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## Mediating Political and Social Conflicts: The Skokie-Nazi Dispute \*

Richard A. Salem\*\*

### ABSTRACT

In 1978, a mediation team from the Community Relations Service [CRS] of the United States Department of Justice attempted to mediate the dispute between residents of Skokie, the predominantly Jewish suburb of Chicago and the Nazi party members of the National Socialists Party of America. This dispute involved a number of issues of legal and legislative significance. After a series of complicated negotiations, the Nazis canceled the Skokie demonstration.

The Community Relations Service (CRS) of the United States Department of justice was established under the Civil Rights Act of 1964 to provide assistance to communities and community residents in resolving disputes, disagreements, or difficulties relating to discriminatory practices based on race, color, or national origin. The CRS was mandated by Congress to offer its services whenever in its judgment peaceful relations among the citizens of the community involved are threatened.

<sup>\*</sup> Printed with permission of Jossey-Bass Inc. Publishers. This article originally appeared in *Mediation Quarterly*, 5, (1984), 65-75.

<sup>\*\*</sup> The views expressed in this article are those of the author and do not necessarily represent those of the Community Relations Service or the United States Department of Justice.

The main tool used by CRS mediators and conciliators is persuasion. They lack enforcement authority, they are precluded by law from investigating, and they are governed by a confidentiality clause that makes it a federal offense to reveal information shared with them in confidence. These prohibitions make it easier for CRS personnel to gain the trust of parties to a dispute, trust that often is imperative in helping to bring about peaceful settlements.

In February 1978, a mediation team from the CRS entered the Skokie-Nazi dispute. Its initial objective was to gain acceptance as an impartial outside party and provide conciliation and technical assistance services that would reduce tension and the likelihood of violence when a small band of Nazis exercised their right to demonstrate there on June 25, 1978. But, when it became apparent in May 1978 that the Nazi demonstration in the predominantly Jewish Chicago suburb would lead to life-threatening confrontations and massive property damage, we expanded our role to include mediation that might lead to cancellation of the planned demonstration. The CRS normally attempts to move the disputants into a negotiating stance so that a settlement can be worked out by the parties. But, in the Skokie case we knew that for both moral and political reasons, none of the other parties would engage in negotiations with the Nazis. That role would fall to the CRS. This article reports on our efforts to persuade the Nazis to examine all the options available to them, including voluntary withdrawal. Our endeavor had the full support of all the parties involved, although to this day most would not acknowledge that they had actively encouraged the mediation process.

Although the possibility of mediation arose when we first intervened in the Skokie case, we viewed it as unlikely for several reasons. First, experience had taught us that it is generally counterproductive to enter into any type of negotiations with extremists, since their objective is conflict, not to produce resolution. Second, we rarely asked any group to consider abandoning its right to conduct a lawful demonstration, even when a physical confrontation seemed inevitable, especially in a case where obtaining a permit to demonstrate was a central issue to the dispute. Such an action by the CRS could be misinterpreted as the very antithesis of the Civil Rights Act under which it works. Thus, we originally anticipated that our only meeting with the Nazis would be brief, in the presence of their attorney, just before the June 25 demonstration. In that way, they would recognize us in Skokie if there was a need to communicate during their demonstration. CRS personnel would be the only persons present who had met previously with all parties.

The National Socialist Party of America, led by Frank Collin, was a splinter group composed at the height of its strength by no more than twenty-five men of varying ages. While their rhetoric was venomous, it was difficult to view Nazi party members as a serious threat to the security of the community. Normally, the Nazis were at home in Marguette Park, a white ethnic neighborhood on Chicago's southwest side where many residents feared the entry of black families into their community. Many wanted the Nazis out of the neighborhood, but some felt that the Nazi rhetoric, as well as the storefront headquarters across the street from the park, discouraged blacks from moving in. Nazi rallies in the park had been peaceful and well received, mostly by younger, beer-drinking members of the crowds that flocked there on warm spring and summer days. But, violence that occurred when the Nazi band tested the waters outside the Marquette Park neighborhood twice in the mid-1970s or when venturesome black organizations attempted to march into the area led the Chicago Park District in 1976 effectively to ban the Nazis from Marquette and most other city parks through a prohibitive insurance bonding requirement.

