

The Watts Gang Treaty: Hidden History and the Power of Social Movements

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On the eve of the 1992 Los Angeles uprising, a small group of gang leaders and community activists drafted an agreement to curtail violence in south Los Angeles. Several gangs in Watts accepted the truce and established a cease-fire agreement. By most accounts, the 1992 Watts Gang Treaty succeeded in reducing gang violence in Los Angeles. Local activists attributed the reduction in shootings to the Treaty. Even law enforcement officials grudgingly recognized the Treaty's contribution to reducing gang violence and a corresponding decrease in homicides.

The origins of the Watts Gang Treaty can be traced to gang leaders recognizing that the devastating struggle between rival gangs was analogous to a military conflict—complete with “no-man’s land,” assault weapons, targeted killings, and civilian casualties—and, therefore, it required a diplomatic solution. Seeking inspiration from international conflict resolution efforts, gang members looked to the 1949 Armistice Agreement adopted by Egypt and Israel to end the Arab-Israeli War. The drafters of the Watts Gang Treaty mirrored the key provisions of the Armistice Agreement, including a cease-fire agreement and other confidence-building measures. The drafters then built a social movement to support the Treaty.

This Article examines the origins, impact, and legacy of the Watts Gang Treaty. It also pursues a prescriptive agenda. It supports the study of hidden history that runs counter to the common narrative of power and privilege in the United States. Moreover, this Article argues that social movements can achieve meaningful change even in the face of poverty, violence, and structural racism.

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DEDICATION

This Article is dedicated to the Watts community and those individuals who risked their lives to end the cycle of pain and violence they had endured for decades. Their creativity and bravery is an inspiration to peacemakers around the world.

PREFACE

A hidden history lies beneath the common narrative of power and privilege in the United States. This history reflects a world where structural racism generates poverty, conflict, and subordination. In the realm of hidden history, there exist compelling, yet overlooked, stories that run counter to assumptions about race, color, and class. In this realm, marginalized communities can achieve meaningful change as they seek to overcome years of neglect, decades of discrimination, and centuries of violence. These stories offer both inspiration and prescription. This is one such story.

INTRODUCTION

On the eve of the 1992 Los Angeles uprising, a small group of gang¹ leaders and local activists drafted an agreement to curtail violence in Watts, a small community in south Los Angeles. Several gangs accepted the truce and established a cease-fire agreement. By most accounts, the 1992 Watts Gang Treaty succeeded in reducing gang violence throughout affected communities, which included the four major housing projects in Watts.² Local activists attributed the reduction in shootings between gang members to the Treaty. Even law enforcement officials grudgingly recognized the Treaty's contribution to reducing gang violence and a corresponding decrease in homicides.³

The origins of the Watts Gang Treaty can be traced to gang leaders' recognition that the devastating struggle between rival gangs was analogous to a military conflict—complete with “no-man’s land,” assault weapons, targeted killings, and civilian casualties—and, therefore, it required a diplomatic solution.⁴ Seeking inspiration from international conflict resolution efforts, gang members visited several libraries to search for a historical document that could provide a template for their own agreement. They eventually discovered the 1949 Armistice Agreement adopted by Egypt and Israel to end the Arab-Israeli War.⁵ The Agreement established an armistice line, prohibited the use of military force, and brokered an exchange of prisoners.⁶ Despite mistrust between the two countries, the Agreement held for several years.

¹ This Article uses the word “gang” because it is the standard nomenclature in legal and ethnographic studies.

² Editorial, *The Breeze of Freedom: South-Central Gang Truce Brings a New Liberation to Law-Abiding Residents*, L.A. TIMES (Aug. 15, 1992), <https://www.latimes.com/archives/la-xpm-1992-08-15-me-4770-story.html>, archived at <https://perma.cc/6VZD-AURN>; Seth Mydans, *Gangs Abiding by Cease-Fire in Los Angeles*, N.Y. TIMES, July 19, 1992, at A1.

³ Leslie Berger, *Police Give Truce Credit for Drop in Gang Killings*, L.A. TIMES (June 17, 1992), <https://www.latimes.com/archives/la-xpm-1992-06-17-me-435-story.html>, archived at <https://perma.cc/9RP8-RGE6>; Andrea Ford & Carla Rivera, *Hope Takes Hold as Bloods, Crips Say Truce is for Real*, L.A. TIMES (May 21, 1992), <https://www.latimes.com/archives/la-xpm-1992-05-21-mn-325-story.html>, archived at <https://perma.cc/U27K-2MMF>; See Don Terry, *After the Riots: Hope and Fear in Los Angeles as Deadly Gangs Call Truce*, N.Y. TIMES, May 12, 1992, at A1.

⁴ Telephone Interview with Daude Sherrills, Watts Gang Treaty Activist (July 13, 2021) [hereinafter D. Sherrills Interview]; Telephone Interview with Twilight Bey, Watts Gang Treaty Activist (Feb. 28, 2020) [hereinafter Bey Interview]; Telephone Interview with Aqeela Sherrills, Watts Gang Treaty Activist (Oct. 3, 2019) [hereinafter A. Sherrills Interview].

⁵ Jesse Katz & Andrea Ford, *Ex-Gang Members Look to Mideast for a Peace Plan: Truce*, L.A. TIMES (June 17, 1992), <https://www.latimes.com/archives/la-xpm-1992-06-17-me-438-story.html>, archived at <https://perma.cc/N9MD-RX4N>.

⁶ Egyptian-Israeli General Armistice Agreement, Egypt-Isr., Feb. 23, 1949, U.N. Doc. S/1264/CORR.1. See generally Hilde Henriksen Waage, *The Winner Takes All: The 1949 Island of Rhodes Armistice Negotiations Revisited*, 65 MIDDLE EAST J. 279, 302–04 (2011); BENNY MORRIS, 1948: A HISTORY OF THE FIRST ARAB-ISRAELI WAR 375–91 (2008).

The drafters of the Watts Gang Treaty mirrored the key provisions of the Armistice Agreement, including a cease-fire arrangement and other confidence-building measures. The Treaty applied to the four main gangs in Watts. On April 26, 1992, the Watts Gang Treaty took form and entered into force. The Treaty influenced gang behavior, saved countless lives, and held for several years despite significant challenges. Its success stemmed from its development within the Watts community as a social movement. Gang members had a personal interest in compliance. They were eventually supported, not by political leaders, but rather by their own community.

The Watts Gang Treaty also had a profound cultural impact.⁷ It was referenced in rap music.⁸ It generated radio and television programs.⁹ It inspired poetry.¹⁰ It influenced literature and theatre.¹¹ It was depicted in documentaries and movies.¹² It gained international prominence.¹³ Reaching ubiquity if not absurdity, the Treaty even led to a beer called Watts Truce.¹⁴

This Article provides an ethnographic study¹⁵ of the origins, impact, and legacy of the 1992 Watts Gang Treaty. This qualitative methodology uses an immersive approach to provide rich insight into its subject matter, highlighting social and cultural norms that might otherwise be overlooked in

⁷ See *infra* Pt. IV. See generally KAMRAN AFARY, PERFORMANCE AND ACTIVISM: GRASS-ROOTS DISCOURSE AFTER THE LOS ANGELES REBELLION OF 1992, at 93–120 (2009).

⁸ KAM, *Peace Treaty*, on NEVA AGAIN (Street Knowledge Records & EastWest Records America 1993); ICE-T, *Gotta Lotta Love*, on HOME INVASION (Rhyme \$yndicate/Priority Records 1993). For a detailed study of the relationship between rap and urban culture, see JEFF CHANG, CAN'T STOP WON'T STOP: A HISTORY OF THE HIP-HOP GENERATION (2005). See also Alex Abramovich, “Can’t Stop Won’t Stop:” A Nation of Millions, N.Y. TIMES (Sept. 4, 2005), <https://www.nytimes.com/2005/09/04/books/review/cant-stop-wont-stop-a-nation-of-millions.html>, archived at <https://perma.cc/CT57-BNR7> (reviewing CAN’T STOP WON’T STOP).

⁹ Kathy Gronau, *Stevie Wonder Takes KJLH to Higher Ground*, RADIOGUIDE, <https://web.archive.org/web/20190218072924/http://www.radioguide.com/whatsnew/stevie/stevie.htm>.

¹⁰ Erin J. Aubry, *Gang Truce Inspires Poetry Festival*, L.A. TIMES (May 23, 1993), <https://www.latimes.com/archives/la-xpm-1993-05-23-ci-39025-story.html>, archived at <https://perma.cc/Z4A2-CLAD>.

¹¹ See ANNA DEVEARE SMITH, TWILIGHT: LOS ANGELES, 1992 (1994).

¹² STRAIGHT OUTTA COMPTON (Universal Pictures 2015); CRIPS AND BLOODS: MADE IN AMERICA (The Gang Documentary 2008).

¹³ See, e.g., *Witness History: Bloods and Crips Truce*, BBC (Apr. 15, 2015), <https://www.bbc.co.uk/sounds/play/p02nnv6w>, archived at <https://perma.cc/W666-YXSL>; *Message to the Grassroots: Gang Truce: The International Scene*, MEDIA BURN (Nov. 16, 1994), <https://mediaburn.org/video/message-to-the-grassroots-gang-truce-the-international-scene/>, archived at <https://perma.cc/C5LH-HFTU>.

¹⁴ The beer was produced by Blood Brothers Brewery in Toronto, Canada. See UNTAPPD, <https://untappd.com/b/blood-brothers-brewing-watts-truce/2525167> (last visited Sept. 26, 2021), archived at <https://perma.cc/E9FE-EJVA> (“Named in honour of two rival gangs coming together for the purpose of peace, this ale is a blend of two of our favourite beers, Paradise Lost and Torch. Blended together and then heavily dry hopped with classic west coast ‘C’ hops, Paradise Lost gains added bitterness and Brett funk while giving the beer a bright acidity.”).

¹⁵ See generally Sally Engle Merry, *New Legal Realism and the Ethnography of Transnational Law*, 31 L. & SOC. INQUIRY 975, 976–77 (2006); John M. Conley & William M. O’Barr, *Legal Anthropology Comes Home: A Brief History of the Ethnographic Study of Law*, 27 LOY. L.A. L. REV. 41, 45–46 (1993).

more traditional legal studies. Such an approach is particularly valuable for assessing the Watts Gang Treaty, a story infused with racial identity, economic inequality, and social conflict.¹⁶ However, this study does not rely solely on first-person accounts, which are often used in ethnographic studies.¹⁷ It relies on various sources, including public records, news reports, and other published sources to provide an evidence-based account.¹⁸

Part I of this Article places the Watts Gang Treaty in the context of the poverty, violence, and structural racism that permeated Los Angeles throughout the twentieth century. It examines the origins of gang culture, which reflect a sociological response to the conditions affecting many marginalized communities. Within this culture, the Treaty emerged through a social movement led by gang members.¹⁹ In the absence of meaningful support by public officials, gang members became agents of their own social change by drafting a self-enforcing peace treaty. Part II assesses both the immediate and long-term impacts of the Treaty.²⁰ Within hours of its adoption, the Treaty's effectiveness was tested by, and survived, the outbreak of violence following the April 29, 1992 criminal trial verdict that acquitted several police officers in the brutal assault of Rodney King.²¹ Part III considers the reasons for the Treaty's success, and its legacy—both in the Watts community and throughout the United States. The gang truce inspired simi-

¹⁶ Cf. KAREN UMEMOTO, *THE TRUCE: LESSONS FROM AN L.A. GANG WAR* 12 (2006) (providing an ethnographic study of a gang conflict and truce in west Los Angeles).

¹⁷ STEVEN LUBET, *INTERROGATING ETHNOGRAPHY: WHY EVIDENCE MATTERS* ix–x (2018).

¹⁸ *Id.* at 136–37. Lubet argues that ethnographic studies should pursue accuracy, provide candor, and offer clear documentation. Cf. EDWARD R. MAGUIRE, *WOODROW WILSON INT'L CTR. FOR SCHOLARS, RESEARCH, THEORY, AND SPECULATION ON GANG TRUCES* (2013) (arguing for evidence-based studies on gang truces).

¹⁹ Edward L. Rubin, *Passing Through the Door: Social Movement Literature and Legal Scholarship*, 150 U. PA. L. REV. 1, 4 (2001) (Social movements can be defined as “coordinated, ideologically based efforts that originate within the social sphere or, in other words, as a self-conscious effort by previously unorganized individuals resulting in collective action.”). The study of social movements is an important part of legal scholarship that examines racism, inequality, and progressive reform. See *HOW SOCIAL MOVEMENTS MATTER* 4–6 (Marco Giugni, Doug McAdam & Charles Tilly eds., 1999); Scott L. Cummings, *The Puzzle of Social Movements in American Legal Theory*, 64 UCLA L. REV. 1554, 1556 (2017); Tomiko Brown-Nagin, *Elites, Social Movements, and the Law: The Case of Affirmative Action*, 105 COLUM. L. REV. 1436, 1436 (2005); Reva B. Siegel, *Equality Talk: Antisubordination and Anticlassification Values in Constitutional Struggles Over Brown*, 117 HARV. L. REV. 1470, 1543 (2004). See generally Steven W. Bender & Keith Aoki, *Seekin' the Cause: Social Justice Movements and LatCrit Community*, 81 OR. L. REV. 595 (2002).

²⁰ Part II uses the language of the law of treaties to frame its organizational structure, including entry into force, implementation, compliance, enforcement, and desuetude. See *THE OXFORD GUIDE TO TREATIES* 699, 765 (Duncan B. Hollis ed. 2012).

²¹ On March 3, 1991, Rodney King was brutally assaulted by several police officers in Los Angeles after a high-speed car chase. His beating was recorded, and four police officers were subsequently indicted for excessive use of force. Despite clear evidence, three of the officers were acquitted and the jury failed to reach a verdict against the fourth officer. See generally REBECCA RISSMAN, *RODNEY KING AND THE L.A. RIOTS* (2014); GEOGRAPHY OF RAGE: REMEMBERING THE LOS ANGELES RIOTS OF 1992 (Jervey Tervalon ed. 2002); Seth Mydans, *Tape of Beating By Police Revives Charges of Racism*, N.Y. TIMES, Mar. 7, 1991, at A18.

lar conciliatory efforts to address the violence that continues to plague many urban communities throughout the United States.²²

Finally, Part IV explores the value of studying hidden history.²³ The stories within hidden history run counter to the common narrative of power and privilege in the United States.²⁴ They reveal how structural racism crafts the walls that keep generations in subjugation through racialized policing and political neglect. Building on earlier scholarship, this Article identifies the power of social movements and their ability to achieve meaningful change in the face of such profound inequality and violence.²⁵ Understanding the morphology of conflict is essential for building peace in urban communities.²⁶ Because many of these communities remain in crisis, the Watts Gang Treaty is a story worth telling.²⁷

²² See *infra* Pt. III(B).

²³ In his seminal work on social justice and gang life in Los Angeles, Tom Hayden titled one chapter of his book, “Hidden Histories.” TOM HAYDEN, *STREET WARS: GANGS AND THE FUTURE OF VIOLENCE* 153 (2004). The concept of hidden history is often used in scholarship about color and race in the United States. See, e.g., FATIMA SHAIK, *THE HIDDEN HISTORY OF A FREE BLACK BROTHERHOOD* (2021) (describing the hidden history of free men of color in New Orleans); Adeel Hassan, *The Hidden History of Slavery That Surrounds Us*, N.Y. TIMES (Feb. 29, 2020), <https://www.nytimes.com/2020/02/29/us/the-hidden-history-of-slavery-that-surrounds-us.html>, archived at <https://perma.cc/VU79-HHQQ> (noting how many sites associated with slavery and the slave trade remain unmarked); John Kent, *The Hidden History of Culver City Racism*, STREETS BLOG (Apr. 5, 2019), <https://la.streetsblog.org/2019/04/05/the-hidden-history-of-culver-city-racism/>, archived at <https://perma.cc/GJT8-ZRWY>.

²⁴ See *infra* Pt. IV.

²⁵ See generally K. Sabeel Rahman & Jocelyn Simonson, *The Institutional Design of Community Control*, 108 CALIF. L. REV. 679, 679–80 (2020); Amna A. Akbar, *Toward a Radical Imagination of Law*, 93 N.Y.U. L. REV. 405, 405–06 (2018); Sameer M. Ashar, *Movement Lawyers in the Fight for Immigrant Rights*, 64 UCLA L. REV. 1464, 1466–67 (2017); Heather K. Gerken, *Second-Order Diversity*, 118 HARV. L. REV. 1099 (2005); Tomiko Brown-Nagin, *The Civil Rights Canon: Above and Below*, 123 YALE L.J. 2698, 2698 (2014); Jack M. Balkin, *How Social Movements Change (or Fail to Change) the Constitution: The Case of the New Departure*, 39 SUFFOLK U. L. REV. 27, 27–30 (2005); Mari J. Matsuda, *Looking to the Bottom: Critical Legal Studies and Reparations*, 22 HARV. C.R.-C.L. L. REV. 323, 348–49 (1987).

²⁶ UMEMOTO, *supra* note 16, at 5. The morphology of conflict describes the emergence and evolution of conflict over time. See generally Ravi Bhavnani, *The Morphology of Urban Conflict*, 5 GLOBAL CHALLENGES (Apr. 2019), <https://globalchallenges.ch/issue/5/the-morphology-of-urban-conflict/>, archived at <https://perma.cc/B3PC-A8ZP>; Margarita Konaev & John Spencer, *The Era of Urban Warfare is Already Here*, FOREIGN POL’Y RSCH. INST. (Mar. 21, 2018), <https://www.fpri.org/article/2018/03/the-era-of-urban-warfare-is-already-here/>, archived at <https://perma.cc/Y24X-MQME>; Marion Harroff-Tavel, *Violence and Humanitarian Action in Urban Areas: New Challenges, New Approaches*, 92 INT’L REV. RED CROSS 329, 329–31 (2010). It should be noted, however, that gangs also exist in rural communities. See James C. Howell & Arlen Egley, Jr., *Gangs in Small Towns and Rural Counties*, NAT’L YOUTH GANG CTR. 1 (2005); William P. Evans, Carla Fitzgerald, Dan Weigel & Sarah Chvilicek, *Are Rural Gang Members Similar to their Urban Peers? Implications for Rural Communities*, 30 YOUTH & SOCIETY 267, 267 (1999).

²⁷ Anthony V. Alfieri, *Black, Poor, and Gone: Civil Rights Law’s Inner-City Crisis*, 54 HARV. C.R.-C.L. L. REV. 629, 633–34, 637 (2019); MITCHELL DUNEIER, *GHETTO: THE INVENTION OF A PLACE, THE HISTORY OF AN IDEA* xi–xii (2016); WILLIAM JULIUS WILSON, *MORE THAN JUST RACE: BEING BLACK AND POOR IN THE INNER CITY* 25–27 (2009); DOUGLAS S. MASSEY & NANCY A. DENTON, *AMERICAN APARTHEID: SEGREGATION AND THE MAKING OF THE UNDERCLASS* 217–18 (1993).

I. THE ORIGINS OF THE WATTS GANG TREATY

While the Watts Gang Treaty was adopted in 1992, the roots that gave rise to its birth can be traced back several decades. Gang violence did not emerge spontaneously in Watts. It was created by racism and segregation, and nurtured by social, economic, and political neglect.

A. *Understanding the Morphology of Conflict in Watts*

1. *Early History and the Rise of Gang Culture*

The community of Watts is located in south Los Angeles.²⁸ It was incorporated in 1907, and eventually joined the city of Los Angeles in 1926.²⁹ Throughout its early years, the population mirrored the broader demographics of Southern California in that its citizens were mostly white or of Mexican ancestry.³⁰ As the area began to grow, a small Black community, known as “Mudtown,” emerged in the southern portion of Watts.³¹ The Black community in Watts expanded in the 1930s and 1940s, reflecting social and economic developments in the United States.³² Black families migrated from the East, and particularly the Southeast, to escape both segregation and poverty. They were joined by a small, but growing, Hispanic population.³³ The poet Oshea Luja spoke these words about early Watts:

In the late 1800s, Lotsa Watta was established ten miles east of the coast.
Nestled ‘tween Compton ‘n Los Angeles.
Outta the South we headed West for opportunity—Brownsville,
Central Avenue, Black ‘n Brown unity.
Downtown Union Station—that mess was segregated.

²⁸ See generally MARY ELLEN BELL RAY, *THE CITY OF WATTS, CALIFORNIA, 1907 TO 1926* (1985).

²⁹ See WATTS NEIGHBORHOOD COUNCIL, <https://wattsncc.org/history-of-watts> (last visited Sept. 27, 2021), archived at <https://perma.cc/2QTX-HF9H>.

³⁰ RAY, *supra* note 28, at 15.

³¹ *Id.*

³² See DAVID WYATT, *FIVE FIRES: RACE, CATASTROPHE, AND THE SHAPING OF CALIFORNIA* 210 (1997); see also, WATTS NEIGHBORHOOD COUNCIL, *supra* note 29 (“Watts did not become predominantly black until the 1940’s, as the second Great Migration brought tens of thousands of migrants from Louisiana, Mississippi and Texas who left segregated states in search of better opportunities in California. During World War II, the city built several large housing projects (including Nickerson Gardens, Jordan Downs and Imperial Courts) for the thousands of new workers in war industries. By the early 1960’s, these projects had become nearly 100 percent black, as whites moved on to new suburbs outside the central city. As industrial jobs disappeared from the area, the projects housed more poor families than they had initially.”).

³³ See Robert J. Lopez, *Watts: It Has Been a Battleground for Gutter Politics, An Easy Source for Exploitable Labor and Ground Zero for a Racial Explosion. Today, Watts Remains in the Grip of its Troubled Past, the Place That Has “Always Been Left Behind.”*, L.A. TIMES (July 17, 1994), <https://www.latimes.com/archives/la-xpm-1994-07-17-ci-16690-story.html>, archived at <https://perma.cc/EFL8-4QG9>.

Last stop for my folks, Mudtown, Watts Station.
 Nobody locked doors, and we always gave thanks for livin'.³⁴

To accommodate its growing population, Los Angeles built several large housing projects in Watts between 1942 and 1954.³⁵ These public housing projects, which included Nickerson Gardens, Jordan Downs, Imperial Courts, and Hacienda Village, would eventually serve a largely Black population. Watts soon had the highest concentration of public housing in the United States west of the Mississippi River.³⁶

Poverty and racism gradually overwhelmed the Watts community.³⁷ The civic vacuum left by political neglect offered few opportunities for residents. Economic development was sporadic.³⁸ As described in the *New York Times*, inequality and violence were evident to residents on a daily basis:³⁹

At first glance, south-central L.A. does not fit the stereotype of a depressed, predominantly black ghetto. Shaded by tall palms, the bungalow-like homes are fronted by lawns and a profusion of oleander and bougainvillea and hibiscus. But a closer look reveals the grim picture of an occupied zone: heavily barred doors and windows; high chain-link fences; walls covered by graffiti indicating the various gang turfs. Many of the street lamps have been shot out, and when the sun goes down the darkened streets crawl with armed children.⁴⁰

³⁴ Oshea Luja, *Historic Watts Ley-lines*, <https://vimeo.com/214767918>, archived at <https://perma.cc/9JAY-GC5X>.

³⁵ Glen Creason, *CityDig: This 1904 Tract Map is the Beginning of Watts' Story*, L.A. MAG. (Apr. 22, 2015), <https://www.lamag.com/citythinkblog/citydig-this-1904-tract-map-is-the-beginning-of-watts-story/>, archived at <https://perma.cc/43WS-ACWU>.

³⁶ CHANG, *supra* note 8, at 308; John Buntin, *What Does it Take to Stop Crips and Bloods from Killing Each Other?*, N.Y. TIMES MAG. (July 10, 2013), <https://www.nytimes.com/2013/07/14/magazine/what-does-it-take-to-stop-crips-and-bloods-from-killing-each-other.html>, archived at <https://perma.cc/3PB4-TS97>; Sam Slovick, *Inside the Nickerson Gardens Projects with Rapper Jay Rock: "They Can Call Anyone a Terrorist, a Gangbanger, and Put Cameras in Your Neighborhood"*, L.A. WEEKLY (Feb. 17, 2011), <https://www.laweekly.com/inside-the-nickerson-gardens-projects-with-rapper-jay-rock-they-can-call-anyone-a-terrorist-a-gangbanger-and-put-cameras-in-your-neighborhood/>, archived at <https://perma.cc/2TR7-52TH>; See generally Gregory Christopher Brown, James Diego Vigil & Eric Robert Taylor, *The Ghettoization of Blacks in Los Angeles: The Emergence of Street Gangs*, 16 J. AFR. AM. STUD. 209, 216 (2012).

³⁷ See BLACK LOS ANGELES: AMERICAN DREAMS AND RACIAL REALITIES (Darnell Hunt & Ana-Christina Ramón eds., 2010); Ron Curran, *Malign Neglect*, in INSIDE THE L.A. RIOTS: WHAT REALLY HAPPENED—AND WHY IT WILL HAPPEN AGAIN 24 (Don Hazen ed., 1992).

³⁸ GERALD HORNE, FIRE THIS TIME: THE WATTS UPRISING AND THE 1960s 361 (1997).

³⁹ See also WANDA COLEMAN, THE RIOT INSIDE ME: MORE TRIALS & TREMORS 247 (2005).

⁴⁰ Robert Reinhold, *In the Middle of L.A.'s Gang Wars*, N.Y. TIMES MAG. (May 22, 1988), <https://www.nytimes.com/1988/05/22/magazine/in-the-middle-of-la-s-gang-wars.html>, archived at <https://perma.cc/QJC2-R3XK>.

