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"WHEN THEY SEE US" THE GREAT WHITE AWAKENING TO BLACK HUMANITY

GREGORY S. PARKS*

Why white folks focus on dogs and yoga, While people on the low end trying to ball and get over.²

In 2015, Damon Young, co-founder of Very Smart Brothas—a website that features essays on pop culture, politics, and humor for African American readers—authored a piece titled Black People Don't Hate Dogs. We Just Hate When Their Lives Are Valued More Than Ours.³ In the piece, he observed that Whites seemed more outraged by Michael Vick's history of financing a dog fighting ring. He further observed that "certain types of White people valu[e] the lives of dogs more than the lives of Black people." The idea that Whites, on average, show more compassion toward dogs than Blacks is a narrative that is not unfamiliar among Blacks.⁵ In this article, I offer some explanation as to why and how Whites—who may fail to see as much humanity in Blacks as they do in dogs—have maybe come to evolve beyond that point in 2020. In the following sections—I and II, respectively—I explore White people's compassion for dogs and relative lack of compassion for, and fear of, Blacks. In section III, I analyze why George Floyd's death was what triggered the awakening of so many Whites with respect to racism

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⁵ See DarkSkyLady, "Dog Gate"—The Divide Between Liberal White People & Black People, MEDIUM (Dec. 22, 2019), https://medium.com/swlh/dog-gate-the-divide-between-liberal-white-people-black-people-6a13c62ddd99; Rachel Garlinghouse, Some White Folks Care More About Dogs Than Black People—And It's F*cking Despicable, YAHOO! (May 26, 2020), https://www.yahoo.com/lifestyle/white-folks-care-more-dogs-124322133.html.

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¹ When They See Us (Netflix 2019).

² COMMON, THE PEOPLE (Geffen Records 2007).

³ Damon Young, *Black People Don't Hate Dogs. We Just Hate When Their Lives Are Valued More Than Ours*, The Root (Aug. 25, 2015, 3:40 PM), https://verysmartbrothas.the-root.com/black-people-dont-hate-dogs-we-just-hate-when-their-li-1822522658.

⁴ *Id*.

⁶ See infra section I-II.

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and White supremacy.⁷ I conclude by exploring just how much has changed in White people's attitudes about racial progress.⁸

I. WHITE PEOPLE'S COMPASSION FOR DOGS

Anthropomorphism is the application of human qualities and characteristics to describe or explain nonhuman, sentient beings. 9 Sentience is central to evolutionary fitness in complex environments, which implies "feelings that matter." Since humans and most domestic animals are sentient, it follows that some aspects of feeling may be similar; where we differ, those differences may simply be a matter of degree. 11 Not surprisingly, it is well documented that pet ownership is beneficial; however, the psychological impact of pet ownership on human subjective well-being is not well understood. 12 According to the American Pet Products Manufacturers Association ("APPMA"), Americans spent twenty-one billion dollars on their companion animals in 1996; that number almost doubled in 2007 (forty-one billion dollars).¹³ This increase is partly because of people's increased pampering of companion animals, resulting in a range of new products and services provided to human guardians that cater to anthropomorphic behavior. 14 This behavior is defined as "the attribution of human states (thoughts, feelings, motivations and beliefs) to nonhuman animals."15

The relationship between humans and their companion animals is increasingly resembling those between humans, with growing anthropomorphic attributions.¹⁶ In fact, human-animal interactions may serve

⁷ See infra section III.

⁸ See infra section IV.

⁹ Alexandra C. Horowitz & Marc Bekoff, *Naturalizing Anthropomorphism: Behavioral Prompts to Our Humanizing of Animals*, 20 Anthrozoös 23, 23–24 (2007); J. Webster, *Zoomorphism and Anthropomorphism: Fruitful Fallacies*?, 20 Animal Welfare 29, 29 (2011).

Webster, *supra* note 9, at 29.

Webster, *supra* note 9, at 29.

¹² Nikolina M. Duvall Antonacopoulos & Timothy A. Pychyl, *An Examination of the Relation Between Social Support, Anthropomorphism and Stress Among Dog Owners*, 21 ANTHROZOÖS 139, 139 (2008).

¹³ Nikolina M. Duvall Antonacopoulus & Timothy A. Pychyl, *The Possible Role of Companion-Animal Anthropomorphism and Social Support in the Physical and Psychological Health of Dog Guardians*, 18 Soc'y & Animals 379, 379 (2010) (citing *Industry Statistics & Trends*, Am. Pet Prods. Mfrs. Ass'n, https://web.archive.org/web/20071231181809/http://www.appma.org/press_industrytrends.asp (last visited February 7, 2021)).

 $^{^{14}}$ Id

Id. at 379–80 (quoting James A. Serpell, Anthropomorphism and Anthropomorphic Selection—Beyond the "Cute Response," Soc'y AND ANIMALS 83, 83 (2003)).
 Id. at 380.

as a substitute for human-human interactions.¹⁷ People who engage in high levels of animal anthropomorphism may use animals as emotional substitutes for family members, such as spouses and children.¹⁸ Moreover, people who feel lonely are more likely to engage in anthropomorphism to satisfy their need for social connection.¹⁹ One study found that anthropomorphism and non-human social support predict dog guardians' physical and psychological health.²⁰ Dog guardians with meaningful human social support do not differ significantly in their number of doctor visits or medications according to their levels of anthropomorphism.²¹ However, dog guardians with limited human social support engage in high levels of anthropomorphism.²² They also have substantially more doctor visits and take more medication.²³ In short, people use their companion animals—specifically by humanizing them—as a replacement for unsatisfactory social relationships and to alleviate their feelings of social disconnection.²⁴

Pet anthropomorphism also works conversely, redounding to the benefit of pets as well. In recent years, a number of grassroots organizations have lobbied United States' municipalities to mandate that pet owners be referenced as "pet guardians" on official documents. While some have dismissed the movements as misguided, other municipalities have adopted these measures, reasoning that changing the language used to describe human-animal relationships will improve animal treatment. Research on the topic examines whether such linguistic cues could improve animal (e.g., dogs) welfare. Given that dehumanization is often associated with the mistreatment of fellow humans, theoretically the reverse might also be true—anthropomorphic, humanizing language might encourage kindness toward non-humans. Indeed, this is what social scientists find. People are more willing to help humans than dogs but are more willing to help dogs when they are described with

¹⁷ *Id*.

¹⁸ Id

¹⁹ Antonacopoulus & Pychyl, *supra* note 13, at 380.

²⁰ Id. at 387.

²¹ Id. at 387–88.

²² *Id.* at 388.

²³ *Id*.

²⁴ Id.

²⁵ Max E. Butterfield et al., *Mangy Mutt or Furry Friend? Anthropomorphism Promotes Animal Welfare*, 48 J. Experimental Soc. Psych. 957, 957 (2012).

²⁶ *Id*.

²⁷ *Id*.

