the courts and not to the streets."⁹⁴

Obledo's comments reflected more than idealistic rhetoric. In 1968, two UC Berkeley law students conducted a survey on how knowledge of the CRLA in Santa Carla, San Benito, and Monterey Counties influenced residents' attitudes toward lawyers, courts, and judges. In response, 52 percent of Mexican-American adults and 76 percent of Mexican-American youth said that because of the CRLA their attitude toward the legal system had improved.⁹⁵ During the hearings, R. Sargent Shriver, the original OEO director under Johnson, as well as CRLA director Cruz Reynoso further discussed how the CRLA helped farmworkers find a place in the existing political and legal system. "The poor whom we have represented have seen that the law can be a friend," said Reynoso, "[and] that the powerful, too, can be accountable."⁹⁶ Shriver added that agencies like the CRLA helped legislators and administrators within the system become more aware of injustices faced by poor and minority communities.⁹⁷ Considering these accomplishments, some residents lambasted the governor for attacking the CRLA. As one Monterey citizen wrote, "It would seem that the voices of Watts, Berkeley, East Los Angeles et al., would be audible to even the most self-serving and expedient politico. And yet, Reagan, with his . . . scuttling of the CRLA is saying in the words of Marie Antoinette, 'Let them eat cake.'"⁹⁸

In the public debate, the most telling of all support letters came from Spanish speaking residents themselves, who were likely farmworkers. "To Governor Reagan," wrote Mariana Romero in handwritten Spanish, "As a poor person I write to respectfully ask that you do not take away the

⁹⁴ "The CRLA Commission Hearings." Carton 21, Folder 49, CRLA Records, Stanford.

⁹⁵ See study by Albert F. Moreno and Philip J. Jimenez, "Do Mexican Americans Get a 'Fair Shake.'" Box 65, Folder 1, CRLA Records, Stanford.

⁹⁶ Fundraising letter from Alberto Saldamando to California communities, 1982. Box 279, Folder 1, CRLA Records, Stanford.

⁹⁷ See Falk and Pollak, "Political Interference," 603.

⁹⁸ Jim Brown, "Marie's Fate: Editorial," *Monterey Peninsula Herald*, Feb. 9, 1971. Box 158, Folder 11, CRLA Records, Stanford.

lawyers because they are the people who help us with our problems, and since we don't have money to pay another lawyer [in] any problem that may arise, we plead with you not to take them away."⁹⁹ In a similar tone, Guadalupe Serna wrote the governor (also in Spanish): "I am one of the low-income people who have received benefits through the CRLA program. They have helped me a lot when I have needed it."¹⁰⁰ Through the CRLA, the Johnson administration had achieved, at least to an extent, its goal of helping California's rural poor tackle certain aspects of their poverty. The letters from these individuals, and from all the other sectors of society in favor of the agency, underscored the argument made by Cruz Reynoso in defense of the agency: "The CRLA has proven that a degree of social and economic change is possible within the system [and] that the system is available and open to the powerless."¹⁰¹

In addition to legal protection and social justice, the case also involved the power of the state government itself. In a sense, the Uhler Report was a test to see how far the governor could go. In his statement at the hearings in San Francisco, William F. McCabe, an attorney for the CRLA, declared that Uhler's report "will stand as a monument to [Joseph] Goebbels' theory that if the lies which government tells are sufficiently outrageous, the majority of the populace will be inclined to believe them." At stake, in other words, was the power of the government to erase opposition to its policies and subvert federal initiatives by twisting facts. As McCabe predicted, however, the Reagan administration would soon find itself in check. "The reason [that Goebbels' theory] can never work in the United States," he declared "is that we have dearly preserved the right of people to challenge what government says and above all else we have insured that when a government official . . . makes charges of the kind Mr. Uhler has leveled against CRLA he had better be prepared to back them up."¹⁰²

⁹⁹ Letter from Mariana Romero to Ronald Reagan. Carton 23, Folder 25, CRLA Records, Stanford; translation by author.

¹⁰⁰ See Letter from Guadalupe Serna to Ronald Reagan. Carton 23, Folder 25, CRLA Records, Stanford; translation by author.

¹⁰¹ CRLA Press Release, Dec. 27, 1970. Carton 29, Folder 54, CRLA Records, Stanford.

¹⁰² "Before the Office of Economic Opportunity Commission on California Rural Legal Assistance, Inc: Closing Memorandum of the CRLA." Carton 75, Folder 16, CRLA Records, Stanford.

