

On May 17, 1954, the U.S. Supreme Court decided the landmark case *Brown v. Board*<sup>1</sup>, unanimously ruling that racial segregation of public schools was unconstitutional in that "separate educational facilities are inherently unequal."<sup>2</sup> Yet whether 11<sup>3</sup>, 30<sup>4</sup>, or 60<sup>5</sup> years after *Brown*, segregation and resegregation<sup>6</sup> persist; contemporary reforms such as school choice<sup>7</sup> and charter schools<sup>8</sup> exacerbate enduring inequities<sup>9</sup>; and the former Jim Crow South has become the most integrated region for black students<sup>10</sup> as *de facto* northern school segregation remains entrenched.<sup>11</sup> Constitutional law scholar Erwin Chemerinsky contends that that "there is no powerful political constituency for equalizing educational opportunities for children who are poor or are part of racial minority groups"<sup>12</sup> and posits that students, absent court protections, lack political power to assert their rights.<sup>13</sup> Yet a legal formalist narrative<sup>14</sup> erases the participation of student activists that undergirds a critical legal lens<sup>15</sup> on resistance to state-sanctioned segregated education policies and minimizes the nuanced interplay between legal and movement actors over time.<sup>16</sup> Chicago student protest movements to school segregation, inequitable funding, and inadequate community control demonstrated the power of affected educational constituencies to secure demands and disrupt

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<sup>1</sup> *Brown v. Board of Education of Topeka*, 347 U.S. 483 (1954)

<sup>2</sup> *Brown*, 347 U.S. at 496.

<sup>3</sup> J. Skelly Wright, *Public School Desegregation: Legal Remedies for De Facto Segregation*, 40 N.Y.U. L. REV. 285 (1965)

<sup>4</sup> Nathaniel R. Jones, *The Desegregation of Urban Schools Thirty Years After Brown*, 55 U. COLO. L. REV. 515 (Summer 1984)

<sup>5</sup> Erica Frankenberg, *Assessing the Status of School Desegregation Sixty Years After Brown*, 2014 MICH. ST. L. REV. 677 (2015)

<sup>6</sup> Laura R. McNeal, *The Re-Segregation of Public Education Now and After the End of Brown v. Board of Education*, 41.5 EDUCATION AND URBAN SOCIETY 562 (July 2009)

<sup>7</sup> Kristie J.R. Phillips, Elisabeth S. Larsen, & Charles Hausman, *School choice & social stratification: How intra-district transfers shift the racial/ethnic and economic composition of schools*, 51 Social Science Research 30 (May 2015)

<sup>8</sup> Leland Ware & Cara Robinson, *Charters, Choice, and Resegregation*, 11 DEL. L. REV. 1, 4-5 (2009)

<sup>9</sup> Robert Bifulco & Helen F. Ladd, *School choice, racial segregation, and test-score gaps: Evidence from North Carolina's charter school program*, 26.1 JOURNAL OF POLICY ANALYSIS AND MANAGEMENT 31 (2007).

<sup>10</sup> Frankenberg, *supra* note 5 (at 678): "The South was still the most integrated region for African-American students in 2011, [though] they were in majority white schools at such a low rate that had not been seen since 1968, before Supreme Court decisions requiring more extensive desegregation efforts."

<sup>11</sup> Paul R. Dimond, *School Segregation in the North: There is But One Constitution*, 7 HARV. C.R.-C.L. L. REV. 1 (1972): "The time has come to scrutinize closely public school segregation everywhere. No longer can an accusing finger be pointed at the South under some regional doctrine of original sin. School segregation is pervasive in all regions of this country...what constitutes impermissible segregation in public schools in the North?"

<sup>12</sup> Erwin Chemerinsky, *The Deconstitutionalization of Education*, 36 LOY. U. CHI. L. J. 111 (2004)

<sup>13</sup> *Id.*: "Nor do students have political power to protect their First or Fourth Amendment rights through the political process. For student rights, courts must take action or there will be no protections at all."

<sup>14</sup> Sida Liu, *Law's Social Forms: A Powerless Approach to the Sociology of Law*, LAW & SOCIAL INQUIRY (2015): "[T]he theoretical opposition between legal formalism and legal realism in jurisprudence...is primarily about the sources of rules and legal reasoning—as Richard A. Posner puts it, 'form referring to what is internal to law, substance to the world outside of law.'"

<sup>15</sup> Gerald Torres, *Local knowledge, local color: Critical legal studies and the law of race relations*, 25 SAN DIEGO L. REV. 1043 (1988): "Critical legal theory sought to organize its 'research program and its conceptual framework with an eye to the aims and activities of those oppositional social movements with which it has a partisan though not uncritical identification.' Accordingly, the questions posed by the theory were based on the self-conscious identification with the movements or the interests expressed in those movements."

<sup>16</sup> Harold A. McDougall, *Social Movements Law and Implementation: A Clinical Dimension for the New Legal Process*, 75 CORNELL L. REV. 84, 85 (1989-1990): "During the Civil Rights Movement of the 1950s and 1960s, [discussion] groups created new norms of radical interaction by using dialogue and moral confrontation....In general, they did not rely on the legal system....In the 1970s and 1980s, these communities began to evolve away from dialogue and confrontation and toward the implementation of civil rights legislation passed in the 1960s."

oppressive school policies.<sup>17</sup> Herein, I shall assess the movement aspirations and power relations in 1960s protests by Chicago students in the aftermath of legal efforts<sup>18</sup> and adult movements<sup>19</sup> in contrast to the neoliberal hegemony oppressing students of color today.<sup>20</sup> While 1960s student protesters targeted local administrators and school policies, neoliberalism's diffuseness has required reorienting the confrontability, and symbolic projection, of power in education protest.