²⁸ *Id*.

anthropomorphic language.²⁹ Similarly, people who rate dogs on anthropomorphic qualities are more willing to help dogs get adopted.³⁰

While there is little research on the intersection of race and dog ownership, two things are clear. First, Whites tend to own dogs more than Blacks.³¹ Second, Whites are more likely to feel protected by dogs than Blacks.³² Historically, there tends to be large racial and ethnic differences among pet owners; these disparities are especially apparent when considering dog ownership.³³ Whites are about three times more likely to own a dog than non-Whites, and Blacks are half as likely to own a dog than other people.³⁴ In 2016, the highest rates of pet ownership was seen in White households with 64.7%. By way of comparison, 36.9% of Black households owned dogs.³⁵

Where racial boundaries can be said to be a result of gentrification and/or differing economic interests, dogs have now become another vehicle of social segregation. In a study of Creekridge Park—a multicultural neighborhood in Durham, North Carolina—pet ownership often enforces racial boundaries among White, Black and Latino residents.³⁶ White residents are able to create ties to the community simply by walking their dogs—these interactions do not occur across racial boundaries.³⁷ In fact, non-White residents often receive complaints about the treatment of their dogs.³⁸ White Creekridge Park resident Tammy stated that her Latino neighbors tether their dog outside, and so she repeatedly reported them for suspected animal abuse.³⁹ Tammy's accusations are only one example of the hostile racial divide enforced by pet owners.⁴⁰ As the U.S. becomes more diverse, one would expect dogs to bridge social differences between White residents and their Black and Latino neighbors. Yet, while White residents allow their pets to facilitate

³⁰ *Id.* at 959.

³¹ Hal Herzog, *Large Study Finds Pet Owners Are Different*, PSYCH. TODAY (July 3, 2017), https://www.psychologytoday.com/us/blog/animals-and-us/201707/large-study-finds-pet-owners-are-different; *AVMA Pet Ownership and Demographics Sourcebook: Executive Summary*, Am. Veterinary Med. Ass'n 5 (2017-2018), https://www.avma.org/sites/default/files/resources/AVMA-Pet-Demographics-Executive-Summary.pdf.

²⁹ *Id.* at 958.

³² Sarah Mayorga-Gallo, *Whose Best Friend? Dogs and Racial Boundary Maintenance in a Multiracial Neighborhood*, 33 Soc. F. 505, 513 (2018).

³³ Herzog, *supra* note 31.

³⁴ Herzog, *supra* note 31.

³⁵ AVMA Pet Ownership and Demographics Sourcebook: Executive Summary, supra note 31.

³⁶ Mayorga-Gallo, *supra* note 32, at 511–12.

³⁷ Mayorga-Gallo, *supra* note 32, at 515–16.

³⁸ Mayorga-Gallo, *supra* note 32, at 515–16.

³⁹ Mayorga-Gallo, *supra* note 32, at 517–18.

⁴⁰ Mayorga-Gallo, *supra* note 32, at 515–19.

community-based relationships, such relationships are between samerace individuals.⁴¹ This reinforces a homogenous White and middleclass habitus and protects interracial boundaries and feelings of safety.⁴²

The construction of safety and danger within contemporary urban spaces helps to understand the normative ideas surrounding race. "Danger" incorporates a larger social context of who and what is dangerous, and considers what persons are immoral or violent. 43 Those who exist outside of this logic—residents of color—are suspect. As such, dogs define the parameters for a "safe" neighborhood space; those who do not feel safe walking around their neighborhood at night will bring their dogs to protect themselves, and so their dogs are integral to the characterization of a "safe" neighborhood. In this case, White residents of Creekridge Park, generally women, feel safe in their immediate area but will not walk, for example, downtown without their "hound[s]."44 Yet, none of the Black dog owners in the same neighborhood mentioned feeling safer with their dogs. 45 Here, White womanhood is tied to vulnerability and the need for protection in "multiracial urban spaces." 46 The breed and size of a dog also play a role in making "ferocious" dogs.⁴⁷ Such breeds are typically associated with non-White masculinity, and considered "outside the boundary" for a White, urban and middle-class spaces like Creekridge Park. 48 It is apparent dogs present a foundation to inter-neighbor, racial boundaries.⁴⁹

In conclusion, many people attribute human-like qualities to their dogs, generally, and dogs, specifically.⁵⁰ Whites tend to be dog owners at higher rates than Blacks—almost double.⁵¹ As such, it would not be surprising if Whites, at higher rates than ethnic minority groups, were more likely to anthropomorphize dogs. Accordingly, this gets to part of Damon Young's question: Why do Whites value dogs' health, safety, and lives so much? In the following section, I address the second part of Damon Young's question: Why do Whites value Blacks' health, safety, and lives so much less than that of dogs?

⁴¹ Mayorga-Gallo, *supra* note 32, at 522–23.

⁴² Mayorga-Gallo, *supra* note 32, at 519–20, 522–23.

⁴³ Mayorga-Gallo, *supra* note 32, at 512.

⁴⁴ Mayorga-Gallo, *supra* note 32, at 513.

⁴⁵ Mayorga-Gallo, *supra* note 32, at 513.

⁴⁶ Mayorga-Gallo, *supra* note 32, at 512.

⁴⁷ Mayorga-Gallo, *supra* note 32, at 515–16.

⁴⁸ Mayorga-Gallo, *supra* note 32, at 513.

⁴⁹ Mayorga-Gallo, *supra* note 32, at 513, 519–20.

⁵⁰ Antonacopoulus & Pychyl, *supra* note 12, at 379–80.

⁵¹ Mayorga-Gallo, *supra* note 32, at 1.

II. WHITE PEOPLE'S LACK OF COMPASSION FOR BLACKS

Police violence against Blacks has been multi-generational.⁵² Its roots are racialized and emerge from slavery.⁵³ The origin of the police can be traced from its origin in the Greek polis (meaning city) to the "civil force charged with deterring crime," particularly in America, where the birth and growth of the police is directly tied to slavery.⁵⁴ More specifically, the origin of police is a power relationship. That relationship, however, is not between a government and its subjects, what we might understand as the term "public sphere," but rather the power of the public over the private, of men over women, children, and the enslaved who were not permitted to be citizens of the polis.⁵⁵ In Eighteenth Century England, there was a construction of the nation as being akin to the home and the King the father of the household.⁵⁶ This concept is transferred to the American colonies; however, the American Revolution reconfigured the metaphor; the law becomes the father, the rule of law, under which all people are equal.⁵⁷ The American Revolution, however, did not alter the power relations between man and family, the origin of police power. Just as in England, the modern police force began with "watches." Unlike in England, however, these were slave patrols and armed militias intended to fight off natives and quell rebellions.⁵⁹ Official police forces came in the Nineteenth Century, where they fell under local jurisdictions and carried guns. 60 Modern American policing, as we know it, began in 1909 with August Vollmer—a veteran elected chief of police in Berkeley, California—who created an often imitated training model based on war tactics used against Native Americans and other colonized people. 61 Vollmer and Progressive Era policing, combined with the Jim Crow laws, criminalized blackness. 62 Black people were disproportionately targeted, harassed, and arrested. This

⁵² Jill Lepore, *The Invention of the Police*, New Yorker (July 13, 2020), https://www.newyorker.com/magazine/2020/07/20/the-invention-of-the-police.

