27 Traces of the Master Narrative in the Story of African American/Korean American Conflict: How We Constructed "Los Angeles"

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MANY who have written about Los Angeles see the dynamics of race in the terrible events that took place on April 29 to May 1, 1992. Some blamed Black racism for what happened; others found fault with the behavior of Korean merchants. Others, more perceptively, blamed our society's system of white-over-colored supremacy for pitting the two outsider groups against one another, setting the stage for the conflict that exploded on those fateful days. I agree with this latter position, but my aim in this chapter is slightly different. It is to explore how we analyzed, explained, came to understand, and gave meaning to "Los Angeles." How and why did we construct the story of that conflict as we did?

During the early aftermath of the civil disorder in Los Angeles, the notion of Korean American/African American conflict emerged as a focal point in explanations for "Los Angeles." Examination of this construct reveals that Korean Americans, African Americans, and those apparently outside the "conflict" used concepts of race, identity, and entitlement in ways that described conflict as inevitable. Further interrogation suggests that despite the absence of obvious whiteness in a conflict described as intergroup, culturally embedded white supremacy (racism) provides the operative dynamic. I use "master narrative" to describe white supremacy's prescriptive, conflict-constructing power, which deploys exclusionary concepts of race and privilege in ways that maintain intergroup conflict. I try here to give my sense of the dynamic that lies beneath the surface of the stories that emerged. I do not assume a unilateral "master hand," although at times I may use that image to evoke a sense of control felt but not seen, and of contrivance. When I assert that I write with the goal of revealing the hand of the master narrative in social discourse, I mean that I will point to traces of white su-

66 S. CAL. L. REV. 1581 (1993).

premacy as evidence of that narrative. And in telling of a master narrative, I may take the role of narrator and impose my own hand.

In questioning the concepts of race used to describe a Korean American/African American conflict, I note that the master narrative defines race and racial identity oppositionally. Here, a Black/African American racial identity is located in opposition to an Asian/Korean American identity, a strategy that merges ethnicity, culture, gender, and class into race.[1] With respect to African Americans, the master narrative tells us that Asians are Koreans who are merchants and crime victims. The assumption that Asians are foreign intruders underlies this description. With respect to Asian Americans, the narrative tells us that African Americans are Blacks who are criminals who are poor. All of these identities replicate the dominant society's understandings of blackness and Asianness.

Although the conflict as constructed does not directly speak of dominant white society, it arranges the various racial identities so as to preserve the authority of whiteness and devalue difference. The differences between Blacks and Asians emerge as a tale of relative nonwhiteness. When racial identity is constructed oppositionally, conflict becomes inevitable, coalition unimaginable, and both groups are publicly debilitated and exposed.

I begin by locating myself with regard to the constructed African American/Korean American conflict. As I do so, I recognize categories that are being imposed and ones that I am claiming. I am a Sansei woman, a person of color who has experienced oppression as an Asian female, not as a Korean or African American, a third-generation Asian American of Japanese descent, not a person who has lived as an immigrant, a woman writing of a story in which few have talked about gender. I grew up in a Los Angeles suburb. I was teaching in the Midwest when the uprising in Los Angeles occurred. Viewing the events from a physical distance, I felt both removed and personally traumatized.

I write aware that I do not know what really happened in "Los Angeles." I doubt it took place only in Los Angeles, and I assert that whatever occurred began long before April 1992. I am conscious that the major news outlets have mediated my picture and experience of Los Angeles, and I wonder to what extent those who lived the uprising relied on the same media accounts to interpret their experiences. I write as one who deploys "Los Angeles" as an ironic, iconic metaphor for the stories of social disorder and racial conflict used to explain what happened there. These stories give birth to "Los Angeles" as a metaphor but are in turn swallowed by it as the events in Los Angeles become part of the master narrative.

