A Race and Power Perspective on Police Brutality in America

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This study presents a review of cases reported in the news media regarding unarmed black men shot and killed by police in the United States (U.S.) between the years 2011 and 2016. In the sampled cases, all police officers involved were acquitted following decisions from grand juries or district attorneys. This research comprises cases involving deaths of unarmed African-American males. Case data were collected from two prominent newspapers: *The Washington Post* and *The New York Times*. Analyzing these articles allows for a better understanding regarding the outcomes, effects, and the repercussions of the incidents in the African American community. By incorporating Critical Race Theory (CRT), this research will provide individuals with a better understanding of racism and discrimination that has been historically propagated by police forces, and its negative effect on Western society. By investigating police policies and procedures, as well high-profile incidents of police coercion, this study will reveal the extent of racially motivated police misconduct in the U.S.

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CONCEPTS AND METHODOLOGY

This study incorporates a review of cases that were reported in the media between the years 2011 and 2016. These cases consist of police officers who were cleared of all criminal charges stemming from the deadly encounters with unarmed African American males. Case data were collected from two prominent newspapers - *The Washington Post and The New York Times*. By utilizing CRT and examining incidents of police misconduct, results will determine whether race plays a crucial factor in case outcomes involving African American victims.

This project also explores the possible reasons for a higher proportion of minorities being killed by police officers.

Critical Race Theory (CRT) is a fundamental framework used in the social sciences and the legal field to examine and analyze the reasons for such racial injustices in today's society. CRT acknowledges that racism exists within societies and tends to be perceived as normal. The present study uses CRT to reveal the relative influence of race and power within the police force (Delgado and Stefancic 1995).

CRT also provides "a theoretical and interpretive mode that examines the appearance of race and racism across dominant cultural modes of expression" (Brizee, Tompkins and Chernouski 2015). By using CRT, one can develop a better understanding of racism and discrimination in policing and how they both have placed a negative impact on society. The American society has become addicted to violence. The relationship between African American and law enforcement has become not only increasingly brutal, but back-breaking (NORC at the University of Chicago 2015). This symbolizes that racism, white supremacist, and violence are interlocked, which means that they each have a lamentable effect on each other and they have all continued to permeate the American society in detrimental ways. Violence against minorities, especially African Americans, is not only a serious issue, but it also heightens the tension between law enforcement and the African American community.

The aim of this research is to provide insight regarding the research question and a contribution on how to solve these societal issues to create a better community. Between the years 2014 and 2015, police violence in the U.S. "generated a national conversation about the nature of America's law enforcement" (Wang 2015, 1). The lives of residents are often not valued. Unfortunately, "no other country in the world imprisons so many of its racial or ethnic minorities" than the U.S. (McCoy 2014, 6). Police misconduct and violence are only symptoms of a larger societal issue: Institutionalized racism in the police force. While there are, many other challenging issues facing modern society, race plays a vital role in the cultivation of police brutality in the US. Studies have shown that by utilizing the theory of change, researchers have uncovered some of the reasons behind the perpetuation of racism, and white privilege in today's world.

The theory of change (TOC) is a methodological tool used to develop long-term strategies and techniques in order to solve complex societal issues for a better tomorrow (Laing and Todd 2005). TOC also aims to unpack the process by which long-term change will occur and provides a dynamic outcome for future researchers to critique or pursue additional studies regarding such societal matters. In this study, TOC helps to analyze the dynamics of race and power by underpinning the functions of policing and the justice system in the U.S. The variables it investigates include the possession of power pertaining to police officers and the social scientific theories concerning police behavior. Subsequently, there are historical ties due to slavery. In his work, Habeas Viscus: Racializing Assemblages, Biopolitics, and Black Feminist Theories of the Human, author Alexander Weheliye discusses the historical significance of slavery, colonialism, segregation, and lynching. African Americans have always been classified as vulnerable, racially impure, and less than human in Western society (Weheliye 2014, 19). Thus, we live in a society where people of color are targeted as the victim of discriminatory crimes and activities, due to environmental destruction, poverty, and war (Smith 2005, 79).