⁵³ *Id*.

⁵⁴ *Id*.

⁵⁵ *Id.* The implication here is that the origin of the police is about maintaining the power of the public over the private through property. Those who are not citizens cannot be subjects, and freedom cannot exist without oppression. For the polis to remain free, there had to be those who were oppressed or owned who were considered to be property.

⁵⁶ *Id*.

⁵⁷ *Id*.

⁵⁸ Lepore, *supra* note 52.

⁵⁹ *Id*.

⁶⁰ *Id*.

⁶¹ *Id*.

⁶² *Id*.

criminalization continued to worsen throughout the Twentieth Century with the war on crime campaign that would become the "tough on crime" mentality that shaped American politics for decades. 63

In recent years, there have been a variety of initiatives to capture the extent of unbridled police violence in the United States, highlighting its racial dimensions.⁶⁴ While there has been palpable Black outrage given the disproportionate killing of Blacks, White outrage has been more muted. Just a few years ago, in 2015, nineteen percent of White adults believed that police brutality is an "extremely/very serious" problem compared to seventy-three percent of Black adults who believed the same thing.⁶⁵ Additionally, in 2015, only thirty-two percent of White Americans believed that police officers who caused injury or death were treated leniently by the criminal justice system. ⁶⁶ On this same topic in 2015, seventy-one percent of Black Americans believed the criminal justice system was too lenient.⁶⁷ This may be for several reasons.

One reason may be that police killings are often of adults, ⁶⁸ and people tend to have relatively less empathy for adults than comparison groups.⁶⁹ For example, as one study showed, people are more empathetic when the victim of an attack is an infant or a puppy than when they are a human adult. 70 Researchers believe that these results could imply two explanations: species similarity may account for preference of infants over puppies and dogs; and the importance of vulnerability (e.g., youth) may account for preference of infants and puppies.⁷¹ However, dogs, of any age, are correlated with the same defenselessness of a baby, since adults may be viewed as fully responsible and capable of removing themselves from an abusive situation.⁷²

⁶³ *Id*.

⁶⁴ See, e.g., MAPPING POLICE VIOLENCE, https://mappingpoliceviolence.org/ (last visited Feb. 7, 2021) (providing maps, charts, and statistics tracking police violence).

⁶⁵ Kat Stafford & Hannah Fingerhut, AP-NORC Poll: Sweeping Change in U.S. Views of Police Violence. ASSOCIATED Press (June 17. 2020), https://apnews.com/article/728b414b8742129329081f7092179d1f.

⁶⁶ *Id*.

⁶⁷ *Id*.

⁶⁸ Mapping Police Violence, *supra* note 64.

⁶⁹ Jack Levin et al., Are People More Disturbed by Dog or Human Suffering? Influence of Victim's Species and Age, 25 Soc'y & Animals 1, 1, 8 (2017).

⁷⁰ *Id.* at 7.

⁷¹ *Id.* at 8.

⁷² *Id.* at 8–9.

Similarly, where Black youth, like Tamir Rice, 73 are killed by police, many Whites may have little empathy for such killings because they do not see the victims as vulnerable youth. For example, as demonstrated by Phillip Goff and colleagues' research, Black boys are seen as less childlike than same-aged White peers. 74 After the age of nine, Black children and adults were rated as less innocent than White children and adults. 75 In addition, the characteristics associated with childhood are applied less to Black boys relative to White boys. ⁷⁶ People inaccurately impute older age to Black boys and perceive them as more culpable for their actions than Latino and White boys. 77 Even for individuals who are more experienced in dealing with criminal suspects, they still overestimate the age of Black and Latino crime suspects. 78 Moreover, these trends are emphasized when people dehumanize Black males by subconsciously associating them—and not Whites or Latinos—with apes.⁷⁹

This type of adultification also takes place with Black girls. 80 As Rebecca Epstein and colleagues demonstrated in their research, people generally perceive that Black girls need less nurturing, less protection, less support, less comfort, and more independence.81 Black girls are viewed as more adult than their White peers at critical stages of development (starting at five, peaking at ten to fourteen, and continuing to age fifteen to nineteen.)82 When adults perceive Black girls as less innocent and more adult-like, harsher punishments occur despite their status as a child.83

Whites may also see Blacks as a more of a physical threat than Whites, therefore warranting police aggression. In their work, Andrew Todd and colleagues found that people more readily associate guns with Black, than with White, boys.⁸⁴ People more readily associate

⁷⁶ *Id.* at 529, 539–40.

⁷³ Richard Luscombe, Tamir Rice Report: Witnesses Contradict Officer on Warning to Boy Shot Dead, GUARDIAN (June 13, 2015, 5:20 PM), https://www.theguardian.com/usnews/2015/jun/13/tamir-rice-prosecutors-report-witnesses-contradict-police-officer.

⁷⁴ Phillip Atiba Goff et al., The Essence of Innocence: Consequences of Dehumanizing Black Children, 106 J. Personality & Soc. Psych. 526, 539-40 (2014).

⁷⁵ *Id.* at 529.

⁷⁷ *Id.* at 532.

⁷⁸ *Id.* at 535.

⁷⁹ *Id.* at 539.

⁸⁰ Rebecca Epstein et al., Girlhood Interrupted: The Erasure of Black Girls' CHILDHOOD 4 (GEO. L. CTR. POVERTY & INEQUALITY 2017).

⁸¹ *Id.* at 1.

⁸² Id. at 8.

⁸⁴ Andrew R. Todd et al., Does Seeing Faces of Young Black Boys Facilitate the Identification of Threatening Stimuli?, 27 PSYCH. Sci. 384, 385–89 (2016).

threatening words with Black, than with White, boys. ⁸⁵ And people are no less likely to be biased against Black youth than Black adults. ⁸⁶ In their work, John Wilson and colleagues made several interesting findings that underscore why Whites may perceive Blacks as more of a threat than Whites. ⁸⁷ Specifically, people perceive Blacks as bigger and more formidable than Whites. ⁸⁸ They perceive Black men as more capable of harm than White men. ⁸⁹ And while people's judgments in this regard may not be rooted in anti-Black prejudice, they do emerge from stereotypes associating Blacks with threats. ⁹⁰ And when Blacks look prototypically Black, people view them as more formidable, which points to perceptions of specific race-related appearance cues. ⁹¹ Not surprisingly, people rate the use of force against Black men as more justified than the use of force against White men. ⁹²

As indicated previously in Phillip Goff's work, Whites dehumanize Blacks by automatically associating them with apes. ⁹³ In another of his studies, Goff and colleagues found that people more easily associate ape images with Black male faces than with White male faces. ⁹⁴ Moreover, they found that Whites more easily associate Blacks with apes than with other types of animals—i.e., big cats. ⁹⁵ Even while there is a lengthy and robust history of Whites associating Blacks with nonhuman primates, ⁹⁶ the Black-primate association seems to largely operate outside of explicit cultural knowledge of the association. ⁹⁷ Nonetheless, the association is consequential. When people associate Blacks with apes, they perceive police violence against Blacks as being justified. ⁹⁸

86 *Id.* at 385, 390–91.