Uhler never could back anything up, yet he had seriously hoped the Nixon administration would back him. Although an attorney by trade, he wrote the report with the hope that the federal OEO would deliver the coup de grâce regardless of the facts. Reagan evidently hoped the same. They were mistaken. Unprepared for the high commission's close examination of their report, which hurt their image far more than it hurt the CRLA's, the two men tried to save face by protesting the commission's methods. Uhler maintained that the justices should conduct "an investigation of CRLA," apart from his report.¹⁰³ Reagan complained that the commissioners had demonstrated an "unwillingness to allow or hear testimony that might be detrimental to CRLA's activities," and as a result he had lost confidence in the federal investigation.¹⁰⁴ This latter complaint made the governor look childish. After all, it was Reagan and Uhler's refusal to follow through with their own fight that led to a greater showing of evidence on behalf of the CRLA. A political cartoon in May 1971 depicted a muscular CRLA boxer and a battered California OEO boxer in opposite corners of a ring. During a timeout, the slick-haired governor had stepped into the ring to scold the referee, the federal investigation commission. "Under my rules," Reagan contended, "you're supposed to fight the [CRLA] instead of playing referee."¹⁰⁵

Despite Reagan's weak protests, numerous witnesses did in fact come to testify against the poverty law agency. Growers, understandably, attacked. In the hearings, the California Farm Bureau declared that Uhler's accusations were correct.¹⁰⁶ Likewise, many residents entered the public debate by expressing support for the governor's veto. "A vast majority of taxpayer-supported CRLA employees are carpet-baggers," charged one resident, "coming here from other parts of the country in order to stir up

¹⁰³ George Murphy, "CRLA Probers Set Ground Rules — 'Narrower Scope,'" *San Francisco Chronicle*, Apr. 1, 1971. Box 158, Folder 13, CRLA Records, Stanford.

¹⁰⁴ Doug Willis, "Reagan Claims Nixon Panel Curbs Anti-CRLA Testimony," *San Diego Union*, May 19, 1971; see also "Pensive Governor," *Inglewood Daily News*, May 19, 1971. Box 158, Folder 15, CRLA Records, Stanford.

¹⁰⁵ See Political Cartoon, *Modesto Bee*, May 4, 1971. Carton 29, Folder 3, CRLA Records, Stanford.

¹⁰⁶ See "Scathing Farm Bureau Charges Against CRLA," *Berkeley California Gazette*, June 18, 1971; see also the articles from Farm Bureau magazine. Box 45, Folder 6, CRLA Records, Stanford.

trouble.”¹⁰⁷ This accusation, along with the Farm Bureau’s testimony, were as baseless as Uhler’s report and almost as absurd as the hate mail that arrived on the desk of Cruz Reynoso: “Hello Comrad [*sic*], You are doing a good job. I am sure Comrad [*sic*] Mao is happy that you lawyers have started trouble in Soledad. And for tax money too.”¹⁰⁸

Slightly more legitimate were voices of opposition from city and county officials who, in response to an inquiry from Uhler, sent letters and passed resolutions urging the governor and the federal OEO to dismantle the CRLA. The Stanislaus Board of Supervisors described the CRLA as a case of “wasted money and manpower and duplication of efforts of existing governmental agencies.”¹⁰⁹ The City of Madera accused the agency of “wantonly and viciously [using] its authority, money and ability to attack governmental administration of schools, welfare and health, thus devoting taxpayer’s money to . . . harass local government[s].”¹¹⁰ Other officials voiced similar opinions.¹¹¹ In many cases, it seemed that local authorities accepted legal services in theory, but they did not agree with the CRLA’s lawsuits against government entities. Yet impact cases against existing institutions were a necessary part of systemic change. As E. Clinton Bamberger, former director of the OEO legal services program, argued at the San Francisco hearing, conflict between successful legal service programs and state and local governments was inevitable.¹¹² By and large, the Johnson administration had embraced this conflict. Carlucci’s final decision regarding the CRLA would determine if the Nixon administration agreed.

On May 21, the investigation became more complicated when, at around 2:00 am, an unknown party hurled a crude firebomb into the

¹⁰⁷ Editorial: “Carpetbaggers,” *Peninsula Herald*, Sep. 15, 1971. Box 45, Folder 6, CRLA Records, Stanford.

¹⁰⁸ Anonymous letter to Mr. Cruz Reynoso, Apr. 10, 1971. Box 75, Folder 25, CRLA Records, Stanford.

¹⁰⁹ Resolution of the Board of Supervisors of Stanislaus County, Dec. 1, 1970. Carton 29, Folder 16, CRLA Records, Stanford.

¹¹⁰ See Letter and Resolution of City of Madera to Lewis Uhler, Dec. 17, 1970. Carton 29, Folder 16, CRLA Records, Stanford.

¹¹¹ See, for example, letters from the district attorneys of Monterey and Madera Counties and from the mayor of Delano to Governor Reagan, Dec., 1970. Carton 29, Folder 16, CRLA Records, Stanford.