Furthermore, CRT focuses on explicating factors that secure the predominantly white culture that has been fixed in its place in American society (Delgado and Stefancic 2012). This culture has and continues to benefit white people, while minorities continue to fail due to systematic oppression. By resolving these issues, one has to do so by promoting activism and challenging the norm (Delgado and Stefancic 1995). Therefore, "race undeniably plays a role in determining access to resources and power in American society" (Snyder 2013, 14). Whites have traditionally enjoyed higher class living and are treated as the more privileged and dominant racial ethnic group (Snyder 2013, 14). Hence, according

to defense lawyers, community activists, and civil libertarians, police brutality is starting to become more widespread and occurs over a hundred times per year in Long Island, with minorities seeming to be the most popular target. As a result, most of these

incidents may go unreported because police officers are essentially the ones who investigate complaints regarding violence and disorderly conduct (Bessent and Tayler 1991).

DISCUSSION

This study presents a review of cases that have been reported in the media between the years 2011 and 2016. The cases discussed in this paper comprise unarmed African American men that have been beaten and killed by police officers because they seem to possess a weapon or some form of threat at the time. The following are the selected cases: Davon Mullins, Michael Brown, Tamir Rice, Anthony Robinson Jr., and Alfred Olango. This approach provides insight regarding the research question and a contribution on how to solve these societal issues in order to create a better community. These cases involve a pattern of unarmed black men being killed at the hands of law enforcement; and the officers were later cleared of all charges stemming from the arrests. For years, it has been very difficult to indict a police officer for wrongful death, due to qualified immunity in relation to use of force (Whether the officer's force was reasonable), by the U.S. Supreme Court (Chemerinsky 2014). A landmark precedent that was used to determine that outcome was Graham v. Connor, 490 U.S. 386 (1989). Law enforcement officers are protected and exempt from being prosecuted for "violating constitutional principles that they could not have reasonably known at the time of the violation" (Deerrose 2016). An analysis of this generally consists of two issues to be decided by the Court: Firstly, as stated in Deerrose, 2016, did the officer's conduct violate a constitutional right? And secondly, was that right established at the time such that the officer should have known of it? The Supreme Court strongly upholds that incidents involving the use of excessive

force, deadly or not, by an officer should be scrutinized under the reasonableness standard of the Fourth Amendment (Deerrose 2016). Hence, the incident has to be carefully examined based on the nature and quality of the intrusion weighed upon applicable governmental interests (Deerrose 2016). Therefore, if an incident involving an officer was found to be objectively reasonable under the law, the officer would be acquitted.

Law enforcement and government officials are protected by qualified immunity and for that reason, many police misconduct or coercion incidents have been dismissed without a fair trial (Greenhouse 2001). In other words, the officer is absolutely protected under qualified immunity even when being sued for compensatory damages (Chemerinsky 2014). This ruling had a powerful effect on American society and the criminal justice system, and provides a reason why Officer Darren Wilson will never be charged for the death of Brown (Chemerinsky 2014). Officer Wilson can be charge with the death of Brown only if every reasonable officer would know that his actions established excessive force and not self-defense (Chemerinsky 2014). Both police officers and law enforcement personnel who are accused of perjury cannot be sued for compensatory damages because they are covered under the qualified immunity clause (Chemerinsky 2014). This helps to protect officials from harassment and liability when they perform their duties reasonably.

Figure 1 illustrates the findings of unarmed African Americans involve in deadly shooting incidents with officers. This study was conducted by

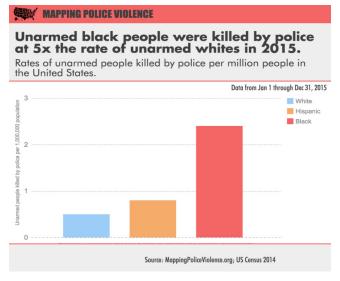


Figure 1. The rate at which unarmed African-Americans are being killed (Mapping Police Violence 2017).