Prior to *Brown*, Chicago schools in after the Civil War were integrated<sup>21</sup> until the 1910s, when the Great Migration brought influxes of black families<sup>22</sup> and whites petitioned school board and city leaders to implement school (and residential) segregation.<sup>23</sup> Black students who initially thrived<sup>24</sup> felt alienated by the dire prospects<sup>25</sup> relegated by Chicago Public Schools policies.<sup>26</sup> Chicago civil rights groups rallied around school segregation and racial disparities in the late 1950s, and by 1961, the Coordinating Committee of Community Organization spearheaded parental direct action<sup>27</sup> on CPS' mobile classrooms for overcrowded black schools<sup>28</sup> and denial of transfer of black students to underused white schools.<sup>29</sup> Litigation<sup>30</sup> led to the 1964 Hauser Report,<sup>31</sup> but CPS did not heed its findings, not even granting transportation for a permissive transfer plan.<sup>32</sup>

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<sup>17</sup> Dionne Danna, *Chicago High School Students' Movement for Quality Public Education, 1966-1971*, 88.2 THE JOURNAL OF AFRICAN AMERICAN HISTORY 138 (2003)

<sup>18</sup> *Webb v. Board of Education of City of Chicago*, 223 F.Supp. 466 (N.D.Ill.1963)

<sup>19</sup> Dionne Danna, *Northern Desegregation: A Tale of Two Cities*, 51.1 HISTORY OF EDUCATION QUARTERLY 77 (2011): "[C]ommunity members in an interracial, civil rights coalition group known as the Coordinating Council of Community Organizations (CCCO) took matters in their own hands and led boycotts of the schools...to protest the lack of desegregation and the lack of quality education in Chicago's schools."

<sup>20</sup> Pauline Lipman, *Making the global city, making inequality: The political economy and cultural politics of Chicago school policy*, 39.2 AMERICAN EDUCATIONAL RESEARCH JOURNAL 379 (2002).

<sup>21</sup> Davison M. Douglas, *The Limits of Law in Accomplishing Racial Change: School Segregation in the Pre-Brown North*, 44 UCLA L. REV. 677, 697 (1996): "In 1874, the Illinois General Assembly resolved the segregation issue by enacting legislation that explicitly prohibited the exclusion of any child from a school because of race."

<sup>22</sup> *Id.* at 710: "Pressure for school segregation also dramatically increased in Chicago during the early twentieth century in response to the arrival of thousands of African Americans, leading to extensive racial gerrymandering of school attendance lines."

<sup>23</sup> Philip TK. Daniel, *A history of discrimination against Black students in Chicago secondary schools*, 20.2 HISTORY OF EDUCATION QUARTERLY 147, 151-52 (1980): "The actions by the white organizations had an immediate effect... Blacks were consigned to areas no greater than twenty-seven blocks by fourteen blocks."

<sup>24</sup> *Id.* at 151: "Although some discrimination existed... a study completed in 1920... stated that there was 'relatively little difference between the reading accomplishments of...[Chicago born]...colored pupils and white pupils who have had the advantages of the same method of instruction and environment.'"

<sup>25</sup> *Id.* at 159: "[M]any of these pupils found a disheartening gap between their hopes and actual achievements...[T]he prospect of becoming red-caps, maids, domestics, and porters caused many to regard education with indifference."

<sup>26</sup> Danna, *supra* note 19 (at 84): "A 1958 NAACP report...noted that Chicago Public Schools used discriminatory policies in school site selection, school boundaries, and instruction quality...[and] found ways to effectively maintain segregation even in areas where desegregation could have been a possibility."

<sup>27</sup> Tracy L. Steffes, *Managing School Integration and White Flight The Debate over Chicago's Future in the 1960s*, JOURNAL OF URBAN HISTORY 5 (2015): "When gathering data and appealing to the board did not work, parents and civil rights groups turned to direct action to increase pressure: they protested at mobile classrooms...picketed the homes of Board of Education members; held sit-ins at board meetings; and organized marches and demonstrations."

<sup>28</sup> John L. Rury, *Race, Space, and the Politics of Chicago's Public Schools: Benjamin Willis and the Tragedy of Urban Education*, 39.2 HISTORY OF EDUCATION QUARTERLY 117, 131 (1999).

<sup>29</sup> Arvarh E. Strickland, *The Schools Controversy and the Beginning of the Civil Rights Movement in Chicago: 1995 Presidential Address*, 58.4 HISTORIAN 717, 723 (1996).

<sup>30</sup> *Webb*, 223 F.Supp. 466

<sup>31</sup> Philip M. Hauser et al, *Report to the Board of Education of the City of Chicago by the Advisory Panel on Integration of the Public Schools*, CHICAGO: BOARD OF EDUCATION (1964):

<sup>32</sup> Danna, *supra* note 19 (at 84).

Superintendent Benjamin C. Willis embodied this obstinacy<sup>33</sup>. In 1963, he called proposed changes to neighborhood school boundaries "ominous"<sup>34</sup> and balked from asking the public for new bonds to build South and West Side schools,<sup>35</sup> instead expanding "Willis Wagons"<sup>36</sup> from 1962 to 1964.

Mounting frustration and movement tactics<sup>37</sup> culminated in CCCO organizing the first of three CPS boycotts<sup>38</sup> that pushed students into the education movement.<sup>39</sup> 224,770 students<sup>40</sup> stayed out of school on October 22, 1963; Freedom Schools at local black churches taught thousands of students about black history, while 120,000 students and adults marched on the Chicago Board of Education.<sup>41</sup> CCCO planned the boycott "in protest of the board's refusal of Willis's resignation" and to draw attention to the gap between the Board's integration "policy" and "racial patterning...[in] the deployment of resources."<sup>42</sup> Yet students brought corollary demands<sup>43</sup> that transcended integration and Willis as its political puppet,<sup>44</sup> whose early retirement CCCO claimed for victory<sup>45</sup> While student numbers dwindled for the '64 and '65 boycotts amid CCCO disunity, Mayor Daley's court order to block the boycott for inciting truancy galvanized the core contingent of black students who sought "immediate changes in the schools" that *they* attended over desegregation.<sup>46</sup> Moreover, the boycotts cemented a black student-teacher alliance via the leadership of former teacher Al Raby<sup>47</sup> and his mentorship of student leaders who adapted boycotts and other civil rights-era tactics to the decentralized community-based movements.<sup>48</sup>

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<sup>33</sup> Rury, *supra* note 28 (at 131): "Willis would not permit the schools to become an instrument for the trans-formation of the spatial relationships of power and privilege that defined Chicago's landscape. Instead, the resources of the system were poured into addressing well-documented inequalities in different areas of the city without changing the neighborhood school policy."

<sup>34</sup> Robert A. Dentler, *Barriers to northern school desegregation*, 95.1 DAEDALUS 45, 55 (1966).

<sup>35</sup> Rury, *supra* note 28 (at 131).

<sup>36</sup> *Id.* at 133: "As a consequence of this stance, or perhaps in spite of it, Willis became a symbol of resistance to school desegregation in Chicago. To African Americans he became an object of vilification, and for years afterward the temporary classroom buildings sometimes set up outside public schools were referred to as 'Willis Wagons' in Black neighborhoods."