¹¹² See “Carlucci Opinion of CRLA Cited.”

office of William Moreno and William P. Carnazzo, two private attorneys who had testified in the Salinas hearings against the CRLA. Specifically, Moreno had testified about the agency's ties with the UFW and, Carnazzo, about the agency's anti-eviction suits on behalf of farm strikers.¹¹³ Moreno had also provided Uhler with extensive anti-CRLA fodder for his report the previous fall. While the bomb caused no injuries, it did cause considerable damage. As Salinas authorities investigated the arson, some observers, including Moreno, suggested that the bombing was an act of retaliation for their testimony against the CRLA and that perhaps the agency was behind it. In response, Dennis Powell, director of the CRLA's Salinas office, argued that "CRLA has everything to lose and nothing to gain by such acts." The crime could have been committed by a CRLA sympathizer, he admitted, but it could just as well have no connection to the agency or it even could have been committed by a CRLA opponent who wished to associate the agency with arson.¹¹⁴

Governor Reagan availed himself of the association. While he did not directly accuse the agency, he did paint the crime as opposition to true but unpopular testimony. In a telegram to Moreno, he wrote, "Our nation will continue to be strong only if men like yourself continue to speak out with the truth in face of threats and terrorism."¹¹⁵ Reagan's idea of truth, of course, was relative. While the possibility of some association with the crime may have hurt the CRLA's image momentarily, Salinas authorities never found any connection, and, in the end, the incident did not bear on the high commission's investigation of the agency.

One of the most complicated questions involved the CRLA's relationship with the UFW. While federal regulations prohibited the agency from aiding the union, many CRLA clients were also members of the union. Moreover, the CRLA and the UFW were, in many ways, fellow advocates of California farmworkers. At the same time, however, the two

¹¹³ "Firebomb Damages Offices of Witnesses Against CRLA," *Oxnard Press Courier*, May 22, 1971. Box 159, Folder 14, CRLA Records, Stanford.

¹¹⁴ "Bombing Causes Shock; Outrage Among Leaders," *Salinas Californian*, May 22, 1971; see also "Firebombing Probe Continues in Salinas," *Monterey Peninsula Herald*, May 22, 1971. Box 159, Folder 14, CRLA Records, Stanford.

¹¹⁵ "Bomb Hits Office of CRLA Foe," *Santa Monica Evening Outlook*, May 22, 1971. Box 159, Folder 14, CRLA Records, Stanford.

organizations used different strategies and fought separate battles.¹¹⁶ In the commission's investigation, the justices heard testimony that two CRLA attorneys had participated in the union's picket lines in El Centro and Calexico.¹¹⁷ Another witness, former CRLA clerk Ollie Rodgers, testified that ten to fifteen union members had slept in CRLA offices during a melon strike in El Centro and that two CRLA employees had been given full-time assignments to work with the UFW.¹¹⁸ While these accounts did indicate that the CRLA office in El Centro had overstepped its bounds, the commissioners looked into all charges of illegal union involvement, and, overall, they found that the CRLA was keeping its distance.¹¹⁹ Another accusation that required considerable energy involved the CRLA's involvement with Black activist Angela Davis and three Soledad Prison inmates. On this matter, too, the commission eventually found that Uhler's charges had "no merit" and dismissed them.¹²⁰

By the summer of 1971, the federal commission was more than ready to side with the poverty law agency. In late June, the justices prepared their final report, noting that "no evidence whatsoever has been produced to support any claim of misconduct by the CRLA." Furthermore, "[our] evidence has overwhelmingly demonstrated that CRLA has operated effectively within the terms of its grant provisions to provide legal services to California's rural poor."¹²¹ In a way, Reagan's veto had had the unintended consequence of showcasing CRLA attorneys' successful practice of poverty law throughout California. "The next time the Reagan administration starts making such charges," wrote one observer, "it should get itself a better attorney. There are a lot of good ones in CRLA."¹²²

¹¹⁶ See Lori Flores, *Grounds for Dreaming: Mexican Americans, Mexican Immigrants, and the California Farmworker Movement* (New Haven: Yale University, 2016), 172–84.

¹¹⁷ "Unionizing by CRLA Probed," *Los Angeles Herald Examiner*, May 22, 1971. Box 158, Folder 14, CRLA Records, Stanford.

¹¹⁸ "Chavez CRLA Help is Charged," *Fresno Bee*, May 22, 1971. Box 158, Folder 14, CRLA Records, Stanford.

¹¹⁹ See "Study Clears CRLA of Union Link," *Oakland Tribune*, May 18, 1971. Box 158, Folder 14, CRLA Records, Stanford.