Mapping Police Violence (MPV) which is a research entity that collects and analyzes data on deadly shootings involving officers nationwide. Mapping Police Violence also confirmed that young black males between ages fifteen to nineteen were killed at a "rate of 31.17 per million, compared to "1.47 per million white males died at the hands of police" (Mapping Police Violence 2017). The graph above explains that African American people are five times more likely to die at the hands of police due to racial discrepancy in policing. While whites represent a majority of the population, blacks and Hispanics represent not only the minorities, but are also the victims of racial profiling and police coercionarmed or unarmed (Beer 2016). The main aim of this graph is to convey racial disparities among whites, blacks, Hispanics and law enforcement in the U.S. This information was collaboratively collected by three large databases that are constantly conducting research on police executions within the country: FatalEncounters.org, the U.S. Police Shootings Database and KilledbyPolice.net (Mapping Police Violence 2017). Mapping Police Violence's (MPV) main aim is to continue extensive research on deadly shootings involving officers in order to improve the quality data findings and reports by media entities, police reports, and criminal records to retrieve the race of ninety-one percent of all victims in the database (Mapping Police Violence 2017).

MPV has also included data from the Bureau of Justice Statistics in order to efficiently cross-reference information across their studies. The bar graph in Figure 1 also concludes that of all reported incidents in 2015, 1 in 3 black people killed by police were considered unarmed and at least twice-a-week a hundred and two (minimum) unarmed black people are killed by law enforcement (Mapping Police Violence 2017). It was also reported that

unarmed African American people were killed at five times the rate in comparison to unarmed whites (Mapping Police Violence 2017). Considering this, it was reported that officials of the City of Ferguson, Missouri, where the incident of Michael Brown occurred, have refused to address contravening acts which were later identified by the Department of Justice (Sussman 2016). The report later portrayed a pattern of inaccuracy by the Ferguson Police Department and the city's municipal court pertaining to discrimination against African Americans, especially, unfairly targeting them for traffic stops, use of force and jail sentences (Sussman 2016). The report also concludes that the reason for such horrendous practices is shaped by law enforcement and officials' need for revenue rather than for public safety needs (Sussman 2016). Based on the outcome of incidents involving police and unarmed deadly men, there seems to be more presumptive evidence than probable cause.

For instance, Officer Loehmann shot Rice because he thought that the toy gun that Rice was holding looked like an actual gun, which would be an example of reasonable suspicion (Blow 2015). Both Officer Loehmann and Garmback also refused to treat Rice medically or perform CPR (Blow 2015). Legal scholar Steven Schwinn argues that this should not be tolerated and is unacceptable (Schwinn 2014). According to the case of Terry v. Ohio, 392 U.S. 1 (1968), the Supreme Court ruled that law enforcement agents have a right to stop and frisk individuals due to reasonable suspicion (Search and Seizure 2009). The court refers to this activity as a Terry Stop which the court later identified as a form of impediment that does not violate the Fourth Amendment — the restriction of unreasonable search and seizure (Search and Seizure 2009). Moreover, individuals are not required to answer any questions, but they are required to identify themselves due to a ruling in the case of Hiibel v. Sixth Judicial District Court of Nevada, 542 U.S. 177 (2004) (Search and Seizure 2009). Officers are trained and are well aware that individuals may not be arrested due to reasonable suspicion. Instead, arrests are made based on probable cause. However, if probable cause develops during an investigatory stop, the officer may arrest the suspect (Search and Seizure 2009). Hence, officers are trained not to pursue lethal force as an option during such activities unless individuals are portrayed as an immediate risk or threat to law enforcement or others in the community.

Officers should also be held accountable for actions involving reasonable suspicion as well. Although reasonable suspicion comprises a lower threshold than probable cause, it is still an effective legal method that is covered under the Fourth Amendment (Schwinn 2014). For that reason, an officer has the power to stop a vehicle based on reasonable suspicion that a crime has been committed (Schwinn 2014). Reasonable suspicion also incorporates the ideology of a reasonable mistake of fact. While interrogating individuals during investigatory stops, reasonable suspicious may escalate tension between the officer and the civilian which may cause racial profiling or misconduct. Consequently, minorities, especially African Americans are more likely to be affected by these instances or incidents. Previous studies conclude that these attacks or incidents involving law enforcement and unarmed African-American men are possibly influenced by racial prejudice (Raasch and Perron 2014).