<sup>37</sup> *Id.* at 132: "In many respects the struggle against Willis and the Board provided the local civil rights organizations an opportunity to practice tactics of confrontation and exposure that they would use in future struggles. As in other cities, early battles over school desegregation provided an outlet for decades of anger and resentment in the Black community."

<sup>38</sup> Danns, *supra* note 19 (at 85): "October 1963, February 1964, and June 1965."

<sup>39</sup> Keeanga-Yamahatta Taylor, *Challenging Jim Crow schools in Chicago*, SOCIALIST WORKER, February 22, 2012, <http://socialistworker.org/2012/02/22/jim-crow-schools-in-chicago>

<sup>40</sup> John E. Coons, *Affirmative Integration: Chicago*, 2 LAW & SOC'Y REV. 80, 82 (1967).

<sup>41</sup> Taylor, *supra* note 39.

<sup>42</sup> Alan B. Anderson & George W. Pickering, *CONFRONTING THE COLOR LINE: THE BROKEN PROMISE OF THE CIVIL RIGHTS MOVEMENT IN CHICAGO* 118 (2008).

<sup>43</sup> Taylor, *supra* note 39: "Students from a group calling themselves Student Advocates of Negro History handed out materials reading, 'We are petitioning for the rewriting of school books so that the Negro is included. Then and only then will whites be able to shed their feeling of false superiority.'"

<sup>44</sup> Rury, *supra* note 28 (at 135): "More than anything else, it was Daley's silence on the question of desegregation and the outspokenness of his machine functionaries against it that probably was most telling in the Chicago school crisis. The response of the Chicago Public Schools to race issues under Willis' leadership, after all, was consistent with many facets of Democratic machine politics in the city during this era

<sup>45</sup> Strickland, *supra* note 29: "Continued pressure from black Chicagoans caused the board of education to agree informally, by a seven to four vote in May 1965, not to extend Willis's contract beyond 31 August of that year."

<sup>46</sup> Taylor, *supra* note 39

<sup>47</sup> Rury, *supra* note 28 (at 132)

<sup>48</sup> Danns, *supra* note 17 (at 139)

With the full-fledged emergence of the students' movement by the mid-to-late-sixties, a transition was marked in activist's conception of power: while the boycotts sought concessions from Willis, Daley, and the political machine, students fought for education equity from within.<sup>49</sup> Students demanded black history curricula taught by black teachers, black administrators and administrative assistants, and the hiring of more black instructors and counselors in lieu of racist white instructors.<sup>50</sup> Mexican-American and other Latino students called for more Latino teachers, Latin American history classes; repaired and larger facilities, bilingual education programs, and funding for a soccer team.<sup>51</sup> While representation tensions lingered,<sup>52</sup> black student groups allied with and included Latino students<sup>53</sup> and overlapping interests<sup>54</sup> The movement arose out of students' political consciousness<sup>55,56</sup>, coalescing on a school-by-school basis out of their mandate for student and community power to set school policies, instructional evaluation and expansion<sup>57</sup>, and newer, better utilized resources. Trained in<sup>58</sup> and inspired by<sup>59</sup> the civil rights tradition, students across the West and South Sides came together in protest.<sup>60</sup> At, Harrison High School had a 250 - student sit-in and 750-student walkout<sup>61</sup> of mostly black students that sparked arrests and media attention and spearheaded student meetings with the Board of Ed<sup>62</sup>, while Mexican-American

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<sup>49</sup> Dionne Danna, *Black student empowerment and Chicago school reform efforts in 1968*, 37.5 URBAN EDUCATION 631, 637 (2002): "One organizer noted, 'Busing does not face the issue of the lack of quality education of the West Side'... The belief that Black youth in Chicago should remain in Black schools was the dominating movement ideology in the latter part of the 1960s."

<sup>50</sup> Danna, *supra* note 17 (at 142-43).

<sup>51</sup> Jaime Alanis, *The Harrison High School walkouts of 1968: Struggle for equal schools and Chicanismo in Chicago* 109, 115 (2010) (unpublished Ph.D. dissertation, University of Illinois at Urbana-Champaign) (on file with IDEALS @ Illinois)

<sup>52</sup> *Id.* at 151: "[Per student leader Salvador Obregon,] I got to look at some funding issues at school and a big percentage was funded for extracurricular activities and clubs which were all geared to Black students at Harrison. And here we were trying to organize a soccer team. We played right there in the Boulevard right in front of the school all the time. And that's when we realized that, hey, Black students are getting everything and we can't get nothing, no counselors, teachers, or a soccer team?"

<sup>53</sup> Danna *supra* note 49 (at 638).

<sup>54</sup> Alanis, *supra* note 51 (at 160): "[I]nterestingly, one of the demands of the New Breed Black student organization at Harrison was the establishment of 'language laboratories'. Clearly ahead of their time, both African American and Latino students at Harrison, one may argue, were already demanding 'Dual-Language programs' before the concept was even coined."

<sup>55</sup> Danna, *supra* note 49 (at 640): "Sharron Matthews served as New Breed's [Harrison High School's black student union] vice president. Her experience in desegregation, sitting alone in the White school lunchroom, gave her an understanding of some of the detriments and sacrifice of desegregation. By her junior year in high school, she developed a sense of Black consciousness. Matthews's new awareness led her to observe the lack of Black administrators and community involvement in the school."

<sup>56</sup> Alanis, *supra* note 51 (at 139): "[Per 1960s Harrison student Hector Rodriguez],[B]ack then, to be 'Chicano' meant that you recognized your Mexican history... asserting that you were Mexican, that you were part of the United States... We went further back to the Indians, the Aztecs, to that culture... We identify with those brothers and sisters over [in the Southwest] who are fighting over... discrimination, disrespect for our history, poor schooling, all the negative stereotypes we see on TV... Even though I'm Mexicano, I see the term as... a political consciousness."

<sup>57</sup> Danna, *supra* note 49 (at 639): "This development could come through the elimination of tracking, evaluation of Harrison's educational instruction through graduate follow-up, reenrollment programs for dropouts."

<sup>58</sup> Danna, *supra* note 17 (at 141): "The Chicago Freedom Movement served as a model for the students. Many had attended rallies and retreats sponsored by movement organizers during the 1965-1966 school year... SCLC... took Marshall students on retreats, and discussed the philosophy of nonviolence and the ongoing campaign to have Black History courses included in the public school curricula."