Traces of White Supremacy

Consider the thesis: The stories of intergroup conflict came from the master narrative of white supremacy. Those Korean and African Americans who participated in the storytelling spoke and acted from the imposed experience of

racism.[2] I am not saying that the Korean American or African American communities or anyone told the conflict constructing stories in a consciously strategic way.[3] Rather, I am acknowledging that we interpret our experiences by referring to familiar stories about the world.[4]

If you live within a society pervaded by racism, then racism prescribes your experience. Racism is so much a part of our experience that we cannot always recognize those moments when we participate.[5] As a corollary, if you experience racism as one marginalized by it, then you use racism to explain your relations with other groups and their members. Racism operates, in part, through stories about race. These stories both filter and construct our reality.[6]

Now consider the stories of conflict.

Claims of Entitlement

"The pie is only so big, and everybody wants a piece, and they're fighting over it."

"[J]ust twenty-three percent of the blacks said they had more opportunities than recently arrived immigrants. Twice that many whites said they had more opportunities than new immigrants."

"People here are out of jobs and yet they allow foreign people to come over and take work away from people born here in America. . . . [T]hey can come over and get loans and open up businesses, but no one will lend any money to us."

"These businesses belong to people who have exploited, abused and disrespected black people."

"I respect the different cultures . . . but they are here in America now, and they're doing business in our community."

"We didn't do anything wrong," said [Bona Lee], who came to Los Angeles from Korea two decades ago. "We worked like slaves here."

"I left Korea because America is a good country, a free country, and to get rich."

"This is not an act of aggression. This is just saying, 'Leave us alone and let us get back to business.'"

As the above sub-stories show, one common explanation circulated during the aftermath of the uprisings that had to do with competition between Korean Americans and African Americans for a too small piece of the economic pie. The issue became one of entitlement. In the fray, many different claims to entitlement were made. Some complained that Korean Americans had, in effect, cut in line. The premise was that African Americans have been waiting in line for a longer time, and that more recent arrivals must go to the back.

This story is more complex than it first appears. To begin, there is the im-

age of the breadline and the use of a first-in-time principle to claim entitlement. The breadline image evokes a picture of hierarchy. At issue is whether Korean Americans or African Americans must stand further back in line or lower in the hierarchy. The image also admits that both Korean Americans and African Americans are outgroups dependent on the will and leftovers of a dominant group. It presupposes deprivation by social and political forces beyond our control. And it assumes that the competition must occur among those forced to stand in line, not between those making the handouts and those subject to those handouts.

The use of the first-in-time principle echoes traditional property law[7] and suggests that the process of keeping outgroups in line has commodified status as well as goods.[8] In part, this story asserts that Korean Americans do not understand the plight of Blacks in America, and that if they did they would wait their turn. This assertion assumes knowledge of the history of white oppression of Blacks stemming from, but not limited to, the practice and laws of slavery. It also expresses the idea that more recently arrived immigrants do not understand because they are less "American." Ultimately, the first-in-time principle both denies and reifies the truth—that African Americans have been first in time, but last in line since the practice of slavery began in the American colonies.[9]

A closely related entitlement claim was that Korean American merchants were not giving back to the Black community. African Americans charged Korean merchants with failure to hire Blacks, rudeness to Black customers, and exploitive pricing. The claim draws a boundary around the Black community as the in-group, relative to the Korean outsiders who can gain admission only by purchasing it—by giving back value. Jobs and respect are the local currency. The claim also elaborates upon the breadline image in a telling way. It describes the Black community as the in-group with the authority to set the standards for admission, yet, by claiming victimhood status for the Black community, it places the Black community behind Korean Americans in the breadline. This simultaneously excuses the resulting end-of-the-line position of African Americans and delegitimizes the relatively better place of Korean Americans.