The dilapidated conditions in the public housing projects served as an apt metaphor for the treatment of the Black community by civic leaders.⁴¹ As explained by prominent social activist and California State Senator Tom Hayden, “[l]ike identical structures that birthed gangs in every northern city, these projects contained and institutionalized the low-income and welfare classes.”⁴² The 1965 Watts uprising—the first rebellion—began with a police stop of a Black man and soon escalated.⁴³ Anger at pervasive discrimination and economic inequality in the community led to the outbreak of violence, which eventually resulted in thousands of arrests and dozens of deaths throughout Los Angeles. Dr. Martin Luther King, Jr. visited Watts on August 17, 1965, soon after the violence had subsided. In describing the uprising, Dr. King observed that “economic deprivation, racial isolation, inadequate housing, and general despair” among the Black community formed “the ready seeds which gave birth to tragic expressions of violence.”⁴⁴ Official accounts were far less candid in their assessments. While the McCone Commission was established by Governor Edmund Brown to investigate the causes of the Watts uprising, its final report failed to provide a meaningful review of many structural conditions that contributed to the outbreak of violence.⁴⁵ The report disregarded racism and dismissed claims of police misconduct.⁴⁶ The recommendations that did address social conditions were largely ignored.⁴⁷

In the absence of economic opportunities and in the face of profound structural racism, a gang culture began to emerge in south Los Angeles, including Watts.⁴⁸ There is no single explanation for gang formation; multi-

⁴¹ For these reasons, the projects were referred to as American *favelas*, “isolated and engulfed in disproportionate poverty and violence.” CONNIE RICE, *POWER CONCEDES NOTHING: ONE WOMAN’S QUEST FOR SOCIAL JUSTICE IN AMERICA, FROM THE COURTROOM TO THE KILL ZONES* 119 (2012). See also Richard Rothstein, *Race and Public Housing: Revisiting the Federal Role*, 21 *POVERTY & RACE* 1, 1–2 (2012).

⁴² HAYDEN, *supra* note 23, at 153. See generally Edward Humes, *Turmoil and Truce in the City*, L.A. TIMES (June 13, 2004), <https://www.latimes.com/archives/la-xpm-2004-jun-13-bk-humes13-story.html>, archived at <https://perma.cc/KFE5-FM6U> (reviewing STREET WARS).

⁴³ ELIZABETH HINTON, *AMERICA ON FIRE: THE UNTOLD HISTORY OF POLICE VIOLENCE AND BLACK REBELLION SINCE THE 1960s*, at 6–7 (2021); KELLY LYTLE HERNÁNDEZ, *CITY OF INMATES: CONQUEST, REBELLION, AND THE RISE OF HUMAN CAGING IN LOS ANGELES, 1771–1965*, at 193–94 (2017); HORNE, *supra* note 38, at 54.

⁴⁴ MARTIN LUTHER KING, JR., *THE AUTOBIOGRAPHY OF MARTIN LUTHER KING, JR.* 290–91 (Clayborne Carson ed., 1998).

⁴⁵ See GOVERNOR’S COMMISSION ON THE LOS ANGELES RIOTS (McCONE COMMISSION), *VIOLENCE IN THE CITY: AN END OR A BEGINNING?* (1965).

⁴⁶ MAX FELKER-KANTOR, *POLICING LOS ANGELES: RACE, RESISTANCE, AND THE RISE OF THE LAPD* 39–41 (2018).

⁴⁷ Darrell Dawsey, *25 Years After the Watts Riots: McCone Commission’s Recommendations Have Gone Unheeded*, L.A. TIMES (July 8, 1990), <https://www.latimes.com/archives/la-xpm-1990-07-08-me-455-story.html>, archived at <https://perma.cc/8GGM-XJPC> (noting the Commission’s recommendations to improve education, unemployment, housing, transportation, and health services were largely ignored).

⁴⁸ A. Sherrills Interview, *supra* note 4. See generally Cynthia Hamilton, *The Making of an American Bantustan*, in *INSIDE THE L.A. RIOTS: WHAT REALLY HAPPENED—AND WHY IT WILL HAPPEN AGAIN* 19, 19 (Don Hazen ed., 1992); Alejandro A. Alonso, *Territoriality Among*

ple factors affect their creation.⁴⁹ To the young residents of the housing projects, gangs offered community, protection, and financial opportunities.⁵⁰ They also offered hierarchy, structure, and respect.⁵¹ Gangs were thus a reflection of social isolation, economic inequality, and public neglect.⁵² As the gang-involved population grew, membership and territory became more valuable.⁵³ Drugs offered a lucrative incentive to protect both membership and territory.⁵⁴

Throughout the 1970s and 1980s, gang violence increased in Watts.⁵⁵ In general, gang culture coincided with the housing projects. The Grape Street Crips were from Jordan Downs; the PJ Watts Crips were from Imperial Courts; the Bounty Hunter Bloods were from Nickerson Gardens; and the Hacienda Village Bloods were from Hacienda Village. Other gangs, such as the Circle City Pirus, resided in neighboring communities. This typology is not meant to reflect a monolithic structure in gang culture.⁵⁶ In fact, membership did not always coincide with residency. Moreover, factions (or sets) often developed within gangs, adding further turmoil and potential for conflict.⁵⁷ In addition, retribution became a common feature of gang culture, which perpetuated a cycle of violence.⁵⁸ By the 1990s, gang violence was endemic in south Los Angeles, and death was a constant feature in the Watts community.⁵⁹

African-American Street Gangs in Los Angeles 107 (Apr. 23, 1999) (unpublished M.A. thesis, University of Southern California) (ProQuest); Brown et al., *supra* note 36, at 209–10.

⁴⁹ See JAMES C. HOWELL, OFF. JUV. JUST. DELINQ. PREVENT., OFF. JUSTICE PROGRAMS, U.S. DEP'T JUST., GANG PREVENTION: AN OVERVIEW OF RESEARCH AND PROGRAMS 2 (Dec. 2010); see also UMEMOTO, *supra* note 16, at 8–9; James Diego Vigil, *Urban Violence and Street Gangs*, 32 ANN. REV. ANTHR. 225, 229–30 (2003).

⁵⁰ The phenomenon of the rise of gangs is well-documented. See, e.g., Jane Wood & Emma Alleyne, *Street Gang Theory and Research: Where Are We Now and Where Do We Go from Here?*, in THE MODERN GANG READER 9 (4th ed., Cheryl L. Maxson, Arlen Egley Jr., Jody Miller & Malcolm W. Klein, 2014); KAREN L. KINNEAR, GANGS 5–12 (2d ed. 2009); MALCOLM W. KLEIN, THE AMERICAN STREET GANG: ITS NATURE, PREVALENCE, AND CONTROL 74–80 (1995).

⁵¹ See SANYIKA SHAKUR, MONSTER: THE AUTOBIOGRAPHY OF AN L.A. GANG MEMBER 14, 102–05 (2004).

⁵² A. Sherrills Interview, *supra* note 4. See also LaVonna Blair Lewis, Oxf. Afr. Am. Stud. Cent., *History of Jordan Downs and Nickerson Gardens Housing Projects* (2016).

⁵³ FELKER-KANTOR, *supra* note 46, at 190–97.

⁵⁴ See Donna Murch, *Crack in Los Angeles: Crisis, Militarization, and Black Response to the Late Twentieth-Century War on Drugs*, 102 J. AM. HIST. 162 (2015); see also Paul E. Bellair & Thomas L. McNulty, *Gang Membership, Drug Selling, and Violence in Neighborhood Context*, 26 JUST. Q. 644, 662 (2009).

⁵⁵ WATTS NEIGHBORHOOD COUNCIL, *supra* note 29.

⁵⁶ See HERBERT C. COVEY, CRIPS AND BLOODS: A GUIDE TO AN AMERICAN SUBCULTURE 4 (2015); see also Daniel Duane, *Straight Outta Boston: Why is the 'Boston Miracle'—the Only Tactic Proven to Reduce Gang Violence—Being Dismissed by the L.A.P.D., the FBI, and Congress?*, MOTHER JONES 60, 63 (Jan./Feb. 2006). See generally Russell D. Flores, *Crips and Bloods*, 13 CRIME & JUST. INT'L 6 (1997).

⁵⁷ CHANG, *supra* note 8, at 359–60.

⁵⁸ See UMEMOTO, *supra* note 16, at 87; see also Scott Decker, *Gangs and Violence: The Expressive Character of Collective Involvement*, 11 JUST. Q. 231 (1996).

⁵⁹ See Richard B. Muhammad & Charlene Muhammad, *What Happened to Gang Peace?*, THE FINAL CALL (May 17, 2012), http://www.finalcall.com/artman/publish/National_News_2/

2. Law Enforcement and the Legal System

The story of Watts cannot be told without reference to the role of law enforcement and the criminal justice system. To be clear, many police officers were sincere in their efforts to protect the community.⁶⁰ They worked in a conflict zone where gangs were organized and violent, and where gang violence often led to the injury or death of innocent people. Occasionally, police were the intended targets of violence. In this challenging environment, many officers sought to fulfill their motto, “to protect and to serve.”⁶¹ However, other officers pursued a different agenda.⁶² Motivated by racism and fueled by unchecked power, they disregarded due process and discarded civil rights.⁶³ Too often, the culmination of police misconduct was murder, and the legal system failed to prosecute most of these cases, signaling to many that Black and Brown lives did not matter.⁶⁴

Police tactics further undermined community trust.⁶⁵ Searches occurred in the absence of probable cause⁶⁶ and arrests were often based on a suspect’s race. The legal system routinely ignored these due process violations.⁶⁷ In the 1980s, military tactics, complete with advanced combat gear, armored vehicles, and aerial support, became a regular part of policing strategy in south Los Angeles.⁶⁸ However, aggressive law enforcement operations only served to exacerbate tensions in the community.⁶⁹ For example, the Los Angeles Police Department initiated Operation Hammer in 1987 to use over-

article_8843.shtml, archived at <https://perma.cc/CT5H-CSH2>; see also WATTS NEIGHBORHOOD COUNCIL, *supra* note 29 (“Watts suffered further in the 1970’s as gangs gained strength and raised the level of violence in the neighborhood.”). Yet, many residents of Watts remained deeply proud of their connections to the city. See Rodney Shepard, *Why I Live and Build in Watts: It’s My Home*, L.A. TIMES (Aug. 12, 1990), <https://www.latimes.com/archives/la-xpm-1990-08-12-re-1195-story.html>, archived at <https://perma.cc/A3L9-J529>.

⁶⁰ Cf. DAVID KENNEDY, DON’T SHOOT: ONE MAN, A STREET FELLOWSHIP, AND THE END OF VIOLENCE IN INNER-CITY AMERICA 16–18 (2011).

⁶¹ See generally JOE DOMANICK, TO PROTECT AND TO SERVE: THE LAPD’S CENTURY OF WAR IN THE CITY OF DREAMS (1994).

⁶² See Robert Reinhold, *Violence and Racism are Routine in Los Angeles Police*, *Study Says*, N.Y. TIMES (July 9, 1991), <https://archive.nytimes.com/www.nytimes.com/books/98/02/08/home/rodney-report.html>, archived at <https://perma.cc/4C7E-ZJUX>.

⁶³ Cf. HORNE, *supra* note 38, at 358–60.

⁶⁴ Joe Domanick, *Police Power*, in INSIDE THE L.A. RIOTS: WHAT REALLY HAPPENED—AND WHY IT WILL HAPPEN AGAIN 21 (Don Hazen ed., 1992).

⁶⁵ HORNE, *supra* note 38, at 358–60; Reinhold, *supra* note 62. Forty years later, police tactics against Black communities continue to undermine community trust. See, e.g., Michael Gentithes, *Suspicionless Witness Stops: The New Racial Profiling*, 55 HARV. C.R.-C.L. L. REV. 491 (2020).

⁶⁶ See generally FELKER-KANTOR, *supra* note 46, at 19–42, 49.

⁶⁷ See, e.g., IAN F. HANEY-LOPEZ, RACISM ON TRIAL: THE CHICANO FIGHT FOR JUSTICE (2003); Judge Stephen R. Reinhardt, *Riots, Racism, and the Courts*, 23 GOLDEN GATE U. L. REV. 1 (1993); see generally EDWARD J. ESCOBAR, RACE, POLICE, AND THE MAKING OF A POLITICAL IDENTITY: MEXICAN AMERICANS AND THE LOS ANGELES POLICE DEPARTMENT, 1900–1945 (1999).

⁶⁸ HINTON, *supra* note 43, at 238–40; FELKER-KANTOR, *supra* note 46, at 50–57.

⁶⁹ See Donna Murch, *Crack in Los Angeles: Crisis, Militarization, and Black Response to the Late Twentieth-Century War on Drugs*, 192 J. AM. HIST. 162, 165 (2015); see also Marc

whelming force to search for criminal activity in the community.⁷⁰ These operations led to massive property damage and large-scale arrests but were really designed “to deliver a strong message to the gangs.”⁷¹ As described by Twilight Bey, a former member of the Circle City Pirus, Operation Hammer “would have police roll through the hood and basically beat brothas up. Brothas were getting slammed every day. Cats were trying to get their lives together, but how can you do that when you’re constantly being abused . . .”⁷² Community members who were innocent and had done nothing wrong were traumatized by the use of excessive force and humiliated by public arrests.⁷³

Some gang members argued the police actually benefited from gang conflict. According to T. Rodgers, who was affiliated with the Black P. Stones in south Los Angeles, “[w]ithout the warring factions of gangs, there would be no CRASH [Community Resources Against Street Hoodlums], there would be no OSS [Operation Safe Streets], which is the county sheriff’s thing, there would be no gang unit, there would be no specialized gang unit, there would be no task force.”⁷⁴ Activists also pointed out that gang conflict was also lucrative for individual officers, who benefitted from overtime pay.⁷⁵

The legal system failed the Watts community in other respects. State and federal officials further isolated and targeted the Black community.⁷⁶ Government resources were rarely offered to promote economic development or to address social problems.⁷⁷ Instead, criminal legislation seemed designed to disproportionately target minority groups. In 1988, for example,

Cooper, *LA’s State of Siege: City of Angels, Cops from Hell*, in *INSIDE THE L.A. RIOTS: WHAT REALLY HAPPENED—AND WHY IT WILL HAPPEN AGAIN* 12–14 (Don Hazen ed., 1992).

⁷⁰ See Mike Davis, *CITY OF QUARTZ: EXCAVATING THE FUTURE OF LOS ANGELES* 268 (1992).

⁷¹ John L. Mitchell, *The Raid That Still Haunts L.A.*, *L.A. TIMES* (Mar. 14, 2001), <https://www.latimes.com/archives/la-xpm-2001-mar-14-mn-37553-story.html>, archived at <https://perma.cc/2TNG-TZTC>; see also John Johnson, *Night of the “Hammer”*: *Retaking the Streets of South L.A.*, *L.A. TIMES* (July 3, 1989), <https://www.latimes.com/archives/la-xpm-1989-07-03-me-2254-story.html>, archived at <https://perma.cc/M3A3-RBML>.

⁷² Transcript, Breakdown FM: Twilight Bey Speaks About the LA Gang Truce and LA Riots 10 Years Later Pt1 (Apr. 29, 2002), <https://radio.indymedia.org/en/node/7890>, archived at <https://perma.cc/5HXY-8LW3> [hereinafter *Bey Transcript*]. Noted American playwright Anna Deveare Smith titled her one-woman play about the L.A. riots “Twilight: Los Angeles, 1992.” SMITH, *supra* note 11, at 253–56. The title was inspired by Twilight Bey and his work in support of the gang truce.

⁷³ See Mitchell, *supra* note 71.

⁷⁴ YUSUF JAH & SISTER SHAH’KEYAH, *UPRISING: CRIPS AND BLOODS TELL THE STORY OF AMERICA’S YOUTH IN THE CROSSFIRE* 203, 209–10 (1995) (interview with “T. Rodgers”).

⁷⁵ Mr. Daveyd, *We Remember the Rodney King Uprisings and the Historic Gang Truce of 1992*, *HIP-HOP AND POLITICS* (Apr. 27, 2012), <http://hiphopandpolitics.com/2012/04/27/we-remember-the-rodney-king-uprisings-and-the-historic-gang-truce-of-1992/>, archived at <https://perma.cc/6CW9-CQLC>.

⁷⁶ FELKER-KANTOR, *supra* note 46, at 19.

⁷⁷ HORNE, *supra* note 38, at 360–64. When resources were provided to the community, it was often in the form of combat gear and riot equipment for law enforcement. FELKER-KANTOR, *supra* note 46, at 197–216.

California adopted the Street Terrorism Enforcement and Prevention Act to impose criminal liability for gang membership.⁷⁸ The state also authorized enhanced criminal penalties for acts committed by gang members.⁷⁹ In addition, Los Angeles began using injunctions to target alleged gang activity, criminalizing common behavior and imposing guilt by association.⁸⁰

By the 1980s, the use of crack cocaine had become an epidemic in urban regions throughout the United States.⁸¹ While drug possession was already criminalized and subject to significant sanctions, the federal Anti-Drug Abuse Act of 1986 created profound disparities between crack cocaine and powder cocaine offenses.⁸² The racial disparity in drug sentencing was evident, and the Black community suffered disproportionately, both in the number of convictions and the length of incarceration.⁸³ While these were national developments, south Los Angeles was on the frontline.⁸⁴

In sum, poverty, civic neglect, discrimination, and racialized policing undermined the Watts community's trust in local government and reinforced the desire of gangs to address the human toll of gang violence themselves.⁸⁵

B. Negotiating the Treaty

While many gang members had little interest in peace or compromise, others realized that conflict did not benefit them or their community.⁸⁶ They were motivated to protect family and close friends from indiscriminate shootings and targeted attacks. They recognized that law enforcement could not end the violence—if anything, the police were part of the problem. Within the Black community, there was also a strong desire to protect itself from destruction.⁸⁷ Public events, such as Louis Farrakhan's 1989 *Stop the Killing Tour*, highlighted these concerns and called on the Black community

⁷⁸ CAL. PENAL CODE §§ 186.20–.33 (West 2019).

⁷⁹ CAL. PENAL CODE § 186.22 (West 2019). See generally Erin R. Yoshino, *California's Criminal Gang Enhancements: Lessons from Interviews with Practitioners*, 18 S. CAL. REV. L. & SOC. CH. 117 (2008); Martin Baker, *Stuck in the Thicket: Struggling with Interpretation and Application of California's Anti-Gang STEP Act*, 11 BERKELEY J. CRIM. L. 101, 104 (2006).

⁸⁰ See generally Lua Kamál Yuille, *Blood in, Buyout: A Property & Economic Approach to Street Gangs*, 2015 WIS. L. REV. 1049.

⁸¹ U.S. GENERAL ACCOUNTING OFFICE, NONTRADITIONAL ORGANIZED CRIME: LAW ENFORCEMENT OFFICIALS' PERSPECTIVES ON FIVE CRIMINAL GROUPS 47–52 (1989).

⁸² Anti-Drug Abuse Act of 1986, Pub. L. No. 99–570, 100 Stat. 3207.

⁸³ See, e.g., AM. CIV. LIB. UNION, CRACKS IN THE SYSTEM: TWENTY YEARS OF THE UNJUST FEDERAL CRACK COCAINE LAW 1 (2006); MARC MAUER, YOUNG BLACK MEN AND THE CRIMINAL JUSTICE SYSTEM: A GROWING NATIONAL PROBLEM, THE SENTENCING PROJECT 5 (1990); JOAN PETERSILIA, RACIAL DISPARITIES IN THE CRIMINAL JUSTICE SYSTEM vii (1983).

⁸⁴ See HERNÁNDEZ, *supra* note 67, at 194; see also HORNE, *supra* note 38, at 358–64.

⁸⁵ FELKER-KANTOR, *supra* note 46, at 240 (“Attempting to set aside grievances, they hoped to redirect energy toward positive community change.”); JAH & SHAH'KEYAH, *supra* note 74, at 291 (interview with “Q-Bone”) (“What could be done to make a whole city that's at rage calm down? The police can't do it. The National Guard can't do it.”).

⁸⁶ See Terry, *supra* note 3.

⁸⁷ See ANTHONY PERRY, BLACK LEADERSHIP, BLACK GANGS: WILL THEY UNITE TO RE-BUILD BLACK AMERICA iv (1995).

to engage in collective action against gang violence.⁸⁸ Various efforts to craft negotiated agreements appeared in the late 1980s.⁸⁹ In fact, local ministers, including the Reverend Charles Mims, Jr. of the Tabernacle of Faith Church in Watts, organized several gang “summits.”⁹⁰ These meetings involved members of the Bloods and Crips, and they often highlighted the strong animosity between the groups.⁹¹ Ad hoc agreements were sometimes made but they generally did not result in meaningful long-term change.⁹²

The Watts Gang Treaty was different. It reflected a social movement with deep roots in the community. Building on prior agreements, it worked to end gang violence and provide new opportunities to local residents.⁹³ It was an organic process that began through informal meetings in the housing projects, community centers, and houses of worship. Local activists wanted to protect their neighbors. Religious leaders sought peace for their congregants and an end to senseless violence. Above all, gang members brought credibility to the process. They knew each other, and they knew the costs of continued conflict. Their injuries were not only physical; their psychological wounds were also profound.⁹⁴

Several members of the Watts community played a defining role in this social movement. Daude and Aqeela Sherrills (of the Jordan Downs housing

⁸⁸ Andrea Ford & Charisse Jones, *Respect Life, Farrakhan Asks L.A. Crowd: Muslims: Nation of Islam leader welcomed by record audience at Sports Arena. Talk comes after recent clashes with police, deputies*, L.A. TIMES (Feb. 3, 1990), <https://www.latimes.com/archives/la-xpm-1990-02-03-me-953-story.html>, archived at <https://perma.cc/NJE4-F3M7>; Charisse Jones, *Farrakhan to Speak to 900 Gang Leaders to “Stop the Killing.”* L.A. TIMES (Oct. 6, 1989), <https://www.latimes.com/archives/la-xpm-1989-10-06-me-628-story.html>, archived at <https://perma.cc/32QC-SVY3>; CHANG, *supra* note 8, at 362.

⁸⁹ Bey Interview, *supra* note 4; see also HAYDEN, *supra* note 23, at 182–83; JAH & SHAH’KEYAH, *supra* note 74, at 312 (interview with “Twilight Bey”).

⁹⁰ HINTON, *supra* note 43, at 240; Bob Baker & Amy Stevens, *Peace Talks: Pastor Hailed, Assailed on Summit to Negotiate Gang Truce*, L.A. TIMES (July 27, 1988), <https://www.latimes.com/archives/la-xpm-1988-07-27-me-6444-story.html>, archived at <https://perma.cc/3M3T-C4UW>; *Local News in Brief: 2nd Gang “Peace Summit”*, L.A. TIMES (Aug. 10, 1988), <https://www.latimes.com/archives/la-xpm-1988-08-10-me-73-story.html>, archived at <https://perma.cc/CYM5-JXJA>.

⁹¹ CHARLES MIMS, JR., “IF I MAKE MY BED IN HELL, HE’S THERE.” AN AUTOBIOGRAPHY 14–16 (1990).

⁹² In 1986, for example, Community Youth Gang Services in Los Angeles worked to develop a peace treaty among Bloods and Crips. See Scott Harris, “We Agree to Stop Killing Each Other:” *Gang Peace Treaties Being Negotiated*, L.A. TIMES (Nov. 5, 1986), <https://www.latimes.com/archives/la-xpm-1986-11-05-me-15363-story.html>, archived at <https://perma.cc/2NNB-DL3B>. These initial efforts proved unsuccessful. Cf. Bob Baker, *Change in Focus Renews Anti-Gang Group*, L.A. TIMES (July 13, 1989), <https://www.latimes.com/archives/la-xpm-1989-07-13-me-4577-story.html>, archived at <https://perma.cc/8BSA-AEGJ>.

⁹³ A. Sherrills Interview, *supra* note 4.

⁹⁴ *Id.*; see generally Sarah Osman & Jane Wood, *Gang Membership, Mental Illness, and Negative Emotionality: A Systematic Review of the Literature*, 17 INT’L J. FORENSIC MENTAL HEALTH 223, 223 (2018); Jane Wood & Sophie Dennard, *Gang Membership: Links to Violence Exposure, Paranoia, PTSD, Anxiety, and Forced Control of Behavior in Prison*, 80 PSYCHIATRY 30, 30–33 (2017); HAYDEN, *supra* note 23, at 48–49; H. Range Hutson, Deirdre Anglin & Kelvin Spears, *The Perspectives of Violent Street Gang Injuries*, 6 NEUROSURGERY CLINICS N. AM. 621, 624 (1995).

project) were early advocates for negotiation.⁹⁵ At one time, both were also members of the Grape Street Crips. Other important members of the Watts community involved in the process included Dewayne Holmes and Tony Bogard (of the Imperial Courts housing project), Don Gordon (of the Jordan Downs housing project), Twilight Bey, and Anthony Perry (now Rasheed L. Muhammad).⁹⁶ Significantly, they all had strong connections to local gangs.

While each individual was influenced by his own distinct experiences with gang culture, they all shared a common desire to end the cycle of violence that had engulfed the Watts community.⁹⁷ Gang violence had killed family members and wounded close friends. They also recognized that “Black-on-Black” violence was destroying the Black community from within.⁹⁸ To Don Gordon, the reason to pursue a truce was self-evident: “In 1987, I was hit three times with [an] AK, ‘cross the head, the arm and the leg . . . If them three reasons ain’t good enough to stop gangbanging, I don’t know what is.”⁹⁹ To Daude Sherrills, the cycle of violence, destruction, and death had to end for his family to survive.¹⁰⁰ His reasoning was straightforward: “I did this for my kid. . . . I stopped gangbanging because I had a son being born.”¹⁰¹

There was also a desire to develop a unified response against systemic racism and police abuse in the community. Confronted with decades of con-

⁹⁵ See *Truce that Ended 30 Years of LA Gang Warfare*, BBC (Apr. 15, 2015), <https://www.bbc.com/news/av/magazine-32250743>, archived at <https://perma.cc/VA8E-H3FN>.

