

## **Messin' White Women, Snake Lyin' Tales Black-on-White Rape in Virginia**

On a cool, spring day in March 1931, two white women hitched a ride on a freight train in Alabama in the hopes of finding work in a neighboring state. When authorities stopped the train some time later, both women, fearing arrest for violating the Mann Act, which prohibited transporting even willing women across state lines for illicit purposes, told police that they had been raped by nine black men who were also scattered along the train.[1] Their accusation caused a furor, and a mob that gathered to lynch the men dispersed only with promises of a speedy trial. Despite little evidence of rape, the men were convicted based on the women's testimony and sentenced to death. As the case meandered through four separate trials and two supreme court decisions, local whites continued to support the women's charges, even though one recanted her claim of rape after the second trial. Allegations eventually surfaced that the women were no paragons of virtue. Both had occasionally resorted to prostitution to support themselves and apparently had engaged in sexual relations with unmarried white men in the days before they made their accusations. Nevertheless, in an early articulation of what would come to be rape shield laws, which, in the 1970s, attempted to protect against attacks on the character of a rape victim, white southerners argued that the two women's sordid sexual past should have no bearing on the case. As one spectator told a reporter, the victim "might be a fallen woman, but by God she is a white woman." [2] Though the nine accused men eventually won their freedom, the Scottsboro case, as it came to be known, has become the paradigm for all black-on-white rape cases in the twentieth century, in which the accuser's whiteness overrode any consideration of her gender, sexual history, or class status. As one song about the case insisted, "Messin' white women / Snake lyin' tale / Dat hang and burn / And jail wit' no bail." [3] This case seemingly proved the power of the "rape myth": that white southerners accepted all white women's accounts of rape when they accused black men, thereby instigating a united effort to seek revenge. The myth insisted that black men were driven to assault white women and that, as a deterrent, "black beast rapists" should pay with their lives, even if white women's charges were little more than "snake lyin' tales."

The Scottsboro, Alabama, case, however, was exceptional in a number of respects and created more controversy than the rape myth would suggest. For one, it motivated a national movement to free the accused men. It also spurred heated confrontations between the NAACP and the Communist Party. Few cases received the national and international press coverage that the Scottsboro trials received. Few resulted in any Supreme Court rulings on due process; two such decisions grew out of the Scottsboro case. Even the claims of rape by the two women generated more controversy than the rape myth would suggest. Many scholars are familiar with the pronouncements of William W. Callahan, the presiding judge over the third series of trials of the Scottsboro men. He instructed the jury that no white woman, regardless of her class or sexual history, would consent to sexual relations with black men, "whether she be the most despised, ignorant and abandoned woman of the community, or the spotless virgin and daughter of a prominent home of luxury and learning." [4] Fewer recall the willingness of his predecessor in the second trial to question the victims' characters. After the jury returned guilty verdicts, Judge James E. Horton Jr. threw out the verdicts, writing, "History, sacred and profane, and the common experience of mankind teach us that women of the character shown in this case are prone for selfish reasons to make false accusation both of rape and insult upon the slightest provocation, or even without provocation for ulterior purposes...."

The tendency on the part of the women shows they are predisposed to make false accusations upon any occasion whereby their selfish ends may be gained." [5] Judge Horton raised the traditional suspicions about the motives behind rape victims' accusations. In his analysis, the compromised characters of the victims superseded the explosive issue of race. Indeed, many of his fellow white southerners, both in Alabama and elsewhere, shared his distrust of those "messin' white women." [6]