The park district initially set the bond at \$100,000 for coverage against personal liability suits and \$50,000 for property damage. A federal judge ruled these sums to be prohibitive, and the park district lowered the figures to \$50,000 personal liability and \$10,000 property damage. But, even that, the Nazis contended, was both beyond their reach and a violation of their First Amendment rights. Collin's first response to the ban was to announce in early 1977 his intention to move his demonstrations from Chicago and the far south suburbs, where he had found some blue-collar support, to the northern suburbs, which, according to a leaflet prepared by his group, was heavily populated by the "real enemy—the Jews." The leaflet continued, "Where one finds the most Jews one also finds the most Jew haters." He proposed taking his group to several communities, including the village of Skokie, where an estimated 10 percent of the 70,000 residents were concentration camp survivors.

Skokie residents responded in anger, and the village council adopted three ordinances. One prohibited demonstrations by political parties wearing military-style uniforms repugnant to the tradition of civilian control of government and to local standards of morality and decency. Another banned distribution of material inciting hatred against race or ethnic groups. The third established a substantial insurance bond requirement.

The American Civil Liberties Union (ACLU), which had challenged the Chicago Park District many times over the years and which was engaged in a running battle with the district over freedom of speech in Chicago parks, had accepted the Nazis as a client in the insurance bond case. It agreed to represent them in the Skokie matter as well.

As the Skokie ordinances began to run into trouble in the courts, two bills were introduced in the state legislature that would ban Nazi demonstrations anywhere in Illinois. One prohibited parades by quasi-military hate groups. The other created a new crime of criminal group defamation and gave local officials the right to seek injunctions to stop derogatory demonstrations and the distribution of hate literature.

While battles were being fought in the courts and the legislature, another front was opened in the media. The story received worldwide publicity and extensive coverage both on the news and editorial pages of the Chicago press, especially the Chicago Sun-Times, which regularly featured articles about the issue on its front page, and on television. Into late spring, each week brought several announcements that outside groups were coming to Skokie to confront the Nazis. The Los Angeles Times reported that one travel agent had booked air passage from Los Angeles to Skokie for 2,000 people. A rabbi in Lawrence, New York, announced that his group would converge on Skokie by air and by land at a cost of \$50 a person round trip by bus, \$140 by air. The Jewish Defense League (JDL) promised 134 buses carrying 1,800 from the New York area. JDL ran an ad in a Jewish newspaper advising those who couldn't join them that \$50 would send a Jew to Skokie. A group called Vermonters Concerned was chartering a bus from Burlington. A leader of the Jewish War Veterans from Allentown, Pennsylvania, promised to deliver up to 10,000 members of his organization. More than 300 were scheduled to come from Phoenix, where a former JDL leader announced that there would be no march in Skokie. "We will break their legs if we have to." Earlier, JDL's national director had assured a press conference in Skokie that there would be violence-"blood on the streets."

These reports did not go unnoticed by the Nazi band. A newspaper columnist reported in late May that Collin's followers were wavering. Was it true? The CRS was asked in a confidential phone call by a Skokie village official. He recalled that we had mentioned the possibility of mediation in our initial meeting. He asked whether we planned to meet with the Nazis. We told him that we did. By then, it had become apparent that the official estimate of 50,000 peaceful counterdemonstrators might be realistic. Some two years earlier, Skokie streets were impassable for hours when just 3,000 people showed up at a local high school to hear presidential candidate Jimmy Carter.

The CRS had been working closely with Jewish leaders in Skokie who were planning a counterdemonstration and with state and local officials, including police, to minimize the likelihood of a confrontation on June 25. One Skokie civic leader, a concentration camp survivor who had emerged as a powerful spokesman for the Jewish community, proposed to a planning committee of the Metropolitan Chicago Jewish Federation that counterdemonstrators should confront the Nazis face to face. Others prepared a quiet, symbolic response. But, the thought of uniforms and swastikas aroused anguished memories and emotions that ruled out anything but a direct and highly visible counterdemonstration.

The planners, headed by Eugene Dubow, regional director of the American Jewish Committee, agreed on a compromise first proposed by the CRS. They would conduct their large rally some distance from the site of the Nazi demonstration, but a representative leadership group would "confront" the Nazis with a silent vigil. Later, we brought Dubow together with Chicago's deputy police superintendent James Riordan in the CRS office to discuss strategies. Riordan was known for his effectiveness in dealing with street confrontations. With his superintendent's approval, Riordan agreed to be on call to work behind the scenes with Skokie police if asked. State officials had agreed to commit up to 1,000 state troopers and national guardsmen and extensive equipment to supplement several hundred local police from Skokie and neighboring communities.