⁹⁶ Several members, including Bey, had been involved in peace negotiations in the late 1980s. Bey Interview, *supra* note 4; see also Bob Baker, *Gang Handshake: There May Be No Truce, But in Get-Together There Is Hope*, L.A. TIMES (July 29, 1988), <https://www.latimes.com/archives/la-xpm-1988-07-29-me-8054-story.html>, archived at <https://perma.cc/GL74-PK2W>; Matt Lait, *Los Angeles Gang Talks Conclude Without Truce*, WASH. POST (July 29, 1988), <https://www.washingtonpost.com/archive/politics/1988/07/29/los-angeles-gang-talks-conclude-without-truce/1f494c18-5b6e-45aa-a3fd-9c6ded2cedfc/>, archived at <https://perma.cc/EYX8-B6JP>.

⁹⁷ The gendered dynamics of gang culture resulted in men playing the most significant roles in the treaty process. See Raegan Kelly, *Watts Love: The Truce is On!*, 3 URB. MAG. 42, 48 (1993) (noting that women were largely excluded from the truce process). However, several female gang members, such as Sista Soulja, were involved. Buntin, *supra* note 36.

⁹⁸ See JAH & SHAH’KEYAH, *supra* note 74, at 241 (interview with “Big Ship”) (“Most of all, and most importantly, is that we must immediately stop this Black-on-Black crime and this gang-banging, because until we start respecting one another as human beings, as well as ourselves, then we won’t be able to build up a damn thing.”). Some gang members even referred to gang violence as “Black on Black genocide.” STANLEY TOOKIE WILLIAMS, *BLUE RAGE, BLACK REDEMPTION: A MEMOIR* 129 (2004). There is some controversy, however, about the term “Black-on-Black” violence. See Anthony A. Braga & Rod K. Brunson, *The Police and Public Discourse on “Black-on-Black” Violence*, NEW PERSP. IN POLICING BULL., (May 2015), <https://www.ojp.gov/pdffiles1/nij/248588.pdf>, archived at <https://perma.cc/CQ4D-9XH3>.

⁹⁹ Kelly, *supra* note 97, at 44.

¹⁰⁰ Charlene Muhammad, *Twenty-Five Years After Rebellion, Gang Peace Treaty: The Struggle for Justice, Progress Goes on in Los Angeles*, THE FINAL CALL (May 2, 2017), http://www.finalcall.com/artman/publish/National_News_2/article_103627.shtml, archived at <https://perma.cc/EQ9L-7YMB>; D. Sherrills Interview, *supra* note 4.

¹⁰¹ FELKER-KANTOR, *supra* note 46, at 240; Michael Krikorian & Greg Krikorian, *Watts Truce Holds Even as Hopes Fade*, L.A. TIMES (May 18, 1997), <https://www.latimes.com/archives/la-xpm-1997-05-18-me-60016-story.html>, archived at <https://perma.cc/DYJ4-6HHF>.

flict, the challenge was finding a way to focus on their common interests. According to Twilight Bey, the community was searching for a way to escape the gang culture and its perpetual cycle of violence:

We had a lot of hate in our hearts. The hate was rooted in the dysfunctionality of our families our schools, communities and the police. We had all of this hate and nowhere to release it in a positive way. Our hate would manifest itself in the form of violence. You could only go that way but for so long.¹⁰²

Anthony Perry echoed this belief: “The concern among this town’s gang members with regard to their self-destructive behavior is what compelled them to cease their . . . war among themselves.”¹⁰³ As noted by Dewayne Holmes, “[t]he natural question became how do we get together but still have these conflicts.”¹⁰⁴

The leaders of the social movement decided that a peace treaty among the warring gang factions could offer a path to peace. While their agreement would focus on Watts, which they saw as “ground zero,” they hoped it would have an impact throughout Los Angeles.¹⁰⁵ According to Aqeela Sherrills, the Treaty drafters believed if they brought together the four major housing projects in Watts, they “would create a domino effect for peace across the city.”¹⁰⁶

The Treaty drafters were supported by a broader group of community and religious leaders. Former National Football League (“NFL”) player Jim Brown used his fame and leadership in the Black community to facilitate conversations through his Amer-I-Can Program, which offered life management training and promoted community development.¹⁰⁷ Some of these meetings were held at his home in Los Angeles.¹⁰⁸ On several occasions, meetings were held at Masjid Al Rasul, a local mosque in Watts.¹⁰⁹ The

¹⁰² Bey Transcript, *supra* note 72.

¹⁰³ RASHEED L. MUHAMMAD, ORIGINAL GANG TRUCE OF 1992 AND THE PROPER HANDLING OF PEOPLE 7 (5th ed. 2010). Following his conversion to Islam, Anthony Perry took the name Rasheed L. Muhammad.

¹⁰⁴ HAYDEN, *supra* note 23, at 182.

¹⁰⁵ A. Sherrills Interview, *supra* note 4.

¹⁰⁶ *Id.*

¹⁰⁷ HAYDEN, *supra* note 23, at 185; CHANG, *supra* note 8, at 361–63; JAH & SHAH’KEYAH, *supra* note 74, at 323–24 (interview with “Twilight Bey”); Michael O’Keefe, *Former NFL Legend Jim Brown Teaches Through 25-Year-Old Program Ameri-I-Can Foundation*, N.Y. DAILY NEWS (Nov. 6, 2011), <https://www.nydailynews.com/sports/football/nfl-legend-jim-brown-teaches-25-year-old-program-amer-i-can-foundation-article-1.972923>, archived at <https://perma.cc/EMM8-3N2Q>.

¹⁰⁸ CHANG, *supra* note 8, at 363.

¹⁰⁹ *Id.* at 365. American photographer, Joel Sternfeld, memorialized the mosque in a July 1993 photograph as part of his series, *On This Site: Landscape in Memoriam*. The photograph is now part of the permanent collection of the Art Institute of Chicago. See *The Masjid-Al-Rasul, 11211 Central Avenue, Watts, Los Angeles, California* (photograph), in ART INST. OF CHI. (July 1993), <https://www.artic.edu/artworks/147220/the-masjid-al-rasul-11211-central-avenue-watts-los-angeles-california>, archived at <https://perma.cc/Q8H2-B8W2>. In describing the photograph, art critic Geoff Dyer offered the following assessment:

mosque was led by Minister Mujahid Abdul-Karim, who had a long history of working with the local community in Watts, and who regularly counseled gang members.¹¹⁰ During these negotiations, local politicians were conspicuously absent.¹¹¹

These were tense meetings, and participants knew the stakes.¹¹² To build credibility, key members from each gang had to attend. Twilight Bey noted the importance of broad representation: “I brought my homeboys from three different generations, because that’s the way it is out here now. In each generation you have a man that’s respected and has influence. So in order to make sure that it gets to every level, you need to bring representatives from every level.”¹¹³

Daude Sherrills acknowledged the difficulties of bringing gang members together: “A lot of brothers didn’t trust the situation. They wanted to make sure that nobody was going to get ambushed.”¹¹⁴ His brother, Aqeela Sherrills, echoed these concerns: “[S]ome of the meetings were really volatile because, you know, you get killers in the same room, you know, who have harmed each other and who have, you know, traded bodies. I mean, you can imagine. You know what I’m saying. It’s intense.”¹¹⁵ Don Gordon shared a similar perspective: “We had a lot of problems, because some brothers weren’t with it. We had people that had killed other people’s cousins, homeboys, and brothers. There was a lot of animosity in bringing about this peace, because everybody wasn’t down with it.”¹¹⁶ Highlighting the inherent tension and mistrust, Bey noted gang members would often bring

One of the most moving photographs I know is also one of the dullest: an empty, uninteresting-looking room with a brown carpet and beige walls. It comes at the end of Joel Sternfeld’s book *On This Site* (1996) . . . The picture I referred to at the beginning is a kind of a postscript; it comes after the Afterword, after the Acknowledgements etc. The dull room is in the Masjid Al Rasul mosque in Watts, where members of the Bloods and the Crips, rival Los Angeles gangs, negotiated and signed a truce on April 26, 1992. In the aftermath of all that has gone before the *promise* of this picture is all the more immense for being tentative, provisional. It offers simple documentary proof of Maxim Gorky’s belief that “Life will always be bad enough for the desire for something better not to be extinguished in men.”

GEOFF DYER, *WORKING THE ROOM: ESSAYS AND REVIEWS: 1999-2010*, at 49–50 (2010) (emphasis in original).

¹¹⁰ Kelly, *supra* note 97, at 44. In September 1992, Minister Abdul-Karim received a Certificate of Special Recognition from Congresswoman Maxine Waters for his work in “originating, organizing, supporting and maintaining the Truce.” (on file with author). For a documentary highlighting the role of the mosque in promoting peace in Watts, see *Bloods & Crips: The Peace Treaty*, YouTube (Oct. 5, 2018), https://www.youtube.com/watch?v=_inline>ase16a3VrQ, archived at <https://perma.cc/3L9D-MRSS>.

¹¹¹ However, some politicians, such as Congresswoman Maxine Waters and California State Senator Tom Hayden, did offer their support to the peace process. AFARY, *supra* note 7, at 97.

¹¹² HAYDEN, *supra* note 23, at 187.

¹¹³ JAH & SHAH KEYAH, *supra* note 74, at 333 (interview with “Twilight Bey”).

¹¹⁴ CHANG, *supra* note 8, at 365.

¹¹⁵ *Witness History: Bloods and Crips Truce*, BBC (Apr. 15, 2015), <https://www.bbc.co.uk/sounds/play/p02nnv6w>, archived at <https://perma.cc/W666-YXSL>.

¹¹⁶ JAH & SHAH KEYAH, *supra* note 74, at 92 (interview with Don Gordon).

weapons to these meetings: “Sometimes there was so much metal [weaponry] that if you melted it down it would become a tanker . . . But it worked so that eventually there was no need to bring metal to the house.”¹¹⁷ These in-person meetings proved invaluable. According to Bey:

There [we could see that] this person feels and hurts in the same way I do, and the only way to stop the pain is to stop hurting each other. Young men expressed their anger and pain but also expressed that they would try to communicate. Some of us have found some of our closest friends to be people from the other side.¹¹⁸

C. Drafting the Treaty

As these meetings advanced, Daude Sherrills met with Anthony Perry and asked him to draft a document that could be used as an outline for a gang truce. Sherrills presented a set of notes to Perry that explained their goal was “to create [a] better environment for children, parents, and for economic dev[elopment], bringing jobs and business back to the community.”¹¹⁹ Sherrills’s interest in history led him to consider using a treaty as a template for their work.¹²⁰ Perry also believed a document drafted in a “military format” would be effective because “many youth” needed “military structure” for discipline.¹²¹ The Treaty would provide an opportunity for gangs to present themselves “in a unified way, signaling peace.”¹²² It would be drafted specifically for the gangs from the four housing projects in Watts.¹²³

To prepare the document, Perry first visited the University of California, Los Angeles.¹²⁴ Because he was not a student, he was not allowed access to the library.¹²⁵ He then went to the University of Southern California, where he was able to conduct his research in the Von KleinSmid Center (“VKC”) Library.¹²⁶ The VKC Library was an ideal research facility be-

¹¹⁷ Beatriz Johnston Hernández, *Gang Truces Have Helped End Violence*, in *GANGS: OPPOSING VIEWPOINTS* 148–49 (Laura K. Egendorf ed., 2001).

¹¹⁸ *Id.* at 149.

¹¹⁹ MUHAMMAD, *supra* note 103, at 27.

¹²⁰ D. Sherrills Interview, *supra* note 4.

¹²¹ MUHAMMAD, *supra* note 103, at 13.

¹²² *Id.*

¹²³ MUHAMMAD, *supra* note 103, at 25; PERRY, *supra* note 87, at iv.

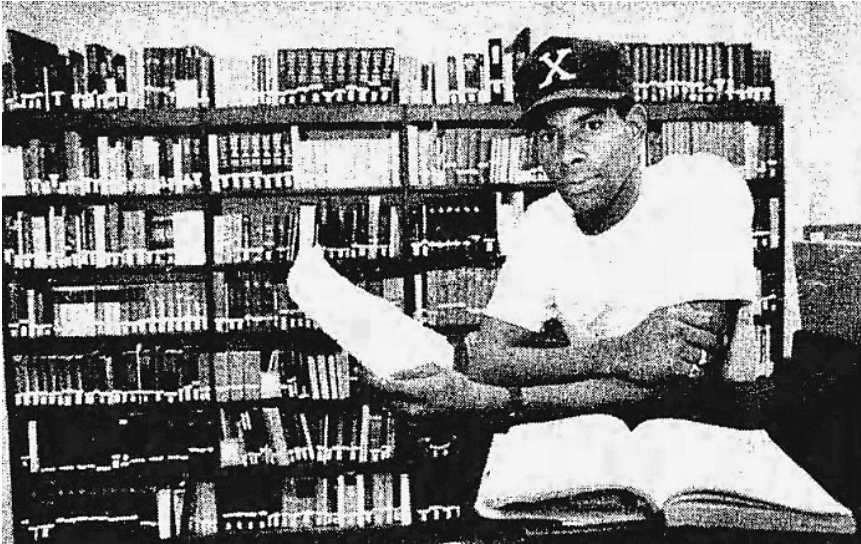
¹²⁴ HAYDEN, *supra* note 23, at 188.

¹²⁵ Advocates in support of the Treaty, including Twilight Bey, returned to UCLA in 1994 to speak about their work. See Tatiana Botton, *Ex-Gang Members Discuss Community Peace*, DAILY BRUIN (Jan. 22, 1995), <https://dailybruin.com/1995/01/22/ex-gang-members-discuss-commun/>, archived at <https://perma.cc/999H-3KJD>.

¹²⁶ Katz & Ford, *supra* note 5. In 2020, the University of Southern California removed the Von KleinSmid name from the building due to his leadership role in the eugenics movement and his support of forced sterilization. Teresa Watanabe & Tomás Mier, *USC Removes Name of Rufus von KleinSmid, a Eugenics Leader, From Prominent Building*, L.A. TIMES (June 12,

cause it housed the university's collection of international legal documents. With the assistance of library staff, Perry eventually discovered the Egypt-Israel armistice documents.¹²⁷

These documents proved significant to gang members for two reasons. First, the Arab-Israeli conflict was an intractable struggle, with countless casualties on both sides, a description that mirrored the ongoing gang conflict in Watts.¹²⁸ According to Perry, the Arab-Israeli conflict involved "fights over land rights, turf, and grudges people just won't let go," a characterization that also served as an apt description of the gang conflict.¹²⁹ Second, the Arab-Israeli conflict and the conflict in Watts both involved opponents who were connected by land and shared a common heritage. As Perry noted, "I knew from the Bible and Koran that the Jews and Arabs were Semitic, they were related, both children of Abraham, it was tribal bloodletting, and I knew from gang members the same thing, that they were saying, 'man, he's my cousin' about their enemies in another gang."¹³⁰



*Anthony Perry holding the draft treaty at the Von KleinSmid Library.*¹³¹

2020), <https://www.latimes.com/california/story/2020-06-11/usc-removes-name-of-former-president-rufus-von-kleinsmid-a-supporter-of-eugenics-from-prominent-building>, archived at <https://perma.cc/6FHN-BPTM>.

¹²⁷ Katz & Ford, *supra* note 5; HAYDEN, *supra* note 23, at 188. Email from Ken Klein, Reference Librarian, University of Southern California, to William Aceves (Apr. 23, 2022) (on file with author).

¹²⁸ MORRIS, *supra* note 6, at 1–12.

¹²⁹ HAYDEN, *supra* note 23, at 188.

¹³⁰ *Id.*; see also PERRY, *supra* note 87, at 19 (describing the historical parallels between "the children of Israel" and "black people").

¹³¹ This photograph was taken at the Von KleinSmid Library by L.A. Times photographer, Jim Mendenhall and appeared in the June 17, 1992 edition of the Los Angeles Times. Copyright © 1992. Los Angeles Times. Used with Permission. See Katz & Ford, *supra* note 5.

Perry copied the relevant text of the Egypt-Israel Armistice Agreement by hand.¹³² By using the Armistice Agreement as a template, Perry believed the Treaty would “take on an official appearance to make the entire world know *Black youth* were serious.”¹³³ Perry then shared this draft with Daude Sherrills, who refined the text to make it applicable to the gang conflict in Watts.

The Egypt-Israel Armistice Agreement took on even greater meaning when the drafters discovered its principal architect was Dr. Ralph Bunche, an American diplomat who worked for the United Nations.¹³⁴ More significantly, Dr. Bunche was African American, and from Los Angeles. He attended Jefferson High School in Los Angeles, which was only a few miles from Watts, and then pursued his undergraduate studies at the University of California, Los Angeles.¹³⁵ Dr. Bunche was eventually awarded the Nobel Peace Prize for his work on the Armistice Agreement. To the drafters of the Watts Gang Treaty, Dr. Bunche’s significance came from his status as a Black American from Los Angeles “who had grown up in the neighborhood.”¹³⁶ This was deeply symbolic. His role in the Armistice Agreement affirmed their conviction that they were pursuing the right course of action.¹³⁷

Daude Sherrills titled the document *Multi-Peace Treaty-General Armistice Agreement*.¹³⁸ The preamble began by identifying the key parties to the agreement.¹³⁹ It indicated that the named representatives of the parties had been granted full authority by their respective neighborhoods. The agreement was then divided into four articles.

Echoing the language of the Egypt-Israel Armistice Agreement, Article I acknowledged the Treaty’s goals were to prevent “the future war-like destruction of the parties” and promote “the return to permanent peace in Watts, California.”¹⁴⁰ It stated that “[n]o aggressive actions by the leading influential neighborhood community leaders will call for attacking another party.”¹⁴¹ It prohibited the planning or threatening of murder. In addition, Article I indicated that each party had a right to security and freedom from

¹³² MUHAMMAD, *supra* note 103, at 46; Katz & Ford, *supra* note 5.

¹³³ MUHAMMAD, *supra* note 103, at 46 (emphasis in original).

¹³⁴ BRIAN URQUHART, RALPH BUNCHE: AN AMERICAN ODYSSEY 21 (1993).

¹³⁵ *Id.* at 33, 37.

¹³⁶ A. Sherrills Interview, *supra* note 4.

¹³⁷ *Id.* Following the June 17, 1992 *Los Angeles Times* article about the Watts Gang Treaty, the Vice Chancellor for University Relations at UCLA wrote a letter to the editor highlighting Bunche’s connections to Watts and his status as a UCLA graduate. See Alan F. Charles, *Ralph Bunche*, L.A. TIMES (June 24, 1992), <https://www.latimes.com/archives/la-xpm-1992-06-24-me-687-story.html>, archived at <https://perma.cc/ZJ6J-W2QC>; see also *LA Gangs Learn About Dr. Ralph Bunche*, JET MAG., July 13, 1992, at 28.

¹³⁸ MUHAMMAD, *supra* note 103, at 17–24. The treaty will be referred to as the Watts Gang Treaty.

¹³⁹ *Id.* pmb1.

¹⁴⁰ *Id.* art. I. This article was based on Article I of the Egypt-Israel Armistice Agreement.

¹⁴¹ *Id.* art. I(1).

fear of attack and that this right would be fully respected.¹⁴² To achieve these goals, the Treaty acknowledged that a cease-fire between the parties was “a necessary step toward the renewal of peace in Watts, California.”¹⁴³

Article II formally established a general cease-fire between the four gangs in Watts.¹⁴⁴ The language again mirrored the terms of the Egypt-Israel Armistice Agreement. “No conflict of the land, that is drive-by-shootings and random slaying or any community representative organizations shall commit any warlike or hostile acts against the other parties or against innocent civilians in the neighborhoods under the influence of that community representative.”¹⁴⁵

Article III addressed social and economic factors. It recognized the importance of supporting Black businesses, economic development, and the advancement of educational programs.¹⁴⁶ Accordingly, “no favoritism or back-stabbing” would be tolerated under the truce.¹⁴⁷ In addition, the Treaty indicated it was not meant to establish, recognize, strengthen, or weaken any parties existing customs or rights.¹⁴⁸

Finally, Article IV addressed the rights of non-gang members as well as several administrative matters. It acknowledged that existing “rules and regulations” among the gangs had prevented “non-community representatives and common citizens from crossing the so-called fighting lines or entering the areas between the lines.”¹⁴⁹ Such rules and regulations “shall not be supported.”¹⁵⁰

With respect to the Treaty’s implementation, the document indicated that it would replace any existing agreements between the parties.¹⁵¹ The designated representatives of the four gangs would sign the Treaty.¹⁵² Each party would receive one copy. Additional copies would be provided to local groups. The document included four signature lines and noted that the four representatives would sign in the presence of mediators from the Fruit of Islam.¹⁵³

¹⁴² *Id.* art. I(2).

¹⁴³ *Id.* art. I(3).

¹⁴⁴ *Id.* art. II. This article was based on Article II of the Egypt-Israel Armistice Agreement.

¹⁴⁵ *Id.* art. II(1).

¹⁴⁶ *Id.* art. III. Neither the preamble nor Article III(1) have a counterpart in the Egypt-Israel Armistice Agreement.

¹⁴⁷ *Id.* art. III(1).

¹⁴⁸ *Id.* art. III(2). This article was based on Article IV(3) of the Egypt-Israel Armistice Agreement.

¹⁴⁹ *Id.* art. IV(1). This article was based on Article V(4) of the Egypt-Israel Armistice Agreement.

¹⁵⁰ *Id.*

¹⁵¹ *Id.* art. IV(2).

¹⁵² *Id.* art. IV(3).

¹⁵³ *Id.* art. IV. The participation of mediators from the Fruit of Islam can be attributed to the role of Muslim religious leaders in supporting the Treaty drafters. The Fruit of Islam are members of the Nation of Islam, which had a strong presence in south Los Angeles. Andrea Ford & Russell Chandler, *A Growing Force and Presence: The Young Men of the Nation of Islam Are a Common Sight in the Black Neighborhoods of Los Angeles*, L.A. TIMES (Jan. 25,

The Watts Gang Treaty included two annexes, which were also influenced by the Egypt-Israel Armistice Agreement.¹⁵⁴ Annex I included a “Plan of Re-Opening Territory.”¹⁵⁵ This provision used language from Annex I of the Armistice Agreement, which established a timetable for troop withdrawals. It also introduced a new concept—a training facility—that would provide instructional opportunities for former gang members. Annex II addressed the termination of “false barriers” in Watts.¹⁵⁶ Presumably, the term “false barriers” referred to the demarcation of gang territory by the respective gangs.

In addition to the Treaty, Daude Sherrills drafted a separate document, *United Black Community Code*, to serve as a code of conduct for gang members.¹⁵⁷ The preamble indicated that signatories accepted “the duty to honor, uphold and defend the spirit of the red, blue and purple, to teach the [B]lack family its legacy and protracted struggle for freedom and justice.”¹⁵⁸ Several standards of behavior were identified, including limiting drug and alcohol consumption and refraining from using derogatory words directed at women and Black men.¹⁵⁹ The Code also imposed rules of behavior when gang members traveled outside their territory, such as prohibiting “throwing” gang signs or wearing provocative clothing.¹⁶⁰ In addition, the Code promoted literacy programs, school attendance, voter registration, investment pools, cultural events, and a food bank.¹⁶¹ It even proposed the establishment of a financial hardship fund, which would be created by annual dues of \$100 per gang member.¹⁶²

Initially, no official signing ceremony occurred although the Treaty symbolized the goals of the peace process.¹⁶³ Perhaps the defining moment of the truce process occurred on April 26, 1992, when a group of Grape Street Crips from the Jordan Downs housing project entered “enemy territory” in the Imperial Courts housing project, which was the home of the PJ

1990), <https://www.latimes.com/archives/la-xpm-1990-01-25-mn-964-story.html>, archived at <https://perma.cc/6FFF-TRVP>. The Fruit of Islam is often referred to as the paramilitary wing of the organization. See MATTIAS GARDELL, IN THE NAME OF ELIJAH MUHAMMAD: LOUIS FARAKHAN AND THE NATION OF ISLAM 55 (1996).

¹⁵⁴ Watts Gang Treaty, *supra* note 138. The Egypt-Israel Armistice Agreement contained three annexes.

¹⁵⁵ *Id.* This article was based on Annex I (Plan of Withdrawal from Al Faluja) of the Egypt-Israel Armistice Agreement.

¹⁵⁶ *Id.* This article was based on Annex II (Demarcation of the Western and Eastern Fronts in Palestine) of the Egypt-Israel Armistice Agreement.

¹⁵⁷ CHANG, *supra* note 8, at 366; KATZ & FORD, *supra* note 5; MUHAMMAD, *supra* note 103, at 47.

¹⁵⁸ KATZ & FORD, *supra* note 5. The colors red, blue, and purple are associated with the respective gangs in Watts. *Id.*

¹⁵⁹ *Id.*

¹⁶⁰ *Id.*

¹⁶¹ *Id.*

¹⁶² *Id.*

¹⁶³ A. Sherrills Interview, *supra* note 4; see also HAYDEN, *supra* note 23, at 189. A ceremonial signing occurred two years later on April 29, 1994 at the Imperial Courts housing project. D. Sherrills Interview, *supra* note 4; see also CHANG, *supra* note 8, at 518.

Crips.¹⁶⁴ Several advocates of the gang truce movement were present, including Daude and Aqeela Sherrills (of the Jordan Downs housing project) and Dewayne Holmes and Tony Bogard (of the Imperial Courts housing project).¹⁶⁵ The senior leaders of the respective gangs entered the local gym to continue negotiations while the younger members waited outside.¹⁶⁶ Suspicion soon gave way to conversation. Don Gordon, a member of the Grape Street Crips, began playing music and other gang members began to socialize.¹⁶⁷ His memories of that moment reveal how significant this moment was to the gang community.