Korean American merchants responded, in part, by casting themselves as actors in the "American Dream"—Koreans working hard to support their families, survive as immigrants, and succeed as entrepreneurs. By doing so, they bring enterprise to the poorest neighborhoods. Claiming entitlement by invoking the American Dream recharacterizes the breadline. One's place in the line is not, according to this claim, the inevitable plight of those marginalized by the dominant society; it is changeable for those who pursue the Dream. Those left standing at the end of the line deserve their fate. The American Dream counters the "American Nightmare"—the history of racial oppression—that the claims of Black community entitlement invoke. For many, "Los Angeles" represents the death of the American Dream.

Racial Positioning

Another story of conflict, intertwined with that of competition, is concerned with racial hierarchy. And, while it expressly racializes Korean American and African American identity, it also implies an important story about whiteness.

African Americans and others who complained about Korean merchants took a nativist position. The first-in-time principle describes Korean Americans not only as immigrants and therefore later in time but also as foreigners and therefore less American.[10] Nativism simultaneously calls for assimilation and assumes that Asians are less assimilable than other races. Characterizing Koreans as rude, clannish, and exploitive, with little or no effort made to learn Korean culture, calls up longstanding anti-Asian stereotypes.[11] The charge that Koreans do not understand the plight of Blacks implies that "real" Americans would. The implication that Blacks are real Americans strikes an odd note in this context since the norm-making dominant society has usually defined the real American as white.[12] Perhaps the real irony is the duality of the un-American charge. Excluding Koreans from the category of American suggests that Koreans are not also subject to racial oppression, while simultaneously racializing Korean identity. The master hand does double duty here. It collapses ethnicity into race, thus including Korean Americans within the racial conflict; and it defines ethnicity as "foreignness," to describe Korean Americans as outside the racial hierarchy.

I noted that usually the dominant society takes the nativist position. When African Americans made nativist charges, they positioned themselves as whites relative to Asians. When Korean Americans responded by placing themselves within the American Dream—a dream produced and distributed by the dominant society—they positioned themselves as white. Their belief in an American Dream and their hope to be independent business operators positioned them as white relative to Blacks. The rule underlying this racial positioning is white supremacy. Racial positioning would not be coherent, could not take place, but for racism. In other words, I have used "positioned" as an active verb, with Korean Americans and African Americans as actors, but here I sense a master hand positioning Korean Americans and African Americans as objects.

The stories of conflict are not about ordinary, marketplace competition. Nor do they tell of empowering community. Instead, they plot relative subordination, subordinated domination, subordinating storytelling. In doing so, the stories of race and conflict flatten our understanding of racial identity.

Constructed Identities and Racial Pairing

The stories of conflict have filtered largely through the major media; other stories have been filtered out. Media-selected images and words both represent and reinforce the constructed conflict. The stories described above were told in words. The stories addressed here were also told with pictures. The latter,

I suspect, will prove more memorable and therefore more significant in the construct of conflict. Recall, for a moment, the much-photographed Latasha Harlins and Soon Ja Du, gangmember looters, and armed Korean storeowners.[13] These images have merged into the African American/Korean American conflict plotted by the master narrative. They operate by informing and reinforcing the identities created for conflict. The result: Shoplifter, looter, and gangmember images are reinforced as the operative aspects of African American identity; crime-victim, gun-toting merchant, and defender-of-property images emerge as the Korean American character types.[14] Thus, apparently race-neutral categories—criminals and property-owning crime victims—become part of African American and Korean American racial identities.