As another prominent 1931 case from Virginia illustrates, white southerners did consider issues other than race when they confronted white women's accusations against black men. [7] Two and a half months before the two women made their charges in Scottsboro, Dorothy Skaggs, a white woman married to an enlisted sailor, allegedly left her home in Portsmouth, Virginia, to go to a guitar lesson. She later testified in court that, while walking along the street, she was struck on the head, dragged into an alley, and raped by a black man. William Harper was subsequently arrested and identified by the victim; after a beating by police, he confessed to the assault. [8] Harper's trial proceeded predictably, and he was convicted and sentenced to death. When the defense revealed new evidence, however, the Norfolk court quickly granted him a new trial. At the second trial, Harper produced six white witnesses who testified that on the night in question, Dorothy Skaggs was not on her way to a guitar lesson but was at a roadhouse across state lines in North Carolina, drinking and dancing with a man who was not her husband. Harper was quickly acquitted, but the case was not over. Dorothy Skaggs and a white woman who had corroborated her story of rape were brought to trial on charges of perjury. Both were initially convicted and sentenced to five years in prison. Eventually, however, both women were granted new trials and were subsequently acquitted.

The original case against Harper followed the expected trajectory of black-on-white rape cases. Harper's confession was the result of police brutality, and police apparently did little to question Dorothy Skaggs's accusations. But when presented with evidence contradicting Skaggs's account of rape, the judge ordered a new trial. Newspaper coverage quickly questioned her innocence, publishing allegations that she used drugs and had previously cheated on her husband, a sailor away at sea. [9] Whites in Norfolk ultimately had no difficulty believing that a white woman, especially one of Dorothy Skaggs's apparent reputation and character, would use a false charge of rape to get herself out of a tight situation. After all, she faced prosecution under the same Mann Act provisions as did the two white women in the Scottsboro case; she voluntarily crossed the border into North Carolina with a man who was not her husband for presumably illicit purposes. An editorial in a Richmond newspaper asked whether the unquestioned acceptance of white women's charges of rape resulted in justice for the men they accused, especially when those men were black:

How many instances have there been when, with counsel and court less careful, the tragedy that was diverted in this instance, has been played out to the end? How often have frightened, undefended Negroes confessed to crimes they never committed? How many times have they been railroaded to prison or to the electric chair because bad women wanted to cover up their own misdeeds? The questions are disquieting. Here in Virginia ... a woman may accuse a man of rape, and with the consent of the court, may make a deposition and not appear in court against him. Accusation has almost been tantamount to conviction. [10] Clearly, the newspaper suggested, no rape victim's accusation should escape careful scrutiny.

The conclusions of the second Norfolk jury, the willingness of the court to charge Skaggs with perjury, and the editorial in the Richmond paper notwithstanding, Virginia was not a bastion of racial equality in the courtroom. Despite being anomalous in its lack of mob violence, Virginians nonetheless voiced the familiar rhetoric about the danger black men represented to white women and the need to maintain white supremacy. The Scottsboro case and the Harper/Skaggs case together, however, suggest that white women's accusations of rape could elicit a range of responses in the legal system. Consider several other cases also tried in Virginia at about the same time. In 1930, Raymond Alsberry received a sentence of twelve years in prison after being accused of attempting to rape a twenty-six-year-old white woman. John Duncan, in 1927, received an eighteen-year sentence for raping a white girl who was not more than fourteen at the time. In 1928, Harold Taylor's four-year sentence for attempted rape of a white woman was overturned after the court ruled the verdict improper. Taylor pleaded guilty to assault and battery and received a twelve-month sentence and was fined \$250. In 1931, Frank Ross was acquitted on an attempted rape charge with no fanfare when his white employer provided him with an alibi.[11] All these cases indicate that white southerners, perhaps especially the white elites who controlled the legal process, considered factors other than the racial composition of the case when they determined what constituted "justice" for accused black men. Indeed, their deliberations over white women's charges and black men's fates illuminate a great deal about social relations in the segregated South.