<sup>59</sup> Alanis, *supra* note 51 (at 139, n. 75): "Juan Mora argues that, 'A new generation of Mexican activists emerged in the 1970's in the Pilsen neighborhood. In part they were influenced by the Chicano, Civil Rights and anti-Vietnam War movement of the 1960's. For the most part, however, this new political generation matured as a result of local conditions.'"

<sup>60</sup> *Id.* at 139-43 (discussing student organizing, protests, boycotts, walkouts, and sit-ins at Jenner Elementary School and Harrison, Farragut, Englewood, Marshall, Phillips, Parker, DuSable, Hirsh, Tilden, Waller, and Austin High Schools).

<sup>61</sup> Danna, *supra* note 49 (at 641).

<sup>62</sup> Danna, *supra* note 17 (at 144).

students conducted a 300-person walkout three days later prior to presenting their grievances<sup>63</sup> amidst rising collaboration between Latino and black students.<sup>64</sup>

In October 1968, 25 mostly high school student leaders formed Black Students For Defense and from a twelve-point manifesto<sup>65</sup> launched "Liberation Monday"<sup>66</sup> citywide boycotts each week until the Board met their demands, and were joined in solidarity Latino students from Harrison and Tuley Park High Schools.<sup>67</sup> The first boycott on October 14, 1968 drew 27,000 to 35,000 students, while student leaders demanded CPS-wide change and a full board meeting with Willis successor James Redmond,<sup>68</sup> who, alarmed by the protests, acceded to calls for more black administrators<sup>69</sup> but threatened protesters with juvenile and disciplinary action<sup>70</sup> Persistent student boycotts and walkouts yielded victories<sup>71,72</sup> and exhibited students' capacity to build mass consciousness<sup>73</sup> on education inequity but did not produce the sustained transformational change to which it aspired<sup>74</sup> amidst deepening segregation and improper implementation of movement-won programs.<sup>75</sup>

Whereas the student protest leaders in the 1960s waged their movement against teachers, school administrators, and a CPS technocracy prodded by the invisible hand that was Mayor Daley, the late 20th to early 21st century has witnessed the corporatization<sup>76</sup> and political de- (and re-) centralization of neoliberal<sup>77</sup> public education in Chicago and across the United States.<sup>78</sup>

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<sup>63</sup> Alanis, *supra* note 51 (at 111).

<sup>64</sup> *Id.* at 104-05.

<sup>65</sup> Danns, *supra* note 17 (at 145): "1. Complete courses in Black history. 2. Inclusion in all courses the contributions of Black persons. 3. Black administration for schools in Black communities. 4. More technical and vocational training. 5. More Black teachers. 6. Repair of school buildings in Black communities. 7. Holidays on the birthdays of such Black heroes as Marcus Garvey, Malcolm X, W. E. B. Du Bois and Dr. Martin Luther King, Jr. 8. Insurance for athletes. 9. Use of Black businessmen to supply class photos and rings to Black schools. 10. Better food. 11. Military training 'relevant to Black people's needs' 12. More required homework to challenge Black students."

<sup>66</sup> Danns *supra* note 49 (at 644): "A rally was held at the Afro-Arts Theater, where student leaders addressed the boycotters. One speaker, called Brother Akenti, of the Umoja Black Student Center, linked the students' fight to an international struggle against oppression."

<sup>67</sup> Alanis, *supra* note 51 (at 117, n. 48).

<sup>68</sup> Danns *supra* note 49 (at 644-46).

<sup>69</sup> Danns, *supra* note 17 (at 145).

<sup>70</sup> Danns, *supra* note 49 (at 647): "Redmond listed the repercussions for absent students, including being taken to juvenile court for truancy and parents being summoned to circuit court for being 'indifferent parents' for having a truant child. . . . Chronically truant students were to be suspended and would have to return with a parent [and] repeat offenders 16 and older would be dropped from school rolls."

<sup>71</sup> Danns, *supra* note 17 (at 145): "The students' continued agitation at area high schools led to the acquisition of insurance for student athletes, the increase and expansion of Black History courses, the appointment of more African Americans as administrators. . . . an increase in funding for school building repairs, more technical and vocational courses, and curricular changes that reflected Africans' contributions to world history."

<sup>72</sup> Alanis, *supra* note 51 (at 121): "[Harrison] brought in a Mexican-American assistant principal, Mr. Henry Romero. . . . [W]ith his assistance, a 'language aid class' was proposed in consultation with parents and community leaders. The Chicago Tribune noted that the purpose of this class was to instill pride for Spanish-speaking students. In addition to tutoring and language laboratories being offered, the Chicago Tribune reported that 150 students would participate. . . . The other compromise from the Harrison administration was to recognize soccer as a school sports team."

<sup>73</sup> Danns, *supra* note 49 (at 651): "If the movement by Black Chicago youth was judged simply by results, their actions would appear to be a failure. . . . But one important result was that students were paying attention or had participated in the civil rights movement and utilized tactics from the movement. . . . [and] drew attention to the massive problems that existed in the city's public schools."

<sup>74</sup> *Id.* at 652: "[T]he current school situation shows that simply having Black faces in Black places has not guaranteed substantial change, particularly when the community does not have control over who will be placed in those positions or when those placed in the positions put career advancement above the needs of the students."

<sup>75</sup> Alanis, *supra* note 51 (at 158): "[I]n the case of bilingual education, there continues to be a dominant cultural and linguistic bias which presumes that (ELL's) English Language Learners are in dire need of remedial education. Throughout Chicago public schools 'transitional bilingual education' programs assume 'subtractive' approaches which aim at substituting English for Spanish as rapidly as possible."

<sup>76</sup> Dorothy Shipps, *The invisible hand: Big business and Chicago school reform*, 99.1 THE TEACHERS COLLEGE 73 (1997).