When they opened the gym up, it was the most beautiful thing that you could ever see in your life. It was what we had been working for. When they opened the gym up, and our big homiez and their big homiez came out hugging each other, and kissing each other, all the people started hollering, and everybody just collided. . . . When they came out, everybody just collided. It was on. It was just beautiful. Talk about power. Talk about strength. Man, they made a long chain of all hugs and handshakes.¹⁶⁸

Aqeela Sherrills has a similar recollection of that night. As word began to spread about the burgeoning peace agreement, he recalled “[t]he young cats from the Imperial Courts, they was like, ‘Man you all wit it? You all wit the peace?’ And we was like, ‘Yeah, we wit it!’”¹⁶⁹ At that point, the truce became reality to Sherrills. “[I]t was like, ‘Fuck it, it’s on?’ People yelling it, house to house, it was unbelievable, you could see people coming outside, ‘It’s on! The peace treaty is on!’”¹⁷⁰ The celebration continued through the night.¹⁷¹ The next day, gang members from Jordan Downs hosted their counterparts from Nickerson Gardens.¹⁷²

On April 28, 1992, a large group from the Watts community drove by bus to Los Angeles City Hall seeking political support for their peace efforts.¹⁷³ Their bus transportation had been arranged by Jim Brown through his Amer-I-Can Program.¹⁷⁴ Several members from the truce delegation spoke during the public comments portion of the Council meeting, including Aqeela Sherrills (Jordan Downs), Dewayne Holmes (Imperial Courts), and Twilight Bey.¹⁷⁵ According to the Council minutes:

¹⁶⁴ AFARY, *supra* note 7, at 77–78.

¹⁶⁵ *Id.*

¹⁶⁶ *Id.*

¹⁶⁷ *Id.*

¹⁶⁸ JAH & SHAH’KEYAH, *supra* note 74, at 95 (interview with Don Gordon).

¹⁶⁹ Duane, *supra* note 56, at 62.

¹⁷⁰ *Id.*

¹⁷¹ *Id.*

¹⁷² A. Sherrills Interview, *supra* note 4.

¹⁷³ HAYDEN, *supra* note 23, at 189–90; *see also* AFARY, *supra* note 7, at 78.

¹⁷⁴ Bey Interview, *supra*, note 4.

¹⁷⁵ Los Angeles City Council, Transcript of Council Meeting 27 (Apr. 28, 1992) (on file with author) [hereinafter L.A. City Council Transcript].

The representatives of the American [Amer-I-Can] Program stated that the reason for escalated gang and drug related activities in minority communities was caused by social conditions in the low-income areas of the City, the significant high school dropout rate and unemployment. They requested the City's financial assistance in achieving peace among the various gang members who have offered to work with the youth in the community to rebuild their neighborhoods, improve the school system and provide more jobs for youth.¹⁷⁶

Despite their entreaties, the Council declined to offer meaningful assistance. Councilwoman Joan Milke Flores, whose district included Watts, encouraged the speakers to contact the Community Development Department and seek assistance in applying for grant funding.¹⁷⁷ Aqeela Sherrills recalls that the Council's lack of interest in their proposal was evident: they "ushered us out of there as quickly as they possibly could."¹⁷⁸

The experience at City Hall reflects the challenges facing this social movement. Gang leaders recognized the value of political support and the importance of economic development. Lobbying City Hall was a reasonable strategy. However, political leaders were skeptical and, ultimately, unsupportive.

II. ENTRY INTO FORCE

The Watts Gang Treaty was now in force. Even without political support, the Treaty had a significant effect in reducing gang violence in Los Angeles.¹⁷⁹ Indeed, its impact was almost immediate.¹⁸⁰

A. *Implementation and Impact*

1. *The Rodney King Assault Trial Verdict*

On April 29, 1992, a jury in Simi Valley, California acquitted four white police officers in the beating of Rodney King.¹⁸¹ In Watts and throughout Los Angeles, the jury's decision was surprising and yet expected. It was surprising that the legal system would allow such an outcome in a highly

¹⁷⁶ *Id.*

¹⁷⁷ *Id.*

¹⁷⁸ CHANG, *supra* note 8, at 368.

¹⁷⁹ Paul Cotton, *Violence Decreases with Gang Truce*, 268 J. AM. MED. ASSOC. 443, 444 (1992).

¹⁸⁰ Duane, *supra* note 56, at 62.

¹⁸¹ LOU CANNON, OFFICIAL NEGLIGENCE: HOW RODNEY KING AND THE RIOTS CHANGED LOS ANGELES AND THE LAPD 215-62 (1998).

publicized trial with clear video evidence of guilt.¹⁸² And yet, the outcome was expected because it simply reaffirmed the experience of the Black community in the criminal justice system.¹⁸³ This perspective was captured by Aqeela Sherrills:

We felt like our cries for help were falling consistently on deaf ears, because of this label “gangs” that was put on us. It dehumanized the people behind it, desensitized the public to our plight, so therefore, regardless of what we said, the system—even though they saw this video, and we had been complaining about this for years—still it was like “oh, that’s not happening to folks.”¹⁸⁴

A field coordinator for Community Youth Gang Services in Los Angeles offered a similar observation. “[W]hen the verdict came in, it was like a 10.0 earthquake that woke everyone up, especially gang members, to the injustice that is happening to minorities. The verdict helped push the process together. The across-the-board not-guilty verdict was a real slap in the face, whether you’re a gang member or Joe Citizen.”¹⁸⁵

The acquittal ignited rage in minority communities throughout Los Angeles.¹⁸⁶ Within forty-five minutes of the verdict’s announcement, protest groups began to form. The growing anger reflected long and deep-seated frustration toward the social, economic, legal, and political inequalities that existed in Watts and throughout Los Angeles.¹⁸⁷ To community members, this was not a riot—it was the second uprising, 27 years after the first uprising in Watts.¹⁸⁸

¹⁸² Peter Feuerherd, *Why Didn't the Rodney King Video Lead to a Conviction*, JSTOR DAILY (Feb. 28, 2018), <https://daily.jstor.org/why-rodney-king-video-conviction/>, archived at <https://perma.cc/5GL6-6GCW>.

¹⁸³ Cindi Katz & Neil Smith, *L.A. Intifada: Interview with Mike Davis*, 33 Soc. TEXT 19, 19 (1992) (“The Rodney King case has forged the link between the local history of police racism in L.A. and the plight of black people all over North America. It has assumed an almost Dred Scott status, a kind of fundamental test of what black citizenship means.”).

¹⁸⁴ Muhammad, *supra* note 100.

¹⁸⁵ Terry, *supra* note 3.

¹⁸⁶ HINTON, *supra* note 43, at 231; CANNON, *supra* note 181, at 303–46.

¹⁸⁷ AFARY, *supra* note 7, at 173; WHY L.A. HAPPENED: IMPLICATIONS OF THE '92 LOS ANGELES REBELLION (Haki R. Madhubuti ed., 1993); Mike Davis, *In L.A., Burning All Illusions: Urban America Sees its Future*, THE NATION, June 1, 1992, at 743; Bey Transcript, *supra* note 72.

¹⁸⁸ FELKER-KANTOR, *supra* note 46, at 228 (“[A]cquittal of the four officers in the King trial and the longer history of police abuse in the city symbolized a racist and unequal criminal justice system.”); CANNON, *supra* note 181, at 282 (“[T]he riots were neither a gang conspiracy nor a revolt against harsh conditions but a cry of black rage.”). In another highly charged incident, a Korean store owner killed Latasha Harlins, a young Black girl, for allegedly shoplifting a bottle of orange juice. While the store owner was convicted of manslaughter, her prison sentence was suspended and she was placed on probation. See BRENDA STEVENSON, THE CONTESTED MURDER OF LATASHA HARLINS: JUSTICE, GENDER, AND THE ORIGINS OF THE LA RIOTS (2015); Reginald Leamon Robinson, “*The Other Against Itself: Deconstructing the Violent Discourse Between Korean and African Americans*,” 67 S. CAL. L. REV. 15, 17, 51 (1993).

The first acts of violence appeared in south Los Angeles in the afternoon. They gradually spread throughout the city. Over the course of four days, violence and destruction overwhelmed the community. Federal troops and the National Guard were called to quell the violence. By May 3, 1992, civil unrest had subsided. However, the human toll was significant. Dozens of people were killed and thousands were injured.¹⁸⁹ Property damage exceeded \$775 million, and the majority of the destruction occurred in south Los Angeles.¹⁹⁰

Amid this violence, the nascent gang truce held. During the rebellion, there were no killings or acts of violence between gang members in Watts.¹⁹¹ While at times tenuous, the truce held during its early months.¹⁹² Drive-by shootings decreased—from 162 in a six-week period in 1991 to 85 during that same period in 1992.¹⁹³

2. *The Treaty's Short-Term Impact*

Medical records from local hospitals provide further evidence of the Treaty's immediate impact.¹⁹⁴ According to an emergency room physician at Martin Luther King, Jr. Hospital in south Los Angeles, Black men were routinely admitted every week with gunshot wounds before the truce. After the truce, this changed. “The first week I worked after the riot there was not a single case of gunshot wound in an African-American male, which is unheard of.”¹⁹⁵ These observations were reinforced by medical studies, which concluded, “[t]here was a statistical decrease in the number of gunshot wound victims treated at King/Drew Medical Center since the Los Angeles riot.”¹⁹⁶ Moreover, the racial distribution of gunshot victims treated at King/Drew Medical Center further affirmed these findings. Before the Watts Treaty, the racial distribution of gunshot victims was 50% African American

¹⁸⁹ Anjali Sastry & Karen Grigsby Bates, *When LA Erupted in Anger: A Look Back at the Rodney King Riots*, NPR (Apr. 26, 2017), <https://www.npr.org/2017/04/26/524744989/when-la-erupted-in-anger-a-look-back-at-the-rodney-king-riots>, archived at perma.cc/EG5G-ZKLR.

¹⁹⁰ Thomas S. Mulligan, *After the Riots: L.A. Insurance Claims Will Hit \$775 Million: Property*, L.A. TIMES (May 21, 1992), <https://www.latimes.com/archives/la-xpm-1992-05-21-fi-477-story.html>, archived at perma.cc/4KHT-JJPN; *The Ten Most-Costly Riots in the U.S.*, CHI. TRIB. (Nov. 26, 2014), <https://www.chicagotribune.com/chi-insurance-civil-unrest-riots-bix-gfx-20141126-htmstory.html>, archived at perma.cc/JC7V-DC6W.

¹⁹¹ HAYDEN, *supra* note 23, at 190–91. *But see* Michele L. Norris & Avis Thomas-Lester, *In L.A., Unlikely Peacemakers*, WASH. POST (May 23, 1992), <https://www.washingtonpost.com/archive/politics/1992/05/23/in-la-unlikely-peacemakers/cf5e1c0c-2555-43a6-9d90-2bc855a36350/>, archived at perma.cc/3FHB-U2G5.

¹⁹² Seth Mydans, *After the Riots: ‘Trial and Error’ in Los Angeles as Gangs Maintain Truce*, N.Y. TIMES, May 18, 1992, at B8; *see also* FELKER-KANTOR *supra* note 46, at 240.

¹⁹³ Cotton, *supra* note 179, at 443.

¹⁹⁴ *Id.*

¹⁹⁵ *Id.*

¹⁹⁶ Gary J. Ordog et al., *Incidence of Gunshot Wounds at a County Hospital Following the Los Angeles Riot and a Gang Truce*, 34 J. TRAUMA 779, 779 (1993). However, the study did not distinguish between gunshot victims from Watts and other local communities that were treated at King/Drew Medical Center.

and 50% Hispanic.¹⁹⁷ After the Treaty was adopted by the predominately Black gangs in Watts, there were far fewer Black gunshot victims. At this point, the racial distribution of gunshot victims was 80% Hispanic and only 20% Black.¹⁹⁸ Even the local funeral home in Watts noted the Treaty's impact in reducing gang violence.¹⁹⁹

Anecdotal evidence indicates the gang truce had a noticeable impact throughout the Watts community. Gang members were the first to observe the Treaty's impact. Twilight Bey noted that "people can go anywhere they want" and "children can walk down the streets and play."²⁰⁰ The Treaty brought families together, many of whom had been separated because of the gang conflict. One gang member observed, "that's when we started to realize that some of us were kinfolks, and we never even knew it."²⁰¹ The Treaty also brought rivals together. "I started feeling good when I started to see brothers open up and take other brothers to their parents' houses. That's something way out to do with your rival. To take your rival to your parents' house. Then we started going places together, going over to each other's houses, hanging out all day."²⁰²

This new freedom of movement extended throughout the community. A local resident explained that "[n]ow it's quiet, peaceful."²⁰³ This resident felt comfortable allowing her young child to play in her front yard. "I don't mind them playing outside now. You can take a walk, water your grass. You don't have to worry about anything."²⁰⁴ Youth teams could now compete within the Watts Friendship Sports League without fear of indiscriminate attacks or worrying about their uniform colors. According to a youth coach, "[w]e're able to go to Imperial Courts and not fear for our lives. We're able to go to Jordan Downs and feel good about playing."²⁰⁵ Community leaders also recognized the long-term benefits. Sports teams motivated children and kept them from becoming involved in the gangs.

While many gang members supported the Treaty, some were initially skeptical that it would change behavior.²⁰⁶ Others were unwilling to accept

¹⁹⁷ *Id.* at 779–80.

¹⁹⁸ *Id.*

¹⁹⁹ Andrea Ford, *Gang Truce Lets Residents Rediscover Their Freedoms*, L.A. TIMES (Aug. 14, 1992), <https://www.latimes.com/archives/la-xpm-1992-08-14-mn-5343-story.html>, archived at <https://perma.cc/BB7L-2E3A>.

²⁰⁰ JAH & SHAH'KEYAH, *supra* note 74, at 334 (interview with "Twilight Bey").

²⁰¹ *Id.* at 257 (interview with "Leon").

²⁰² *Id.*

²⁰³ Cotton, *supra* note 179, at 443; Ford, *supra* note 199.

²⁰⁴ Cotton, *supra* note 179, at 443.

²⁰⁵ Otto Strong, *Gang Truce Brings Youngsters Back to Watts Playgrounds*, L.A. TIMES, Sept. 27, 1992, at H31.

²⁰⁶ This skepticism extended beyond the gangs. According to a medical official in the L.A. County Department of Health Services, the truce was unlikely to have a meaningful impact on gang violence. Cotton, *supra* note 179, at 443. (They are part of . . . our environment. I find it hard to believe that they have suddenly shaken hands and we have a Middle East peace truce in South Central Los Angeles. Even if we do, that's just one small part of the gang problem, one small part of town.")

it. One gang member raised such concerns by noting, “I know my homeboys aren’t going to be with any peace treaty, so I’m not with it. Man, that ain’t going to last.”²⁰⁷ Another gang member expressed similar concerns. “I didn’t really like the [P]eace [T]reaty anyway. If I kill you today, then one of your homies who’s like 11 or 12 now is gonna remember it, and when he gets older he’s gonna blow my head off. That’s what’s happening today.”²⁰⁸

However, other gang members were willing to believe the Treaty could work. Some even entered “enemy” territory to test the Treaty. As described by Ronald “Kartoon” Antwine, a prominent member of the Bounty Hunters gang from Nickerson Gardens, “[o]ne day I said, ‘Let’s find out,’ and we all started walking through the Nickersons, Bloods and Crips. The young homies were stunned, but they joined in. It was beautiful.”²⁰⁹ A similar experience was described by another gang member:

I was standing on the other side of the projects, and everybody was running around saying, “There’s a Crip walking through the neighborhood.” He was with one of the guys from the Villains [a Blood]. So we were wondering what they were up to. The youngsters were running around preparing to get the dude. The Crip stepped to some of the older dudes that were sitting out there, along with me and a couple of other guys, and he said, “I know I’m in violation, but I think it’s time for brothers out here to come to peace. It’s time to stop all of this. If you brothers are going to do me, go ahead and do me now. Whatever, man, I just feel like it’s time for somebody to step up and say it’s time to have some peace over here.”²¹⁰

As news of the Treaty spread, trust grew and support extended throughout the community.²¹¹

3. *The Treaty’s Long-Term Impact*

The Treaty’s long-term impact was also significant. Crime statistics reveal a pronounced decrease in violence in south Los Angeles.²¹² In addition, gang homicides in Los Angeles County fell during this period, from 803 in

²⁰⁷ JAH & SHAH’KEYAH, *supra* note 74, at 49 (interview with “Red”).

²⁰⁸ Michael Krikorian, *War and Peace in Watts, Part Two*, L.A. WEEKLY (July 14, 2005), <https://www.laweekly.com/war-and-peace-in-watts-part-two/>, archived at perma.cc/8QLC-GA28 (interview with “Scrap”). Another gang member raised similar concerns. “I hope it does [last], but it probably won’t . . . People’s brothers been killed, their mothers, fathers. There are too many grudges.” Terry, *supra* note 3, at A21.

²⁰⁹ Krikorian, *supra* note 208 (interview with “Scrap”).

²¹⁰ JAH & SHAH’KEYAH, *supra* note 74, at 256 (interview with “Leon”).

²¹¹ *Id.* at 73 (interview with “Angelo”); see also Ford & Rivera, *supra* note 3.

²¹² See Michael Krikorian, *Ex-Gang Members Work to Bring Peace to Streets*, L.A. TIMES (Jan. 26, 1998), <https://www.latimes.com/archives/la-xpm-1998-jan-26-me-12251-story.html>, archived at <https://perma.cc/HF4Z-RE2Y>. See generally COUNTYWIDE CRIMINAL JUSTICE COORDINATION COMMITTEE, L.A. CTY. INTERAGENCY GANG TASK FORCE REPORT ON THE STATE

1992 to 399 in 1998.²¹³ By 1999, homicides dropped to their lowest levels in thirteen years.²¹⁴ Drive-by shootings by gangs in the city of Los Angeles also decreased during this period, from 1,548 in 1991 to 1,070 by 1993.²¹⁵ While numerous factors contributed to the reduction, criminologists, police officials, and medical researchers all cited “periodic truces among violent street gangs” as a contributing factor.²¹⁶

To be clear, gang violence did not end in Watts. On January 13, 1994, for example, Tony Bogard was shot and killed at the Imperial Courts housing project.²¹⁷ On January 10, 2004, Aqeela Sherrills’s son was shot eight times and killed while visiting home from college.²¹⁸ Such individual tragedies continued to occur. But the overall reduction in gang deaths was noticeable.²¹⁹ As stated by the police commander overseeing south Los Angeles, “[t]here’s no question there has been a real decrease in violence among [B]lack gangs.”²²⁰ He pointed to a decrease in drive-by shootings and murders by Bloods and Crips as two examples. Another L.A. deputy police chief shared the same view: “Just looking at these statistics, one would have to feel it is a very positive situation developing. We hope it is going to last indefinitely, and we’re going to try to do what we can to ensure that it

OF LOS ANGELES STREET GANGS (1992) (describing the increasing level of gang violence in Los Angeles through December 1991).

²¹³ L.A. CTY. DEPT OF PUBLIC HEALTH, INJURY & VIOLENCE PREVENTION PROGRAM, GANG HOMICIDES IN LOS ANGELES COUNTY 1980-2009 (Apr. 26, 2012), http://publichealth.lacounty.gov/ivpp/injury_topics/GangAwarenessPrevention/Gang%20Homicide%20Chart%20%202012.pdf, archived at perma.cc/3S4M-DSA9.

²¹⁴ *Id.*

²¹⁵ H. Range Hutson et al., *Drive-by Shootings by Violent Street Gangs in Los Angeles: A Five-year Review from 1989 to 1993*, 3 ACAD. EMERGENCY. MED. 300, 301 (1996).

²¹⁶ Matt Lait, *Homicides in L.A. Drop to Lowest Total in 20 Years*, L.A. TIMES (Dec. 29, 1997), <https://www.latimes.com/archives/la-xpm-1997-dec-29-mn-3170-story.html>, archived at perma.cc/73L9-UAHQ. Cf. Shawn Hubler, *Homicides in 1992 Set Record for L.A. County*, L.A. TIMES (Jan. 5, 1993), <https://www.latimes.com/archives/la-xpm-1993-01-05-me-819-story.html>, archived at perma.cc/5TNQ-2VFK; Hutson, *supra* note 215, at 302; FELKER-KANTOR, *supra* note 46, at 240. Other factors included an improving economy and enhanced law enforcement activities.

²¹⁷ Lucille Renwick & Jesse Katz, *Veteran of Gangs’ War and Peace Dies by Gunfire: Violence*, L.A. TIMES (Jan. 15, 1994), <https://www.latimes.com/archives/la-xpm-1994-01-15-mn-12043-story.html>, archived at perma.cc/2E9C-NLCB. At the time of his death, Bogard had become a regular advocate for the gang truce. He was allegedly killed by suspected drug dealers.

²¹⁸ HAYDEN, *supra* note 23, at 196; Celeste Fremon, *How the Worst Kind of Personal Sorrow Led LA Violence Reduction Expert Aqeela Sherrills To Help Newark, NJ, Lower Its Murder Rate*, WITNESS LA (Mar. 5, 2018), <https://witnessla.com/how-la-violence-reduction-expert-aeqela-sherrills-own-sorrow-led-him-to-help-newark-nj-lower-its-murder-rate/>, archived at perma.cc/PH2W-GYWS; Lee Hawkins, *An L.A. Peacemaker Tackles East Coast Crime and Trauma*, WALL ST. J. (Mar. 1, 2018), <https://www.wsj.com/articles/an-l-a-peacemaker-tackles-east-coast-crime-and-trauma-1519932550>, archived at perma.cc/FS8G-YLHB.

²¹⁹ Berger, *supra* note 3; Ford & Rivera, *supra* note 3.

²²⁰ Berger, *supra* note 3.

lasts”²²¹ Yet despite their public statements, law enforcement did little to support the Treaty.²²²

By its express terms, the Watts Gang Treaty was only applicable to Watts and the four gangs that had participated in negotiations and agreed to its provisions. This explains, in part, why the number of gang-related homicides outside of Watts did not fall.²²³ In fact, gang violence continued in other communities throughout Los Angeles.²²⁴

However, the Treaty served as inspiration and model to other groups. As noted by a gang member from Compton, “[t]he truce started in Watts, then Compton, that’s it, but there were other gangs that were coming to Watts, because that’s like the Holy Grounds, so you could go over there, Blood, Crip, or whoever. If you’re down with Black-on-Black unity, then come on over to the projects.”²²⁵ Similar truce efforts began to develop in surrounding areas, including East Los Angeles, Long Beach, Pasadena, and Santa Ana.²²⁶ The truce movement soon extended beyond Southern California into other parts of the state and throughout the country, as reflected in a 1993 gang summit in Kansas City.²²⁷ Such was the goal of the Treaty’s drafters.

²²¹ Cotton, *supra* note 179, at 443.

²²² See, e.g., Davis, *supra* note 187, at 745; Russell Ben-Ali, *Police Wary of L.A. Gangs’ Truce*, NEWSDAY, May 10, 1992, at 17.

²²³ Sylvester Monroe, *Trading Colors for a Future*, EMERGE, Aug. 1993, at 46–47.

²²⁴ David Haldane, *Efforts for Gang Truce Continue, but So Do Drive-Bys*, L.A. TIMES (May 25, 1992), <https://www.latimes.com/archives/la-xpm-1992-05-25-mn-262-story.html>, archived at perma.cc/X7XG-ADGB.

²²⁵ JAH & SHAH KEYAH, *supra* note 74, at 76–77 (interview with “Angelo”).

²²⁶ Kelly, *supra* note 97, at 47; Efrain Hernandez Jr., *Latino Gang Truce in Valley is Praised Despite Rise in Homicides*, L.A. TIMES, Nov. 30, 1997, at B2; Jesse Katz, *Crips and Bloods Factions Prepare Ground for Widespread Gang Truce*, L.A. TIMES (May 19, 1994), <https://www.latimes.com/archives/la-xpm-1994-05-19-me-59703-story.html>, archived at perma.cc/7EMS-S4Z7; Richard Lee Colvin, *Valley Gangs’ Peace is Strained but Holding*, L.A. TIMES (Dec. 26, 1993), <https://www.latimes.com/archives/la-xpm-1993-12-26-mn-5777-story.html>, archived at perma.cc/U9SU-7K2V; Robert J. Lopez & Jesse Katz, *Mexican Mafia Tells Gangs to Halt Drive-Bys*, L.A. TIMES (Sept. 26, 1993), <https://www.latimes.com/archives/la-xpm-1993-09-26-mn-39383-story.html>, archived at perma.cc/S9BY-DJCD; Eric Young, *Gang Truce Sparks Hope that Peace Talks Are Fruitful*, L.A. TIMES (June 15, 1992), <https://www.latimes.com/archives/la-xpm-1992-06-15-me-342-story.html>, archived at <https://perma.cc/ML97-KZEQ>; Haldane, *supra* note 224.

²²⁷ Don Terry, *A Fight for Peace on Chicago’s Streets*, N.Y. TIMES, Apr. 4, 1994, at A8; Gary Lee, *Organizers Call Street-Gang Summit a Success*, WASH. POST (May 3, 1993), <https://www.washingtonpost.com/archive/politics/1993/05/03/organizers-call-street-gang-summit-a-success/54a7c6e9-4fdc-4fbf-8170-31454fffffd6/>, archived at <https://perma.cc/29HZ-88G5>; Jesse Katz, *Gang Members Converge on Kansas City for Peace Summit*, L.A. TIMES (Apr. 30, 1993), <https://www.latimes.com/archives/la-xpm-1993-04-30-mn-29262-story.html>, archived at <https://perma.cc/QAU9-CLAE>.

B. Compliance and Enforcement

1. Promoting the Treaty

As with any peaceful settlement between countries, “developing a system to enforce the truce is a major challenge.”²²⁸ Proponents of the Watts Gang Treaty used several strategies to promote compliance.