The numerous cases that passed through the legal system without excessive media attention, without the participation of civil rights groups, without appeals to higher courts, and without apparent mob action provide a better means of examining southern attitudes toward all kinds of interracial relationships. These cases reveal a complex collection of interracial interactions and alliances that often existed in contradiction to white southerners' rhetoric about the need to protect and defend white women. A close examination of 288 cases of black-on-white rape in Virginia reveals the balancing act required to maintain intertwined race, class, and gender hierarchies. Although these cases demonstrate that being accused of an assault by a white woman placed a black man in considerable jeopardy, they also show that extreme punishment was not inevitable.[12] Seventeen of the 288 accused black men (6 percent) were killed through extralegal violence.[13] Approximately 230, or 87 percent, of the 271 men not lynched were convicted of some crime, ranging from rape and murder to robbery, assault and battery, and even "annoying a white woman." [14] Of those 230 convicted men, fifty (22 percent) were executed. Nevertheless, most black men escaped with their lives, and many with comparatively minor sentences. While 48 (21 percent of the 230 convicted men) received the maximum prison sentences allowed under Virginia law, the majority (133, or 58 percent) received lesser sentences. Fifty-two convicted men (23 percent of the 230 convicted men) received sentences of five years or less.[15] Thirty-five men (13 percent) were acquitted or saw the charges against them dismissed. Finally, Virginia governors granted many convicted men conditional pardons long before they completed their sentences.[16]

Looking back through time, it is not possible to determine exactly what occurred between the accused black men and the white women who named them as assailants. Though legal trials ostensibly sought to ascertain "The Truth," in reality they functioned as ritualistic spectacles that diffused the furor usually awakened by the alleged assault. Trials themselves were public performances in which white juries usually, though not always, acted out their role as the protectors of white women,

adhering to a script of sexual and racial ideologies made familiar through southern rhetoric.[17] Most accused black men were convicted, but they were not necessarily guilty. The verdict of the jury merely indicated which side's version of events better adhered to accepted social realities and expectations. Once the jury returned its verdict, back-stage maneuverings in appeals or clemency petitions allowed white legal authorities to weigh the need to punish black men with the need simultaneously to reassert related class and gender hierarchies.[18] Their decisions rendered judgments upon related issues: the white woman's behavior as victim and her or her family's reputation for abiding by accepted social norms; the previous good reputation, age, or mental ability of her alleged assailant and his ability to use his relationships with other whites to win leniency; and even whites' perceptions of the defendant's desire to subvert the racial hierarchy. Many of the actions for which black men faced capital charges would not have placed a white man in legal jeopardy, underscoring the power of white legal authorities to police both consensual and forced interracial sexual relationships. Simultaneously, however, clemency files also contained considerable criticism of the failure of some whites to behave as a "superior" race should.

Cases of black-on-white rape both fed and grew out of white fears. White Virginians, like other white southerners, believed that blacks were reverting to savagery, that black men were driven biologically to desire white women and to fulfill those desires by force.[19] Most horrifying, whites convinced themselves that by stealing sexual relations with white women, black men were attempting to seize the patriarchal privileges and social power that southern society gave white men. For whites, responding to black men's alleged assaults was both a means of racial control and a way to assert white supremacy. To many white Virginians, however, automatic extralegal violence represented a crude tool of white power. Avoiding a lynching and conducting a legal trial, in their eyes, proved the superiority of white civilization. Only the most civilized of men could sublimate their primitive urge for retribution in favor of the rational and objective rule of law. Although legal authorities willingly used the potential for mob violence to influence a case, they also acknowledged that black men did not always represent a sexual danger to white women. Some black men might commit violent crimes against white women, some might even express sexual desires for white women, but not all of these actions were preludes to rape. Making these sorts of distinctions allowed whites to judge not only black men's supposed propensity toward sexual violence but also women's own anxieties toward strange black men.

