

MYTH & REMEMBRANCE: THE HARVARD LIFE OF PEDRO ALBIZU CAMPOS

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ABSTRACT

This paper attempts two distinct, yet related goals. First, it engages with primary sources, such as transcripts, letters, and class reports, to uncover details about the academic student life of one of Harvard's most famous Latino alumni, Pedro Albizu Campos. Second, it advances a normative argument that Pedro Albizu Campos should be remembered at Harvard University to guard against extremism and to foster intergenerational solidarity. To accomplish these ends, the paper critically examines myths told about Albizu Campos, and then attempts to confirm, dismiss, or leave untouched the myths. As a work of historical research undertaken in a single semester, this paper does not purport to be the definitive biography of Albizu Campos's Harvard years, but it does hope to contribute to the understanding of this controversial figure, and to foster debates about the role of commemorating Albizu Campos in the twenty-first century.

* Harvard Law School, J.D., 2022; Lehigh University, M.A., 2017; Lehigh University, B.A., 2016. Writing this paper was not a single person endeavor – I want to apologize up front to the people I fail to recognize. First, I want to thank Professor Daniel Coquillette for putting together a wonderful seminar where I workshopped this paper. I would not have enrolled in this seminar if not for Professor Elizabeth Kamali's encouragement – thank you. And I would not have written about Albizu Campos, if not for Professor Andrew Crespo introducing me to that remarkable Harvard graduate. Gracias profe. To the hidden figures behind the Harvard University Archives email account: this institution is blessed to have you. I want to thank the librarians that always lent me a helping hand when I was examining archival materials, especially considering Covid-19. Thanks to my classmates who helped me think through the normative puzzle posed by this paper. It remains unresolved but I hope people continue to entertain this knot of commemoration for generations to come. To the team at the *Harvard Latin America Law Review*: thank you so much for your insightful comments that helped bring this piece to life. All errors, from the factual to the grammatical, are my own. Mom and Peter – thank you for everything, los amo.

INTRODUCTION

On January 6, 2021, a mob consisting of former President Trump supporters overran the United States Capitol.¹ The aftermath was bloody,² violent,³ and deadly.⁴

One of the lead organizers of the insurrection attended a prestigious law school.⁵ Stewart Rhodes, charged for seditious conspiracy,⁶ graduated from Yale Law School,⁷ consistently ranked as the best law school in the United States. The January 6 insurrection, however, was not the first attack organized by an elite law school's graduate on the nation's legislature.⁸ A Puerto Rican, Harvard-educated, revolutionary inspired an attack several decades earlier.⁹ His posse shot five members of Congress on the House floor; seriously injuring one Congressman.¹⁰ But why would the reader know this:

¹ See Devlin Barrett, Abigail Hauslohner, Spencer S. Hsu & Ashlyn Still, *A sprawling investigation: What we know so far about the Capitol riot suspects*, WASH. POST (May 13, 2021), <https://www.washingtonpost.com/nation/interactive/2021/capitol-riot-arrests-investigation/>, archived at <https://perma.cc/Z9EF-MPEE>.

² Over fifty officers were injured and some were hospitalized in the aftermath of January 6, 2022. See Michael S. Schmidt & Luke Broadwater, *Officers' Injuries, Including Concussions, Show Scope of Violence at Capitol Riot*, N.Y. TIMES (July 12, 2021), <https://www.nytimes.com/2021/02/11/us/politics/capitol-riot-police-officer-injuries.html>, archived at <https://perma.cc/5TZV-34V7>; see also Peter Hermann & Julie Zauzmer Weil, *Beaten, sprayed with mace and hit with stun guns: police describe injuries to dozens of officers during assault on U.S. Capitol*, WASH. POST (Jan. 11, 2021), https://www.washingtonpost.com/local/public-safety/police-capitol-injures-trump/2021/01/11/ca68e3e2-5438-11eb-a08b-f1381ef3d207_story.html, archived at <https://perma.cc/A7U5-AWLB>.

³ According to the U.S. Department of Justice, approximately 140 police officers were assaulted at the Capitol on January 6, 2021. *One Year Since the Jan. 6 Attack on the Capitol*, U.S. DEPT. OF JUSTICE <https://www.justice.gov/usao-dc/one-year-jan-6-attack-capitol> (last updated Dec. 30, 2021), archived at <https://perma.cc/64VJ-ND5D>.