<sup>77</sup> Pauline Lipman & David Hursh, *Renaissance 2010: The reassertion of ruling-class power through neoliberal policies in Chicago*, 5.2 POLICY FUTURES IN EDUCATION 160 (2007): "Neoliberalism asserts that societies function best when individuals make decisions within competitive

From the 1950s to 1970s, corporate elites formed philanthropy roundtables that aimed to reverse the civil rights movement's "attempts at resource redistribution" via privatizing public education.<sup>79</sup> While the 1980s saw a mass recession, companies conspired with the federal government in a "manufactured crisis"<sup>80</sup> that racialized poverty and social programs, situated business leaders as appropriate education policymakers, molded economic-based school performance as common sense discourse, and expanded standardized tests into a universal benchmark for accountability.<sup>81</sup> Meanwhile, national policies were replicated locally. In 1979, the City, faced with CPS's imminent collapse, solicited the Commercial Club<sup>82</sup> for an emergency loan; the Club forced out the Board and founded the Chicago School Finance Authority, vested with statutory power over school finances and budget approval.<sup>83</sup> The Club leveraged the SFA to push for district decentralization, blaming principals<sup>84</sup> and building a coalition with community advocates, who agreed that CPS's "bloated, entrenched central bureaucracy [was] indifferent to the needs of Chicago's students" but otherwise diverged.<sup>85</sup> City business elite parlayed this agenda into two monumental Illinois reform laws: the "Chicago School Reform Act of 1988," which ostensibly empowered parental school governance<sup>86</sup> but in practice marginalized them;<sup>87</sup> and a 1995 amendment which vested mayoral appointment control over board and transformed CPS, in positions and management, into a corporation.<sup>88</sup>

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markets rather than having governmental organizations or other agencies make decisions for them. The government that governs best is that which governs least."

<sup>78</sup>Lesley Bartlett et al., *The marketization of education: Public schools for private ends*, 33.1 ANTHROPOLOGY & EDUCATION QUARTERLY 5 (2002).

<sup>79</sup> Kevin K. Kumashiro, et al., *When billionaires become educational experts*, 98.3 ACADEME 10-16 (2012): "At the top of the chopping block was public education, considered by some to be a drain on the government and a crutch for society not only because it was the most expensive of domestic enterprises but also because it exemplified what they considered to be a socialist enterprise. Conservatives called for the entire school system to be privatized, made into a free enterprise, and the conservatives' strategy of choice was school vouchers."

<sup>80</sup> Bartlett et. al., *supra* note 77 (at 9): "In ... (1983)... a task force appointed by former President Ronald Reagan blamed the schools' supposed 'rising tide of mediocrity' for America's slipping economic competitiveness. CEOs of ... Xerox and IBM invested significant amounts of economic, political, and social capital to publicize such charges. Companies deflected attention from their own contributions to school failure and economic recession: the flux their new mobility created; the benefits and low tax rates they wrangled from cities that competed over their relocation; and the layoffs they instigated, creating instability and economic uncertainty in families."

<sup>81</sup> Bartlett et. al., *supra* note 77 (at 10, 6).

<sup>82</sup> Shipp, *supra* note 76 (at 81-82): "[T]he Commercial Club of Chicago... began in 1877 and it remains[] an elite institution. By the early 1990's, it had grown to include 275 leaders of the city's top industrial, commercial, and financial institutions ... as well as the heads of the city's main philanthropic and civic institutions."

<sup>83</sup> *Id.* at 88

<sup>84</sup> *Id.* at 90: "[O]ur view in 1980 and '81 was that the Chicago school principals were not ready to take on the actual formal responsibility of being in charge of their schools because they were in a bureaucratic system in which they were rewarded for not taking responsibility[. . .]. We didn't think that the principals had the tools to do the job. It would take some time to first decentralize the district superintendents, who would then train the principals so that they could then be in a position that if they were given the authority; they could have a chance to succeed."

<sup>85</sup> *Id.* at 91-92: "[B]y their reckoning, the system needed more, rather than fewer, decision makers. They sought an infusion of grass-roots democracy powered by parents, who could be trusted to hold the interests of students above others. Their version of decentralization had intellectual roots in the community control movements of the 1960s... call[ing] to strengthen school autonomy."

<sup>86</sup> *Id.* at 74: "[The Act] ma[de] parents and community members the statutory majority on each of about 550 Local School Councils, giving them power to hire and fire the school principal, determine the school's educational priorities, and approve the spending of state Chapter 1 funds."

<sup>87</sup> *Id.* at 101: "The vast majority of parents and community members remain spectators most of the time, becoming consumers every two years when they vote for LSC members. Moreover, mistrust among teachers and between teachers and parents remains high despite all the activity. Absent effective means of shaping parents, community members, and school professionals into empathic and trusting deliberative bodies, parents and community members are demonstrating their decreasing interest in the LSC form of school participation."

<sup>88</sup> *Id.* at 173: "Replacing the General Superintendent are a Chief Executive Officer, a Chief Financial Officer, a Chief Operations Officer, a Chief Purchasing Officer, and a Chief Education Officer. This team, directly appointed by the mayor of Chicago, works with a new, five-member board

has led to (1) suppressed agency, (2) low-skill "control"-based learning; (3) hyper-surveillance and pushout; and (4) erasure of school space/place<sup>90</sup>. High-stakes testing operates on the premise that student performance stems from "individual responsibility," pressuring students to pass or else be held back or not graduate while placing the school "on probation"<sup>91</sup> even as such schools are the most disinvested and segregated.<sup>92</sup> Test-prep dominant curricula deprive students from honing independent thinking skills crucial not for academics, but rather, for "critically...reflecting on their own lives and futures."<sup>93</sup> Far from incidental, curricula rooted in elementary math and reading skills is by design relegated to work as "ever-more-skilled" service employees with "basic literacies, ability to follow directions, and accommodating dispositions" to the managerial business class interests CPS served.<sup>94</sup> Differentiated learning between "general high schools" and magnet and selective schools preselects learners' "social dualization" and segmentation in the labor market.<sup>95</sup> Consistent with these programs of socioeconomic and intellectual<sup>96</sup> control are physical corollaries. On one hand, school pushout and discipline relates to the aforesaid labor-industrial complex.<sup>97</sup> On the other, zero tolerance is the educational arm of mass incarceration and criminalization that, via the school to prison pipeline, calcifies blacks and Latinos' "spatial containment" within the urban landscape<sup>98</sup> and echoes the carceral rhetoric around standardized testing performance<sup>99</sup>

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of trustees, also mayoral appointees. Together they have authority to determine which schools require intervention; to dismiss, lay off, or reassign any and all personnel in them;... to cut costs, privatize work usually performed by employees, and abrogate many collective bargaining agreements.

<sup>89</sup> Lipman & Hursh, *supra* note 77 (at 166-67): "Renaissance 2010 provides neither more funding for schools nor support for teachers but rather aims to improve schools by restructuring them as a private-public ventures and by introducing markets and competition... a system of school choice will spur innovation and raise quality, including in public schools forced to compete with charters for students."

<sup>90</sup> Pauline Lipman, *Chicago School Policy: regulating Black and Latino youth in the global city*, 6.4 RACE ETHNICITY AND EDUCATION 358 (2010)  
<sup>91</sup> *Id.* at 344.