Despite the extensive planning, nobody believed that tens of thousands of emotional counterdemonstrators could be restrained, especially if hundreds of JDL members were on hand to arouse the crowd. Some predicted that the Nazis would be too frightened to appear and that they would cancel at the last minute. But, by then it might take only a rumor that the Nazis had crossed the village line to stampede the crowd. Deputy superintendent Riordan told the CRS that he saw no way the peace could be preserved. This position was shared by village officials and community leaders, and it was reflected in newspaper columns and editorials.

We knew that the decision to sit down at the table with the Nazis would cause a number of moral and ethical questions to be asked of the CRS. Was it proper to negotiate with a group that espoused a Nazi philosophy? Was it legitimate to trade off Skokie for an alternative site? Can mediators maintain impartiality when dealing with such a group? The questions seemed more theoretical than actual when they arose. Collin's real power, we felt, was his ability to create emotional distress and violence in Skokie. We gave credibility to the media report that Collin's supporters were wavering, and we sensed that he needed a face-saving way out. Helping to find that way was the only course we could consider in light of the risks of not doing so.

There were also some operating problems for the mediators. For one thing, none of the other parties would go to the table. Negotiating with Nazis was taboo. For some, it was a moral issue. For others, the political stakes were too high. But, none would go on record in favor of a settlement. This meant there could be no signed agreement, the traditional hallmark of successful mediation. Whose word, then, could we trust? How could we be sure that the parties would abide by any agreement that was reached? In the case of the Nazis, we would rely on their attorney to hold them accountable. This, we assumed, he could do; they would have difficulty finding new counsel. With politicians and public officials, we would take our chances.

But, there was the other side of the coin. Would the parties trust the CRS, especially the ACLU? Our civil rights mandate notwithstanding, the ACLU had not always viewed the CRS as an ally. It was a Department of justice agency, which was enough for some civil libertarians to rule us out. In addition, we avoided making advocacy statements. We sought to bring about positive change through the process of negotiations. We could not publicly advocate change without impeding our effectiveness as a change agent. In this case, we made the assumption that any credibility gap between the CRS and the parties would be more than compensated for by the common goal of all the players≈preventing physical violence in Skokie.

We were wrestling with a strategy for mediation when on May 23 Collin issued a press release that showed us the way. Citing a federal appeals court ruling of the previous day that upheld the Nazis' right to demonstrate in Skokie, Collin declared he would be there unless three demands were met: First, Skokie must repeal its restrictive ordinances; second, the state must withdraw its proposed anti-Nazi legislation; third, the Chicago Park District must abolish its restrictive insurance requirement. Calling his demands reasonable, lawful, and irreversible, Collin pledged to go to Skokie without violence, but he said that they would fight back if they were physically attacked.

The response by public officials was not surprising. Their statements were politically sound but they did not reflect the pressure that the officials must have felt as the date of the scheduled demonstration grew closer. Skokie Mayor Albert Smith said he wouldn't ask the Park District to yield. Two state senators, sponsors of anti-Nazi bills, adamantly refused to deal with Collin. Finally, the Park District's public information officer said that the district had not heard from Collin.

At our request, the Chicago Park District information officer came to the CRS office to brief us on the park district's position. He held out no hope for lifting the insurance requirement. He pointed out that there were four other parks in the city where the Nazis could demonstrate without a permit, including Lincoln Park, which, he said would give the Nazis "good exposure." However, the park district would not allow Collin and his followers to demonstrate in Marquette Park unless it was ordered by the court to do so.

But a court decision appeared to be months away, and we needed a solution within a matter of weeks, so we met with an influential planner of the counterdemonstrations to seek help from the Jewish leadership. We asked whether there was someone among the shakers and makers in the Jewish community who would use clout with the mayor and the head of the Park District. The answer was a clear and irrevocable no. It appeared that the matter had already been considered. Nobody in the Jewish leadership would be involved in making a deal with the Nazis, we were told.