⁴ Several people died in the crowd; some officers committed suicide. See Chris Cameron, *These Are the People Who Died in Connection With the Capitol Riot*, N.Y. TIMES (Jan. 5, 2022) <https://www.nytimes.com/2022/01/05/us/politics/jan-6-capitol-deaths.html>, archived at <https://perma.cc/988D-CKGA>.

⁵ See Jeannie Suk Gersen, *The case against the Oath Keepers*, NEW YORKER (Jan. 21, 2022) <https://www.newyorker.com/news/daily-comment/the-case-against-the-oath-keepers>, archived at <https://perma.cc/B2WX-4CLN>.

⁶ See *id.*; see also Indictment at ¶¶ 1–13, *United States v. Rhodes III et al.* (Jan. 12, 2022), <https://www.justice.gov/opa/press-release/file/1462481/download>, archived at <https://perma.cc/EH8Z-RWSX>.

⁷ Given the charges of seditious conspiracy and other felonies, it is a historical irony that the Mr. Rhodes won the Judge William E. Miller Prize while at Yale Law School – a prize awarded to a student that submitted the “best paper concerning the Bill of Rights” which purported to solve “the puzzle of ‘enemy combatant’ status.” *Student Prizes 2003–04*, NEWS IN BRIEF @ YALE LAW SCHOOL (Winter 2005) <https://ylr.law.yale.edu/pdfs/v52-1/NIB52-1.pdf>, archived at <https://perma.cc/8VFX-R45D>.

⁸ It was the first one incited by a sitting United States president, however, with thousands of Americans around the Capitol and with extraordinary degrees of preparation and planning.

⁹ See ROBERTO REXACH BENÍTEZ, PEDRO ALBIZU CAMPOS LEYENDA Y REALIDAD 6 (1961).

¹⁰ See Clayton Knowles, *Five Congressmen Shot in House by 3 Puerto Rican Nationalists; Bullets Spray From Gallery*, N.Y. TIMES, Mar. 2, 1954, at A1; Lulu Garcia-Navarro, *Eyewitnesses Recount The 1954 Shooting Attack On The U.S. Capitol (2021)*, NPR (Jan. 17, 2021) <https://www.npr.org/transcripts/957722906>, archived at <https://perma.cc/9JDR-RG4M>.

Pedro Albizu Campos¹¹ has been erased from the history of Harvard Law School.

This paper leaves aside normative questions about whether Pedro Albizu Campos should be commemorated, and argues that he should be remembered. Part One begins an exploration of Pedro Albizu Campos's life preceding Harvard. Part Two, the heart of this paper, brings a magnifying glass to Pedro Albizu Campos's life at Harvard. It explores the groups he belonged to, the friends he made, the classes he sat through, and other biographical minutiae and foundations to prove, disprove, and leave untouched some myths about his Harvard days. Part Three briefly summarizes his life after Cambridge, Massachusetts. And the Conclusion stresses the importance of remembering this controversial figure for two reasons. First, to guard against the glorification and mystification of caudillos. And second, to root the experiences of marginalized students at elite law schools to a century of struggle and resilience.

PART ONE: FROM PUERTO RICO TO NEW ENGLAND

Pedro Albizu Campos's exact date of birth is a minor mystery. His mother, Juliana Campos, attested on October 3, 1891 that Albizu Campos was born on September 12, 1891.¹² Yet when asked for his birthday on official forms, Albizu Campos would mostly state his date of birth as June 29, 1893.¹³ The discrepancy has no obvious explanation. A biographer, Marisa Rosado, suggests that the date differences may be attributed to a confusion on the part of his mother: Albizu Campos had an older brother who died shortly after birth.¹⁴ But there are very few records from that time that confirm or disprove his date of birth.¹⁵ For the most part, Pedro Albizu Campos adopted the later date, June 29, 1893, as his official birthday.