<sup>92</sup> *Id.* at 339: "As deindustrialization and disinvestment have produced economic destitution, African American communities have been further undermined by their demonization and criminalization in the media and public discourse... [S]chools... located in very low-income African American communities[] are the schools with the fewest resources with which to make comprehensive, transformative changes, and their communities have the least political power. These are also the schools most subject to a narrow, test-driven curriculum at a time when the students urgently need an education that helps them struggle against oppression and critique the new social inequalities enveloping their lives."

<sup>93</sup> *Id.* at 343: "African American students in these schools are being immersed in very different dispositions toward knowledge and have fewer opportunities to practice independence of thought and action than students at Farley. Although schools are just one context for young people to develop critical consciousness and a sense of agency, different school experiences provide them with different resources from which to do this."

<sup>94</sup> Lipman, *supra* note 20 (at 404). "This... is corroborated by Rosenbaum and Binder's (1997) interviews with 51 urban and suburban Chicago employers, the majority of whom said they needed employees with 'eighth-grade math skills and better than eighth-grade reading and writing skills.' The 1990 Commercial Club report also notes that 'minorities' in low-[]performing schools will become a greater part of the work force and will need these new basic competencies."

<sup>95</sup> *Id.* 406-07

<sup>96</sup> Pauline Lipman, *Education accountability and repression of democracy post-9/11*, 2.1 JOURNAL FOR CRITICAL EDUCATION POLICY STUDIES 52 (2004): "To the extent that students are subjected to the regimentation of education-as-test-preparation and scripted curricula, they are learning inside practices that deny their capacity for critical thought, prescribe their responses, and undermine the authority of their own ideas and experiences. This is a deeply pedagogical project, teaching people the limits of who they are and what they can think and become."

<sup>97</sup> Lipman, *supra* note 20 (at 404): "Public perception and the actual socialization of youth and of a *disciplined* work force are constructed through a set of policies and a rhetoric that emphasize... regulation and *control*... There is a potent racial subtext here as well. The ideological force of racially coded 'basic skills,' scripted instruction, and *social control in the classroom* is to discursively construct African-American and Latino youth as in need of regulation and control." (emph. added)

<sup>98</sup> Lipman, *supra* note 90 (at 349)

<sup>99</sup> *Id.* at 345: "Probation" is also the language of the prison system, signaling the delinquency of schools in African American and some Latino communities, and, by implication, the delinquency of students and families as well. This implied depravity justifies control, mandated rectification, and even dispersal of communities."

as black students are pushed out at rates disproportionate to their to their composition in CPS.<sup>100</sup> Much like the 1960s, schools are intertwined with place and residential segregation that mirrors adjacent schools', with CPS's primary concern, then as now, was with appealing to white middle class families.<sup>101</sup> Yet the 2000s witnessed renewed endeavors to further push out black and Latino families from their communities, and inextricably, their schools, in the service of whites "retaking" neighborhoods of color,<sup>102</sup> coming to a head with the mass closing of 54 CPS schools in 2013<sup>103</sup> and also in the larger framework of the neoliberal (white) middle class global city<sup>104</sup>.

While student-led and -solidarity protest in CPS in the 2010s evoked 1960s-era tactics, modern protests are engaged in a less direct confrontation of power reliant on symbolic projection —i.e. decentralized neoliberal ascendance to centralized political office—than their forebears.<sup>105</sup> CPS's mayoral control and Mayor Rahm Emanuel's unabashed loyalty to (and past work in) finance and disregard for working-class interests earned him the moniker "Mayor 1%"<sup>106</sup> as student protesters have placed Emanuel at CPS policy's epicenter from Chicago Teachers Union-student rallies against closings<sup>107,108</sup> equitable funding and elected school board marches,<sup>109</sup> and anti-

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<sup>100</sup> *Id.* at 348: "CPS data, obtained by Generation Y, show that in 1994, the year before Zero Tolerance began, African American students made up 55% of CPS enrollment, but got 66% of suspensions and expulsions. In 1999-2000, under Zero Tolerance, African American students were less than 53% of all CPS students, but received more than 73% of all suspensions and expulsions. Although enrollment in CPS increased by only 665 students between 1999 and 2000, suspensions increased from 21,000 to nearly 37,000."

<sup>101</sup> Lipman, *supra* note 20: "'Good' schools are real estate anchors in gentrifying neighborhoods. The intersection of CPS policies and the interests of developers and real estate companies is apparent in the geographical location of four of the new college-preparatory magnet high schools.... The displacement of the previous students [at Jones Commercial High School] was itself a process of gentrification, removing the working-class high school students who fought to keep it open much as working-class families have fought developers in the neighborhood."

<sup>102</sup> Lipman & Hursh, *supra* note 77 (at 173).

<sup>103</sup> Carl A. Grant, et al., *Fighting for the 'right to the city': examining spatial injustice in Chicago public school closings*, 35.5 BRITISH JOURNAL OF SOCIOLOGY OF EDUCATION 670 (2014).

<sup>104</sup> Lipman & Hursh, *supra* note 77 (at 173):

"Before communities can become new sites of capital accumulation...[t]heir 'regeneration' is only possible through dispersing the people who live there, erasing the identities they have constructed for their communities, and replacing them with new, sanitized images.... In Chicago's global city image of middle-class stability, upscale leisure and cultural venues, and affluent housing and retail complexes, they are a presence to be excluded or contained."

<sup>105</sup> Ashlee Rezin, *CPS Students Dress Like Zombies, Protest The 'Death Of Public Education'* (VIDEO), PROGRESS ILLINOIS, Nov. 4, 2013, <http://www.progressillinois.com/quick-hits/content/2013/11/04/cps-students-dress-zombies-protest-death-public-education-video>: "I love to learn, but because *education officials* put so much emphasis on standardized testing — they use it to measure school success, measure teacher success, measure student success — teachers are forced to teach to the test and that really limits what we can do in the classroom," said Charlie Murphy, 16, a junior at Lane Technical College Prep High School and member of the CSO." (emphasis added).

<sup>106</sup> Kari Lydersen, *How Mayor Rahm Emanuel Awoke a Progressive Resistance in Chicago*, IN THESE TIMES, Nov. 18 2013, [http://inthesetimes.com/article/15835/rahm\\_emanuel\\_mayor\\_1\\_percent](http://inthesetimes.com/article/15835/rahm_emanuel_mayor_1_percent)

<sup>107</sup> Steven Yaccino, *Thousands Attend Rally for Chicago Teachers as Union Nears Contract*, NEW YORK TIMES, Sept. 12, 2012, <http://www.nytimes.com/2012/09/16/education/thousands-gather-in-support-of-chicago-teachers.html>: "[T]hey were not yet ready to stop voicing their grievances about Mayor Rahm Emanuel's education policies, which have been at the heart of these contentious negotiations."