Racializing identity has another effect; it submerges class and gender. According to the constructed identities, "Korean Americans" are merchants. "African Americans" are not simply criminals, but are most likely poor, because shoplifting and looting are considered crimes of poverty. And both gun-toting merchants and gangmember looters are probably typified as male.[15] These identities describe class and gender as characteristics of race, not effects of racism. The construct of conflict defines African American and Korean American identities in opposition to each other. It neatly positions Korean Americans as white, relative to Blacks. In other words, in black-white conflicts, blackness would be similarly criminalized and whiteness would be accorded victim status. This conclusion does not require a leap of logic or faith. Rodney King and Latasha Harlins emerged as the two main symbols of racial injustice during the events surrounding the uprising. The Rodney King verdict became representative, in part, of white oppression of Blacks. Once the uprising began, many invoked the name "Latasha Harlins" to recall the sentence issued in *People v. Soon Ja Du*. "Latasha Harlins" came to represent (white) systemic, race-based injustice even while it reinforced the sense of African American/Korean American conflict and goaded many to target Korean-owned stores for looting and vandalism. For purposes of defining racial injustice, "Korean" became provisionally identified with whiteness. Racial pairing not only creates racial differences, but it also makes racial difference a source of inevitable conflict. The primary model for identifying bases for positive relations between groups is that of sameness/difference—the assumption that there are either samenesses or differences and that we should identify and focus on sameness and overlook difference. The underlying assumption is that difference can only lead to contention. Positive relations between Blacks and Asians become impossible because there are only apparent racial differences. "Black" now suggests the possibility of conflict with Asian, and "Asian" with Black.

Racial pairing also essentializes race. The essentialized understanding of race occurs via a syllogism: The stories of conflict construct African American identity in opposition to Korean American identity. In the context of intergroup conflict with African Americans, the oppositional Asian is Korean; all Asians are Korean. This syllogism silently strips Korean identity of ethnic and cultural content, making "Korean" interchangeable with "Asian." It is important that "Korean"

has been defined in the context of conflict with African Americans. So, it is probably more accurate to say that the syllogism concludes: All Asians are Korean for purposes of intergroup conflict. Further, the constructed Korean American/Asian identity—economically successful minorities, hardworking, entrepreneurs[16]—reinforces its opposite, constructed blackness. "It is no accident . . . that immigrant populations (and much immigrant literature) understood their 'Americanness' as an opposition to the resident black population."[17]

The media-reinforced construct makes racial identity not only flat, but also transparent. The stories of conflict have given many the sense that they know about Korean Americans and African Americans. "Korean American" and "African American" invoke a whole set of conclusions that do not follow from a personal or group history or from Korean American or African American experience, but from the construct of conflict. For those who are both object and subject of the conflict, the essentialized racial identities filter out the possible bases of understanding. What is perceived as Korean rudeness may reinforce the experience African Americans have had—race-based rejection. In responding negatively to "Korean Americans," African Americans may be rejecting imposed blackness. In addition, many of the comments made by both African Americans and Korean Americans to reporters indicated that the speaker not only lacked understanding of the culture, experience, or history of the other group but also rejected the need to try—the other group was the one that had an obligation to conform in some way. For example, in response to claims of bigotry by Black customers, Korean storeowners often asserted that they had businesses to run, thereby suggesting that good business practice did not include recognizing local concerns. Or consider African Americans who discounted the Korean cultural practice of not touching strangers by asserting "this is America." The construct of conflict not only filters out personal experience, group history, and culture, but deems them irrelevant.

Distancing Stories, Symbols of Disorder

Consider the effect of the stories of conflicts: The notion of a Korean American/African American conflict locates the causes of the uprisings in problems originating within and bounded by communities of color. At the same time, the rubric of race and racism used to describe the conflict is legalistic; it focuses on intent and attributes racism to wrong-minded individuals. This denies the possibility of embedded, culture-wide racism. It makes race fungible and independent of the history of racial subordination in the United States. And it distances the problem of intergroup conflict from the dominant society; the problem is defined as one of race. This distance distinguishes race from whiteness.