White women's accusations of rape also brought struggles for power among whites, both women and men, to the fore. The rape myth, based on white women's role as the symbolic guardians of white purity and virtue, gave white women considerable ability to accuse black men of rape and demand that white men provide protection through revenge. This power theoretically resided in the hands of all white women, regardless of their character or social status, and thus gave all white women, no matter how untrustworthy, virtually dictatorial power over white men's actions. Fickle, weak women, however, could be manipulated. Allegations that disreputable men's wives or daughters had been raped could become a means for men to assert their own white privilege, or to settle scores with black men. Black-on-white rape cases thus could buttress the racial hierarchy, but they also leveled class and gender hierarchies that were equally important to the southern social order. Despite the rhetoric of white solidarity, not all whites were equal, and not all white women were worthy of protection. Whites' varied responses to charges of black-on-white rape balanced these interests over the course of the legal process and conceded that not

all whites were superior to all blacks and that all rape victims, even white women accusing black men, merited suspicion and scrutiny when they levied their charges.

Whites did not always weigh these competing considerations simultaneously or even openly, however. Most black men were convicted, representing tangible proof of white men's rhetorical duty to protect all white women. Whites usually upheld white solidarity in decisions about guilt or innocence and then, in considerations of pardon, raised concerns about the defendant's or the victim's character or their place in the community. White elites, in the person of legal officials, law enforcement officers, or state authorities, often sought to "correct" justice years after the jury returned its verdict. The variety of white responses to black men's assaults flies in the face of accepted scholarly and popular conclusions about black-on-white rape: that all black men faced death for even the most ludicrous charges made by scheming white women. This assumption grew out of the tangled history of race in America.

White fears of the black beast rapist have a long history in the South, but they are not timeless. Indeed, they reflect a particular historical context. In the antebellum South, communities tolerated sexual relations between white women and black men as long as those involved in them did not blur the relationship between race and slavery, usually through the birth of a "black" child to a white woman. In the late nineteenth century, in the midst of whites' efforts to reassert control over their former slaves and over southern society in general, sexual relations between white women and black men became politicized. After Reconstruction, whites conflated black men's desires for white women with their desire for political rights as men, thus creating the rape myth.[20] By the twentieth century, the rape myth was at its height, and it structured most white southerners' beliefs about the consequences of allowing interaction between white women and black men. The rhetoric about black men's propensity to rape and the corresponding need for white men to protect white women flourished both in debates about black men's civil and political rights and in discussions about new freedoms and opportunities for white women. The rape myth thus enforced white women's subordination to white men and the social, economic, and political power of whites over blacks.[21] Historians assumed that this rhetoric determined how white southerners responded to any and all allegations that a black man assaulted a white woman, and they found considerable proof in the wave of lynchings that plagued the South in the late nineteenth century and well into the twentieth.

There is no doubt that lynchings served as a means of social, economic, and political control of African Americans and represent some of the most egregious instances of injustice and brutality in American history. Lynching controlled African Americans through fear and united whites across class and gender lines. Lynching also became a catalyst for civil rights activism among African American men and women and brought the true nature of southern race relations to the attention of the rest of America. Only occasionally, however, did these extralegal murders result in federal intervention.[22] Many white southerners sought to justify extralegal violence by claiming it was a necessary means of deterring black rapists, and lynching unsurprisingly became the primary vehicle for discussions of sexual relations between white women and black men in the twentieth-century South. Despite the fact that most lynchings did not grow out of charges of sexual assault, northern critics accepted southerners' favorite explanation for the necessity of mob justice. Historians did so as well, taking white southerners at their word that they were compelled to respond to all charges of rape with, at best, barely contained violence.

The development of the rape myth and the explosion in extralegal violence together help account for the widespread belief that all black men accused of assaulting white women paid with their lives.[23] Nevertheless, our focusing solely on lynching and infamous cases of interracial rape that represent some of the worst miscarriages of justice may obscure more than it reveals about the relationship among race, gender, sexuality, and power in the South. Though charges of black-on-white rape could explode into mob violence, even in Virginia, in most cases, they did not. The rhetoric white southerners used to condemn black men's supposed propensity to rape white women did not necessarily reflect all of the ways in which whites understood interactions between white women and African American men.