Gang truce parties became a key strategy for maintaining the peace. These parties brought rival gang members, and eventually their families, together at local parks. Music, food, and sports promoted an atmosphere free from violence. “Children romped, while their mothers chatted. Football, baseball and domino games were organized.”²²⁹ Music at truce parties was carefully chosen to minimize offending rival gangs.²³⁰

In fact, rap and hip-hop music became an important mechanism for promoting the Treaty. Some local rappers addressed the Treaty in their music, such as the 1993 song, *Peace Treaty*, by Kam:

Bound by a peace treaty . . .
 It’s now or never.
 More than ever,
 Black people have to stick together.
 But yo. Let’s hear it for the Bloods and the Crips.
 I gots to admit it, y’all brothers did it.
 I just hope it don’t cease.
 For the sake of all the homies that’s restin’ in peace.²³¹

In his song, *Gotta Lotta Love*, rapper Ice-T sang “[t]he gang truce is on, so you wear whatever.”²³² As a member of the Crips, Ice-T’s lyrics and support for the Treaty resonated with gang members.²³³ Such acts of cultural support

²²⁸ UMEMOTO, *supra* note 16, at 166.

²²⁹ Marc Lacey & Shawn Hubler, *Police, Revelers Clash at Gang Truce Barbecue*, L.A. TIMES (June 8, 1992), <https://www.latimes.com/archives/la-xpm-1992-06-08-mn-105-story.html>, archived at <https://perma.cc/Y2FG-TG58>.

²³⁰ Musical artists were associated with particular gangs. See AFARY, *supra* note 7, at 83.

²³¹ KAM, *supra* note 8.

²³² ICE-T, *supra* note 8.

²³³ Ice-T referred to the Watts Gang Treaty as “the most dramatic turning point in American history from my perspective.” Ice-T, *Forward* to JAH & SHAH’KEYAH, *supra* note 74, at 9.

are not surprising.²³⁴ There is a long history in Watts and south Los Angeles of using music and art to address social issues.²³⁵

Gang leaders worked to reduce provocations in other ways. For example, certain colors had long been associated with distinct gangs: blue represented the Crips, and red represented the Bloods.²³⁶ These colors served to identify both friends and enemies. Because of the Treaty, these colors became less provocative, something that local residents observed: “I see them (gang members) walking together with blue and red rags (bandannas). A few months ago, whenever you saw a red rag, he was looking for a blue rag to kill.”²³⁷ Clothing with blue and red colors was distributed at various events with messages of unity and positive references to the truce.²³⁸ Posters acknowledging the Peace Treaty often referenced the Crips and Bloods and included both colors and symbols of peace.²³⁹

²³⁴ See Annette Ejiofor, *The L.A. Riots as Told Through Rap and Hip-Hop*, NBC NEWS (Apr. 29, 2017), <https://www.nbcnews.com/news/nbcblk/l-riots-told-through-rap-hip-hop-n751896>, archived at <https://perma.cc/Z56G-V8MC>; CHANG, *supra* note 8; Sia Michel, *Bangin’: For Life, Love & A Future—Ice-T Relives His Gangsta Days*, THE SOURCE (July 3, 2017), <https://thesource.com/2017/07/03/bangin-life-love-future-ice-t-relives-gangsta-days/>, archived at <https://perma.cc/A65J-RUSY>; Dennis Hunt, *Crips and Bloods “Bangin’ on Wax,” Not on the Street: Producers Bring Together Gang Members in a Unique Cooperative Venture—A Rap Album*, L.A. TIMES (Feb. 27 1993), <https://www.latimes.com/archives/la-xpm-1993-02-27-ca-522-story.html>, archived at <https://perma.cc/5KZF-5M8K>.

²³⁵ See Robin D.G. Kelley, *Watts: Remember What They Built, Not What They Burned*, L.A. TIMES (Aug. 11, 2015), <https://www.latimes.com/opinion/op-ed/la-oe-0811-kelley-watts-civil-society-20150811-story.html#page=1>, archived at <https://perma.cc/5CY7-ML5S>; DANIEL WIDENER, *BLACK ARTS WEST: CULTURE AND STRUGGLE IN POSTWAR LOS ANGELES* 90 (2010).

²³⁶ See AFARY, *supra* note 7, at 82; Ford, *supra*, note 199.

²³⁷ Ford, *supra* note 199.

²³⁸ AFARY, *supra* note 7, at 82–83.

²³⁹ The United Black Code, which accompanied the Treaty, included a provision that gang members should not wear provocative clothing, including gang colors. See Katz & Ford, *supra* note 5.



Poster acknowledging Watts Gang Treaty.²⁴⁰

Sports also served as an opportunity for community building. Proponents of the Treaty organized football, basketball, and baseball games to build positive relationships within the community.²⁴¹ Each neighborhood was encouraged to put together athletic teams. These activities gave gang members an opportunity to develop relationships with their peers in the community and defuse potential conflicts. Hundreds of people attended these games.²⁴²

Various groups within the community supported the gang truce. Long-standing organizations, such as the Coalition Against Police Abuse and the Amer-I-Can Program, used their political and community networks to support the truce.²⁴³ Newly established groups also supported the Treaty including Community in Support of the Gang Truce, Hands Across Watts, Mothers Reclaiming Our Children, and Focusing on and Creating Ethnic Solidarity.²⁴⁴ While these groups were established to promote distinct goals, they each

²⁴⁰ Curt Cramer, *The Historic Truce Between the Bloods and Crips in L.A. 1992*, THE SOURCE (Apr. 28, 2015), <https://thesource.com/2015/04/28/today-in-hip-hop-history-the-historic-truce-between-the-bloods-and-crips-in-l-a-1992/>, archived at <https://perma.cc/P223-L9EQ>. The poster incorporates several images and colors that are representative of the participating gangs. Its reference to April 28, 1992 reflects different perspectives on the effective date of the Treaty.

²⁴¹ A. Sherrills Interview, *supra* note 4; Lacey & Hubler, *supra* note 229.

²⁴² See AFARY, *supra* note 7, at 112.

²⁴³ *Id.* at 75, 103.

²⁴⁴ *Id.* at 76–77, 104, 109, 110.

recognized the value of supporting the gang truce.²⁴⁵ These groups engaged in various projects to promote peace. They conducted fundraising campaigns, including car washes and clothing drives.²⁴⁶ They organized rallies to generate support for the truce.²⁴⁷ They engaged in political advocacy.²⁴⁸ They held workshops on conflict resolution.²⁴⁹ They even filmed videos to celebrate the truce and encourage peace within the community.²⁵⁰

Many of these events addressed the Treaty as part of a broader social justice movement. In May 1993, for example, a group of activists inspired by the gang truce organized a poetry festival, *Peace L.A.: The Poetics of a Gang Truce*, to highlight community concerns, including lack of employment opportunities, limited funding for education, and the failure of the political process to address local problems.²⁵¹ Event organizers viewed poetry as a way to bridge the gap between inspiration and action. According to one of the organizers, “[t]he gang truce document is far-reaching. It’s a working piece of art we can act on, help make real. This is a celebration of peace, not war.”²⁵²

The work of Community in Support of the Gang Truce reflected the broad nature of the community response. Its mandate recognized “the truce is not just a cessation of gang warfare, but a dynamic militant movement for social justice.”²⁵³ The group recognized the risks faced by the Treaty’s supporters and their efforts to promote unity among competing gangs. To support the Treaty, the group developed several programs, including a speaker’s bureau and a “grass-roots rumor-control network to counteract misinformation.”²⁵⁴ The group denounced the mass incarceration of minority youth and lobbied for jobs.²⁵⁵ It called for economic support programs, from the establishment of neighborhood cooperative zones to funding for local schools and community programs.²⁵⁶ It targeted labor and religious organizations, social

²⁴⁵ *Id.* at 75–77; Ruth Wilson Gilmore, *Mothers Reclaiming our Children*, in *THE PEOPLE, PLACE, AND SPACE READER* 122 (Jen Jack Gieseck et al. eds., 2014).

²⁴⁶ Ashley Dunn, *Gang Members Test Capitalist Waters*, L.A. TIMES (July 4, 1992), <https://www.latimes.com/archives/la-xpm-1992-07-04-me-1037-story.html>, archived at <https://perma.cc/FB7A-ZLV9>.

²⁴⁷ Mydans, *supra* note 2, at A1.

²⁴⁸ AFARY, *supra* note 7, at 102–13.

²⁴⁹ *Id.* at 110–13.

²⁵⁰ Independent Video Archive, *See Watts Up?*, MEDIABURN (1992), mediaburn.org/video/watts-up/, archived at <https://perma.cc/XJG3-9QWM>. The *Watts Up?* Video was produced with the support of several groups, including the Coalition Against Police Abuse, Hands Across Watts, Mothers Reclaiming our Children, and the Amer-I-Can Program.

²⁵¹ Erin J. Aubry, *Gang Truce Inspires Poetry Festival*, L.A. TIMES (May 23, 1993), <https://www.latimes.com/archives/la-xpm-1993-05-23-ci-39025-story.html>, archived at <https://perma.cc/Z4A2-CLAD>.

²⁵² *Id.*

²⁵³ Michael Zinzun, *The Gang Truce: A Movement for Social Justice*, 24 SOCIAL JUSTICE 258, 265 (1997).

²⁵⁴ *Id.* at 265.

²⁵⁵ *Id.*; JOAO H. COSTAS VARGAS, NEVER MEANT TO SURVIVE: GENOCIDE AND UTOPIAS IN BLACK DIASPORA COMMUNITIES 29–31 (2008).

²⁵⁶ Zinzun, *supra* note 253, at 265.

clubs, and businesses and promoted a variety of causes, including criminal justice reform. To further support the Treaty, the organization even drafted a truce plan for the broader Los Angeles community.²⁵⁷

In May 1993, Hands Across Watts helped organize the Los Angeles Gang Peace Summit, which was held to bring together gang members from throughout the city. As described in the *New York Times*, it was “part business meeting and part motivational seminar.”²⁵⁸ During the conference, a video by Stanley Tookie Williams, the purported co-founder of the Crips, was shown to summit attendees. The video was recorded by Williams from death row in San Quentin with the assistance of Barbara Becnel, a member of Hands Across Watts. In his recorded remarks, Williams expressed support for the gang truce movement.²⁵⁹ Williams had previously been skeptical about the Treaty, but came to recognize that it could succeed.²⁶⁰ He continued to express support for the truce movement until his execution in 2005.

Local media outlets in Los Angeles offered a valuable forum for promoting the Treaty.²⁶¹ The KJLH radio station, which was owned by Stevie Wonder, established a radio show titled *Peace Treaty* that was hosted by former gang members.²⁶² The show “provided opportunities for many ordinary African Americans to participate in an ongoing dialogue on the gang truce movement” and “gave gang members a forum through which they could initiate truce activities in their local communities.”²⁶³ In fact, several gang members noted how the radio program influenced their decision to support the truce.²⁶⁴ As noted by one gang member, “that program saved a whole lot of lives.”²⁶⁵ Another gang member observed how the program “allowed us to all come together and talk about changing things.”²⁶⁶ Other Black-owned media, such as *The Sentinel* newspaper, played an important role in addressing the social, economic, and political conditions affecting minority communities in Los Angeles. Given concerns about the mainstream

²⁵⁷ Kelly, *supra* note 97, at 48.

²⁵⁸ Seth Mydans, *Gangs Go Public in New Fight for Respect*, N.Y. TIMES (May 2, 1993), <https://www.nytimes.com/1993/05/02/us/gangs-go-public-in-new-fight-for-respect.html>, archived at <https://perma.cc/ZZB4-VDZC>.

²⁵⁹ Barbara Cottman Becnel, *Stanley “Tookie” Williams: The Crips Co-Founder Now Realizes Violence Does Not Solve Anything*, L.A. TIMES (Aug. 22, 1993), <https://www.latimes.com/archives/la-xpm-1993-08-22-op-26460-story.html>, archived at <https://perma.cc/L5D5-2QLL>.

²⁶⁰ *Id.*

²⁶¹ AFARY, *supra* note 7, at 90.

²⁶² Gronau, *supra* note 9; JAH & SHAH’KEYAH, *supra* note 74, at 47, 249. *See generally* PHYLIS JOHNSON, *KJLH-FM AND THE LOS ANGELES RIOTS OF 1992: COMPTON’S NEIGHBORHOOD STATION IN THE AFTERMATH OF THE RODNEY KING VERDICT* (2009).

²⁶³ AFARY, *supra* note 7, at 72.

²⁶⁴ JAH & SHAH’KEYAH, *supra* note 74, at 30–31, 47, 145, 234–35, 249.

²⁶⁵ *Id.* at 145 (interview with “General Robert Lee”).

²⁶⁶ *Id.* at 47 (interview with “Red”).

media's depiction of the truce, these alternative media outlets were particularly important.²⁶⁷

2. *Challenges to the Treaty*

Political leaders had mixed reactions to the Treaty.²⁶⁸ Some politicians became strong supporters of the gang truce and were sincere advocates. Congresswoman Maxine Waters endorsed the truce and challenged assertions that the Treaty was ineffective.²⁶⁹ To promote similar peace-building efforts in other parts of Los Angeles, Waters referenced the Treaty as a template for gang cooperation. California State Senator Tom Hayden was also a strong advocate of the Treaty and even hired Dewayne Holmes in 1996 to work in his Senate office, a reflection of his commitment to support the treaty drafters.²⁷⁰

Other politicians were skeptical of the Treaty and reluctant to provide the gang authors with any credibility. Of course, they celebrated the reduction in gang violence in Los Angeles. Some even took credit for the reduction in violence. Local leaders, including the mayor, police chief, and district attorney attributed this reduction to new legislation and heightened policing efforts.²⁷¹ They cited gang injunctions, curfews, and the state's adoption of the three-strikes law in 1994 in support of their claims.²⁷² Demographic changes and an improving economy were also offered as explanations.

To the architects of the Treaty, these claims were exaggerated and inaccurate. Daude Sherrills noted, for example, that politicians "always downplayed the gang truce because they didn't start it, the gangs did."²⁷³ Sherrills added, "[y]ou can bet if the mayor or City Council started up the Watts [G]ang [P]eace [T]reaty, you'd be hearing about it every . . . day."²⁷⁴ Dewayne Holmes emphasized that "the people on the streets" who were "on the front lines" were overwhelmingly responsible for the decrease in crime.²⁷⁵

²⁶⁷ See AFARY, *supra* note 7, at 70-72, 90; see generally RONALD N. JACOBS, RACE, MEDIA AND THE CRISIS OF CIVIL SOCIETY: FROM WATTS TO RODNEY KING (2000).

²⁶⁸ See Luis J. Rodriguez et al., *Gang: The New Political Force in Los Angeles: Governance: Bloods-Crips Unity is About Who Will Rule South-Central*, L.A. TIMES (Sept. 13, 1992), <https://www.latimes.com/archives/la-xpm-1992-09-13-op-1541-story.html>, archived at <https://perma.cc/8UG3-FSUB>; Terry, *supra* note 3, at A1.

²⁶⁹ See Andrea Ford, *Ex-Gang Members, Officials Call for Bloodless Weekend: Violence: Rep. Waters and Clergymen Ask Crips and Bloods to Maintain Their Truce, and Accuse the Media of Stirring Fear*, L.A. TIMES (Sept. 4, 1992), <https://www.latimes.com/archives/la-xpm-1992-09-04-me-6353-story.html>, archived at <https://perma.cc/HVV9-FEEG>.

²⁷⁰ See HAYDEN, *supra* note 23, at 193.

²⁷¹ Krikorian, *supra* note 208.

²⁷² *Id.*

²⁷³ *Id.*

²⁷⁴ *Id.* Cf. Tamara Audi, *L.A. Gangs Seek Profit in Peace*, WALL ST. J. (Dec. 30, 2009), <https://www.wsj.com/articles/SB126213528444809699>, archived at <https://perma.cc/2B48-KBHH>.

²⁷⁵ Krikorian, *supra* note 208.

Some political leaders expressed concern that gangs would grow in strength, focus their efforts on criminal activity, and direct their violence at law enforcement officers.²⁷⁶ For example, Councilwoman Joan Milke Flores expressed conditional support for the Treaty, but noted that “if the result is that you have one larger gang instead of two smaller gangs . . . I’m not so sure that’s a plus.”²⁷⁷ L.A. police officials were more direct: “We received intelligence well in advance of the [Rodney King] verdict that there would be certain informal truces among gangs. There is a belief and perception now that . . . they are directing their efforts towards police.”²⁷⁸ These allegations were made on several occasions.²⁷⁹ This dynamic was captured by social critic Mike Davis: “the police and military occupiers of Los Angeles give no credence to any peaceful, let alone entrepreneurial, transformation of L.A.’s black gang cultures. The ecumenical movement of the Crips and Bloods is their worst imagining: gang violence no longer random but politicized into a black intifada.”²⁸⁰ Concerns about growing gang power eventually led to the deployment of crime suppression task forces into the Watts community, despite fears that such efforts would undermine the truce.²⁸¹

On several occasions, police used excessive force to break up truce parties, resulting in violence among attendees and numerous arrests. Watts residents denounced the police intervention, which often occurred with dozens of police in riot gear supported by helicopters.²⁸² As noted by one long-time resident, the parties were a way of uniting the community. Even if they were loud, “I’d much rather have them doing this than going out and killing each other.”²⁸³ Community activists made similar observations. “If the gangbangers are serious about what they’re trying to do, they should be sensitive to the residents they’re disturbing . . . But for the police to be insensitive to the gangbangers is also a downer. The way they’re responding doesn’t do nothing but incite more things to happen.”²⁸⁴

To many, the heavy-handed manner in which law enforcement responded was counterproductive. At one truce party, a young resident ob-

²⁷⁶ See AFARY, *supra* note 7, at 94; Jesse Katz, *Crips, Bloods Look Back—and Ahead—With Anger: Gangs: They Say Seeds for Violence Remain. Officials Fear Talk of More Rioting Will Become Self-Fulfilling*, L.A. TIMES (Mar. 21, 1993), <https://www.latimes.com/archives/la-xpm-1993-03-21-mn-13725-story.html>, archived at <https://perma.cc/MCV5-MVCC>.

²⁷⁷ Jesse Katz, *Police, Gangs Blame Each Other for Party Melees*, L.A. TIMES, June 9, 1992, at B1.

²⁷⁸ Gary Fields & Sally Ann Stewart, *Gang Truce Makes Some in L.A. Uneasy*, USA TODAY, May 6, 1992, at 3A; *Officials Worry That Gang Truce Could Mean Attacks on Police*, ST. PETERSBURG TIMES, May 7, 1992, at 2A.

²⁷⁹ See, e.g., Ben-Ali, *supra* note 222, at 17.

²⁸⁰ Davis, *supra* note 187, at 745.

²⁸¹ Richard A. Serrano & Jesse Katz, *LAPD Gang Task Force Deployed Despite Truce*, L.A. TIMES, June 26, 1992, at A1.

²⁸² Lacey & Hubler, *supra* note 229.

²⁸³ Ford & Rivera, *supra* note 3.

²⁸⁴ Katz, *supra* note 277, at B1.

served, “[t]here wasn’t no fighting until the police arrived. . . . They were ready to fight. People didn’t like getting hit, so they fought back.”²⁸⁵ Such actions undermined the truce by connecting heightened law enforcement activity in the community with the Treaty.²⁸⁶ When police officers in riot gear entered the community and disrupted social gatherings, it provoked conflict. It also perpetuated the existence of a “martial” state in Watts, where resources were allocated to law enforcement operations at the expense of community building.

The police reaction was not surprising to gang members.²⁸⁷ They were convinced law enforcement officials actively opposed the treaty.²⁸⁸ As noted by one gang activist, the police want to destroy gang unity.²⁸⁹ The police see the Treaty “as a threat and attempt to crush it because it is out of their control.”²⁹⁰

Such aggressive law enforcement tactics stood in stark contrast to the limited political and economic support offered to the truce movement or broader efforts to revitalize the Watts community.²⁹¹ In the aftermath of the uprising, local leaders and community activists called for economic support to rebuild destroyed buildings and generate employment opportunities for local residents. Weeks after the uprising, Mayor Tom Bradley announced the creation of Rebuild L.A., a non-profit organization that would spearhead these efforts.²⁹² Heralded with much fanfare, the organization had limited success in promoting community revitalization.²⁹³ While Rebuild L.A. worked with several private companies to establish job programs, these efforts did not generate sufficient jobs to create meaningful change in the community. Critics also pointed out that the primary beneficiaries of Rebuild

²⁸⁵ Lacey & Hubler, *supra* note 229, at A1.

²⁸⁶ Marsha Mitchell, *Gang Truce Holds Despite LAPD Critics*, L.A. SENTINEL, May 21, 1992, at A1.

²⁸⁷ As explained by Mike Davis, “[t]he ecumenical movement of the Crips and Bloods is their worst imagining: gang violence no longer random but politicized into a black *intifada*.” FELKER-KANTOR, *supra* note 46, at 241.

²⁸⁸ Ford & Rivera, *supra* note 3 (“Worse, some gang members alleged, some police officers appear to be trying to sabotage the truce by harassing gang members, hoping to provoke a violent reaction.”).

²⁸⁹ AFARY, *supra* note 7, at 94.

²⁹⁰ *Id.*

²⁹¹ See Lucille Renwick, *Gang Truce Has Brought Little Aid, Watts Leader Complains*, L.A. TIMES (Jan. 6, 1994), <https://www.latimes.com/archives/la-xpm-1994-01-06-me-8904-story.html>, archived at <https://perma.cc/8YS4-5YWG>.

²⁹² Jonathan Peterson & Patrick Lee, *Rebuild L.A. Builds its Team: As Task Force Gears Up, Offers of Aid Pour Forth*, L.A. TIMES (May 7, 1992), <https://www.latimes.com/archives/la-xpm-1992-05-07-fi-2588-story.html>, archived at <https://perma.cc/W6U7-U2LT>.

²⁹³ Peter J. Boyer, *Looking for Justice in L.A.*, THE NEW YORKER (Mar. 15, 1993), at 68, 80. *But see* Mayor Tom Bradley, *Rebuild L.A. Achievements*, L.A. TIMES (May 18, 1993), <https://www.latimes.com/archives/la-xpm-1993-05-18-me-36570-story.html>, archived at <https://perma.cc/TE2Y-VBDQ>.

L.A. were politicians and corporations instead of the affected communities.²⁹⁴ By 1999, Rebuild L.A. ceased operations.

In May 1992, a provocative economic proposal was released in Los Angeles, although its origins and authors remain unclear.²⁹⁵ The proposal called for political leaders to undertake a massive infusion of financial support into the community, including a \$3 billion financial commitment to rebuilding Los Angeles.²⁹⁶ It highlighted five broad initiatives: (1) a “face-lift” of the community that would improve structures, buildings, lighting, landscaping, and sanitation; (2) an education initiative to improve L.A. Unified schools as well as increased funding for teachers, school supplies, tutoring programs, and financial incentives for students; (3) a law enforcement program to revise policing; (4) an economic development proposal to encourage loans for local businesses; and (5) a human welfare proposal to improve hospitals and health care centers as well as a demand for the wholesale restructuring of the welfare system.²⁹⁷ In return for implementing these demands, the proposal indicated that “the Bloods/Crips Organization” would undertake to provide financial support for rebuilding Los Angeles.²⁹⁸ Unsurprisingly, the proposal gained little traction. Apart from its cost, the proposal required city leaders to respond within seventy-two hours along with the admonition, “[m]eet these demands and the targeting of police officers will stop!”²⁹⁹ As a result, it was never seriously considered.³⁰⁰

The lack of meaningful economic support for the Watts Gang Treaty is one of the most significant failings of political and business leaders. In contrast, gang members recognized the importance of economic development. As noted by a local community activist, “[i]f [we] don’t address the issues of unemployment and underemployment and poverty, we are inviting (the warfare) back.”³⁰¹ In June 1992, for example, Daude Sherrills helped establish Hands Across Watts as a non-profit organization to promote jobs and economic opportunities in the community.³⁰² Sherrills noted that “[t]his is

²⁹⁴ Melissa Chadburn, *The Destructive Force of Rebuild LA*, CURBED L.A. (Apr. 27, 2017), <https://la.curbed.com/2017/4/27/15442350/1992-los-angeles-riots-rebuild-la>, archived at <https://perma.cc/TT44-Y9TM>; Daniel B. Wood, “*Rebuild L.A.*” *Finds Itself at Center of Controversy*, CHRISTIAN SCI. MONITOR (Apr. 29, 1993), <https://www.csmonitor.com/1993/0429/29013.html>, archived at <https://perma.cc/8RMY-H3LB>.

²⁹⁵ HINTON, *supra* note 43, at 244–45; FELKER-KANTOR, *supra* note 46, at 240–41; CHANG, *supra* note 8, at 383; D. Sherrills Interview, *supra* note 4.

²⁹⁶ Bloods/Crips Proposal for LA’s Face-Lift (on file with author) [hereinafter Bloods/Crips Proposal]. See also Madhubuti, *supra* note 187, at 274–82.

²⁹⁷ Bloods/Crips Proposal, *supra* note 296, at 1–6.

²⁹⁸ *Id.* at 8. However, the “funding” offered would apparently come from “drug lords,” who would be asked to stop drug trafficking activities and invest in business and property in Los Angeles. *Id.* at 7.

²⁹⁹ *Id.* at 9.

³⁰⁰ But see Alexander Cockburn, *Blood’s Money*, 5 NEW STATESMAN & SOC’Y (May 15, 1992), <http://gangresearch.net/GangResearch/Policy/cockburn.html>, archived at <https://perma.cc/76X3-75TD>.

³⁰¹ Ford, *supra* note 199.