The constructed conflict created a great sense and desire for distance. Even as the uprising and the events surrounding it enraged, demoralized, inspired, and traumatized me, I also felt safe and fortunate in viewing it all from afar. When I acknowledged my lack of physical proximity as my good fortune, I removed my-

self from those more directly affected. It was not my problem. Since the conflict was specifically cast as African American/Korean American, that I am Japanese and not Korean American made this conclusion easier to reach. I used the categories deployed in this construct to opt out. I can, to the extent that I opt out, sympathize with victims and condemn villains. This may make me well-meaning. But it protects me from participation, which is harder to accomplish, more difficult to bear, but may reduce the sense that the conflict is confined to two specific groups. I could not opt out entirely. I was affected—perhaps because I identify as a person of color and as an Asian American, more inclusive descriptors that place me within the conflict.

At first, I wanted to deny that intergroup conflict was a significant problem. I wanted to say that the problem was economic. That may have been an effort to reject the submerging, essentializing effects of imposed racial identity. I may have been resisting the sense of inevitable unresolvable conflict that flows from my experience and understanding of race. I know that others denied race as the problem. Perhaps they did so because they know that not every person intentionally discriminates. Some described the problem as specific to Los Angeles. But "Los Angeles" is not located in Southern California. As I have been arguing, it is part of the master narrative. Each of us creates and locates it somewhere else to make it unique, episodic—i.e., not integral to American functioning—and, above all, "not my fault." Racial distancing enables each of us to say, "It was really too bad. But fundamentally, it is not my problem."

Symbols of Disorder, or Why Multiculturalism Won't Work

The constructed Korean American/African American conflict has become, for many, the racial conflict of the moment. The symbolized conflict is not only that between Korean Americans and African Americans. It is the potential for conflict among the (too) many groups of racial minorities. To the extent that the apparent Korean American/African American conflict contributes to the conclusion that a multiracial/multicultural[18] society is doomed to conflict, it displaces white supremacy as the central race issue. That displacement, in turn, may strengthen the distinction between whiteness and race.

The stories of conflict also describe interracial tension as representative and key to broader social disorder. Because the constructed identities conflate other forms of problematized status with race, intergroup conflict implicates underclass and failure to assimilate. One result is that whiteness becomes symbolic of order and race becomes symbolic of disorder. Thus, while Latasha Harlins and Rodney King became symbols of systemic racial injustice, "Los Angeles" has become a metaphor for the failure of racial diversity.

It is difficult to escape the constructs I describe. To the extent that we interpret our experience from within the master narrative, we reinforce our own subordination. We must also compete for space with the master narrative. That is

where the master hand tailors stories about identity and conflict to the situation—African American/Korean American relations, Los Angeles, Latasha Harlins and Soon Ja Du, Rodney King—in ways that make Asianness the subordinator of Blackness and vice versa, and in ways that isolate the conflict from whiteness. Whether Korean and other Asian Americans can counter racism may depend, finally, on our ability to claim identities outside the master narrative.

Conflict—the real world kind, I mean—can be bloody, misguided, and wholly tragic. It behooves us always to try to understand how and why bloodshed breaks out as it does. But the very narratives and stories we tell ourselves and each other afterwards, in an effort to explain, understand, excuse, and assign responsibility for conflict, may also be, in a sense, the source of the very violence we abhor. I have identified a number of ways the "master narrative" works itself out in the stories by which we constructed "Los Angeles." This master narrative is at one and the same time lulling, disturbing, provocative, and always powerfully apologetic. Understanding how we assemble reality unjustly, apologetically, and in status-quo-preserving ways may enable us, with effort, to disassemble it—and perhaps, one day, to define difference as a basis for coalition and fairness.

NOTES

1. Compare the conflict constructed from the Clarence Thomas confirmation hearings. The fact that both Clarence Thomas and Anita Hill are African American had the effect of submerging race to gender in dominant culture's account of the conflict. This reinforces the point that existing categories inadequately describe the experience of oppression. *See* Kimberlé Williams Crenshaw, *Whose Story Is It Anyway? Feminist and Antiracist Appropriations of Anita Hill*, in RACE-ING JUSTICE, EN-GENDERING POWER: ESSAYS ON ANITA HILL, CLARENCE THOMAS, AND THE CONSTRUCTION OF SOCIAL REALITY 402 (Toni Morrison ed. 1992); Adrienne D. Davis & Stephanie M. Wildman, *The Legacy of Doubt: Treatment of Sex and Race in the Hill-Thomas Hearings*, 65 S. CAL. L. REV. 1367, 1378–84 (1992).