The prevalence of the rape myth in the South, the endless reiterations of the dangers black men represented to white women, and the extent of extralegal violence all played important roles in creating common understandings about the likely outcome of any interaction between a white woman and a black man. More important, the historical echoes of both the rape myth and lynching continued to resonate because they reflected African Americans legitimate sense of racial injustice that pervaded the court system and American society in general. Black-on-white rape cases became the cipher for blacks' inability to achieve justice and equality throughout the twentieth century. They came to express something true about the South—the reality of racial injustice, discrimination, persecution, and exploitation—though the individual cases in and of themselves might not always have accurately reflected that larger truth.[24]

But it is not enough merely to point out that black men occasionally, even usually, escaped with their lives and thus what we thought we "knew" about black-on-white rape may be incorrect. There remains a gulf between the pervasive rhetoric about "black beast rapists" and whites' responses to what, in their eyes, was the most egregious of racial transgressions that requires explanation. White southerners were not insincere when they denounced black men as rapists. White southerners, even those in Virginia who eschewed lynching, earnestly believed that black men's assaults on white women represented attacks on the racial hierarchy and on white civilization in general. At the same time, these cases involved real people who had reputations and relationships in Virginia communities. The reality of southern life, the inevitable and continual interactions between blacks and whites, and the troublesome behavior of some whites and some women all had to be considered when cases came to the attention of the courts and the community. White southerners' need to achieve equilibrium among the mandates of segregation, white patriarchy, and all kinds of personal interactions created the gap between rhetoric and reality. Not every accused black man who previously "knew his place" immediately transmogrified into the stereotypical black beast rapist. Not every white woman who made an accusation was a paragon of white female virtue. White testimony could be mistaken or defy credibility. Despite their support for the ideological construct of the rape myth, some whites viewed the black tenant they had known for years as more honorable and trustworthy than the lewd, poor, disreputable, or perhaps just hysterical and anxious white woman who accused him. Interracial relations under segregation were more fluid than the rules of racial interaction would imply, and indeed they had to be if segregation as an institution were to survive. Under close scrutiny, this seemingly straightforward social system becomes enormously complex.

White Virginians' willingness to impose varied sentences, to reconsider the relative severity of a given crime, and to grant pardon to convicted black men provided them the flexibility necessary to maintain segregation as a malleable system of racial and social control. It allowed white Virginians to adjust the rules of racial separation to fit the specific needs of their own communities.[25] If, by contrast, segregation had upheld impermeable boundaries and had been enforced by rigid rules that insisted that any racial transgression provoke an invariably violent response, it would have been too brittle to survive. Communities could excuse any private cross-racial relationship that blurred the racial hierarchy as long as in the public behavior of whites and blacks and men and women continued to conform to segregation's rules. A system of racial relations in which some transgressions of racial boundaries could be forgiven, ignored, or erased was a more flexible, and therefore more durable, mode of control. The threat of lynching struck fear in the hearts of all blacks. Significantly, however, lynching's power to uphold segregation and to control those who lived under its mandate arose from its very arbitrariness. Not every violation of the rules of racial etiquette, including those prohibiting sexual relations between white women and black men, resulted in an execution by a mob. Who paid for racial transgressions with their lives and who did not was largely random.[26] At the same time, the ability of white elites to show mercy to accused black men through the legal system could be a powerful means of control over the black community, as well as a means of reassuring whites that southern society was just.[27]

This flexibility of response and the varieties of punishment black men received allowed southern whites to incorporate and consider the multifarious forms of racial interaction that continued despite segregation's attempt to enforce racial separation. The combination of the threat of extralegal violence and the legal system's ability, through granting mercy, to acknowledge and neutralize the power of marginalized whites—especially white women—to accuse blacks of crimes with impunity created a complicated and subtle means of social control. It patrolled interracial boundaries and simultaneously upheld the patriarchal power of white males and the class distinctions among all whites that remained despite the frantic insistence that all whites were superior to all blacks. Unsurprisingly as a result, some of these cases led to conflict among whites about who controlled the ultimate fate of African Americans.