The next and obvious step was to meet with Collin. We cleared the meeting with his ACLU counsel. There were three ground rules: We would make no misrepresentations, we would do nothing to interfere with the progress of the legal cases or Collin's civil rights, and no one would mention the meeting to the press unless all parties concurred. Thus, on June 1, CRS conciliation specialist Werner Patterson and I met with Collin and his counsel. One day earlier, in response to a U.S. Supreme Court ruling, Skokie officials had issued a permit to Collin and said that a permit for a counterdemonstration would be forthcoming. In another development, the ACLU had initiated court action to force the park district to issue a permit for July 9 in Marquette Park.

We opened the meeting with Collin by expressing our concern about the ability of police to maintain order and protect Collin and his followers on June 25. Despite the planned presence of more than 1,000 state and local police, we said, it was questionable whether anybody could control the tens of thousands of counterdemonstrators. Collin said that he did not want violence, and if it occurred it would not be his fault. He said that he wasn't interested in going to Skokie but that he had to prove his First Amendment rights. It was a matter of principle. He would rather be in Marquette Park. We suggested that his victories in court meant that it was just a matter of time until his First Amendment rights were sustained. Everybody, it seemed, expected him to win the Marquette Park case. Why not postpone Skokie until the Chicago Park District case was resolved? He declined.

With victory virtually in hand, we asked, why was Collin holding out for all three of his demands? Would he consider less than all of them? He said that he might, and we said that we would be back in touch within a day or two.

Telephone calls to determine the status of the proposed state legislation revealed that, while the anti-Nazi bills had cleared the senate, they were on shaky ground in the house. But, they might pass the house if it appeared that the Nazis were going to Skokie. If the demonstration was called off, we were assured that there would be no support for the bills. There was considerable sentiment in the State Capitol that the bills were bad legislation-a political necessity for legislators with a Jewish constituency, perhaps, but bad legislation nonetheless.

We had been surprised by Collin's willingness at our first meeting to consider a compromise, so we decided to press harder at a second meeting on June 2. At that meeting, we proposed to Collin that he allow the CRS to announce that, since he already had his Skokie permit and since it was a matter of time until he prevailed in Marquette Park, he had decided that his First Amendment rights were being upheld and that he was cancelling the Skokie demonstration. This would assure defeat of the bills in the state legislature. Two of Collin's demands would thereby be met, and he would have made his point without having to go to Skokie. We suggested that Collin's group demonstrate elsewhere on June 25 while waiting for court access to Marquette Park. Four city parks were available without a permit. But Marquette Park was where Collin wanted to be, and he agreed only to consider the proposition that I had made.

On June 4, I was summoned to a meeting at the home of a legislative leader who had learned of our quiet mediation effort from a legislator we had consulted on the Skokie bills. The leader said that the bills would be heard in committee in a matter of days. Unless there was some sign that Collin was backing out of the Skokie demonstration, it appeared that the bills would pass. Emphasizing that no deals were possible, the leader pointed out that the bills would keep the Nazis from demonstrating anywhere in Illinois until all the court challenges were over.

We sensed that these words were a bluff. There would have been other indications in our earlier discussion with legislators or in the media if the bills were close to passage. Despite a strong sentiment in the legislature against the Nazis, there were equally strong concerns that the proposed legislation was unconstitutional and that it would do nothing more than buy time. The meeting suggested to us that the bills might actually be in serious trouble and that legislative leaders with strong Jewish constituencies were feeling the pressure. They in turn wanted to put more pressure on Collin. Being precluded from dealing with him directly, they chose the obvious conduit. We played our role and took their message back to Collin.

The possibility of a full summer without demonstrations concerned Collin when we discussed it with him the following day. He had already considered it but wasn't ready to act. However, he agreed to our suggestion that the CRS should float a story in the media saying that, in our view, there was a distinct possibility that an alternative to Skokie would be found. The Chicago Sun-Times ran such a story on June 9, and the wire services quickly spread it throughout the state and across the country. We went to the media for three reasons: First, the story might influence action on the anti-Nazi bills in the legislature. Second, it might help to slow down the flow of outof-state counterdemonstrators who were planning to move on Skokie. Third and most important, we hoped it would change the dynamics either within the Nazi group or between them and the other parties and thereby help to make something happen. We weren't certain whether Collin would ultimately agree to cancel Skokie, but we sensed that cancellation was within reach, because we felt that nobody really wanted the demonstration to happen. But, we didn't know how this end was to be achieved. We certainly didn't feel in control of the situation—something a mediator never wants to acknowledge—and we were careful not to acknowledge it.