Cases of unarmed black men are not only increasing, but they are also threatening to the public, especially the black community. Law enforcement is visualized and portrayed as a protector of the people and the community. Police officers are trained to protect the community, but have become known for participating in horrendous activities involving misconduct and coercion. Society has

scrutinized the abusing actions of police officers towards citizens, especially when those citizens have been fatally shot and they are later declared unarmed and innocent. Most of these violent incidents took place because the officer used racial profiling as a factor when arresting the suspect. For that reason, the U.S. Supreme Court ruled in the case of *Tennessee v. Garner, 471 U.S. 1 (1985)* that the Fourth Amendment prohibits "the use of deadly force to effect an arrest or prevent the escape of a suspect unless" the officer fairly agrees that the individual

has committed or attempted to commit a crime involving any form of infliction or significant physical injury and the cautious use of intentional deadly physical force given, whenever attainable (Coppolo 2008). Thereby, statutory laws regarding the use of deadly force seem to duplicate federal standards (Coppolo 2008). In the end, these incidents leave residents questioning the intentions of law enforcement and have had a negative psychological impact on the African-American community.

IMPLICATIONS FOR REDUCING POLICE COERCION

This project highlights a few implications for law enforcement practice to address growing concerns about police violence. Based on the data that have been collected and analyzed, this study provides five important implications to law enforcement in order to better their relationship with the community and lower the number of incidents that occur (especially involving unarmed black males). Of course, one may agree that American society has improved regarding racial equality, especially since the Jim Crow Era. However, in terms of community perceptions towards police in disadvantaged urban neighborhoods, one might argue that things have gotten worse, and that are large segment of minority

communities still suffer the effects of concentrated disadvantage. There are several suggestions to consider: Upon entering the academy and the force, officers should complete a thorough background check, as well as psychological and polygraph examinations; police training needs to be reorganized so that it addresses cultural differences in behavior, such as, how to work with mentally compromised individuals, when to use reasonable or excessive force, and how to employ better communication techniques and strategies; effective training needs to be prioritized by police leaders, and they can also encourage officers on the beat to foster positive relationships with the public.

RECOMMENDATIONS FOR FUTURE RESEARCHERS

Despite decades of research on police brutality and minorities, violent interactions between law enforcement and the African-American community persist. Future researchers may consider implementing new and progressive police practices in black neighborhoods. Researchers can be embedded within law enforcement agencies and encouraged to conduct studies in partnership with police departments on police-citizen encounters. Interactions can be rated based on a range of factors with a special focus on the treatment of racial minorities.

Researchers can also incorporate qualitative field research studies with racially diverse samples in order to analyze different perspectives and opinions pertaining to police coercion. Police recruitment and training can also be scrutinized and evaluated to increase knowledge on daily police routines.

Furthermore, while observing police departments, researchers can obtain permission to gather data from cases involving unarmed black men that are currently being investigated. Today, there is a need for clarification on police use-of-force and

minorities. After reviewing over a decade of peer-reviewed studies, a 2010 study published in the Southwest Journal of Criminal Justice concluded that there was a correlation between minorities and police use-of-force. Other studies did not confirm these findings, and yet others have shown mixed results (Ruth 2015). There is still a need for a more developed methodology that can provide more accurate results on the use-of-force by police officers during encounters with minorities. Researchers can consider qualitative interviews with new recruits to assess perspectives on attitudes regarding policing discretion and use-of-force decisions.

A 2012 study in Criminal Justice Policy Review (Ruth 2015), found patterns of behavior in a large police department where a small number of officers were frequently involved in use-of-force incidents. There were similar findings in a 2007 study in Criminal Justice and Behavior ("Police Education, Experience and the Use of Force"). It determined that officers who are more experienced and educated are less likely to use force unjustifiably (Ruth 2015). On the other hand, a review of case studies indicates that lack of training programs and accountability structures can heighten the use of violence by police departments (Ruth 2015). There is clearly a need for further study on the differences between officers' behavior based on training and experience.

Despite inconclusive evidence, the majority of studies concluded that race has become a crucial factor in the criminal justice system. Minorities, especially African Americans, are more likely to receive harsher sentences "for assaults on whites, than on whites committing the same offenses" (Walker 2011, 576). Race, class, and gender privilege, are all discriminatory factors that play a vital role in systematic oppression and identity (Walker 2011). Incidents involving unarmed black men being shot or killed by police in the media may lead civilians to question the innocence of the black man and assumes