It is possible to analyze the social implications of cases of black-on-white rape and to examine how white responses to those cases illuminate the workings of southern society. It is not possible, however, to determine what precisely happened between victim and assailant. Most white southerners accepted, at least initially, that black men who faced charges of rape were guilty because that assumption accorded with their beliefs about both black men's innately savage, criminal nature and the sexual allure of white women. Certainly their assumptions reflected their cultural concerns rather than the literal truth, and black men were punished accordingly. Racial bias accompanied every case throughout the legal process, but it did not always manifest itself in predictable ways. And, as we must question white southerners' assumptions that all black men were guilty, we cannot assume that black men were always innocent. It is unlikely that *all* white women made false accusations. It is equally unlikely that because assaulting white women carried such certain and grave consequences, no black man would be so foolish or suicidal to attempt it. It is unreasonable to assume that black men as a group were able to refrain entirely from sexual violence. Black men, such as Eldridge Cleaver, have even admitted that very thing and attributed political meaning to it.[28] Consequently, though it is clear that some white women "cried rape," it is equally clear that not all white women lied when they accused black men.[29]

Most scholars would agree that the historical treatment of black-on-white rape cases has an important place in our understanding of race relations in the South. But it should have an equally prominent place in our understanding of the prosecution of rape. Many white women who accused black men of rape faced the same distrust and suspicion that confronted women who raised charges of sexual assault by white men. Although white women in these cases escaped scrutiny into their sexual history or reputation at trial, when testifying offered them some limited opportunity to challenge insinuations about their character, these questions about their reputation frequently surfaced in considerations of pardon, when their voices were entirely absent. Not only did some women bring their assaults on themselves, some whites seemed to believe, but some white women's characters were already so compromised that their having been violated did not represent a threat to the social order. They were not sheltered under the mantle of white womanhood with its attendant promise of protection. White men's discussions about a victim's complicity in her violation indicates that whites believed that certain kinds of women, and potentially all women, were untrustworthy, either because they were irrational or because they were deceitful. Though the accusing women's whiteness conveyed privilege and their white femaleness endowed them with an exalted symbolic role, the fact that they were women also made them vulnerable to violent men, both white and black. That the legal system erected barriers to justice for African American men should not blind us to the difficulties that patriarchy created for women, white and black, as well. In fact, both women and black men were subject to the same system of power.

Although these conclusions are drawn from as comprehensive a collection of cases as possible, they surely are not based on every case of black-on-white assault that occurred in Virginia between 1900 and 1960. There is no easy way to gather criminal case records. Virginia maintains no compendium of rape cases. Virginia prisons do hold records of the crimes of which inmates were convicted, but these records have several important drawbacks for this study.[30] Though they indicate the race of convicted rapists, they do not include the race of the victim. Equally important, lists of rapists from prison records would not include men who were charged but acquitted of rape or were acquitted of rape but convicted of other lesser crimes such as assault, battery, or "peeping," or convicted of more serious charges such as murder. Consequently, the 288 cases that comprise this study have come from a variety of sources.

The *Richmond Times-Dispatch* consistently reported cases that occurred throughout the state of Virginia. Virginia's black newspapers also ran stories on rape cases, especially white-on-black cases in the 1940s and 1950s. In both sources, there were many instances in which women reported they had been assaulted but for which police never arrested a suspect. If a newspaper named a suspect, I proceeded to the courthouse where the case was tried. Each courthouse in Virginia determines its own procedure for maintaining criminal case files under broad state guidelines that mandate that criminal records only need to be kept for a certain number of years. Some courthouses kept both the order books and the case files for all cases in their jurisdiction. Some of these case files still contain evidence such as hair samples and photos of the victim's injuries, or descriptions of testimony. In other files, however, only the summonses for witnesses and jury members remain. Several courthouses have kept only the minimum of records, generally the order books recording the formal legal procedures and the jury's verdict. Others have lost or disposed of them entirely. Where possible, I have supplemented legal sources with local news reports of both assaults and trials. The clemency files located in the papers of Virginia's