³⁰² Dunn, *supra* note 246.

our first step.”³⁰³ Tony Bogard was more direct: “Economics plays a major role in maintaining the peace. If we had industry and venture capital we wouldn’t have all the drug selling and robbing that’s going on. Economics is the key to everything.”³⁰⁴ Other local groups, including the Coalition Against Police Abuse and Community in Support of the Gang Truce developed job training programs for local residents, including silk-screening classes and training on the use of pesticides for pest control.³⁰⁵

C. *Desuetude*

1. *An Ending*

While the truce held in Watts for several years, tensions eventually began to emerge.³⁰⁶ Given the ebb and flow of conflict, this should be expected. Gang disputes are similar to other forms of violent conflict, which also go “through stages of escalation and decline.”³⁰⁷ Demographic, economic, and societal developments also played a significant role in explaining this fluctuation. The lack of economic opportunities had a profound influence on the community. As noted by Dewayne Holmes, “[w]e are seeing people going back to what they used to be doing, the familiar ways of surviving—selling drugs, robbing, gambling, stealing, hustling . . . People do all sorts of things to live, to survive, to pay their rent and their bills.”³⁰⁸

It is also unsurprising that support for the truce waned as gang leaders who had been involved in the original negotiations stepped away from their gang affiliations.³⁰⁹ Aqeela Sherrills moved to New Jersey and became a nationally recognized gang violence and community intervention specialist.³¹⁰ In July 2021, he was invited to the White House to meet with President Biden.³¹¹ Daude Sherrills was instrumental in establishing Hands Across

³⁰³ *Id.*

³⁰⁴ Monroe, *supra* note 223, at 48.

³⁰⁵ Bey Interview, *supra* note 4; HINTON, *supra* note 43, at 241–42; JOAO H. COSTA VARGAS, NEVER MEANT TO SURVIVE 30 (2008); Zinzun, *supra* note 253, at 260–61.

³⁰⁶ Michael Krikorian & Greg Krikorian, *Watts Truce Holds Even as Hopes Fade*, L.A. TIMES (May 18, 1997), <https://www.latimes.com/archives/la-xpm-1997-05-18-me-60016-story.html>, archived at <https://perma.cc/TTG7-B4ZJ>.

³⁰⁷ UMEMOTO, *supra* note 16, at 15.

³⁰⁸ HINTON, *supra* note 43, at 254.

³⁰⁹ Mydans, *supra* note 258 (“As they age into their 20’s and 30’s, some gang leaders around the country have begun what they call “trucing.”).

³¹⁰ Liz Ohanesian, *Aqeela Sherrills: The Homegrown Watts Peacemaker*, KCET (June 19, 2019), <https://www.kcet.org/shows/broken-bread/aqeela-sherrills-the-homegrown-watts-peacemaker>, archived at <https://perma.cc/D29L-NN9V>. Sherrills established The Reverence Project in Watts to provide holistic services to survivors of crime. A. Sherrills Interview, *supra* note 4. See THE REVERENCE PROJECT, www.trproject.org. He also co-founded the Community-Based Public Safety Collective, which promotes neighborhood leadership in public safety initiatives. See COMMUNITY-BASED PUBLIC SAFETY COLLECTIVE, <https://cbpscollective.org/>.

³¹¹ Emily Goodin, *Biden Pushes More Funding and Hiring for Police*, DAILY MAIL (U.K.), (July 12, 2021), <https://www.dailymail.co.uk/news/article-9780299/Eric-Adams-join->

Watts and has continued his activism in the community.³¹² He is also producing a documentary on the Treaty.³¹³ Twilight Bey eventually moved to London and used his experiences to address gang conflict in England.³¹⁴ Soon after the Treaty was finalized, Dewayne Holmes was arrested and sentenced to seven years in state prison.³¹⁵ Yet even from prison, Holmes urged the community to support the Treaty: “Watts is the foundation of the Truce and if it fails so shall every gang that stands with it. I’m asking you to do whatever you can so that this does not happen. Don’t let everything that we have worked for be all for nothing. Please! Who among us is listening?”³¹⁶ Upon his release, Holmes went to work for California State Senator Tom Hayden and became a community organizer, including serving as an active member of Focusing on and Creating Ethnic Solidarity.³¹⁷ Unfortunately, not all the Treaty drafters survived the conflict. Tony Bogard was killed in a gang-related shooting less than two years after the Treaty was finalized.

As new gang members entered the community, they did not have the same connections to the Treaty and began to challenge the status quo.³¹⁸ The racial composition in Watts also changed—from a predominantly Black community to a more diverse population.³¹⁹ In addition, economic factors played a role in the Treaty’s gradual demise. Inequality became even more pronounced in Los Angeles, placing further pressure on the Treaty. Indeed, employment opportunities fell drastically in Watts, which lost 55,000 jobs between 1992 and 1999.³²⁰ Many of the structures destroyed during the 1992 uprising were never rebuilt.³²¹

Biden-White-House-discuss-spiraling-gun-violence-problem.html, *archived at* <https://perma.cc/5VJN-6KPH>.

³¹² D. Sherrills Interview, *supra* note 4.

³¹³ D. Sherrills Interview, *supra* note 4.

³¹⁴ Roy Chacko, *Key Figure in LA Gang Truce Tries to Tackle Youth Violence in Hackney*, HACKNEY GAZETTE (Aug. 12, 2019), <https://www.hackneygazette.co.uk/news/key-figure-in-lagang-truce-tackles-hackney-violence-1-6210932>, *archived at* <https://perma.cc/FA8A-6RK9>; *Can Twilight Bey Tackle London’s Gang Culture?*, BBC (Sept. 23, 2011), <https://www.bbc.co.uk/news/uk-england-london-15035790>, *archived at* <https://perma.cc/8RPH-4MK6>.

³¹⁵ Jesse Katz, *Gang Truce Leader: From Peacemaker to Prisoner*, L.A. TIMES (Dec. 6, 1992), <https://www.latimes.com/archives/la-xpm-1992-12-06-mn-3562-story.html>, *archived at* <https://perma.cc/2T54-DHVX>.

³¹⁶ Kelly, *supra* note 97, at 48.

³¹⁷ HAYDEN, *supra* note 23, at 193; AFARY, *supra* note 7, at 110–13.

³¹⁸ Frank Stoltze, *Forget the LA Riots—Historic 1992 Watts Gang Truce Was the Big News*, KPCC (Apr. 28, 2012), <https://www.scpr.org/news/2012/04/28/32221/forget-la-riots-1992-gang-truce-was-big-news/>, *archived at* <https://perma.cc/JV88-Q592>. According to Alex Alonso, “[t]here is a newer generation of gang member[s] who decide they do not want to be a part of the truce . . . The identity of the gang is more important to them and fighting over that identity consumes them.” *Id.*

³¹⁹ Jennifer Medina, *In Years Since the Riots, A Changed Complexion in South Central*, N.Y. TIMES (Apr. 24, 2012), <https://www.nytimes.com/2012/04/25/us/in-south-los-angeles-a-changed-complexion-since-the-riots.html>, *archived at* <https://perma.cc/57J9-DY73>; Lewis, *supra* note 52.

³²⁰ HAYDEN, *supra* note 23, at 192.

³²¹ HORNE, *supra* note 38, at 361.

By 2005, news reports indicated that the Treaty had died, although Aqeela Sherrills explained that it simply faded away.³²² Unlike its origins in April 1992, there is no single moment that would clearly reflect the Treaty's desuetude. But as described by a former *Los Angeles Times* reporter, the change was evident:

The nights of mixing purple, blue and red are over. Gone are the days when the Grape Street Watts Crips from Jordan Downs (purple), the Bounty Hunter Bloods from Nickerson Gardens (red) and the Project, or PJ, Crips from Imperial Courts (blue) could encounter one another without fear of death . . . So far this year there have been at least seven killings in and around the projects, dozens of shootings, a reported 187 violent crimes and, with all that, the acknowledgment that there is no more treaty. Long gone are the joyous parties and rowdy football games that homies from the projects threw and played together. Gone are the days when a gangster from the Jordans who had a child with a lady from the Nickerson could have a lazy Sunday-afternoon barbecue in peace.³²³

2. *A Legacy*

While the Watts Gang Treaty is no longer in force, its legacy remains. The Watts community takes great pride in the Treaty. The architects of the truce view their work as a profound accomplishment. The broader Los Angeles community celebrates it as well.³²⁴

³²² Stoltze, *supra* note 318.

³²³ Michael Krikorian, *War and Peace in Watts*, LA WEEKLY (July 14, 2005), <https://www.laweekly.com/war-and-peace-in-watts/>, archived at <https://perma.cc/HK26-ESNJ>.

³²⁴ In June 2019, KCET and Tastemade produced a short documentary on the social and economic situation in Watts. The documentary was titled "W.A.T.T.S: We Are Taught to Survive," and was part of a larger series called "Broken Bread." See <https://www.kcet.org/shows/broken-bread/broken-bread-episode-guide>, archived at <https://perma.cc/UML9-EKPE>.



*Parade celebrating Watts Gang Treaty*³²⁵

In April 2012, the Watts community celebrated the twentieth anniversary of the Treaty.³²⁶ At the event, Aqeela and Daude Sherrills as well as other members of the Watts community spoke about the Treaty's history. They also addressed its legacy in Watts.³²⁷ In 2014, Daude Sherrills marked another anniversary with the following statement on social media:

Today mark the anniversary of the watts Los Angeles truce between gangs . . . 22 years ago brother and sister came together in solidarity to address serious issues that affect the lives of family love[d] one[s] and friends. The 1992 gang truce save so many lives and launch many social efforts and organization that produce jobs and a better quality of living. So today salute to all those who where [*sic*] active in those days and salute to all those who are still in the trenches today peace!!³²⁸

On the twenty-fifth anniversary of the Treaty, the community held a series of panel discussions, film screenings, and other festivities.³²⁹ Videos

³²⁵ Daude Sherrills, *20th Anniversary Reunion Celebration Watts Peace Treaty*, FACEBOOK (Apr. 30, 2014), <https://www.facebook.com/20thPeaceTruce/>, archived at <https://perma.cc/HU5L-EZA3>.

³²⁶ *Id.*

³²⁷ Organizers of the twentieth anniversary event filmed a short video to promote the event. See USC Writ 340 – Watts Gang Truce, YOUTUBE (Apr. 24, 2012), <https://www.youtube.com/watch?v=R1AU57zMmSI>, archived at <https://perma.cc/WF36-86QL>.

³²⁸ Sherrills Facebook Post, *supra* note 325.

³²⁹ Muhammad, *supra* note 100.

celebrating the Treaty were also produced.³³⁰ Reflecting on the anniversary, Aqeela Sherrills acknowledged that gang violence had created a war zone and that the people living there still suffered from post-traumatic stress disorder, hyper vigilance, and vicarious trauma.³³¹ Because of this, Sherrills argued it was important for the community to address these harms and recommit itself to peace.³³²

As Watts approaches the thirty-year anniversary of the Treaty, it reflects a community shaped by racial discrimination, marred by violence, and yet inspired by hope. There is an optimism and resilience even as poverty remains.³³³

III. REFLECTIONS ON THE WATTS GANG TREATY

The Watts Gang Treaty was the product of a social movement led by gang members. As described by Tom Hayden, “[t]he truce was truly a movement, needing individual steps of courage from the bottom up.”³³⁴ While social movements can encompass a diverse array of groups and issues, the unique origins of this movement and its ability to generate meaningful change within the gang community in Watts merits further reflection.³³⁵

³³⁰ See, e.g., *Bloods and Crips: The Peace Treaty*, YOUTUBE (2018), <https://www.youtube.com/watch?v=XOUUmZEWpWQ>, archived at <https://perma.cc/38U5-ZB5Q> (celebrating the 25th anniversary of the truce); *Aqeela Sherrills Talk on LA Riots, Watts Gang Truce and Grape Street Crips History*, YOUTUBE (Feb. 20, 2013), <https://www.youtube.com/watch?v=PGAwl7wehGc>, archived at <https://perma.cc/MCJ4-LEEN> (celebrating the 20th anniversary of the truce). A documentary on the Watts Gang Treaty was also announced. See *Truce: A Watts Story*, VIMEO, <https://player.vimeo.com/video/214767918>, archived at <https://perma.cc/D67A-E7TN>.

³³¹ Charlene Muhammad, *Preparations Underway for 25th Anniversary of Watts Gang Truce*, THE FINAL CALL (Apr. 19, 2017), http://www.finalcall.com/artman/publish/National_News_2/article_103613.shtml, archived at <https://perma.cc/69Q7-85LX>; see also JORJA LEAP, PROJECT FATHERHOOD: A STORY OF COURAGE AND HEALING IN ONE OF AMERICA'S TOUGHEST COMMUNITIES 59 (2015).

³³² Muhammad, *supra* note 331.

³³³ LEAP, *supra* note 331, at 59; *AP Photos: Watts Section of LA Sees Change, Faces Challenges*, U.S. NEWS (Aug. 10, 2020), <https://www.usnews.com/news/us/articles/2020-08-10/ap-photos-watts-section-of-la-sees-change-faces-challenges>, archived at <https://perma.cc/U6AP-ZFV4>; Jennifer Medina, *Watts, 50 Years On, Stands in Contrast to Today's Conflicts*, N.Y. TIMES (Aug. 10, 2015), <https://www.nytimes.com/2015/08/11/us/50-years-after-watts-riots-a-recovery-is-in-progress.html>, archived at <https://perma.cc/273T-JD8A>.

³³⁴ HAYDEN, *supra* note 23, at 189.

³³⁵ See generally Robert D. Benford & David A. Snow, *Framing Processes and Social Movements: An Overview and Assessment*, 26 ANN. REV. SOCIO. 611, 611–12 (2000); John D. McCarthy & Mayer N. Zald, *Resource Mobilization and Social Movements: A Partial Theory*, 82 AM. J. SOCIO. 1212 (1977).

A. *Understanding the Anatomy of Peace in Watts*

1. *Credibility*

Most significantly, the Treaty was crafted from within the community, by gang members who had a personal stake in its success. They were motivated to save their own lives and to protect their families and friends.³³⁶ The Treaty's language reflected a formal structure and hierarchy that gang members understood. Moreover, it was explicitly drafted by gang members and directed at them.³³⁷ The Treaty signaled the idea "that black youth were serious."³³⁸

Because it had been drafted by their leaders and peers, the truce was seen as credible by gang members. This basic point was made clear by one gang member: "[T]he only way this is going to work is if it is an inside job. It has to be an inside job. Within every hood they have to be peacing with themselves."³³⁹ Moreover, the internal hierarchy of gang culture ensured compliance as senior leaders had the authority to dissuade errant members inclined to violate the agreement. In fact, the active participation of gang members in monitoring the Treaty was essential.³⁴⁰ According to Daude Sherrills, "[w]e school those guys that get out and try to be destructive . . . We educate them on the value of the treaty and of unity. We work at it all the time. You've got to work on the healing."³⁴¹ Aqeela Sherrills also described how gang members would enforce the Treaty: "If you get too far out of line, there's folks in the neighborhood that will check you."³⁴²

2. *Socialization*

Gang leaders recognized that group socialization was essential for building trust. Thus, they promoted meetings to bring gang members together. Larger meetings, such as gang truce parties, complete with picnics and sports contests, became commonplace.³⁴³ The consequences of these efforts were pronounced. As described by Ivory Clemons, a gang member liv-

³³⁶ A. Sherrills Interview, *supra* note 4; HAYDEN, *supra* note 23, at 32–36; RICE, *supra* note 41, at 131; *cf.* Fox Butterfield, *The Wisdom of Children Who Have Known Too Much*, N.Y. TIMES (June 8, 1997), <https://www.nytimes.com/1997/06/08/weekinreview/the-wisdom-of-children-who-have-known-too-much.html>, archived at <https://perma.cc/95DX-AKPN>.

³³⁷ Watts Gang Treaty, *supra* note 138, arts. I, II, III, IV.

³³⁸ MUHAMMAD, *supra* note 103, at 46.

³³⁹ JAH & SHAH'KEYAH, *supra* note 74, at 49 (interview with "Red").

³⁴⁰ A. Sherrills Interview, *supra* note 4; HAYDEN, *supra* note 23, at 32–36.

³⁴¹ Michael Krikorian, *Gang Truces All But Forgotten as Homicides Soar*, L.A. TIMES (July 21, 2002), <https://www.latimes.com/archives/la-xpm-2002-jul-21-me-truce21-story.html>, archived at <https://perma.cc/837B-FAR8>.

³⁴² Stoltze, *supra* note 316.

³⁴³ AFARY, *supra* note 7, at 80–82; *cf.* JAH & SHAH'KEYAH, *supra* note 74, at 286 (interview with "Q-Bone") (describing how other gangs in south Los Angeles also used sporting events to promote unity between the Bloods and Crips).

ing in Nickerson Gardens, “[w]e party together every night” and “I embrace fellas who tried to stab and shoot me.”³⁴⁴ Inviting close family members to attend these parties sent a clear message of support for the truce. According to a gang member who supported the Treaty, “[t]hat’s how it has to go if you’re really about peace.”³⁴⁵ When family members and children began attending, truce parties became “indistinguishable from family reunions” and the socialization process was firmly in place.³⁴⁶

3. Symbolism

Symbolism was paramount to every aspect of the Treaty and its success. Alluding to its origins in the 1949 Egypt-Israel Armistice Agreement, the Treaty drafters acknowledged the historical parallels between the Arab-Israeli conflict and the experiences of “Black America.”³⁴⁷ By framing their efforts through the language of military conflict and diplomacy, the Treaty drafters generated interest and credibility within the gang community. A cease-fire agreement structured as a treaty between rival gangs was an obvious response to a conflict that killed both “combatants” and “civilians.” More broadly, the Treaty drafters hoped that Black leaders “would one day get a chance to review the rudimentary principles outlined in every article and annex of the gang truce” and realize how “serious street organizations wanted to see a better way of life while they live and not after they die.”³⁴⁸

Perhaps the most powerful symbols of the conflict were the red and blue colors that many gang members wore as a depiction of their respective affiliations. Before the Treaty’s adoption, both gang and non-gang members were often targeted because of the color of their clothing.³⁴⁹ Advocates of the gang truce reframed these colors as symbols of unity. On some occasions, gang members would carry both red and blue bandannas.³⁵⁰ On other occasions, red and blue bandannas were tied together as a symbol of unity and a reflection of the truce.³⁵¹ According to one gang member, “[t]he little homiez were going to school tying up red rags and blue rags together, telling

³⁴⁴ Richard Price, *On L.A. Streets, Precarious Peace: Gang Unity Faces Tough Test of Time*, USA TODAY, May 18, 1992, at A3.

³⁴⁵ JAH & SHAH’KEYAH, *supra* note 74, at 50 (interview with “Red”).

³⁴⁶ AFARY, *supra* note 7, at 80.

³⁴⁷ PERRY, *supra* note 87, at 22.

³⁴⁸ *Id.* at 10.

³⁴⁹ JAH & SHAH’KEYAH, *supra* note 74, at 130 (interview with “General Robert Lee”); *id.* at 188 (interview with “Leibo”); Avishay Artsy, *Gang Borders Create Invisible Walls in Los Angeles*, KCRW (Mar. 13, 2018), <https://www.kcrw.com/culture/shows/design-and-architecture/gang-borders-create-invisible-walls-in-los-angeles>, archived at <https://perma.cc/F9KD-P5GR>; Jerome Campbell, *Prevalence of Gang Colors Fades, But They Can Still Be Deadly*, L.A. TIMES (June 6, 2015), <https://homicide.latimes.com/post/gang-colors/>, archived at <https://perma.cc/83E2-5S8D>.

³⁵⁰ Terry, *supra* note 3, at A21.

³⁵¹ Ford & Rivera, *supra* note 3; RICE, *supra* note 41, at 127.

the dudes in the schools, ‘this ain’t what it’s about.’”³⁵² These colors would regularly appear in posters and clothing, which served as further evidence to gang members and the broader community that the Treaty was working.

4. *Empowerment and Respect*

For decades, Watts had been ignored by civic leaders. Residents felt isolated, disempowered, and disrespected. The absence of political engagement and economic opportunities created a vacuum.³⁵³ It is not surprising that gangs would emerge in this environment.

The Treaty served to empower the gangs in a non-violent manner.³⁵⁴ “We are empowering people who have never been empowered before,” noted Daude Sherrills.³⁵⁵ Treating gang leaders as community leaders with obligations to the broader community reframed the manner in which they viewed their lives. As explained by Aqeela Sherrills, community members have “to become public safety experts themselves by policing their own communities and being responsible for their own neighborhoods.”³⁵⁶ This realization was painted on a gym wall in the Nickerson Gardens housing project.

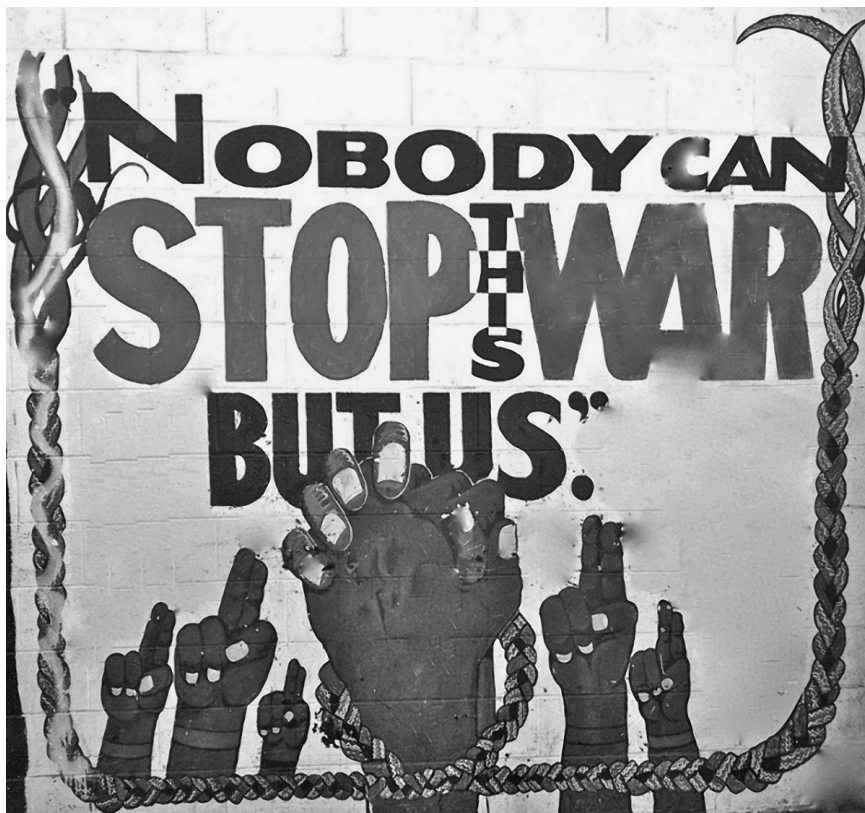
³⁵² JAH & SHAH’KEYAH, *supra* note 74, at 257 (interview with “Leon”).

³⁵³ D. Sherrills Interview, *supra* note 4; A. Sherrills Interview, *supra* note 4.

³⁵⁴ Albert R. Marston, *Perspective on Gangs: Ripe Time for a Constructive Shift?*, L.A. TIMES, June 29, 1992, at B5.

³⁵⁵ Dunn, *supra* note 246.

³⁵⁶ D. Amari Jackson, *The Lasting Legacy of the 1992 Watts Gang Truce*, ATLANTA BLACK STAR (Apr. 29, 2017), www.atlantablackstar.com/2017/04/29/lasting-legacy-1992-watts-gang-truce/, archived at <https://perma.cc/XSF7-37NK>.



Mural located in Watts³⁵⁷

The Treaty offered gang members something that civil society did not—respect.³⁵⁸ Countless forces marginalized gang members. Police tactics routinely stripped them of their dignity.³⁵⁹ Lack of employment opportunities prevented them from taking care of themselves and their loved ones. In this environment, there were no meaningful career prospects. In addition, the cycle of violence between gang members perpetuated fear and mistrust.³⁶⁰ In contrast, gang members felt valued under the Treaty.³⁶¹ They also felt respected by their peers.³⁶² This motivated gang members to continue supporting the Treaty.

³⁵⁷ *Jordan Downs Transformation by the Decade-1990s*, CORNERSTONE THEATER COMPANY, (May 16, 2019), <https://cornerstonetheater.org/change-series/jordan-downs-transformation-by-the-decade-1990s/>, archived at <https://perma.cc/LW55-FZLY>. Red and blue colors, which represented the Bloods and Crips, appear prominently in the mural.

³⁵⁸ JAH & SHAH'KEYAH, *supra* note 74, at 217 (interview with "T. Rodgers").

³⁵⁹ *Id.* at 300 (interview with "Q-Bone").

³⁶⁰ Monica C. Bell, *Safety, Friendship, and Dreams*, 54 HARV. C.R.-C.L. REV. 703 (2019).

³⁶¹ Ford & Rivera, *supra* note 3.

³⁶² JAH & SHAH'KEYAH, *supra* note 74, at 97 (interview with Don Gordon).

5. *Community Support*

The Treaty generated support from local residents, parents, and social activists.³⁶³ Several non-profit organizations with roots in the community were active in supporting the Treaty. While each organization served different constituencies, they shared a common interest in promoting peace. The Amer-I-Can Program offered leadership development and life-skills training. Many gang members participated in the Program and viewed it as a path away from gang life.³⁶⁴ Communities in Support of the Gang Truce had been formed by community leaders combatting police abuse.³⁶⁵ Mothers Reclaiming Our Children was established by parents in response to the growing crisis of incarceration within communities of color.³⁶⁶ Hands Across Watts and Focusing on and Creating Ethnic Solidarity were both created by gang members to back the truce.³⁶⁷ These organizations supported the Treaty through various activities, including public advocacy, community events, workshops on conflict resolution, and promoting employment opportunities.

Religious leaders also played an important role in promoting the Treaty. Indeed, they were involved from the beginning.³⁶⁸ The Tabernacle of Faith Church in Watts was used as a meeting place in the early stages of the peace process. The Masjid Al Rasul mosque was also an important location for talks. As described by Jitu Sadiki of the Black Awareness Community Development Organization, neutral grounds were essential for these conversations:

In this place, a neutral zone, the guys could cry about their pain, the loss of loved ones . . . The Imam allowed them to discuss and work things out for themselves, but when things got sticky, he would step in and pray about it. Many reminisced about going to school together when they were little, about the invisible borders that rose up between them and didn't allow them to cross that line. They began to remember the things they did as youngsters.³⁶⁹

³⁶³ See *Message to the Grassroots: We All Need to Support the Gang Truce*, MEDIA BURN (Jan. 1, 1993), <https://mediaburn.org/video/we-all-need-to-support-the-gang-truce/>, archived at <https://perma.cc/VQ44-PBLN>.