2. For an elaboration of the effects of imposed "truth," see MICHEL FOUCAULT, *Truth and Power*, in POWER/KNOWLEDGE: SELECTED INTERVIEWS & OTHER WRITINGS 1972–1977 (Colin Gordon ed. 1980).

3. I do acknowledge that some, for commercial, political, or other reasons, consciously and tactically construct stories. For purposes of this chapter, the media are the primary storymaker. It is important to remember, however, that while print, television, and radio media may have commercial motives, to some extent the stories are part and parcel of mainstream culture.

4. Richard Delgado & Jean Stefancic, *Images of the Outsider in American Law and Culture: Can Free Expression Remedy Systemic Social Ills?*, 77 CORNELL L. REV. 1258, 1277–82 (1992); *see generally* PETER L. BERGER & THOMAS LUCKMAN, THE SOCIAL CONSTRUCTION OF REALITY: A TREATISE IN THE SOCIOLOGY OF KNOWLEDGE (1966).

5. *See* JOEL KOVEL, WHITE RACISM: A PSYCHOHISTORY 211–12 (1984) describing "metaracism":

> Metaracism is a distinct and very peculiar modern phenomenon. Racial degradation continues on a different plane, and through a different agency: those who participate in it are not racists—that is, they are not racially prejudiced—but metaracists, because they acquiesce in the larger cultural order which continues the work of racism.

6. *See* Trina Grillo & Stephanie M. Wildman, *Obscuring the Importance of Race: The Implication of Making Comparisons Between Racism and Sexism (Or Other -Isms)*, 1991 DUKE L.J. 397, 397 (illustrating the use of "filter" to explain how personal experience shapes one's worldview.)

7. *See Symposium, Time, Property Rights, and the Common Law*, 64 WASH. U.L.Q. 661 (1986) for a recent evaluation of this principle. Historically, the first-in-time principle has been racialized. *See, e.g.*, Johnson v. M'Intosh, 21 U.S. (8 Wheat.) 543, 573–74 (1823) (holding valid a land patent taken from the United States because the United States' claim derived from the (white) European "discovery" of America. The Court reached its conclusion, in part, by distinguishing between mere "occupancy" made by Native American nations and "ultimate dominion" asserted by the European nations.).

8. For valuable discussion on the link between property rights and status, see Joseph William Singer, *Sovereignty and Property*, 86 NW. U.L. REV. 1, 40–51 (1991). *See also* DERRICK BELL, AND WE ARE NOT SAVED, 135 (1989) (where the fictional character Geneva Crenshaw, recalling the fate of the Black Reparations Foundation and its leader, Goldrich, stated, "Goldrich planned to raise the actual status of blacks as compared with their white counterparts, and that is why in the Chronicle he was more condemned than canonized.").

9. *See* Bakke v. Regents of Univ. of Cal., 438 U.S. 265, 400 (1978) (Marshall, J., dissenting) ("The experience of Negroes in America has been different in kind, not just in degree, from that of other ethnic groups. It is not merely the history of slavery alone but also that a whole people were marked as inferior by the law. And that mark has endured."); *see also* DERRICK BELL, FACES AT THE BOTTOM OF THE WELL (1992) (discussing "Racial Realism"). For discussion of the history of racism and the historical origins of Western concepts of race, see Christina Delacampagne, *Racism and the West: From Praxis to Logos*, in ANATOMY OF RACISM 83 (David Theo Goldberg ed. 1990); David Theo Goldberg, *The Social Formation of Racism Discourse*, in ANATOMY OF RACISM, *supra*, at 295.