<sup>108</sup> Matt Uetrich, *Chicago Students Boycott Class, Demanding an Elected and Accountable School Board*, IN THESE TIMES, Aug. 28, 2013, [http://inthesetimes.com/working/entry/15534/chicago\\_students\\_boycott\\_class\\_demanding\\_an\\_elected\\_and\\_accountable\\_school](http://inthesetimes.com/working/entry/15534/chicago_students_boycott_class_demanding_an_elected_and_accountable_school): "Standing in the middle of the crowd with her three children participating in the day's boycott, Mae McLeninen, a janitor at Curie High School on the South Side, said she kept her elementary-age kids out of school to join the effort against Emanuel and the board. 'We've gotta get rid of the mayor, but not just him. We have to hold them accountable through an elected school board,' McLeninen says." (rally also featured calls for board chairperson David Vitale to step down)

<sup>109</sup> Ellyn Fortino, *CPS Students Call For An Elected School Board, Adequate School Funding* (VIDEO), PROGRESS ILLINOIS, Aug. 18, 2014, <http://www.progressillinois.com/posts/content/2014/08/18/cps-students-demand-elected-school-board-adequate-neighborhood-school-fundi>: "We've taken over Board of Education meetings, had marches, had press conferences, but the Board of Education has not listened to us," said CSU organizer Ross Floyd, a junior at...Jones College Prep[.]... 'They continue to move forward with devastating cuts to our schools that hurt each and every student's education. The reason this happens is because the Board of Education is only accountable to one man — Rahm Emanuel. And that is not right.'"



standardized testing walkouts.<sup>110</sup> (To a lesser extent, the Board has also been the subject of student and others' power critiques as relates to local school administration.)<sup>111</sup> While student protest leaders pinpoint neoliberal corporatism as the impetus for modern-day educational inequity, such discourse arose around policy rather than divestment or confrontation of corporate power.<sup>112</sup> At the local-school level, students' movement framing in relation to larger district had the most visibility in anti-charter protests,<sup>113</sup> school closings<sup>114</sup>, and relatedly, school safety concerns.<sup>115</sup> Local school student protest also coalesced in protesting censored student curricula<sup>116</sup> unjustly terminated teachers<sup>117</sup> and administrators<sup>118</sup>, and the non-indictment in Ferguson;<sup>119</sup> only the walkout for banning *Persepolis* at selective-enrollment Lane Tech, received a formal CPS response. The 2013 school closures in 2013 mobilized the modern student protest movement and framed its struggle in opposition to privatization, endemic structural racism, high-stakes testing, and the school to prison pipeline in relation to CPS policies generally and Mayor Emanuel and the Board of Education particularly<sup>120</sup> from a budgeting-structural inequity intersectional standpoint.<sup>121</sup> Most notably, the student movement has prevailed in phasing out zero tolerance discipline within

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<sup>110</sup> Amien Essif, *Chicago 11th-Graders Walk Out in Defiance of State-Mandated Test*, IN THESE TIMES, Apr. 24, 2013, [http://inthesetimes.com/uprising/entry/14912/chicago\\_11th\\_graders\\_walk\\_out](http://inthesetimes.com/uprising/entry/14912/chicago_11th_graders_walk_out): "Wednesday morning, when most public-school 11th graders in Chicago were preparing to take the state-mandated Prairie State Achievement Exam (PSAE), nearly 100 students left high schools across the city in protest. Boycotting students met up with parents and allies downtown to rally in front of the Chicago Public Schools headquarters in defiance of what they call Mayor Rahm Emanuel's 'misguided agenda.'"

<sup>111</sup> Linda Lutton, *Chicago teachers, parents, students protest budget cuts to schools*, WBEZ, June 27, 2013, <http://www.wbez.org/news/chicago-teachers-parents-students-protest-budget-cuts-schools-107877>: "Teachers, students, parents and activists from two dozen Chicago schools descended on the Board of Education Wednesday to protest what they say are "deep, painful" budget cuts at local schools. 'We lost \$535,000. That's gonna mean six teachers,' Pilsen Alliance director Nelson Soza said of Jungman school. 'That's going to mean 25 percent of their budget. And that's gonna mean the classroom may go from 20 to 30 kids.' The citywide parent group Raise Your Hand says it has documented more than \$80 million in cuts from over 100 local schools."

<sup>112</sup> Pepe Lozano, *Chicago students walk out to protest education cuts*, PEOPLE'S WORLD, Apr. 9, 2010, <http://www.peoplesworld.org/chicago-students-walk-out-to-protest-education-cuts>: "Student activists at the rally said CPS must stop the destruction of public education. They should cut from the top and keep schools out of the hands of private corporations, they said. City, state and national lawmakers including CPS officials should stop blaming each other and should all advocate increasing public education funding by raising the corporate tax and cutting the military budget, they add."

<sup>113</sup> Patty Wetli, *Albany Park Community Mobilizes Against Charter Schools*, DNAINFO, Sept. 30, 2013,

<http://www.dnainfo.com/chicago/2013/09/30/albany-park/albany-park-community-mobilizes-against-charter-schools>

<sup>114</sup> *CPS Students Stage Sit In & Walkout To Protest Closures, Teacher Firings*, CHICAGOIST, May 4, 2013,

[http://chicagoist.com/2013/05/04/cps\\_students\\_stage\\_sit\\_in\\_walkout.php](http://chicagoist.com/2013/05/04/cps_students_stage_sit_in_walkout.php)

<sup>115</sup> Yoseling Cueto and Leslie Leon, *Chicago Students Teach Through Their Walkout for School Safety*, Education Week Teacher, Mar. 12, 2013, [http://blogs.edweek.org/teachers/living-in-dialogue/2013/03/chicago\\_students\\_teach\\_through.html](http://blogs.edweek.org/teachers/living-in-dialogue/2013/03/chicago_students_teach_through.html)

<sup>116</sup> Ellyn Fortino, *Lane Tech Students Hold Morning Sit-In To Protest Persepolis Book Ban*, PROGRESS ILLINOIS, Mar. 18, 2013,