³⁶⁴ O'Keefe, *supra* note 107; The Amer-I-Can Program, *About Us*, AMER-I-CAN.ORG, <http://www.amer-i-can.org/about/about.html>, archived at <https://perma.cc/3QWY-L9H6>.

³⁶⁵ Zinzun, *supra* note 253, at 258, 265.

³⁶⁶ AFARY, *supra* note 7, at 121–22.

³⁶⁷ *Id.* at 109, 110–13, 117.

³⁶⁸ The Reverend Charles Mims, Jr. played an important role in promoting gang summits in the late 1980s. See Baker & Stevens, *supra* note 90.

³⁶⁹ Johnston Hernández, *supra* note 117, at 148.

6. *Religion and Spirituality*

Religion provided inspiration and a path to redemption.³⁷⁰ According to one gang member, the Treaty “was meant to be. This is God’s work. Nobody else could pull people that had been warring like that together and, at the spur of the moment, bring about peace. It’s not possible for any one man to be able to do that. That’s God’s work.”³⁷¹ In fact, many gang members were deeply religious. As explained by Twilight Bey, “[w]e have a strong belief in God, even though we’re out here doing all of these terrible things, and going stark out of our minds, a lot of us believe in God.”³⁷² In describing the power of religion and spirituality, T. Rogers noted that “[y]ou have to acknowledge that there is something greater than you.”³⁷³

To some, there was even a mystical component to the Watts Gang Treaty. Watts was viewed as the physical and psychological center of Los Angeles.³⁷⁴ Aqela Sherrills also noted how the housing projects in Watts were all connected, akin to ley-lines.³⁷⁵ “One of the things I came to is that three of the four major housing projects—the Jordan Downs, Imperial Courts and the Nickerson Gardens—fell in a perfect ninety-degree angle.”³⁷⁶ These connections reinforced his belief in the Treaty as a mechanism for uniting the distinct groups living in the projects. According to Sherrills, “[m]y epiphany was if we connected the Jordan Downs and the Nickerson Gardens, if we brought those two neighborhoods together, we would create a domino effect for peace all across the country.”³⁷⁷ Oshea Luja also spoke about these connections in his poem, “Historic Watts Ley-lines:”

Historic Watts Ley-lines Afro Mejicano.
Lotsa Watta gotta rep my.
Marching down Central Ave. in the drum line.

³⁷⁰ D. Sherrills Interview, *supra* note 4; JAH & SHAH’KEYAH, *supra* note 74, at 217 (interview with “T. Rodgers”) (“[T]here has to be some form of religion, some spirituality in your life. You have to acknowledge that there is something greater than you.”).

³⁷¹ JAH & SHAH’KEYAH, *supra* note 74, at 259 (interview with “Leon”); *see also id.* at 159 (interview with “Godfather Jimel Barnes”).

³⁷² *Id.* at 318 (interview with “Twilight Bey”).

³⁷³ *Id.* at 217 (interview with “T. Rodgers”). Anthony Perry connected the Treaty’s origins to religious inspiration. PERRY, *supra* note 87, at 16 (“Since one of Black America’s well known civil rights activist, [sic] Ralph Bunche, negotiated the Egyptian/Israeli agreement of 1949, I wonder if he too realized the truth about what Muhammad of Arabia had developed in Medinah?”).

³⁷⁴ CHANG, *supra* note 8, at 358.

³⁷⁵ A. Sherrills Interview, *supra* note 4; HAYDEN, *supra* note 23, at 186. Ley-lines represent sacred or mystical alignments of buildings and landmarks. The concept of ley-lines rose to prominence in the early twentieth century. *See generally* DANNY SULLIVAN, LEY LINES: THE GREATEST LANDSCAPE MYSTERY (2005); ALFRED WATKINS, THE OLD STRAIGHT TRACK (1925).

³⁷⁶ CHANG, *supra* note 8, at 360–61.

³⁷⁷ *Id.*

No charades Watts parade.
Shout at one time.³⁷⁸

B. *Beyond the Watts Gang Treaty*

The Watts Gang Treaty is not the only agreement established between gangs. Similar truces appeared in other California cities and in other states.³⁷⁹ Some were inspired by the Watts Gang Treaty.³⁸⁰ Others grew independently through local efforts. A review of these agreements reveals a broad diversity within the truce movement. These agreements involved a multitude of distinct gangs, whose membership varied based on race and geography.³⁸¹ Agreements sought to prevent violence between gang members, promote economic development, and establish a common front against racism and discrimination. They reflected the influence of various religious groups, community organizations, and even politicians.³⁸²

The active participation of gang members in monitoring agreements became a model for gang intervention programs throughout the country.³⁸³ These programs contained several core features. They used former gang members to monitor conflict in local communities.³⁸⁴ When conflicts arose, these individuals worked to mediate disputes. Their familiarity with gang culture gave them credibility and allowed them to navigate the complex relationships in the gangs.³⁸⁵ Numerous studies highlight the success of this strategy.³⁸⁶

In June 1994, for example, two gangs in west Los Angeles negotiated a truce to end a violent conflict.³⁸⁷ The morphology of this conflict mirrored

³⁷⁸ Luja, *supra* note 34.

³⁷⁹ See, e.g., Brian Charles, *Baltimore Gangs Agree to Truce Similar to One During 1992 Riots in L.A.*, DAILY NEWS, (Apr. 30, 2015), <https://www.dailynews.com/2015/04/30/baltimore-gangs-agree-to-truce-similar-to-one-during-1992-riots-in-la/>, archived at <https://perma.cc/DVZ9-F98D>; Efrain Hernandez Jr., *Latino Gang Truce in Valley is Praised Despite Rise in Homicides*, L.A. TIMES, Nov. 30, 1997, at B2; Gebe Martinez, *Architect of Gang Truce is Arrested by DEA Agents*, L.A. TIMES, Sept. 26, 1992, at B1; Lisa Richardson, *Once-Bitter Enemies Unite to Help Others*, L.A. TIMES, Sept. 10, 1992, at B3; Eric Young, *Gang Truce Sparks Hope that Peace Talks Are Fruitful*, L.A. TIMES, June 15, 1992, at B1.

³⁸⁰ MUHAMMAD, *supra* note 103, at 37–41; cf. RICE, *supra* note 41, at 127, 131.

³⁸¹ AFARY, *supra* note 7, at 98–102; Juan Francisco Esteva Martínez, *Urban Street Activists: Gang and Community Efforts to Bring Justice to Los Angeles Neighborhoods*, in GANGS AND SOCIETY: ALTERNATIVE PERSPECTIVES 95 (Louis Kontos et al., 2003).

³⁸² AFARY, *supra* note 7, at 98–102.

³⁸³ See Jennifer M. Whitehill, Daniel W. Webster & Jon S. Vernick, *Street Conflict Mediation to Prevent Youth Violence: Conflict Characteristics and Outcomes*, 19 INJURY PREVENTION 204, 204 (2012).

³⁸⁴ A. Sherrills Interview, *supra* note 4; Whitehill et al., *supra* note 383, at 204.

³⁸⁵ A. Sherrills Interview, *supra* note 4.

³⁸⁶ See generally DANIEL W. WEBSTER, JENNIFER MENDEL WHITEHILL, JON S. VERNICK & ELIZABETH M. PARKER., *EVALUATION OF BALTIMORE'S Safe Streets Program: Effects on Attitudes, Participants' Experiences and Gun Violence 2* (2011); Wesley G. Skogan et al., *Evaluation of CeaseFire-Chicago* (2008).

³⁸⁷ UMEMOTO, *supra* note 16, at 143.

the story of the Watts Gang Treaty in several respects. It was a racialized conflict between two gangs, although V-13 was a predominantly Latino gang whereas the members of the Shoreline Crips were Black.³⁸⁸ The conflict began with individual attacks and retaliatory shootings between the gangs.³⁸⁹ Both gang members and non-gang members were injured and killed. The growing death toll led gang members to seek a negotiated solution. The truce itself was brokered by gang leaders with significant support from community activists.³⁹⁰ The success of the truce could be measured by a tangible reduction in gang attacks.³⁹¹ Finally, the truce required active monitoring, both by gang members and the local community.³⁹²

A very different gang truce emerged in Los Angeles in September 1993.³⁹³ A series of internal discussions within the leadership of the Mexican Mafia culminated in a large-scale meeting near downtown Los Angeles where gang leaders announced a “no drive-by” edict.³⁹⁴ As described by the *Los Angeles Times*, “[u]nder the new rules, gangs are still allowed to attack rivals with whom they have a personal beef, but they have been instructed to do it face-to-face, taking care not to harm bystanders.”³⁹⁵ The consequences for non-compliance were significant, and sanctions would be imposed in jail or prison if a gang member was arrested for a drive-by shooting.³⁹⁶ Unlike other truce efforts, this gang truce appeared to be motivated by strategic considerations among the gang leadership to consolidate their power and protect their lucrative drug trade.³⁹⁷

In 2000, State Senator Tom Hayden proposed a *Blueprint for Gang Peace* that built upon his own experiences working with gang members in Los Angeles.³⁹⁸ The proposal included five core provisions: (1) the creation

³⁸⁸ *Id.* at 2.

³⁸⁹ Scott Collins, *A Tenuous Truce: Gang Cease-Fire in Violence-Plagued Oakwood Kept Summer Peaceful; Police Remain Skeptical*, L.A. TIMES (Sept. 27, 1994), <https://www.latimes.com/archives/la-xpm-1994-09-27-me-43526-story.html>, archived at <https://perma.cc/H7XT-6YW5>.

³⁹⁰ UMEMOTO, *supra* note 16, at 143.

³⁹¹ Mary Moore, *Peace Thrives Where Terror Reigned*, L.A. TIMES (July 8, 1996), <https://www.latimes.com/archives/la-xpm-1996-07-08-me-22182-story.html>, archived at <https://perma.cc/M86F-6492>.

³⁹² UMEMOTO, *supra* note 16, at 166–68.

³⁹³ Jesse Katz, *Edict to Gangs Follows an Old Pattern: Violence*, L.A. TIMES (Oct. 3, 1993), <https://www.latimes.com/archives/la-xpm-1993-10-03-me-41977-story.html>, archived at <https://perma.cc/6HH7-GM4Z>.

³⁹⁴ Lopez & Katz, *supra* note 226; Rodrigo Ribera d’Ebre, *The Peace Treaty of Sur 13 Gangs*, HUFFINGTON POST (Nov. 23, 2013), https://www.huffpost.com/entry/the-peace-treaty-of-sur-13_b_3960279, archived at <https://perma.cc/W6SG-VR8W>.

³⁹⁵ Lopez & Katz, *supra* note 226.

³⁹⁶ *Id.*; see also Jesse Katz & Robert J. Lopez, *Mexican Mafia’s Impact on Gangs Questioned*, L.A. TIMES (Sept 28, 1993), <https://www.latimes.com/archives/la-xpm-1993-09-28-me-39855-story.html>, archived at <https://perma.cc/RUA7-MBTJ>. Police officials indicated that the leadership of the Mexican Mafia had authorized attacks on members who violated its mandates.

³⁹⁷ HAYDEN, *supra* note 23, at 65–66; RODOLFO ACUÑA, *ANYTHING BUT MEXICAN: CHICANOS IN CONTEMPORARY LOS ANGELES* 256–57 (1995).

³⁹⁸ HAYDEN, *supra* note 23, at 50–51.

of a peace process coordinator; (2) a peace council; (3) violence prevention projects; (4) education and skill training; and (5) jobs.³⁹⁹ The document reflected Hayden's long-held belief in the importance of working within the gang community to promote peace.⁴⁰⁰ It also recognized the essential nature of economic development.

In 2004, Stanley Tookie Williams released his *Protocol for Peace*.⁴⁰¹ The Protocol was drafted to serve as a template for gangs seeking to promote peace and reconciliation.⁴⁰² Like the Watts Gang Treaty, it was drafted to appear as a legal document. While it was similar to the Treaty, it also contained additional features. It began with an affirmation:

This word-of-honor agreement binds the aforementioned rival factions to put aside their differences, be they ideological, political, religious, philosophical, racial, economical, geographical, criminal, material, personal and collective retaliation, or any social reliance on violence or murder. This document is an oath of responsibility for the parties involved to co-exist in peace and reconciliation for the security of their communities, residents and offspring.⁴⁰³

Substantively, the Protocol established a cease-fire and the development of buffer zones between the parties.⁴⁰⁴ In addition, it called for the formation of a Peacekeepers and Monitoring Committee that would work to promote peace and community stability.⁴⁰⁵ Violations of the Protocol were to result in fines or community service.⁴⁰⁶ Each provision of the Protocol was meant to be signed and dated. The Protocol was eventually used by gangs in Indiana and New Jersey to develop their own agreements.⁴⁰⁷

Gang violence is not unique to the United States; it exists throughout the world.⁴⁰⁸ Agreements between gangs have also developed outside the

³⁹⁹ *Id.*

⁴⁰⁰ Tom Hayden, *We Need Peacemakers Like Alex Sanchez*, L.A. TIMES (Jan. 26, 2000), <https://www.latimes.com/archives/la-xpm-2000-jan-26-me-57932-story.html>, archived at <https://perma.cc/2FCE-PRNU>.

⁴⁰¹ WILLIAMS, *supra* note 98, at 339–71. Williams was executed at San Quentin State Prison in 2005. For a different approach, see *What Are the 26 Rules of Tupac's T.H.U.G.L.I.F.E. Code for Ethical Drug Dealing?*, CLASSIC HIP HOP MAG. (July 24, 2018), <https://classichiphopmagazine.com/answers/2018/7/22/what-are-the-26-rules-of-tupacs-thug-life-code-for-ethical-drug-dealing>, archived at <https://perma.cc/F25S-C5CQ>.

⁴⁰² WILLIAMS, *supra* note 98, at 361.

⁴⁰³ *Id.* at 349.

⁴⁰⁴ *Id.* at 356.

⁴⁰⁵ *Id.* at 353–354.

⁴⁰⁶ *Id.* at 352.

⁴⁰⁷ *Id.* at cover.

⁴⁰⁸ See, e.g., ELANA ZILBERG, SPACE OF DETENTION: THE MAKING OF A TRANSNATIONAL GANG CRISIS BETWEEN LOS ANGELES AND SAN SALVADOR (2011); Emma Mahern, *La Mano Extendida: The Interaction Between International Law and Negotiation as a Strategy to End Gang Warfare in El Salvador and Beyond*, 24 IND. INT'L & COMP. L. REV. 767, 767–68 (2014); Pierre Hauck & Sven Peterke, *Organized Crime and Gang Violence in National and International Law*, 92 INT'L REV. RED CROSS 407, 407 (2010). In fact, supporters of the Watts

United States.⁴⁰⁹ In some instances, agreements have even developed between gangs and law enforcement. The gang crisis in El Salvador reflects this dynamic.⁴¹⁰ Salvadoran gangs, such as MS-13, first arose in the United States and were exported to El Salvador through the deportation of gang members.⁴¹¹ Eventually, these gangs became a leading cause of violence in the country. In response, the Salvadoran government entered negotiations with leaders from the two gangs.⁴¹² An ensuing truce was established in 2012. Initially, the truce led to a significant reduction in gang violence.⁴¹³ Reports indicate that the homicide rate in El Salvador dropped by almost 50%.⁴¹⁴ However, there were substantial concerns that the government had offered concessions to gang leaders that allowed for selective criminal activity.⁴¹⁵ Public pressure led the Salvadoran government to rescind its support for the truce. In response, homicide rates eventually returned to their pre-truce levels.⁴¹⁶ Gang truces have also been documented in other countries, including Honduras, Jamaica, and Trinidad and Tobago.⁴¹⁷

Twenty-eight years after the Watts Gang Treaty, the death of noted social activist and rapper Nipsey Hussle in south Los Angeles further highlights the Treaty's significance. Hussle was well-regarded within the Black community because he promoted numerous philanthropic causes while counseling against gang violence.⁴¹⁸ He had credibility because he had been

Gang Treaty shared their experiences around the world. *See Message to the Grassroots: Gang Truce: The International Scene* (Nov. 16, 1994), <https://mediaburn.org/video/message-to-the-grassroots-gang-truce-the-international-scene/>, archived at <https://perma.cc/YW8N-FQBL>.

⁴⁰⁹ *See generally* JENNIFER M. HAZEN & DENNIS RODGERS, *GLOBAL GANGS; STREET VIOLENCE ACROSS THE WORLD* (2014); SMALL ARMS SURVEY, GRADUATE INST. INT'L & DEV. STUD., *SMALL ARMS SURVEY 2010: GROUPS, GANGS, AND GUNS* (2010); Mahern, *supra* note 408, at 767.

⁴¹⁰ *See generally* Charles M. Katz, E.C. Hedberg & Luis Enrique Amaya, *Gang Truce for Violence Prevention, El Salvador*, 94 BULL. WORLD HEALTH ORG. 660, 660 (2016); Diana Villiers Negroponte, *MS-13 and Barrio 18 Truce: Can This Be Successfully Replicated in Honduras and Guatemala*, BROOKINGS (June 5, 2013), <https://www.brookings.edu/blog/up-front/2013/06/05/ms-13-and-barrio-18-truce-can-this-be-successfully-replicated-in-honduras-and-guatemala/>, archived at <https://perma.cc/4HGP-5J28>.

⁴¹¹ *See* ÓSCAR MARTÍNEZ, *A HISTORY OF VIOLENCE: LIVING AND DYING IN CENTRAL AMERICA XX* (2016); T.W. WARD, *GANGSTERS WITHOUT BORDERS: AN ETHNOGRAPHY OF A SALVADORAN STREET GANG* (2013).

⁴¹² Azam Ahmed, *"They Will Have to Answer to Us,"* N.Y. TIMES MAG. (Nov. 29, 2017), <https://www.nytimes.com/2017/11/29/magazine/el-salvador-police-battle-gangs.html>, archived at <https://perma.cc/Q38L-MRD4>.

⁴¹³ Randal C. Archibald, *Gangs' Truce Buys El Salvador a Tenuous Peace*, N.Y. TIMES, (Aug. 28, 2012), <https://www.nytimes.com/2012/08/28/world/americas/in-el-salvador-gang-truce-brings-tenuous-peace.html>, archived at <https://perma.cc/V7C8-WUUA>.

⁴¹⁴ TERESA WHITFIELD, *MEDIATING CRIMINAL VIOLENCE: LESSONS FROM THE GANG TRUCE IN EL SALVADOR* 9 (2013).

⁴¹⁵ *Id.* at 12–13; Ahmed, *supra* note 412.

⁴¹⁶ Moritz Schuberth, *Beyond Gang Truces and Mano Dura Policies: Towards Substitutive Security Governance in Latin America*, 5 STABILITY 1 (2016).

⁴¹⁷ *See* CHARLES M. KATZ & LUIS ENRIQUE AMAYA, *THE GANG TRUCE AS A FORM OF VIOLENCE INTERVENTION: TECHNICAL REPORT* 1–2, 7–10 (July 2015).

⁴¹⁸ Sidney Madden & Rodney Carmichael, *Caught in the System: Nipsey Hussle, the LAPD and the Inescapable Trap of Gang Affiliation*, NPR (Dec. 12, 2020), <https://www.npr.org/2020/12/12/945454343/caught-in-the-system-nipsey-hussle-lapd-affiliation>,

a member of the Rollin' 60s, a Crips gang. When he was killed on March 31, 2019, local leaders feared reprisal attacks.⁴¹⁹ Such fears were mitigated when gang members agreed to a cease-fire agreement.⁴²⁰ However, negotiators had to make clear that a cease-fire agreement was not akin to a treaty. As noted by the *Los Angeles Times*, “[i]n gang culture, the difference between a cease-fire and a truce is crucial. A truce implies friendship beyond the mere cessation of violence. Some who are not ready to accept a truce may accept a cease-fire.”⁴²¹ This explains why gang members from Watts sought inspiration in a forty-year-old armistice agreement located in a university library and used it as a template to draft a peace treaty to end their own conflict.⁴²² They sought hope for a durable peace and a focal point to build a better life.

IV. THE MEANING OF HIDDEN HISTORY

Hidden history surrounds us. Its stories reside beneath the common narrative of power and privilege that exists in the world.⁴²³ Some stories are intentionally hidden because they do not align with ideological or political agendas, or they run counter to assumptions about race, color, or class.⁴²⁴

archived at <https://perma.cc/9K2F-W66B>; Nicole Santa Cruz & Cindy Chang, *Nipsey Hussle's Death Unified Crips and Bloods in Grief. Now, Peace Talks Carry on His Call*, L.A. TIMES (June 23, 2019), <https://www.latimes.com/local/lanow/la-me-gang-cease-fire-nipsey-hussle-crips-bloods-compton-riots-20190623-htm1story.html>, archived at <https://perma.cc/Z383-2LDP>.

⁴¹⁹ Richard Winton & Laura Newberry, *Killing of Nipsey Hussle in South L.A. Likely Has Some Ties to Gangs, Source Says; LAPD Seeks Suspect*, L.A. TIMES (Mar. 31, 2019), <https://www.latimes.com/local/lanow/la-me-nipsey-hussle-shot-rapper-20190331-story.html>, archived at <https://perma.cc/27DK-QUDY>.

⁴²⁰ A.R. Shaw, *Crips and Bloods Agree to Historic Cease-Fire in Honor of Nipsey Hussle*, ROLLINGOUT (June 25, 2019), <https://rollingout.com/2019/06/25/crips-and-bloods-agree-to-historic-cease-fire-in-honor-of-nipsey-hussle/>, archived at <https://perma.cc/HWX4-YFJ3>.

⁴²¹ Santa Cruz & Chang, *supra* note 418.

⁴²² Cf. Errol Henderson & Russell J. Leng, *Reducing Intergang Violence: Norms from the Interstate System*, 24 PEACE & CHANGE 476, 498 (1999). A rigorous review of research on promoting peace in conflict zones seems worthwhile. See, e.g., Daniel Druckman & Lynn Wagner, *Justice Matters: Peace Negotiations, Stable Agreements, and Durable Peace*, 63 J. CONFLICT RES. 287, 288 (2017). See generally PAGE FORTNA, PEACE TIME: CEASE-FIRE AGREEMENTS AND THE DURABILITY OF PEACE (2004).

⁴²³ There is a rich and diverse history of storytelling in law. See generally, PETER BROOKS & PAUL GEWIRTZ, LAW'S STORIES (1998); LAW STORIES (Gary Bellow & Martha Minow eds., 1996); Linda H. Edwards, *The Convergence of Analogical and Dialectic Imaginations in Legal Discourse*, 20 LEGAL STUD. F. 7 (1996); Stephen Paskey, *The Law is Made of Stories: Erasing the False Dichotomy Between Stories and Legal Rules*, 11 LEGAL COMM. & RHETORIC: JAWLD 51 (2014); Kim Lane Scheppelle, *Foreword: Telling Stories*, 87 MICH. L. REV. 2073 (1989); Toni M. Massaro, *Empathy, Legal Storytelling, and the Rule of Law: New Words, Old Wounds?*, 87 MICH. L. REV. 2099 (1989); Richard Delgado, *Storytelling for Oppositionists and Others: A Plea for Narrative*, 87 MICH. L. REV. 2411 (1989); Derrick Bell, *The Supreme Court, 1984 Term - Foreword: The Civil Rights Chronicles*, 99 HARV. L. REV. 4 (1985). But there are also critics of this methodology. See, e.g., Daniel A. Farber & Suzanna Sherry, *Telling Stories Out of School: An Essay on Legal Narratives*, 45 STAN. L. REV. 807 (1993).

⁴²⁴ While some hidden history has been found, other stories remain to be discovered. See generally, FATIMA SHAIK, ECONOMY HALL: THE HIDDEN HISTORY OF A FREE BLACK BROTHERHOOD (2021) (describing the story of benevolent association and social club run by French-speaking Black freemen in New Orleans); PAUL ORTIZ, EMANCIPATION BETRAYED: THE HIDDEN

Other stories are obscured through ignorance or neglect, unnoticed by those who record history.⁴²⁵ While such neglect may be unintentional, it often reflects a perspective that is unable to see the world as it really is. Or, in Ralph Ellison's words, these stories are "invisible . . . simply because people refuse to see [them]."⁴²⁶

Within this hidden history, marginalized communities fight against entrenched forces. In their struggles, many of these groups build social movements to challenge the status quo and attack extant subordination. The power of social movements is well-documented and a rich scholarship chronicles their role in promoting racial justice and equality.⁴²⁷ Some movements seek structural reform at the national level.⁴²⁸ Other movements seek change in their local communities.⁴²⁹ Some social movements are led by lawyers; others by activists.⁴³⁰

DEN HISTORY OF BLACK ORGANIZING AND WHITE VIOLENCE IN FLORIDA FROM RECONSTRUCTION TO THE BLOODY ELECTION OF 1920 (2006) (describing a powerful Black social movement that opposed segregation and discrimination in Florida).

⁴²⁵ The Watts Gang Treaty was publicized in the *Los Angeles Times* and several other media sources. However, it has not generated meaningful analysis. Today, the Treaty's legacy exists through the efforts of former gang members and community activists to keep its memory alive.

⁴²⁶ RALPH ELLISON, *INVISIBLE MAN* 3 (1947).