⁸⁵ *Id.* at 389–90.

⁸⁷ John Paul Wilson et al., *Racial Bias in Judgments of Physical Size and Formidability: From Size to Threat*, 113 J. Personality & Soc. Psych. 59, 60 (2017).

⁸⁸ *Id.* at 65.

⁸⁹ *Id.* at 65–66.

⁹⁰ *Id.* at 67, 69–70.

⁹¹ *Id.* at 71–73.

⁹² *Id.* at 70.

⁹³ Goff et al., *supra* note 74, at 526–28.

⁹⁴ Phillip Atiba Goff et al., *Not Yet Human: Implicit Knowledge, Historical Dehumanization, and Contemporary Consequences*, 94 J. Personality & Soc. Psych. 292, 296–98 (2008).

⁹⁵ *Id*. at 301

⁹⁶ See generally Gregory S. Parks & Danielle C. Heard, "Assassinate the Nigger Ape[]": Obama, Implicit Imagery, and the Dire Consequences of Racist Jokes, 11 RUTGERS RACE & L. REV. 259, 269–79 (2010).

⁹⁷ Goff et al., *supra* note 94, at 301.

⁹⁸ Goff et al., *supra* note 94, at 301–02.

What may make it more likely that Whites could see Blacks in their fullness and their humanity would be more meaningful relationships with Blacks. Noted psychologist Gordon Allport's 1954 intergroup contact thesis states that intergroup contact under the correct circumstances can effectively reduce prejudice between majority and minority group members.⁹⁹ There are four conditions that must be met in order for intergroup contact to be effective in reducing bias and prejudices. 100 The first is, within a given situation, equal status. 101 Equal status must be expected and perceived by both groups in the situation. 102 Next, a common goal must underlie the group's efforts. ¹⁰³ Each person relies on one another to complete the goal. 104 The third condition requires intergroup cooperation in order to see a reduction in prejudices. 105 Lastly, effective intergroup contact is achieved when all groups support authorities, laws, or customs. 106 All four of these conditions must be met within a situation to see an effective reduction of prejudice from intergroup contact. In his work, Christopher Smith found that interracial contact among Black and White neighbors that met Allport's conditions reduced prejudice.¹⁰⁷

The problem is that most whites lack any meaningful friendships with Blacks. In their research, Deborah Plummer and colleagues found that "a racial divide exists in having cross-racial friendships, most notably among Blacks and Whites." White Americans are less likely to have friends of another race than non-White Americans, as forty percent of White Americans reported having only White friends and only twenty-five percent of non-White Americans reported only having friends of their own race. 109 A 2015 study from the Pew Research Center found that eighty-one percent of "adults who are White with no other race in their background" say that all or most of their close friends are

⁹⁹ Thomas F. Pettigrew, *Intergroup Contact Theory*, 49 Ann. Rev. Psych. 65, 66 (1998).

 $^{^{100}} Id$

¹⁰¹ *Id*.

¹⁰² *Id*.

¹⁰³ *Id*

¹⁰⁴ *Id.* at 66–67.

¹⁰⁵ Pettigrew, *supra* note 99, at 66–67.

¹⁰⁶ *Id*. at 67

¹⁰⁷ Christopher B. Smith, *Back and to the Future: The Intergroup Contact Hypothesis Revisited*, 64 Socio. Inquiry 438, 444–49 (1994).

¹⁰⁸ Deborah L. Plummer et al., *Patterns of Adult Cross-Racial Friendships: A Context for Understanding Contemporary Race Relations*, 22 CULTURAL DIVERSITY & ETHNIC MINORITY PSYCH. 479, 490 (2016).

¹⁰⁹ Id. at 479.

White.¹¹⁰ Plummer and colleagues attribute White Americans' lack of Black friends to three factors: "Spatial racism, cultural encapsulation, and personal choice."¹¹¹ Spatial racism refers to the layout of cities "in which racially and economically segregated suburbs or gentrified areas of cities are created."¹¹² Cultural encapsulation, which results from spatial racism and lack of workplace diversity, "may lead to ethnocentrism and limited understanding of another's worldview."¹¹³

III. GEORGE FLOYD AND THE GREAT WHITE AWAKENING

George Floyd was arrested on May 25, 2020 in Minneapolis, Minnesota after a convenient store employee called 911 to report that Floyd had used a counterfeit twenty dollar bill to buy cigarettes. ¹¹⁴ According to the 911 transcript, the employees said that Floyd had given them a fake twenty dollar bill and appeared "awfully drunk" and believed he was "not in control of himself." ¹¹⁵ Shortly after, the first police officers, J. Alexander Kueng and Thomas Lane, arrive on the scene to approach Floyd in his car. ¹¹⁶ A few minutes after arriving, Officer Lane takes out his gun and orders Floyd to put his hands on the wheel. ¹¹⁷ Then, Officer Lane begins to yank Floyd out of the car. ¹¹⁸ They continue to handcuff Floyd's hands behind his back, and after approximately six minutes, move Floyd back to the police vehicle. ¹¹⁹ As they approach the car, Floyd falls to the ground and states that he feels claustrophobic and repeats that he cannot breathe. ¹²⁰

¹¹⁰ Kim Parker et al., *Multiracial in America: Proud, Diverse and Growing in Numbers*, PEW RES. CTR. 1, 71 (2015), https://www.pewresearch.org/social-trends/wp-content/up-loads/sites/3/2015/06/2015-06-11 multiracial-in-america final-updated.pdf.

Plummer et al., *supra* note 108, at 480.

Plummer et al., *supra* note 108, at 479.

Plummer et al., *supra* note 108, at 479.

Evan Hill et al., *How George Floyd Was Killed in Police Custody*, N.Y. TIMES (March 18, 2021), https://www.nytimes.com/2020/05/31/us/george-floyd-investigation.html.

¹¹⁵ Nelson Oliveira, *READ IT: Full transcript of George Floyd 911 call describes "awfully drunk" suspect who was "not acting right,"* N.Y. DAILY NEWS (May 29, 2020, 10:27 AM), https://www.nydailynews.com/news/crime/ny-full-transcript-of-george-floyd-police-call-released-20200529-spsyfhzezzcptfndp2ml26lhze-story.html.

¹¹⁶ Hill et al., *supra* note 112 (referencing the New York Times video reconstructing the events leading up to George Floyd's fatal encounter with Minneapolis police officers and showing the events that occurred during and after police confronted Floyd).

¹¹⁷ Hill et al., *supra* note 114.

¹¹⁸ Hill et al., supra note 114.

¹¹⁹ Hill et al., supra note 114.

Hill et al., supra note 114.