10. Immigration and naturalization laws at various times have defined "American" in similarly exclusive ways. SUCHENG CHAN, ASIAN AMERICANS: AN INTERPRETIVE HISTORY 45–61 (1991) (describing anti-Asian laws, including exclusive immigration and naturalization laws); YUJI ICHIOKA, THE ISSEI: THE WORLD OF THE FIRST GENERATION JAPANESE IMMIGRANTS, 1885–1924, at 210–54 (1988) (describing the struggle for naturalization rights, Alien Land Law litigation, and the 1924 Immigration Act); RONALD TAKAKI, STRANGERS FROM A DIFFERENT SHORE: A HISTORY OF ASIAN AMERICANS 99–112, 271–73, 419–20 (1989) (discussing anti-Chinese laws, including the Chinese Exclusion Act of 1882 and People v. Hall, the Asiatic Exclusion League activities against Korean immigrants, and the Immigration Act of 1965).

11. TAKAKI, *supra* note 10, at 101, 105. *See also* Richard Delgado & Jean Stefancic, *Norms and Narratives: Can Judges Avoid Serious Moral Error?*, 69 TEX. L.

REV. 1929, 1943–46 (1991) (discussing the Chinese Exclusion Cases and the Japanese Internment Cases as judicial expressions of anti-Asian stereotypes).

12. ROGER DANIELS, THE POLITICS OF PREJUDICE 65–68 (1977).

13. *See* People v. Super. Ct. (Soon Ja Du), 7 Cal. Rptr. 2d 177, *modified*, 5 Cal. App. 4th 1643a (1992). The print media devoted extensive space to presenting verbal descriptions of the Soon Ja Du case and the events during the uprising. It is, however, the photographic and video images that have proved the most memorable and defining. A store security camera recorded Soon Ja Du shooting Latasha Harlins and the preceding confrontation. The television media replayed this video many times. Television camera crews filmed two Korean men firing weapons in defense of their store, and people, including Black men, looting stores and other businesses during the uprising. These videos were broadcast on the television news and published as photos in newspapers across the nation.

14. *See, e.g.*, IRA REINER, GANGS, CRIME, AND VIOLENCE IN LOS ANGELES: FINDINGS AND PROPOSALS FROM THE DISTRICT ATTORNEY'S OFFICE iv (1992). The study reports that "the police have identified almost half of all Black men in Los Angeles County between the ages of 21 and 24 as gang members." *Id.* The fact that the police made these identifications should raise questions about the finding. The report itself admits that the "number is so far out of line with other ethnic groups that careful, professional examination is needed to determine whether police procedures may be systematically over-identifying Black youths as gang members." *Id. See also* Stephen Braun & Ashley Dunn, *View of Model Multiethnic City Vanishes in Smoke*, L.A. Times, May 1, 1992, at A1 ("Each new graphic televised image— . . . angry black assailants, frightened Korean merchants guarding their shuttered markets with guns—threatened to reinforce the long-held fears and prejudices gnawing at the city's populace, worried community leaders and race relations experts said Thursday.").

15. *See, e.g.*, REINER, *supra* note 14, at 118–19.

16. *See* TAKAKI, *supra* note 10, at 474–84 (discussing the harmful effects of the Myth of the Model Minority).

17. TONI MORRISON, PLAYING IN THE DARK 47 (1992). For a case illustrating how Asians as relative whites were deployed against Blacks, see Gong Lum v. Rice, 275 U.S. 78 (1927).

18. Stuart Alan Clarke, *Fear of a Black Planet: Race, Identity Politics, and Common Sense*, 21 SOCIALIST REV. 37, 40–41 (illustrating how some have racialized "multiculturalism" so as to present it as a threat to democratic principles. "In this context, it is unsurprising that the 'multicultural threat' is pictured most compellingly in the public imagination as a black threat."). *Id.* at 41.