governors also contain numerous cases of black-on-white rape. These proved to be the richest source, as legal officials often candidly revealed their honest opinions about the case, the defendant, the victim, and the jury's verdict. Other cases came to my attention through the NAACP files on microfilm.

The resulting 288 cases of black-on-white rape in which the assailant was identified thus represent a significant percentage of the cases for the period under study, but my analysis avoids several admittedly important and interesting questions. Because I examined approximately eight months of pardon papers for each year of the study, estimates of the percentage of convicted men who either petitioned for pardon or received pardon are impossible to make. Similarly, because I confined my attention to pardon papers for cases of rape or attempted rape or for defendants already included in my list of cases, my study does not include pardons granted to men convicted of other crimes against white women such as robbery or simple assault. The difficulty in ascertaining the extent to which convicted men were released early is further complicated by Virginia's legal procedures. Before 1942, decisions about the early release of convicted offenders resided solely in the hands of Virginia's governors, in the form of pardons or conditional pardons. After 1942, when Virginia established its parole board, parole became another form of early release. Unfortunately, the records of the parole board are not available to scholars without the written permission of the convicted men. Consequently, though many men, in addition to those included in this study, were likely released on parole, their numbers, or the factors affecting the parole board's decisions, are not included in my analysis. The nature of legal record keeping in Virginia, moreover, makes it difficult to draw comparisons of black men's treatment in the legal system to white men's. Culling Virginia's newspapers, clemency records, and courthouse files for cases of white men accused of rape would necessitate the research efforts sufficient for a second book. I do not attempt such a comparison here. Accounts of white men's cases in the Richmond papers suggest that many, if not most, white men who faced trial either were acquitted or received minimal prison terms. The clemency papers indicate that convicted white men occasionally received more severe sentences, but that was usually when they were convicted of raping a daughter, step-daughter, or other female relative. As yet, however, there is no comprehensive study of rape in the South in the twentieth century and thus no way to put my findings in comparative perspective. Finally, although the prosecution of rape after World War II receives separate attention in this book, I am less concerned with the issue of change over time. Though my approach challenges accepted periodizations of the twentieth-century South, the themes I address in the following chapters remain remarkably consistent throughout the period under study.

Black-on-white rape cases expose the paradoxes that existed at the heart of southern society. These cases reveal the tension between civilization and savagery, between the desire for orderly and predictable racial boundaries and the relationships that crossed both race and gender lines, between the inequality among whites despite white supremacy and the rhetoric implying iron-clad white solidarity, and between the dignity of blacks and a system that insisted they were inferior to all whites. Black-on-white rape so inflamed the white population precisely because it revealed the fissures in segregation. Whites' responses to individual cases attest to the need among whites both to control blacks and to convince themselves that the legal system provided something like genuine justice. Ultimately, these cases show us how race, class, and gender interacted in southern communities and illuminate the distribution of power across the full spectrum of society. In the practice of protection, white southerners sought to order a complicated social reality into easy

categories of black and white, despite the contradictions embedded within it. Cases of black-on-white rape simultaneously supported and undermined segregation because they revealed the agency of white women and African Americans in their attempts to pursue their own forms of justice. Historians are well familiar with how white southerners talked about black-on-white rape; this study examines what their actions when allegations of assault surfaced. These cases reveal how all Virginians negotiated and contested the distribution of power in southern society and underscore the difficulties white men faced in trying to exert effective control over the entire uncooperative lot.

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White Women, Rape, and the Power of Race in Virginia, 1900-1960