Nine minutes into the arrest, police officers Derek Chauvin and Tou Thao arrive, both of whom have recorded complaints on their files.¹²¹ As they try to get Floyd into the car, Officer Chauvin pulls him onto the street. 122 All four officers are gathered around Floyd as he is placed face-down with three officers applying pressure to his body. 123 Floyd continues to shout that he cannot breathe as the officers call an EMS Code 2 to report an injury to Floyd's mouth. 124 Then, the code is quickly updated to level three for emergency medical assistance. 125 Despite the calls for medical help, Officer Chauvin is seen with his knee on Floyd's neck and he keeps it there for over eight minutes. 126 The officers prompt Floyd to get into the car while Chauvin's knee is on Floyd's neck, and within five minutes, Floyd is heard saying he cannot breathe sixteen times. 127 Twenty minutes into the arrest, an ambulance arrives on the scene and Floyd is loaded into the vehicle. 128 The officers request the fire department delaying the ride to the nearest hospital, and as they are doing so, Floyd goes into cardiac arrest. 129 After Floyd arrives at the hospital, he is pronounced dead at 9:25 p.m. ¹³⁰

In the wake of George Floyd's death, there has been an awakening of sorts with respect to race and policing. In June 2020, the majority of both Black and White Americans believe that Black people are treated less fairly when dealing with the police and by the entirety of the criminal justice system. According to polls from PEW Research Center, eighty-four percent of Black adults believe that Blacks are treated less fairly than Whites by the police. Additionally, sixty-three percent of Whites reported the same thing. Looking at the criminal justice system and their treatment of police officers, an AP News poll stated that eighty-four percent of Black Americans believe the criminal justice system is too lenient to police officers who cause injury or death

¹²¹ Hill et al., supra note 114.

¹²⁵ Hill et al., *supra* note 114.

Hill et al., supra note 114.

¹²⁷ Hill et al., *supra* note 114.

Hill et al., supra note 114.

¹²⁹ Hill et al., supra note 114.

¹³⁰ Hill et al., supra note 114.

¹³¹ Drew DeSilver et al., *10 Things We Know About Race and Policing in the U.S.*, PEW RES. CTR. (June 3, 2020), https://www.pewresearch.org/fact-tank/2020/06/03/10-things-we-know-about-race-and-policing-in-the-u-s/.

¹³² *Id*.

¹³³ *Id*.

compared to sixty-two percent of White Americans.¹³⁴ The AP News poll compared changes in views on police violence from 2015 to 2020.¹³⁵ This comparison demonstrated how dramatic a shift in public opinion had occurred from 2015 to 2020.¹³⁶ More Black and White Americans believe police brutality is a more serious problem.¹³⁷

But why was George Floyd's killing the trigger? After all, there were factually analogous police killings of Blacks caught on camera, ¹³⁸ with many onlookers, ¹³⁹ and with the victim indicating that they could not breath. ¹⁴⁰ Arguably, George Floyd's death was the catalyst simply

134 Stafford & Fingerhut, supra note 65.

Oscar Grant (Jan. 2009), Brakkton Booker, *California District Attorney Says Probe Of Oscar Grant Killing Will Be Reopened*, NPR (Oct. 6, 2020, 6:05 PM), https://www.npr.org/sections/live-updates-protests-for-racial-justice/2020/10/06/920895464/

california-district-attorney-says-probe-of-oscar-grant-killing-will-be-reopened; Eric Garner (July 2014), 'I can't breathe': Eric Garner put in chokehold by NYPD officer - video, 2:46 https://www.theguardian.com/us-4, 2014, PM), GUARDIAN, (Dec. news/video/2014/dec/04/i-cant-breathe-eric-garner-chokehold-death-video; Katie Benner, Eric Garner's Death Will Not Lead to Federal Charges for N.Y.P.D. Officer, N.Y. TIMES (July 16, https://www.nytimes.com/2019/07/16/nyregion/eric-garner-case-death-daniel-pantaleo.html; Walter Scott (Apr. 2015), Valerie Bauerlein, Man Who Recorded Walter Scott's Death on Cellphone Video Testifies in Murder Trial, WALL St. J. (Nov. 4, 2016), https://www.wsj.com/articles/man-who-recorded-walter-scotts-death-on-cellphone-video-testifies-in-murder-trial-147829624; Alton Sterling (July 2016), Anthony Izaguirre & Michael Kunzelman, New Videos Show Clearest Account of Alton Sterling's Killing, PBS NEWS HOUR (Mar. 31, 2018, 1:13 PM), https://www.pbs.org/newshour/nation/new-videos-show-clearest-account-of-alton-sterlings-killing; Philando Castle (July 2016), Mitch Smith, Minnesota Officer Acquitted in Killing of Philando Castile, N.Y. TIMES (June 16, 2017), https://www.nytimes.com/2017/06/16/us/police-shooting-trial-philando-castile.html.

¹³⁹ Michael Brown (Aug. 2014), Susannah Cullinane, Breaking Down the Michael Brown Video—and What it CNN (Mar. 14, Reveals, 2017, https://www.cnn.com/2017/03/14/us/michael-brown-ferguson-video-claims/index.html; Eliott C. McLaughlin, What We Know About Michael Brown's Shooting, CNN (last updated Aug. 15, 2014, 12:10 AM), https://www.cnn.com/2014/08/11/us/missouri-ferguson-michael-brownwhat-we-know/index.html; Tanisha Anderson (Nov. 2014), Michelle Dean, 'Black Women Unnamed': How Tanisha Anderson's Bad Day Turned into Her Last, GUARDIAN (June 5, 2015, 11:49 AM), https://www.theguardian.com/us-news/2015/jun/05/black-women-police-killingtanisha-anderson; Ron Regan, George Floyd Death Renews Painful Memories for Tanisha Anderson's Family, NEWS 5 CLEVELAND (last updated June 24, 2020, 7:15 PM), https://www.news5cleveland.com/news/local-news/investigations/george-floyd-death-renewspainful-memories-for-tanisha-andersons-family; Tamir Rice (Nov. 2014), Richard Luscombe, Tamir Rice Report: Witnesses Contradict Officer on Warning to Boy Shot Dead, GUARDIAN (June 13, 2015, 5:20 PM), https://www.theguardian.com/us-news/2015/jun/13/tamir-rice-prosecutors-report-witnesses-contradict-police-officer.

¹⁴⁰ Eric Garner (July 2014), Al Baker et al., *Beyond the Chokehold: The Path to Eric Garner's Death*, N.Y. TIMES (June 13, 2015), https://www.nytimes.com/2015/06/14/nyregion/eric-

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¹³⁵ Stafford & Fingerhut, *supra* note 65.

¹³⁶ Stafford & Fingerhut, supra note 65.

¹³⁷ Stafford & Fingerhut, *supra* note 65.

because it came at just the right moment in our country's history, where a confluence of factors opened many Whites' eyes to racism and White supremacy. Those factors included: the impact of cell phones and social media on public perception about race and policing, American's attentional focus that came with the social isolation associated with the pandemic, and realizing the peril brought by Trump's presidency.