⁴²⁷ See generally STEVEN M. BUECHLER, *UNDERSTANDING SOCIAL MOVEMENTS: THEORIES FROM THE CLASSICAL ERA TO THE PRESENT* 1–3 (2011); JOEL F. HANDLER, *SOCIAL MOVEMENTS AND THE LEGAL SYSTEM: A THEORY OF LAW REFORM AND SOCIAL CHANGE* (1978); Amna A. Akbar, Sameer M. Ashar, & Jocelyn Simonson, *Movement Law*, 73 STAN. L. REV. 921 (2021); Scott L. Cummings, *The Social Movement Turn in Law*, 43 L. & SOC. INQ. 360, 360–61 (2018); Jack M. Balkin & Reva B. Siegel, *Principles, Practices, and Social Movements*, 154 U. PA. L. REV. 927, 928–30 (2006); Debra C. Minkoff, *The Sequencing of Social Movements*, 62 AM. SOCIO. REV. 779, 779–80 (1997); Alan Hunt, *Rights and Social Movements: Counter-Hegemonic Strategies*, 17 J. L. & SOC'Y 309 (1990).

⁴²⁸ Lani Guinier, *Beyond Legislatures: Social Movements, Social Change, and the Possibilities of Demosprudence*, 89 B.U. L. REV. 539, 549–51 (2009); Reva B. Siegel, *Constitutional Culture, Social Movement Conflict and Constitutional Change: The Case of the De Facto ERA*, 94 CALIF. L. REV. 1323, 1369–78 (2006); Kenneth W. Mack, *Rethinking Civil Rights Lawyering and Politics in the Era Before Brown*, 115 YALE L.J. 256, 318–42 (2005); William N. Eskridge, Jr., *Some Effects of Identity-Based Social Movements on Constitutional Law in the Twentieth Century*, 100 MICH. L. REV. 2062 (2002).

⁴²⁹ Rahman & Simonson, *supra* note 25, at 681–82; M. Adams & Max Rameau, *Black Community Control Over Police*, 2016 WIS. L. REV. 515, 515–16 (2016); Larry Redmond, *Why We Need Community Control of the Police*, 21 LOY. PUB. INT. L. REP. 226, 228–31 (2016); Nadav Shoked, *The New Local*, 100 VA. L. REV. 1323, 1325–33 (2014); Richard Briffault, *The Rise of Sublocal Structures in Urban Governance*, 82 MINN. L. REV. 503 (1997).

⁴³⁰ See generally CAUSE LAWYERS AND SOCIAL MOVEMENTS (Austin Sarat & Stuart Scheingold eds., 2006); Alexi Nunn Freeman & Jim Freeman, *It's About Power, Not Policy: Movement Lawyering for Large-Scale Social Change*, 23 CLINICAL L. REV. 147 (2016); Tomiko Brown-Nagin, *The Civil Rights Canon: Above and Below*, 123 YALE L.J. 269 (2014); Martha Davis, *Law, Issue Frames and Social Movements: Three Case Studies*, 14 U. PA. J. L. & SOC. CH. 363 (2011); Sameer Ashar, *Public Interest Lawyers and Resistance Movements*, 95 CALIF. L. REV. 1879 (2007); Jennifer Gordon, *Lawyer Is Not the Protagonist: Community Campaigns, Law, and Social Change*, 95 CALIF. L. REV. 2133 (2007); Tomiko Brown-Nagin, *Elites, Social Movements, and the Law: The Case of Affirmative Action*, 105 COLUM. L. REV. 1436 (2005); William P. Quigley, *Reflections of Community Organizers: Lawyering for Empowerment of Community Organizations*, 21 OHIO N.U. L. REV. 455 (1995); Jennifer Gordon, *We Make the*

The Watts Gang Treaty reveals the hidden history of a unique social movement—one led by gang members.⁴³¹ It also reveals the power of private ordering and its potential role in marginalized communities long isolated from public law and often ignored by political institutions.⁴³² Private ordering involves a set of norms, rules, and institutions that operate outside formal legal systems.⁴³³ Private ordering often develops when political institutions are unable or unwilling to address societal problems.⁴³⁴

In Watts, gang members drafted a self-enforcing peace treaty to address the intractable problem of gang violence. Prior to the Treaty's adoption, drive-by shootings were rampant throughout south Los Angeles.⁴³⁵ Most of these attacks could be traced to conflicts between rival gangs. Law enforcement operations did little to stop the violence. In fact, police activity would often exacerbate tensions in the community.⁴³⁶ Public confidence in law enforcement suffered due to racial profiling and the excessive use of force.⁴³⁷ The failure of political institutions provided gang leaders with an opportunity to develop their own solution to the ongoing conflict. Gang members researched the Treaty. They drafted its provisions and presented the agreement to their leaders for ratification. Moreover, the Treaty did not rely on

Road by Walking: Immigrant Workers, the Workplace Project, and the Struggle for Social Change, 30 HARV. C.R.-C.L. REV. 407 (1995).

⁴³¹ The Watts Gang Treaty also reveals the many ways in which legal pluralism operates in the United States. See Brian Z. Tamanaha, *Understanding Legal Pluralism: Past to Present, Local to Global*, 30 SYDNEY L. REV. 375 (2008); Sally Engle Merry, *Legal Pluralism*, 22 LAW & SOC'Y REV. 869 (1988); Marc Galantar, *Justice in Many Rooms: Courts, Private Ordering, and Indigenous Law*, 19 J. LEGAL PLURALISM 1 (1981). The Treaty could even be called a form of indigenous law. See BRUCE DUTHU, *SHADOW NATIONS: TRIBAL SOVEREIGNTY AND THE LIMITS OF LEGAL PLURALISM* (2013).

⁴³² Comparative scholars and legal theorists would refer to this as “law from below.” See, e.g., LAW AND GLOBALIZATION FROM BELOW: TOWARDS A COSMOPOLITAN LEGALITY (Boaventura de Sousa Santos & Cesar A. Rodriguez-Garavito eds., 2005); RAJAGOPAL BALAKRISHNAN, *INTERNATIONAL LAW FROM BELOW: DEVELOPMENT, SOCIAL MOVEMENTS, AND THIRD WORLD RESISTANCE* (2003); Sally Engle Merry et al., *Law From Below: Women's Human Rights and Social Movements in New York City*, 44 LAW & SOC'Y REV. 101 (2010).

⁴³³ ROBERT C. ELLICKSON, *ORDER WITHOUT LAW: HOW NEIGHBORS SETTLE DISPUTES* 123–27 (1991). Private ordering has been documented in a variety of fields. See generally David V. Snyder, *Private Lawmaking*, 64 OHIO STATE L.J. 371 (2003); Jonathan R. Macey, *Public and Private Ordering and the Production of Legitimate and Illegitimate Legal Rules*, 82 CORNELL L. REV. 1123 (1997); Steven L. Schwarcz, *Private Ordering*, 97 NW. L. REV. 319 (2002); Lisa Bernstein, *Private Commercial Law in the Cotton Industry: Creating Cooperation Through Rules, Norms, and Institutions*, 99 MICH. L. REV. 1724 (2001); Curtis J. Milhaupt & Mark D. West, *The Dark Side of Private Ordering: An Institutional and Empirical Analysis of Organized Crime*, 67 U. CHI. L. REV. 41 (2000); Avery Katz, *Taking Private Ordering Seriously*, 144 U. PA. L. REV. 1745 (1996).

⁴³⁴ See Barak D. Richman, *Firms, Courts, and Reputation Mechanisms: Towards a Positive Theory of Private Ordering*, 104 COLUM. L. REV. 2328, 2335 (2004); Schwarcz, *supra* note 433, at 324. But see Orly Lobel, *The Paradox of Extralegal Activism: Critical Legal Consciousness and Transformative Politics*, 120 HARV. L. REV. 937 (2007).

⁴³⁵ Reinhold, *supra* note 40; H. Range Hutson et al., *The Epidemic of Gang-Related Homicides in Los Angeles County From 1979 Through 1994*, 274 J. AM. MED. ASSOC. 1031, 1033 (1995).

⁴³⁶ Serrano & Katz, *supra* note 281, at A1.

⁴³⁷ Bey Transcript, *supra* note 72; Katz, *supra* note 277, at B1.

public officials to monitor or enforce its terms. Instead, compliance was maintained by the hierarchical structure within each gang and the support of the broader community, including family, friends, neighbors, religious leaders, musicians, and social activists.⁴³⁸ The Treaty's development within the Watts community was essential to its success. As explained by a gang member, "[I]t ha[d] to be an inside job."⁴³⁹

The Watts story highlights the role of symbolism in the success of social movements.⁴⁴⁰ In south Los Angeles, colors—red, blue, and purple—were often used to self-identify gang affiliation.⁴⁴¹ When the treaty was adopted, colors were used to convey a different message—one of unity. Gang members would show their support of the treaty by mixing gang colors together.⁴⁴² As rapper Ice-T explained in his song, *Gotta Lotta Love*, "[t]he gang truce is on, so you wear whatever."⁴⁴³

The Treaty itself served as a powerful symbol in Watts. The decision by gang leaders to use the 1949 Armistice Agreement between Egypt and Israel as the template for their own agreement was intentional.⁴⁴⁴ It was informed by the parallels between the gang conflict in Watts and the Arab-Israeli War, both of which were seen as intractable and deeply violent.⁴⁴⁵ The connections between the Armistice Agreement and the Watts Treaty were further heightened by the pivotal role of Dr. Ralph Bunche.⁴⁴⁶ To gang members, it established a tangible and direct connection between the Armistice Agreement and the Watts Treaty.

In Watts, the land was symbolic. The four major housing projects—Jordan Downs, Imperial Courts, Hacienda Village, and Nickerson Gardens—converged in Watts, which was described by gang members as "Holy Grounds."⁴⁴⁷ In south Los Angeles, territory had long played a role in gang conflict.⁴⁴⁸ It defined gang membership and established zones of control. The Treaty acknowledged the importance of land and the need to protect both

⁴³⁸ AFARY, *supra* note 7, at 79–80.

⁴³⁹ JAH & SHAH'KEYAH, *supra* note 74, at 49 (interview with "Red").

⁴⁴⁰ See generally Thomas Olesen, *Injustice Symbols and Global Solidarity*, in TRANSNATIONAL STRUGGLES FOR RECOGNITION: NEW PERSPECTIVES ON CIVIL SOCIETY SINCE THE TWENTIETH CENTURY (Dieter Gosewinkel & Dieter Rucht eds., 2016); Eric A. Posner, *Symbols, Signals, and Social Norms in Politics and the Law*, 27 J.L. STUD. 765 (1998); Julius Cohen, *The Value of Value Symbols in Law*, 52 COLUM. L. REV. 893 (1952); Max Lerner, *Constitution and Court as Symbols*, 46 YALE L.J. 1290 (1937).

⁴⁴¹ See Steven W. Bender, *Knocked Down Again: An East L.A. Story on the Geography of Color and Colors*, 12 HARV. LATINO L. REV. 109, 112 (2009).

⁴⁴² Ford, *supra* note 199.

⁴⁴³ ICE-T, *supra* note 8.

⁴⁴⁴ MUHAMMAD, *supra* note 103, at 13.

⁴⁴⁵ MUHAMMAD, *supra* note 103, at 46; Katz & Ford, *supra* note 5.

⁴⁴⁶ A. Sherrills Interview, *supra* note 4.

⁴⁴⁷ JAH & SHAH'KEYAH, *supra* note 74, at 76–77 (interview with Angelo).

⁴⁴⁸ See generally IRVING A. SPERGEL, *THE YOUTH GANG PROBLEM: A COMMUNITY APPROACH* 87 (1995); Olivier Bangert, *Territorial Gangs and Their Consequences for Humanitarian Players*, 92 INT'L REV. RED CROSS 387, 391–98 (2010); Charlie Beck, "Where Are You From?" L.A. TIMES (June 24, 2008), <https://www.latimes.com/archives/la-xpm-2008-jun-24-oe-beck24-story.html>, archived at <https://perma.cc/8QPZ-TBBD>; Robert Garot, "Where You

gang members and non-gang members; living in these neighborhoods.⁴⁴⁹ The Watts story also reveals how land could be used to transcend gang affiliation. The ley-lines that formed in Watts inspired gang leaders.⁴⁵⁰ The land gave their movement both meaning and a clear connection to their community.

To be clear, gangs continued to exist in Watts even after the Treaty's adoption. In fact, gang structure was essential for the Treaty's success because it gave gang leaders power over their members. Without this structure, there would be no mechanism, formal or otherwise, to monitor compliance and promote enforcement in the event of a breach.⁴⁵¹ It also empowered leaders to bring their members together and coalesce around a common goal.⁴⁵² Gang members were now "bound by a peace treaty."⁴⁵³

Studying hidden history acknowledges and celebrates the lives of the people that reside within its stories. The Watts story conveys agency and provides a human face to a deeply marginalized community.⁴⁵⁴ Few groups in American society suffer more from isolation and dehumanization than gangs.⁴⁵⁵ The word "gang" itself immediately creates negative images and assumptions.⁴⁵⁶ In fact, gang members are keenly aware of this dynamic.⁴⁵⁷

From! *Gang Identity as Performance*, 36 J. CONTEMP. ETHNOGRAPHY 50, 50–51, 60–65 (2007).

⁴⁴⁹ Watts Gang Treaty, *supra* note 138, art. I.

⁴⁵⁰ A. Sherrills Interview, *supra* note 4; HAYDEN, *supra* note 23, at 186.

⁴⁵¹ *Id.* at 32–36.

⁴⁵² JAH & SHAH'KEYAH, *supra* note 74, at 95 (interview with Don Gordon).

⁴⁵³ KAM, *supra* note 8.

⁴⁵⁴ See generally Bryan Stevenson, *A Presumption of Guilt: The Legacy of America's History of Racial Injustice*, in POLICING THE BLACK MAN: ARREST, PROSECUTION, AND IMPRISONMENT 3 (Angela J. Davis ed., 2017); ELIZABETH HINTON, *FROM THE WAR ON POVERTY TO THE WAR ON CRIME: THE MAKING OF MASS INCARCERATION IN AMERICA* (2016); MICHELLE ALEXANDER, *THE NEW JIM CROW: MASS INCARCERATION IN THE AGE OF COLORBLINDNESS* (2012); KHALIL GIBRAN MUHAMMAD, *THE CONDEMNATION OF BLACKNESS: RACE, CRIME, AND THE MAKING OF MODERN URBAN AMERICA* (2010).

⁴⁵⁵ MONICA BROWN, *GANG NATION: DELINQUENT CITIZENS IN PUERTO RICAN, CHICANO, AND CHICANA NARRATIVES* xiv (2002); Jamila Jefferson-Jones, "Community Dignity Takings": *Dehumanization and Infantalization of Communities Resulting From the War on Drugs*, 66 U. KAN. L. REV. 993, 998–1006 (2018); Bernadette Atuahene, *Dignity Takings and Dignity Restoration: Creating a New Theoretical Framework for Understanding Involuntary Property Loss and the Remedies Required*, 41 LAW & SOC. INQUIRY 796, 798–801 (2016). Dehumanization of gang members is common in political discourse. See, e.g., Emile Bruneau, *Why it Matters When the President Calls People, Even Violent Gang Members, "Animals,"* WASH. POST (May 18, 2018), <https://www.washingtonpost.com/news/posteverything/wp/2018/05/18/why-it-matters-when-the-president-calls-people-even-violent-gang-members-animals/>, archived at <https://perma.cc/Z3LK-CMCS>; Vann R. Newkirk II, *The Real Risk of Trump's Dehumanization of Immigrants*, THE ATLANTIC (May 19, 2018), <https://www.theatlantic.com/politics/archive/2018/05/the-real-risk-of-trumps-dehumanization-of-immigrants/560762/>, archived at <https://perma.cc/H4LQ-5HXE>.

⁴⁵⁶ JAH & SHAH'KEYAH, *supra* note 74, at 301 (interview with "Q-Bone") ("The problem is that the society needs to start accepting the gang members back into the community as human beings and take that label off of us."). Gang members are often the subjects of targeted sanctions under civil and criminal law. See MATTHEW D. O'DEANE, *GANG INJUNCTIONS AND ABATEMENT: USING CIVIL REMEDIES TO CURB GANG-RELATED CRIMES* (2012); EDWARD L. ALLAN, *CIVIL GANG ABATEMENT: THE EFFECTIVENESS AND IMPLICATIONS OF POLICING BY*

They recognize that they live in a dangerous world and that their members often contribute to its violence.⁴⁵⁸ Yet, many gang members seek peace and stability for themselves, their families, and their communities.⁴⁵⁹ They also seek respect.⁴⁶⁰ In Watts, they joined forces to draft a treaty that would end the “war-like destruction of the parties” and establish a “permanent peace.”⁴⁶¹

Finally, the stories in hidden history are valuable because of what they provide to their communities.⁴⁶² These stories memorialize a shared struggle and create a legacy that can be conveyed to future generations. They also provide a counter-narrative to the dominant perception about marginalized communities.⁴⁶³ There was poverty and violence in south Los Angeles. But there was also hope as peacemakers sought to build a better life. The writing of hidden history reflects what Milan Kundera wrote about the struggle of man against power: it represents “the struggle of memory against forgetting.”⁴⁶⁴ These stories are worth recording because they are worth remembering.

CONCLUSION

Given the connection between the Watts Gang Treaty and the 1949 Armistice Agreement between Egypt and Israel, it is unsurprising the gang truce would confront serious challenges.⁴⁶⁵ Seven years after the Egypt-Israel

INJUNCTION (2004); Lua Kamál Yuille, *Dignity Takings in Gangland's Suburban Frontiers*, 92 CHI.-KENT L. REV. 793, 798–800 (2017); Lindsay Crawford, No Way Out: An Analysis of Exit Processes for Gang Injunctions, 97 CALIF. L. REV. 161, 161–63 (2009).

⁴⁵⁷ A. Sherrills Interview, *supra* note 4; Bey Transcript, *supra* note 72.

⁴⁵⁸ See, e.g., Leonard Eric, *LA's Staggering Murder Rate Linked to Gang Shootings and Violence Against Homeless*, NBC L.A. (Nov. 23, 2020), <https://www.nbctv.com/news/local/las-staggering-murder-rate-linked-to-gang-shootings-and-violence-against-homeless/2469360/>, archived at <https://perma.cc/4DQ5-3NDW>; City News Service, *Murders in Los Angeles Increased by 20% in 2020 as Overall Crime Declined, Report Says*, CBS L.A. (Oct. 20, 2020), <https://abc7.com/murder-los-angeles-crime-covid/7185695/>, archived at <https://perma.cc/A5RZ-SR49>.

⁴⁵⁹ Zinzun, *supra* note 253, at 260. See also Ted Chen, *Rival Gangs Come Together in Los Angeles to Talk About Their Truce*, NBC L.A. (Aug 21, 2020) <https://www.nbctv.com/news/local/rival-gangs-come-together-in-los-angeles-to-talk-about-their-truce/2416944/>, archived at <https://perma.cc/5P5K-XX9C>.

⁴⁶⁰ JAH & SHAH'KEYAH, *supra* note 74, at 38, 97, 267, 300; HAYDEN, *supra* note 23, at 41 (“By all accounts, what triggers most gang violence is disrespect—being ‘dissed’”); Ford & Rivera, *supra* note 3 (“We’re tired of being pulled over with our mother or our kids in the cars and told to get against the wall. They have got to give us our respect.”).

⁴⁶¹ Watts Gang Treaty, *supra* note 138, pmbl, art. I. The word “gang” was only used once in the Treaty. Instead, the drafters used the terms “parties” and “community representatives” to describe gangs and gang members, respectively. See also Perry, *supra* note 87, at v.

⁴⁶² Delgado, *supra* note 423, at 2412.

⁴⁶³ This is uniquely important in communities that face marginalization and dehumanization. Jefferson-Jones, *supra* note 455, at 1004–05; Atuahene, *supra* note 455, at 801.

⁴⁶⁴ MILAN KUNDERA, *THE BOOK OF LAUGHTER AND FORGETTING* 3 (1980).

⁴⁶⁵ See Katz & Ford, *supra* note 5 (“The bad thing is the armistice did not last—it led to the 1956 war, which led to the 1967 war, which led to the 1973 war,” said Richard H. Dekmejian, a USC professor of political science who specializes in the Middle East. “But as

Armistice Agreement was signed, the Suez Crisis developed between Egypt and Israel, leading to Israel's invasion of the Sinai Peninsula.⁴⁶⁶ Armed conflict between Egypt and Israel also occurred in 1967 and 1973.⁴⁶⁷ A lasting peace between Egypt and Israel would take thirty years to achieve and was not concluded until the Camp David Accords of 1979.⁴⁶⁸ A key element to the eventual peace agreement was the U.S. commitment to provide billions of dollars in financial support to both countries.⁴⁶⁹

In his 1950 Nobel Laureate Lecture, Ralph Bunche acknowledged the strong connection between economic development and lasting peace. To those “who have known only suffering,” he wrote, peace “must be translated into bread or rice, shelter, health, and education, as well as freedom and human dignity—a steadily better life.”⁴⁷⁰ For peace to be secure, Bunche argued that the “long-suffering and long-starved, forgotten peoples of the world, the underprivileged and the undernourished, must begin to realize without delay the promise of a new day and a new life.”⁴⁷¹

The Watts Gang Treaty provided such an opportunity for “a new day and a new life.” While political leaders gave tacit approval to the truce, they failed to take advantage of the peace. As Dr. King acknowledged when he visited Watts in 1965 after the first rebellion, “a mere condemnation of violence is empty without understanding the daily violence that our society inflicts upon many of its members.”⁴⁷² He rightly recognized that “[t]he violence of poverty and humiliation hurts as intensely as the violence of the club.”⁴⁷³ In Watts, limited support by political leaders could not overcome decades of neglect and continued isolation.⁴⁷⁴ Their unwillingness to make meaningful financial investments in the community prevented the truce from building a civic infrastructure and generating the economic prosperity neces-

an opener, it's a good initial step. It reflects a significant intellectual strength on the part of (the gangs') leadership.”)

⁴⁶⁶ See generally KIRSTEN E. SCHULZE, *THE ARAB-ISRAELI CONFLICT* 22 (2d ed. 2008).

⁴⁶⁷ *Id.* at 32, 39.

⁴⁶⁸ The status of Gaza, however, remains unsettled and a source of ongoing conflict between Israel and the Palestinian Authority. Gaza is now one of the most populated and impoverished regions in the world. See generally Press Release, *Cash-Strapped Gaza and an Economy in Collapse Put Palestinian Basic Needs at Risk*, THE WORLD BANK (Sept. 25, 2018), <https://www.worldbank.org/en/news/press-release/2018/09/25/cash-strapped-gaza-and-an-economy-in-collapse-put-palestinian-basic-needs-at-risk>, archived at <https://perma.cc/4SKJ-6YZS>.

⁴⁶⁹ Peter Grier, *U.S. Aid to Egypt: What Does it Buy?*, CHRISTIAN SCI. MONITOR (Feb. 15, 2011), <https://www.csmonitor.com/USA/Politics/Decoder/2011/0215/US-aid-to-Egypt-What-does-it-buy>, archived at <https://perma.cc/NY72-RBMX>.

⁴⁷⁰ Ralph Bunche, Laureate, 1950 Nobel Peace Prize, *Some Reflections of Peace in Our Time* (Dec. 11, 1950).

⁴⁷¹ *Id.*

⁴⁷² KING, *supra* note 44, at 295.

⁴⁷³ *Id.*

⁴⁷⁴ A. Sherrills Interview, *supra* note 4. See also E. Douglass Williams & Richard H. Sander, *The Prospects for “Putting America to Work” in the Inner City*, 81 GEO. L.J. 2003 (1993).

sary to ensure its permanence.⁴⁷⁵ Relying on gangs alone to solve gang violence proved unsustainable.

The Watts Gang Treaty reveals the power of localized social movements—even those led by gangs—to achieve meaningful change. However, it also reveals the limits of such efforts in the absence of political support, financial investment, and structural change.⁴⁷⁶ For a durable peace to be secured, it must be accompanied by economic development, employment opportunities, civic infrastructure, and respect.⁴⁷⁷ For Watts, this support never arrived.⁴⁷⁸

⁴⁷⁵ See, e.g., Stoltze, *supra* note 316 (“The gangbangers that are in the community, that are slinging drugs—put an economic plan together and then they’ll quit selling drugs . . . You have to substitute something.”).

⁴⁷⁶ FELKER-KANTOR, *supra* note 46, at 240–41 (“Yet for the millions of dollars fueling the city’s carceral state-building, none of the money was redirected in support of the truce or of efforts to rebuild the city on an equitable basis.”); Johnston Hernández, *supra* note 117, at 147 (“Economic development programs, job training, counseling and other programs are needed on a massive scale if cities are going to be able to provide a viable alternative to gangs.”); HAYDEN, *supra* note 23, at 50 (“The need for an inner-peace process, led by former gang members or inmates with street knowledge, respect, and the capacity to be role models, must be reinforced by a peace movement in civil society demanding economic and social reform.”); RICE, *supra* note 41, at 142 (“[P]overty does not cause gang violence . . . [b]ut it makes a great petri dish in which violence hides and the violent thrive.”).

⁴⁷⁷ See Martin Wolk, *Father Gregory Boyle Has an Ambitious Plan to Expand Homeboy Industries*, L.A. TIMES (Dec. 5, 2019), <https://www.latimes.com/entertainment-arts/books/story/2019-12-05/gregory-boyle-barking-to-the-choir-book-club>, archived at <https://perma.cc/JKN8-KVFT> (“Homeboy Industries has long been known for Father Gregory Boyle’s slogan, ‘Nothing stops a bullet like a job.’”); Henderson & Leng, *supra* note 422, at 497 (“As long as society fails to eliminate problems such as poverty, racism, drugs, and social marginalization, urban youths will find gang membership an attractive, if ultimately illusory, means of achieving security, self-respect, and a sense of power in an oppressive and threatening environment.”).

⁴⁷⁸ Krikorian & Krikorian, *supra* note 101 (“The only tragedy of the truce was that society needed to reward [gang members who created it] and didn’t do a damn thing.”).