that officer is the good guy (Walker 2011). Civilians draw their own conclusions about the justifiable useof-force by police officers, and though such conclusions are often influenced by news media depictions, they are also influenced by longstanding stereotypes that perpetuate victim-blaming (Walker 2011). According to Walker, these attitudes and perceptions have been "ingrained since slavery, (and) nurtured and manipulated by the police, who are quick to release the prior-arrest or medical record of their victims [in order to] somehow justif[y] being killed by the police" (Walker 2011, 576). Furthermore, a 2014 Department of Justice (DOJ) study, which incorporates a two-year investigation, shows that the Albuquerque, New Mexico, police department violated the Fourth Amendment due to continuous practices of the use of excessive force (Ruth 2015). Likewise, a 2014 DOJ study concluded that the Cleveland police department violated the Fourth Amendment due to continuous practices of the use of excessive force (Ruth 2015).

In 2015, the DOJ findings also produced an alarming pattern of "clear racial disparities" and "discriminatory intent" by the Ferguson, Missouri, police department (Ruth 2015). For this reason, researchers may consider examining data from police departments such as Ferguson, Missouri, which have been under Federal oversight, to see whether they are sustaining changes made in the aftermath of tragic events and racially insensitive practices. More sophisticated analysis approaches can be included in order to determine whether there has been a decrease in the number of incidents that involve police shootings of unarmed black men. This research may produce policy recommendations for implementing new and effective technological tools and educational resources that may help prevent such incidents from increasing.

Based on past studies of police brutality, the degree to which race, and social status (e.g. bourgeoisie) influence outcomes of police violence and aggression towards minority young men is still unclear (Brunson and Miller 2006). Many conclude that racial profiling is the main problem, and law enforcement leaders may consider incorporating evidence-based practices in order to implement solutions to reduce police brutality incidents over time (Magaloni, Franco and Melo 2015). Dr. Beatriz Magaloni, an associate professor of political science at Stanford, made such recommendations based on studies in Rio de Janeiro, Brazil (Magaloni, Franco and Melo 2015). Magaloni sought to explain why 5,132 civilians were killed by police between the years 2005 and 2014 (Magaloni, Franco and Melo 2015). Despite the differences between Rio

de Janeiro and major American cities, the findings showed similar trends regarding police brutality towards minorities, especially in marginalized and predominantly black communities (Magaloni, Franco and Melo 2015). Magaloni's work prompted changes in regard to strategies for preventing police coercion incidents and other violent incidents that contribute to a culture of violence (Magaloni, Franco and Melo 2015). As stated earlier, improving methodologies and data analysis techniques in the criminal justice field will help to reduce tragic incidents involving police and residents. It is hoped that such approaches may also lead to greater confidence in law enforcement within the communities that they serve.

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BIBLIOGRAPHY

- Beer, Todd. 2016. Police Killing of Blacks: Data for 2015, 2016, 2017. https://thesocietypages.org/toolbox/police-killing-of-blacks/(accessed September 11, 2017).
- Bessent, Alvin E., and Letta Tayler. 1991. "Police brutality: Is it no problem?" Newsday, (June 2): 5. Google Scholar.
- Blow, Charles M. 2015. "Tamir Rice and the Value of Life." *The New York Times*, 2015. 19. Academic OneFile, EBSCOhost (accessed September 11, 2017).
- Brizee, Allen J., Case Tompkins, and Libby
 Chernouski. 2015. *Critical Race Theory*(1970s-present). Last modified August 17,
 2015. https://owl.english.purdue.edu/owl/resource/722/14/
- Brunson, Rod K., and Jody Miller. 2006. "YOUNG BLACK MEN AND URBAN POLICING IN THE UNITED STATES." British Journal Of Criminology 46, no. 4: 613. Complementary Index, EBSCOhost https://doi-org.ezproxy.fau.edu/10.1093/bjc/azi093 (accessed January 22, 2018).