A. Cell Phones, Social Media, and the Policing of Black Bodies

With respect to race and policing in the United States, "[t]he truth is finally coming out. And it's ugly." The death of Oscar Grant, Trayvon Martin, Eric Garner, Michael Brown, Walter Scott, Sandra Bland, Breonna Taylor, George Floyd, and many others brought attention to the systematic racism in the United States. The twentieth Century Civil Rights Movement grew in conjunction with technology. Television provided a visual testament of police brutality that embodied a larger issue of institutional racism which was unwilling to change. It exposed a system of racial injustice, which was manifested in the moral justification and foundation of the movement. Televised broadcasts helped gain support and disseminate momentum for the movement, by

garner-police-chokehold-staten-island.html; Christopher Lowe (July 2018), Jaweed Kaleem and Jenny Jarvie, *Police Grapple with Fallout from Protests*, L.A. Times (June 21, 2020), https://enewspaper.latimes.com/infinity/article_share.aspx?guid=52e915af-3b28-4dab-97b8-a9c7c840d60b; Prescott Stokes III, *He Was Handcuffed and Placed in the Back of a Cop Car. They Returned to Find Him Dead*, Fort-Worth Star Telegram (Aug. 2, 2018, 7:58 PM), https://www.star-telegram.com/news/local/fort-worth/article216019920.html; Javier Ambler II (Mar. 2019), Tony Plohetski, *Reality Show Cameras Roll as Police Chase Turns Fatal*, USA Today (June 10, 2020), https://www.pressreader.com/usa/usa-today-us-edition/20200610/281509343421749; Derrick Scott (May 2019), Denise Lavoie, *Families Seek New Investigations into Old Police Killings*, ABC News (Oct. 10, 2020),

https://abcnews.go.com/US/wireStory/families-seek-investigations-police-killings-73539295; Byron Williams (Sept. 2019), Ken Ritter, *Videos: Man Who Died in Handcuffs Said He Couldn't Breath*, U.S. News (Oct.2, 2020, 6:26 PM), https://www.usnews.com/news/us/articles/2020-10-02/videos-man-who-died-in-handcuffs-said-he-couldnt-breathe; John Neville (Dec. 2019), N'dea Yancey-Bragg, *Videos Show Man's Fatal Injury*, USA TODAY (Aug. 7, 2020), https://www.pressreader.com/usa/usa-today-us-edition/20200807/281676847257524; Manuel Ellis (Mar. 2020), Mike Baker, *Another Man who Said 'I Can't Breathe' Died in Custody. An Autopsy Calls it Homicide*, N.Y. TIMES (last updated June 5, 2020), https://www.ny-times.com/2020/06/03/us/manuel-ellis-tacoma-police-homicide.html.

¹⁴¹ Robinson Meyer, *Thank God for Cellphone Video Cameras*, THE ATLANTIC (Apr. 29, 2015), https://www. theatlantic.com/technology/archive/2015/04/thank-god-for-cellphone-video-cameras/391688/.

¹⁴² Nicol Turner Lee, *Where Would Racial Progress in Policing be Without Camera Phones?*, BROOKINGS (June 5, 2020), https://www.brookings.edu/blog/fixgov/2020/06/05/where-would-racial-progress-in-policing-be-without-camera-phones/.

¹⁴³ Michael Bowman, TV, Cell Phones and Social Justice: A Historical Analysis of How Video Creates Social Change, 24. RACE, GENDER, & CLASS. 16, 19 (2017).

showing the nation the need for legislative and social reform.¹⁴⁴ Contemporarily, the cellphone provided the platform for anyone to distribute content, which removed the influence and control that main stream media and major corporations had on the truth.¹⁴⁵ The filter was finally lifted for the current or twenty-first century Civil Rights Movement, as social media platforms have served as a system of accountability.¹⁴⁶ The images that aid the reform movement were captured at the convergence of chance and purposeful efforts by citizens, which effectively supply documentational testimony to help change the narrative.¹⁴⁷ Today's accessibility to cellphones and social media has generated a revolution of public empowerment.¹⁴⁸ The platform created by the evolution of technology during the first Civil Rights Movement to the current Civil Rights Movement, is still working to "turn a paradigm dependent on trust, which can be confounded by racism and institutional authority, into one founded on synthesis and witness."¹⁴⁹

B. A Worldwide Pandemic, A Time to Focus

Social science would suggest that people who are engaged in multiple tasks at the same time do not, or cannot, focus on a single important issue. Here, that issue is racism/white supremacy. When people try to perform multiple tasks at once, execution of one of those tasks typically leads to postponement of others. This is the "response selection bottleneck" where the brain has to decide to adjust to the new task and time is lost in the process of that decision, ultimately leading to less efficiency and productivity. Therefore, when trying to perform more than one task at once, the brain's limited ability to process information results in an "interference between the tasks." Similarly, mind wandering—which makes up roughly half of our daily thoughts—has been proven to hinder our performance on everyday tasks, resulting in "increased risk of injury and death while driving, difficulties in educational

¹⁴⁵ *Id.* at 22.

¹⁴⁴ *Id.* at 24.

¹⁴⁶ Id. at 24.

¹⁴⁷ Meyer, *supra* note 141.

¹⁴⁸ Turner Lee, *supra* note 142.

¹⁴⁹ Meyer, supra note 141.

¹⁵⁰ Paul E. Dux et al., Isolation of a Central Bottleneck of Information Processing with Time-Resolved fMRI, 52 NEURON 1109, 1109 (2006).

¹⁵¹ *Id*.

¹⁵² *Id*.

16

settings, increased response variability in tasks assessing sustained attention, and impaired performance in everyday life."¹⁵³

It comes as no surprise that mindfulness—which reduces such wandering thoughts—positively impacts our ability to complete focus-oriented tasks. Mindfulness is a conscious awareness of thought, emotion, and the present moment. Mindfulness impacts behavior in four ways: attention, awareness, presence, and acceptance. Considerable research supports these claims, linking the practice of mindfulness to an increase in attentional control and cognitive flexibility..., [a reduction in] automatic processing..., de-centering..., and [the embrace of] thoughts and feelings as they are, without attempting to suppress them." Results of relevant mindfulness studies have reported more on-task thoughts, fewer mindless actions, and improved test scores in general populations post-treatment.

The United States finally found the urgency to break the deadly cycle of being temporarily outraged by an unjust killing at the hands of police. Although its history of systemic racism is nothing new, the global pandemic, record-breaking unemployment rate, isolation, and even lack of professional sports to enjoy created the perfect storm to focus people's attention.¹⁵⁸ As more and more Americans were ordered to shelter in place,¹⁵⁹ it allowed Whites to focus and become more educated about police brutality and our country's history of racism. Pro-Black and anti-racist podcasts, New York Times bestsellers, and social media accounts have spiked in the weeks after the video of George Floyd's death went viral, forcing Whites to think more critically about race in the United States.¹⁶⁰

¹⁵⁵ Eyal Rosenstreich & Lital Ruderman, *Not Sensitive, yet Less Biased: A Signal Detection Theory Perspective on Mindfulness, Attention, and Recognition Memory*, 43 CONSCIOUSNESS & COGNITION 48, 48 (2016).