¹²⁰ "CRLA Charges Unfounded Says U.S. Commission," *Santa Cruz Sentinel*, May 21, 1971. Box 158, Folder 14, CRLA Records, Stanford.

¹²¹ "The CRLA Commission Hearings."

¹²² "Editorial: U.S. Says 'Prove it,' Reagan's Team Can't."

In explaining his final decision to override Governor Reagan's veto, Frank Carlucci was not quite so complimentary. "On the whole," he wrote, "California Rural Legal Assistance has provided a useful service to the rural poor . . . and is operating within existing statutory and administrative regulations." In a tribute to Reagan, however, he immediately added, "The Governor is determined that his Administration shall play a major role in finding new ways to improve the legal services program and expand its impact."¹²³ To Carlucci, the CRLA was "useful" but not essential; Reagan's veto was designed to "improve" legal services, not destroy them; and "expand[ing] the impact" of legal services meant eliminating impact cases. It was clear from Carlucci's statement that although he could not base a final veto on Uhler's smear report, he sympathized in many ways with Governor Reagan. While Reagan and Uhler had lost this match, the agency's future was still not secure. Yet as political debate over legal services continued, Governor Reagan's spectacular loss to the CRLA provided a convincing reason for many politicians to leave the program alone. The investigation had demonstrated that the War on Poverty, or at least the legal services program, was working in rural California — perhaps not perfectly, but it was working quite well. Thus, year after year, as the CRLA applied for refunding, it not only survived but expanded into what are now seventeen offices.

In her recent book on the shortcomings of the Great Society and War on Poverty, Amity Shlaes argues that President Nixon allowed Carlucci to override Reagan's veto solely to assert his own authority. "This was not about ideas," she writes. "A governor was attacking a part of Nixon's budget. Nixon was defending himself. For the Nixon Administration, CRLA was a simple turf war."¹²⁴ Perhaps there was an element of turf war between Reagan and Nixon, yet Shlaes' argument ignores the investigation of the federal commission, which was all about ideas. Count by count, these justices found that the CRLA really was helping the rural poor. Johnson's vision of lifting Mexican-American farmworkers out of poverty with the help of attorneys was, at least to an extent, coming to fruition. Conservatives such as Shlaes may echo Reagan's argument of the 1980s that the War

¹²³ "Carlucci's Press Release." Carton 21, Folder 51, CRLA Records, Stanford.

¹²⁴ Shlaes, *Great Society*, 370–73.

on Poverty actually impoverished people by increasing their dependence on the government and that, in short, “poverty won the war.”¹²⁵ If they are honest, however, they must recognize that this was certainly not the case with the CRLA in California.

In addition to ideas about federal involvement in American society, the case had called into question the role of Mexican-American farmworkers in California society. By attacking the CRLA, politicians like Senator Murphy and Governor Reagan sought to remove Mexican-American farmworkers’ most powerful ally and, in many ways, return the state’s agricultural labor system to the 1950s. Yet try as they might to weaken, discredit, defund, and destroy the CRLA, in the end they could not return their state to the good old days of the Braceros. The poverty law agency had changed California society, and the change, though incomplete, lasted.

Legal scholar Mark Tushnet has argued that “litigation is a social process” that begins with recognition of an injustice and continues through legal proceedings and into the future as officials grapple with implementation of court rulings.¹²⁶ In California, the legal work of the CRLA, including its 1971 battle for survival, helped underpin the process of social change in which institutions and authorities began to take farmworker voices and farmworker needs into greater consideration. Perhaps this social change is best visualized in the CRLA’s final battle with the Reagan administration. In 1973, through a petition and lawsuit against Reagan’s Industrial Safety Board, the agency won a ban on the short-handled hoe, a tool that made workers stoop at a ninety-degree angle to thin and weed row crops and that caused debilitating back damage as well as constant humiliation. With this victory, along with other CRLA cases, farmworkers won the right to stand a little taller in rural California.¹²⁷

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¹²⁵ Eleanor Clift, “Reagan Condemns Welfare System, Says It’s Made Poverty Worse Instead of Better,” *Los Angeles Times*, Feb. 16, 1986, <https://www.latimes.com/archives/la-xpm-1986-02-16-mn-8585-story.html> (accessed Apr. 25, 2020).

¹²⁶ Mark V. Tushnet, *The NAACP’s Legal Strategy against Segregated Education, 1925–1950* (Chapel Hill: University of North Carolina, 1987), 138, 143–44.

¹²⁷ See Taylor Cozzens, “Defeating the Devil’s Arm: The Victory over the Short-Handled Hoe in California Agriculture,” *Agricultural History* 89, no. 4 (Fall 2015).