- Chemerinsky, Erwin. 2014. "How the Supreme Court Protects Bad Cops." *The New York Times*, 2014. A23. *Opposing Viewpoints in Context*, EBSCOhost (accessed September 11, 2017).
- Coppolo, George. 2008. *Use of Deadly Force by Law Enforcement Officers*. https://www.cga.

 ct.gov/2008/rpt/2008-R-0074.htm (accessed September 11, 2017).
- Deerrose, Sanna. 2016. "Aldaba V. Pickens: Police Excessive Force and Mentally Disturbed Individuals. JD diss., University of Denver Sturm College of Law. http://www.denverlaw-review.org/dlr-onlinearticle/2016/5/23/aldaba-v-pickens-police-excessive-force-and-mentally-disturb.html (accessed September 11, 2017).
- Delgado, Richard, and Jean Stefancic. 1995. *critical race theory: the cutting edge*. Philadelphia: Temple University Press.
- Delgado, Richard, and Jean Stefancic. 2012. *Critical race theory: an introduction*. New York: New York University Press.
- Greenhouse, Linda. 2001. "Court gives more protection to officers sued over force." New York Times, June 19, 2001. http://www.nytimes.com/2001/06/19/us/court-gives-more-protection-to-officers-sued over-force.html (accessed September 11, 2017).
- Laing, Karen, and Liz Todd. 2005. "Theory-based Methodology: Using theories of change in educational development, research and evaluation." Research Centre for Learning and Teaching, Newcastle University: 1-32. http://www.hfrp.org/evaluation/the-evaluation-exchange/issue-archive/evaluation-methodology/an-introduction-to-theory-of-change (accessed September 11, 2017).

- Mapping Police Violence. 2017. "Mapping Police Violence." *Mapping Police Violence*. https://mappingpoliceviolence.org/2015/ (accessed March 12, 2017).
- McCoy, Terrence. 2014. "Darren Wilson explains why he killed Michael Brown." *The Washington Post*, 2014., *Opposing Viewpoints in Context*, EBSCOhost (accessed March 12, 2017).
- NORC at the University of Chicago. 2015. "Law Enforcement and Violence: The Divide between Black and White Americans." http://www.apnorc.org/projects/Pages/HTML%20 Reports/law-enforcement-and-violence-the-divide-between-black-and-white-americans0803-9759.aspx (accessed March 12, 2017).
- Raasch, Rachel, and Isabella Perron. 2014. "Pro/ Con: Are Police going to Far?" *Wingspan*. http://wingspanonline.net/?p=2683 (accessed March 13, 2017).
- Schwinn, Steven D. 2014. "May a police officer stop a vehicle based on a reasonable but mistaken interpretation of the law?." *Preview of United States Supreme Court Cases*, 2014. General OneFile, EBSCOhost (accessed September 11, 2017).
- Search and Seizure. 2009. *Reasonable Suspicion*. http://www.searchandseizure.org/reasonablesuspicion.html (accessed September 11, 2017).
- Smith, Andrea. 2005. Conquest: Sexual Violence and American Indian Genocide. New York: South End Press.
- Snyder, Benjamin L. 2013. "Policing the Police:
 Conflict Theory and Police Violence in a
 Racialized Society." Master's Thesis, *University*of Washington. https://digital.lib.washington.
 edu/researchworks/handle/1773/22805

- Sussman, Barry. 2016. "The Federal Government Is Failing to Correct Police Brutality". n.p.: 2016. Opposing Viewpoints in Context, EBSCOhost (accessed September 11, 2017).
- Walker, April. 2011. "Racial profiling separate and unequal keeping the minorities in line the role of law enforcement in America." St.

 Thomas Law Review no. 4: 576. Business
 Insights: Essentials, EBSCOhost (accessed September 11, 2017).
- Wang, Stephanie. 2015. "Police Brutality." *Pittsburgh Post-Gazette*, December 28, 2015.
- Weheliye, Alexander G. 2014. *Habeas Viscus:*Racializing Assemblages, Biopolitics, and Black
 Feminist Theories of the Human. Durham: Duke
 University Press.
- Wihbey, John. 2015. "There Is Conflicting
 Information on Police Brutality." *Police*Brutality, edited by Michael Ruth, Farmington
 Hills: Greenhaven Press. http://link.
 galegroup.com/apps/doc/EJ3010156257/
 OVIC?u=gale15691&xid=2b471df1
 (accessed September 11, 2017). Originally
 published as "Excessive or Reasonable Force
 by Police? Research on Law Enforcement and
 Racial Conflict," April 8, 2015.
- Wihbey, John, and Leighton W. Kille. 2016.

 "Journalist's Resource." Research on Today's

 News. https://journalistsresource.org/studies/government/criminal-justice/police-reasonable-force-brutality-race-research-review-statistics (accessed 03 11, 2017).