¹⁵³ Mengran Xu et al., *Mindfulness and Mind Wandering: The Protective Effects of Brief Meditation in Anxious Individuals*, 51 Consciousness & Cognition 157, 157 (2017).

¹⁵⁴ *Id.* at 158.

¹⁵⁶ Id.

¹⁵⁷ Xu et al., *supra* note 153, at 158.

¹⁵⁸ Gene Demby, *Why Now, White People?*, NPR: CODE SWITCH (June 16, 2020, 11:55 PM), https://www.npr.org/2020/06/16/878963732/why-now-white-people; *The Power of Protest and the Legacy of George Floyd*, ECONOMIST (June 11, 2020), https://www.economist.com/lead-ers/2020/06/11/the-power-of-protest-and-the-legacy-of-george-floyd.

¹⁵⁹ Demby, supra note 158.

¹⁶⁰ Demby, supra note 158.

C. Trump Comes into Focus

The pandemic enlightened many, allowing Americans to deconstruct and reflect on their personal values and purpose in society. This experience, called mortality salience, has taken precedence over the fear of contracting the virus from large crowds of protestors, proving that Americans value achieving racial equality and justice more than the virus itself. 161 Trump's response, or lack thereof, regarding the pandemic also made people think critically about his administration. COVID-19 prompted a larger response in support of the Black Lives Matter ("BLM") and civil rights movements because it increased people's vulnerability and has re-sensitized their views, pushing more White Americans to spark conversation, donate to organizations that benefit people of color, and sign petitions to demand justice. 162 But many still feel guilty or conspicuous by not protesting or posting on social media because of the pressure from their peers, another important factor in the ever-growing movement.¹⁶³

More specific to attitudes about Trump, in an Emerson college survey, only thirty-six percent of respondents approved of Trump's handling of Floyd's death and the ensuing protests. ¹⁶⁴ On the same question, a Reuters survey found only thirty-three percent approval. 165 We see a similar picture from a CBS News survey which finds a minority thirtythree percent approval rating for Trump's handling of race relations, with fifty-eight percent of respondents explicitly disapproving. 166 A Monmouth University poll found that, beyond the aftermath of Floyd's killing, sixty percent of respondents had almost no faith in Trump's ability to handle race relations at all. 167 With near universal condemnation of Floyd's killing, Trump's militaristic response to the protests which followed clearly left many Americans wanting. Where Trump's hostile tweets and calls for "law and order" fueled racial tensions, the Floyd protests against systemic racism demanded a leader who could demonstrate understanding, call for unity, and assist the nation in finding

¹⁶⁷ *Id*.

¹⁶¹ Demby, supra note 158.

¹⁶² Demby, supra note 158.

¹⁶³ Demby, *supra* note 158.

¹⁶⁴ William Cummings, Americans Disapprove of Trump Response to George Floyd Death and Protests, Polls Find, USA TODAY (June 4, 2020), https://www.usatoday.com/story/news/politics/2020/06/04/george-floyd-trump-response-disapproved-americans-polls-find/3142639001/.

¹⁶⁵ *Id*.

¹⁶⁶ *Id*.

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healing.¹⁶⁸ According to polling on Trump's impact on race relations, in the eyes of most respondents, this leader could not be Trump. Polling showed that sixty-seven percent of respondents said Trump had mostly increased racial tensions, including ninety-two percent of Democrats, seventy-three percent of independents, eighty-eight percent of Blacks and sixty-three percent of Whites.¹⁶⁹ Only eighteen percent of respondents claimed that Trump had decreased tensions, a minority which only includes forty percent of Trump's own party membership.¹⁷⁰ In the midst of an anti-racist revolution, Trump positioned himself as a proponent of law and order even at the expense of racial justice and national unity.¹⁷¹ Divisive and inflammatory, his history of racialized remarks "held a mirror to society" and revealed the systemic, racialized violence prevalent long before his term as president began.¹⁷²

Added, the psychological stress of the virus and its implications also exposed a new concept called the terror management theory, when people have innate defense mechanisms that helps ease rising levels of anxiety and fear which appears when our mortality is threatened. But, when our defense mechanisms fail, we are more willing to connect to a broader social entity that creates purpose. It Joining the collective to fight against systemic racism and the evident police brutality towards people of color has increased activism by mobilizing more people for the cause and by encouraging more people to take to the streets.

CNN's Van Jones referred to the massive global force as the "Great Awakening," the cultural tsunami that is impacting the empathy and solidarity of White people and people of color alike. ¹⁷⁶ The notion

¹⁶⁸ Jonathan Tamari, *America's Twin Crises are Highlighting Trump's Biggest Weaknesses*, PHILA. INQUIRER (June 28, 2020), https://www.inquirer.com/politics/election/trump-coronavirus-george-floyd-protests-2020-election-20200628.html.

¹⁶⁹ Domenico Montanaro, *Poll: Two-Thirds Think Trump Made Racial Tensions Worse After Floyd Was Killed*, NPR (June 5, 2020), https://www.npr.org/2020/06/05/870019283/poll-two-thirds-think-trump-made-racial-tensions-worse-after-george-floyds-death.

¹⁷⁰ *Id*.

¹⁷¹ Ibram X. Kendi, *Is This the Beginning of the End of American Racism?*, THE ATLANTIC (Sept. 2020), https://www.theatlantic.com/magazine/archive/2020/09/the-end-of-denial/614194/.

¹⁷² Id.

¹⁷³ Pam Ramsden, *How the Pandemic Changed Social Media and George Floyd's Death Created a Collective Conscience*, THE CONVERSATION (June 15, 2020), https://theconversation.com/how-the-pandemic-changed-social-media-and-george-floyds-death-created-a-collective-conscience-140104.

¹⁷⁴ *Id*.

¹⁷⁵ *Id*.

¹⁷⁶ Van Jones, Opinion, Welcome to the "Great Awakening," CNN (June 14, 2020, 11:21 PM), https://www.cnn.com/2020/06/12/opinions/great-awakening-empathy-solidarity-george-floyd-jones/index.html.

that "racism is over" has been vehemently disproven now more than ever. An impressively extensive list of achievements spanning from big corporations like Target and our justice system that charged the officers for George Floyd's murder have taken action and proven that this movement will shake the status quo in this country.¹⁷⁷

Not only have the effects of the pandemic, the protests, and Donald Trump impacted Americans, but the movement has moved internationally as well. The fury of America has sparked protests in Berlin, London, Copenhagen, Toronto, and many more, instilling an outrage that proves that no one is above the law and each country has their own struggles in the fight for equality, whether it regards race, sex, or other denominations.¹⁷⁸

IV. CONCLUSION

In certain segments of the Black community, there is the notion that Whites recognize the "humanity" in dogs more readily than they do Blacks. This is at least related to—may be driven by or resulting from—the fact that Whites have more meaningful engagement with pets, dogs in particular, than Blacks. In the summer of 2020, the police murder of George Floyd caused many Whites to finally and in large numbers recognize Black humanity. That is because of the confluence of three things—(1) the stark image of Floyd's murder on social media and television, (2) a worldwide pandemic that almost forced people to take notice of issues of race in ways that their busy lives otherwise militated against, and (3) a deeper appreciation for how poorly Donald Trump handled issues of race and the pandemic.