The anti-Nazi bills died in committee on June 12. With two of his three demands in hand, what would Collin do? Unfortunately, he was not available to discuss the matter. He had departed on a trip east to round up support for his demonstration, and the answer would have to wait on his return. Before he left, Collin had written a letter to the General Services Administration (GSA) declaring that on Saturday, June 24, one day before the scheduled Skokie demonstration, the Nazis would conduct a rally at the Federal Plaza in downtown Chicago. The Federal Plaza was a favorite rally place for all manner of organizations, in part because no permit was required. The ACLU had established that right in court for an earlier client.

ACLU's executive director, David Hamlin (1981), has credited the CRS with first proposing the Federal Plaza alternative. While the CRS initiated a general discussion of alternatives with Collin, the one that he chose came from elsewhere. The CRS was advised in confidence in mid June that a letter would soon be mailed to the GSA administrator. Our only role at that point was to provide the caller with the administrator's name and address. We advised the GSA to be on the lookout for the letter, and once it was received we arranged for the U.S. Attorney to convene a meeting with local and federal law enforcement officials, Collin, and his counsel to set ground rules for June 24.

Nothing was to come easily in this case. GSA officials in Chicago advised us that their top Washington administrator was incensed when he learned of Collin's plan and was considering imposing a ban that would keep the Nazis out of Federal Plaza. Surely he was acting on his own. Was he under the impression that a ban would be looked upon favorably by the Jewish community? We responded with three phone calls. First, we asked the director of the CRS to try to reach the GSA administrator and explain the need for the Federal Plaza alternative, which he did. Next, we spoke to a leader in the Jewish community and suggested that, if he agreed on the value of the Federal Plaza alternative, he might want to generate some calls to the GSA administrator. Finally, we asked the GSA general counsel in Washington to review the law and consider the ramifications of the proposed action. We heard of no further effort to block the Federal Plaza rally.

This was the situation on June 13: The Nazis planned to hold two demonstrations, one at the Federal Plaza in downtown Chicago on June 24 and one in Skokie on the following day. Their attorneys were in court seeking to force the Chicago Park District to grant them a permit for Marquette Park on July 9. A hearing on that matter had been scheduled for June 20. While lower court actions had convinced most observers that the Nazis would ultimately win their way back into Marquette Park, it was by no means clear whether they would get there by July 9. Collin was traveling somewhere in the East. A demonstration in Skokie still appeared to be likely.

We decided to approach the Chicago Park District once again on June 14. The previous day, park district superintendent Edmund Kelly had told the *Chicago Sun-Times* that he would not yield on the insurance requirement. Skokie and Marquette Park were unrelated, he said, and the Chicago Park District would make no special effort to let the Nazis demonstrate on July 9. The same article noted that the Jewish community's estimate of 50,000 peaceful demonstrators did not include 12,000 demonstrators recruited by the Jewish Defense League, which had vowed to stop the Nazi rally with violence if necessary. We assumed that Kelly must have been feeling some pressure and decided to approach him. However, his information officer referred us to the attorney who was handling the Federal Court case for the park district.

The attorney responded promptly to our call of June 14. We asked if we could come by to see him, but he preferred to meet in our office and was there within an hour. Before getting to the purpose of the meeting, we engaged in the small talk that typically occurs at the outset of important meetings. I commented on the pros and cons of mediating community disputes when lawyers were involved. One of the problems, I said, was the question of lawyers' fees, which sometimes made a settlement more difficult. Fees and damages, he responded. He had run into the problem, too. I didn't relate his comment to the Nazi dispute and thought the point had been dropped.

Our discussion then turned to the Nazis. The attorney saw no way to waive the insurance requirement. The Nazis claimed that they could not afford the bond, he said, yet they refused to reveal their finances to the park district. For the park district to waive the insurance requirement, the Nazis would have to show that they were destitute. He said that he was going to court to prevent the July 9 demonstration. There were four parks where no permit was required, he noted. I pointed out that Collin wanted Marquette Park.

The only way the Nazis could have Marquette Park, the attorney said, was by applying for seventy-four people or fewer. But, the Nazis always applied for a hundred or five hundred or a thousand. Collin would not admit, the attorney said, that he could not find seventy-five followers. However, if Collin would use the rule of seventy-four, as it was called, he did not need a permit even for Marquette Park, but merely had to give the park supervisor a few days notice. The attorney added that Collin and his attorney were aware of the rule, which had come up in court repeatedly.