<http://progressillinois.com/quick-hits/content/2013/03/18/lane-tech-students-hold-morning-sit-protest-persepolis-book-ban>

<sup>117</sup> Lincoln Park H.S. Students Walk Out To Protest Teacher Firings, CBSCHICAGO, May 3, 2013,

<http://chicago.cbslocal.com/2013/05/03/lincoln-park-h-s-students-walk-out-to-protest-teacher-firings>

<sup>118</sup> Judy Wang, *Teachers and students outraged over sudden firing of principal*, WGN TV, Sep. 15, 2014, <http://wgntv.com/2014/09/15/marshall-hs-principal-removal-triggers-protest>

<sup>119</sup> *Chicago Students Protest in Woodlawn*, ABC7 CHICAGO, Dec. 8, 2014, <http://abc7chicago.com/news/chicago-students-protest-in-woodlawn/427164>

<sup>120</sup> Brian Sturgis, *We Are Chicago Students, and We are Here to Save Our Schools!*, Common Dreams, Apr. 24, 2013,

<http://www.commondreams.org/views/2013/04/24/we-are-chicago-students-and-we-are-here-save-our-schools>: "[T]his boycott is...about every child in every neighborhood. Mayor Emanuel and the Chicago Board of Education are supposed to make the CPS system work for all of us. But instead they are putting too much pressure on standardized testing and threatening to close schools that don't have high test scores. When schools are under so much pressure to raise test scores it leads to low-scoring students being neglected, not supported."

<sup>121</sup> Jacob Klippenstein & Sarah Mendelsohn, *Interview with Organizers from the Chicago Student Union*, AREA Chicago,

<http://areachicago.org/interview-with-organizers-from-the-chicago-student-union>.

CPS via protests<sup>122</sup> to revise the Student Code of Conduct that resulted in a new Code, less out-of-school discipline, and expanded restorative justice programs for the 2014-15 school year.<sup>123</sup>

Student protests in Chicago Public Schools in response to educational and social inequities have long confronted institutional actors' complicity in policies that deny equal opportunity to students of color. With the departure from the movement ideologies of the 1960s, neoliberalism adapted a nefarious colorblind racism rooted in policies orchestrated by a politically decentralized business elite. Yet the changing political landscape in Chicago and Illinois via the neoliberal tandem of Emanuel and Governor Bruce Rauner<sup>124</sup> and the former venture capitalist's enmeshment in CPS's privatization<sup>125</sup> and staunch-anti-union, pro-charter, corporatist and outlook on school reform<sup>126</sup> has set the foundation for a tangible *recentralization* of targeted policymaking power. The intersection of the Black Lives Matter in critical discourse on public education,<sup>127</sup> mounting political consensus for a local elected school board,<sup>128</sup> and a labor consciousness counteractive<sup>129</sup> to the service labor industrial complex<sup>130</sup> delineate emerging paths for student resistance.

While Chicago in the 21st century has yet to witness the scale of mobilization in the sixties, when tens and thousands of students descended upon City Hall and the central business district, the success of the modern movement shall ultimately hinge on advancing that march<sup>131</sup> straight into the halls of privilege to confront the very architects of Chicago education inequality themselves.

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<sup>122</sup> Chicago Public Schools Code Of Conduct's Minimal Revisions Prompt Student Protest, Huffington Post, June 19, 2012, [http://www.huffingtonpost.com/2012/06/19/chicago-public-schools-co\\_n\\_1608664.html](http://www.huffingtonpost.com/2012/06/19/chicago-public-schools-co_n_1608664.html)

<sup>123</sup> Becky Vevea, *CPS softens strict discipline policies*, WBEZ, June 24, 2014, <http://www.wbez.org/news/cps-softens-strict-discipline-policies-110396>

<sup>124</sup> Alexander Burns, *Illinois' odd couple*, POLITICO, Nov. 19, 2014, <http://www.politico.com/story/2014/11/bruce-rauner-rahm-emanuel-illinois-odd-couple-113012.html>

<sup>125</sup> Carol Felsenthal, *The CPS No-Bid Investigation Spreads to CPEF, Once Chaired By Bruce Rauner*, CHICAGO, Apr. 20, 2015, <http://www.chicagomag.com/Chicago-Magazine/Felsenthal-Files/April-2015/CPS-CPEF-SUPES-Barbara-Byrd-Bennett/>

<sup>126</sup> Melissa Sanchez & Sarah Karp, Rauner likes 'bankruptcy' to cure CPS financial woes, Catalyst, Apr. 14, 2015, <http://catalyst-chicago.org/2015/04/rauner-likes-bankruptcy-to-cure-cps-financial-woes/>

<sup>127</sup> SCHOTT FOUNDATION FOR EDUCATION, BLACK LIVES MATTER: THE SCHOTT 50 STATE REPORT ON PUBLIC EDUCATION AND BLACK MALES (2015)

<sup>128</sup> Juan Perez, Jr., *Chicago voters back a non-binding call for an elected school board*, CHICAGO TRIBUNE, Feb. 25, 2015, <http://www.chicagotribune.com/news/local/politics/ct-chicago-election-referendums-met-0225-20150224-story.html>

<sup>129</sup> Courtney Gousman, *Fight to increase minimum wage continues in Chicago*, WGN TV, Apr. 11, 2015, <http://wgntv.com/2015/04/11/fight-to-increase-minimum-wage-continues-in-chicago>: "College students across the U.S. as well as high school students and community members participated in a march and rally on April 11. The 'Fight for 15' campaign partnered with M.E.Ch.A., a student activist movement that promotes higher education, culture, and history. Coordinators say raising the minimum wage will help with that cause. Those rallying Saturday say this fight is especially important for students."

<sup>130</sup> Courtney Gousman, *Fight to increase minimum wage continues in Chicago*, WGN TV, Apr. 11, 2015, <http://wgntv.com/2015/04/11/fight-to-increase-minimum-wage-continues-in-chicago>: "College students across the U.S. as well as high school students and community members participated in a march and rally on April 11. The 'Fight for 15' campaign partnered with M.E.Ch.A., a student activist movement that promotes higher education, culture, and history. Coordinators say raising the minimum wage will help with that cause. Those rallying Saturday say this fight is especially important for students."

<sup>131</sup> Ellyn Fortino, *Chicagoans Rally For Economic Justice, Policies To Support Working Families*, Progress Illinois, Nov. 11, 2014, <http://progressillinois.com/posts/content/2014/11/11/chicagoans-rally-economic-justice-policies-help-working-families-video>