While statistics initially reassured that this movement would not be temporary, the desire for social change was short-lived for many. In a June 16 poll, Americans were more troubled by the brutality of police than the protests that turned violent.¹⁸² This was a striking contrast to the riots in 1968 regarding Richard Nixon and the Rodney King riots in

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¹⁷⁷ Id

Robin Wright, Fury at America and Its Values Spreads Globally, New Yorker (June 1, 2020), https://www.newyorker.com/news/our-columnists/after-the-killing-of-george-floyd-fury-at-america-and-its-values-spreads-globally.

Shontel Stewart, Man's Best Friend? How Dogs Have Been Used to Oppress African Americans, 25 MICH. J. RACE & L. 183, 189 (2020).
 Id.

¹⁸¹ Demby, *supra* note 158.

David Brooks, *The Culture of Policing Is Broken*, THE ATLANTIC (June 16, 2020), https://www.theatlantic.com/ideas/archive/2020/06/how-police-brutality-gets-made/613030/.

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1992. 183 Similarly, comparing the public opinion about the death of Eric Garner and George Floyd, who were killed in the same manner but six years apart, the majority of Americans were convinced in 2020 that racism and discrimination is a major problem. 184 The difference between the past and 2020 is the number of videos surging the media that disproves the theory that there are just a few "bad apples" in the police force and proves that the disproportionate violence towards people of color is a problem on the systemic level and, therefore, is in need of reform. 185

A closer look reveals that the shifting of attitudes towards denouncing racism and acknowledging racial disparities following the murder of George Floyd are disparate between Republicans, Democrats, Black people, and White people. For each of the identities, views towards the BLM movement and the recognition of racial injustice increased, though to different degrees. There was also a change in the prevalence of those values immediately following the presence of protests in the spring into late summer and early fall.

Overarchingly, the protests enacted a wave of support among American voters in which Civiqs data notes a twenty-eight point margin in support of the BLM movement over two weeks as opposed to a seventeen point margin before the protests began. 186 "About two in three Americans (sixty-five percent) support the nationwide protests about racial injustice that followed the death of George Floyd at the hands of Minneapolis police in late May... a slim majority say the protests have changed their views on racial justice "a lot" (twenty-one percent) or "a little" (thirty-three percent), while nearly half (forty-seven percent) say the protests haven't changed their views "at all." 187

However, this increase in support is mostly attributed to White Democrats as Black people have fairly consistently held the same views towards race. As one study points out, "This change has come entirely among supporters of the Democratic candidates: [Seventy-four percent] of Biden supporters say it is a lot more difficult to be Black than White, while a smaller majority of Clinton supporters ([fifty-seven percent]) said this in 2016. Among Trump supporters, there has been virtually no

¹⁸⁴ *Id*.

¹⁸³ *Id*.

¹⁸⁵ *Id*.

¹⁸⁶ Nate Cohn & Kevin Quealy, How Public Opinion Has Moved on Black Lives Matter, N.Y. TIMES (June 10, 2020), https://www.nytimes.com/interactive/2020/06/10/upshot/black-livesmatter-attitudes.html.

¹⁸⁷ Steven Long & Justin McCarthy, Two in Three Americans Support Racial Justice Protests, GALLUP (July 28, 2020), https://news.gallup.com/poll/316106/two-three-americans-support-racial-justice-protests.aspx.

change since 2016. Currently, [nine percent] say it is a lot more difficult to be Black than White; [eleven percent] said this four years ago." As of June 2020, PRRI data indicates that seventeen percent of Democrats believe that the killing of Black Americans are isolated instances rather than consequences of systemic racism which is a change from twentysix percent believing so in 2018. 189 For Republicans, seventy-eight percent believe they are isolated incidents which have not changed since 2018 where the percentage sat at seventy-seven percent. ¹⁹⁰ When factoring in race, seventeen percent of Black Americans believe the killings are isolated in 2020 when the percentage was at sixteen percent in 2018. For White Americans, that percentage has dropped from sixty-five percent in 2018 to fifty percent in 2020.¹⁹¹ Roughly ninety-percent of White Democrats (eighty-eight percent) express at least some support for the BLM movement, compared with sixteen percent of White Republicans. 192 And while more than half of White Democrats (fifty-one percent) say they strongly support the movement, only two percent of White Republicans say the same. 193

As the media attention from protests died down entering late summer and early fall, so did attitudes of support. "Overall, Americans are now less likely than they were earlier this summer—when protests sparked by the death of George Floyd began—to say that racism is a big problem in society ([sixty-seven percent] said so then, [fifty-five percent] feel that way now). And while there has been some decline across party lines in that sentiment, the drop has come most sharply among Republicans. In June, [forty-three percent] said racism was a big problem in society; now, just [twenty-two percent] say the same. Among Democrats, [eighty-four percent] feel that way, compared with [ninety

¹⁸⁸ Voters' Attitudes About Race and Gender Are Even More Divided Than in 2016, PEW RES. CTR. (Sept. 10, 2020), https://www.pewresearch.org/politics/2020/09/10/voters-attitudes-about-race-and-gender-are-even-more-divided-than-in-2016/.

¹⁸⁹ Summer Unrest over Racial Injustice Moves the Country, But Not Republicans or White Evangelicals, Pub. Religion Res. Inst. (Aug. 21, 2020), https://www.prri.org/research/racial-justice-2020-george-floyd/.

¹⁹⁰ *Id*.

¹⁹¹ *Id*.

Deja Thomas & Juliana Menasce Horowitz, Support for Black Lives Matter Has Decreased Since June but Remains Strong Among Black Americans, PEW RES. CTR. (Sept. 16, 2020), https://www.pewresearch.org/fact-tank/2020/09/16/support-for-black-lives-matter-has-decreased-since-june-but-remains-strong-among-black-americans/.
 Id

percent] in June."¹⁹⁴ As mentioned before, Black Americans have maintained consistency as, "Support for the Black Lives Matter movement remains particularly widespread among Black adults. Some [eighty-seven percent] of Black Americans say they support the movement, similar to the share who said this in June. However, the share of Black adults expressing strong support for the movement has decreased [nine] points, from [seventy-one percent] to [sixty-two percent]."¹⁹⁵

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¹⁹⁴ Jennifer Agiesta, *CNN Poll: Views on Racism, Protests Grow More Partisan This Summer*, CNN (Sept. 4, 2020, 6:19 AM), https://www.cnn.com/2020/09/04/politics/cnn-poll-racism-protests/index.html.

¹⁹⁵ Thomas & Horowitz, *supra* note 192.