The rule of seventy-four had never come up in CRS conversations with Collin or his attorney. If it offered a possible alternative, I wondered why they had never mentioned it. As the discussion wound down, I stared at my notes. I was not certain of our positions at that moment. Was there nothing new to explore? Had we exhausted the options? The park district attorney leaned forward in his chair and asked me what I thought. The answer, I said, seemed to be in my notes. "Good," he replied, adding on his way out that he did not want any claims against the park district for damages if the rule of seventy-four was invoked, and he did not want to litigate fees for the ACLU attorneys. I prefer to credit the success of that meeting to intelligent persistence, not to luck.

I called the ACLU attorney. I asked, Why couldn't Collin use the rule of seventy-four? and added that I had just met with the park district's attorney and that I had a proposal to discuss. The ACLU attorney told me that damages and fees would be no problem, but there was a problem with the rule of seventy-four: The audience and the onlookers were always counted. I proposed limiting the count to Collin and his supporters. The ACLU lawyer did not know whether Collin would agree, but he suggested that I present the proposal in writing and give assurances that spectators of their own free will would not be counted as part of the seventy-five.

I called the park district attorney to ask for details on the rule of seventyfour. The code specified that permits were not required for public gatherings, ceremonies, or assemblies of less than seventy-five. I asked whether bystanders were included. The park district attorney said that they were not but that the district construed bystander quite literally. The crowd would not be counted if Collin and his followers did not post notices or leaflet the community. If the CRS were to draft an agreement on those terms, the park district attorney said that he would stand behind it.

Trust levels were always low, and emotions ran high between the ACLU and its persistent adversary, the Chicago Park District. Bringing them together to work out their differences would be too risky. We continued our dialogue with both sides the following day.

On the morning of June 16, we learned from a newspaper reporter that a clear-cut split over Skokie had developed at Nazi headquarters in Collin's absence. A press conference had been scheduled for that evening, just around the time when Collin was due back from his East Coast recruiting trip.

We had to act quickly. There had been some progress in our talks with the park district attorney. I phoned him and said we needed an agreement that day. Because a large turnout would be inevitable on July 9, we proposed that the park district agree not to count the crowd on that day only. I argued that it would not matter whether Collin leafletted the neighborhood. There would be a large crowd in any case, and it would be impossible to determine how many had been attracted by the leaflets and how many by the media. He agreed. That afternoon I brought him a draft letter from the CRS covering our understanding. He made some minor revisions, initialed the margin, and handed it back to me with a smile: "Here's your evidence," he said, "just in case it ever comes up." I asked whether a copy of the letter should be sent to the park district superintendent and the public information officer. The attorney said that it wouldn't be necessary. The attorney always acted as though he had full authority to speak for his client.

A companion letter from the CRS was prepared for Collin and shared with his attorney. Both letters were signed and hand delivered by 5:00 P.M. on June 16. The man who accepted delivery at the Nazi headquarters was told that the letter should be opened in Collin's absence. We confirmed by a phone call an hour later that the letter had been received and read. Collin was still away when the Nazis started their press conference. Waving the CRS letter before the cameras, they announced that they had gained access to Marquette Park. However, since the access was limited, they were inclined to reject the offer.

Collin arrived just after the press conference ended. A reporter asked him whether he was going to Skokie. Collin said that he was, and added that he was not interested in a one-shot arrangement to go to Marquette Park.

The CRS was not represented at the press conference, but I learned from a reporter what had transpired. I telephoned Nazi headquarters and reached Collin at 10:30 P.M., just after the television news, and asked whether he had had a chance to read my letter. He replied that he had and that the letter was good. I asked him if he still needed to go to Skokie. He said that he wanted to think about it over the weekend.

A reporter called me late Friday night to say that the Chicago Park District's public information officer was denying that a deal had been offered. For the record, we delivered copies of the two letters to the key newspapers and radio stations the next day.

Collin did not respond after the weekend. On Tuesday, June 20, U.S. District Judge George Leighton ruled that the insurance requirement was unreasonable. He ordered the Chicago Park District to give the Nazis a permit to demonstrate in Marquette Park on July 9. The following day, Collin announced that he had cancelled his Skokie demonstration and that for the time being he would limit his demonstrations to Marquette Park and the Federal Plaza.

#### REFERENCE

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