What is clear, however, is that Albizu Campos was biracial and poor.¹⁶ Pedro's mother was Black and the daughter of a former enslaved person.¹⁷ His father, Alejandro Albizu y Romero, was a white accountant and businessman who refused to recognize his son as his legitimate heir until much later in life.¹⁸ Because of his father's refusal, little Pedro was known as Pedro Campos for the formative era of his youth.¹⁹ His father's animus against Al-

¹¹ I plan to refer to Pedro Albizu Campos as either Albizu Campos, Campos, or Pedro throughout this paper. However, his name changed and was sometimes "Anglified" to Pete throughout his life.

¹² MARISA ROSADO, *LAS LLAMAS DE LA AURORA* 3 (Jose M. Torres Santiago ed., 3rd ed. 2001).

¹³ *Id.* at 7.

¹⁴ *Id.* at 11.

¹⁵ *See id.* at 14.

¹⁶ *See* NELSON DENIS, *WAR AGAINST ALL PUERTO RICANS – REVOLUTION AND TERROR IN AMERICA'S COLONY* 110 (2015); ROSADO, *supra* note 12, at 17–19.

¹⁷ *See* ROSADO, *supra* note 12, at 4.

¹⁸ *See id.* at 13; DENIS, *supra* note 16, at 110.

¹⁹ *See* ROSADO, *supra* note 12, at 13–14.

bizu Campos may have derived from his son's skin tone and from the fact he was born out of wedlock.²⁰ This was not the last sting of racism that Albizu Campos was forced to bear.

As the bastard child of an enslaved person's daughter, illegitimated by his white father, Albizu Campos grew up in the confines of a pigmentocracy²¹ created by the Spanish to rule Puerto Rico and its other colonies.²² His race dictated, *de jure* and *de facto*, his opportunities in Puerto Rico.²³ It is truly remarkable that he would one day return to the island as a Harvard-educated revolutionary. It is especially remarkable considering that his poverty served as a further limitation to his future.

Albizu Campos's childhood home was in an extremely impoverished area of the city of Ponce in southern Puerto Rico.²⁴ His neighborhood, Tenerías, in the barrio of Machuelo Bajao, was considered a "shanty-town" and undesirable.²⁵ His mother died while Albizu Campos was just a child; he was sent to live with his aunt, a day laborer, along with his other siblings.²⁶ If not for Puerto Rico's public school system, Albizu Campos may have never "made it out" of his barrio. However, he excelled at school, despite having only formally started his public-school education at age twelve,²⁷ and eventually won a scholarship from Ponce's Logia Aurora to attend the University of Vermont's College of Engineering.²⁸

Campos's trip from Tenerías to Burlington was not his first time traveling beyond the island's borders. According to his Harvard transfer application, Campos, between 1907–1909, visited Brazil, Cuba, the Dominican Republic, Venezuela, and other locales in the West Indies.²⁹ But it appears to be his first trip to the United States, and likely his first experience in a racially homogenized society, which was Vermont in the 1910s.³⁰

²⁰ See DENIS, *supra* note 16, at 110.

²¹ For a definition of pigmentocracy see EDWARD TELLES, PIGMENTOCRACIES, ETHNICITY, RACE, AND COLOR IN LATIN AMERICA 3–4 (2014).

²² See Tanya Kateri Hernandez, *Multiracial Matrix: The Role of Race Ideology in the Enforcement of Antidiscrimination Laws, a United States Latin America Comparison*, 87 CORNELL L. REV. 1093, 1145 (2002) ("[After slavery ended in Puerto Rico], the colonial racial hierarchy continued as a privileged White elite, an intermediate "buffer" class of persons of African ancestry with physically apparent European ancestry and a sizeable population of disempowered darker-skinned African descendants").

²³ See Mara Loveman & Jeronimo O. Muniz, *How Puerto Rico Became White: Boundary Dynamics and Intercensus Racial Reclassification*, 72 AM. SOC. REV. 915, 923–24 (2007).

²⁴ See Kelvin Santiago-Valles, "Our Race Today [Is] the Only Hope for the World": An African Spaniard as Chieftain of the Struggle Against "Sugar Slavery" in Puerto Rico, 1926–1934, 35 CARIBBEAN STUD. 107, 110 (2007).

²⁵ *Id.*

²⁶ *Id.*

²⁷ See Gerald J. Meyer, *Pedro Albizu Campos, Gilberto Concepción De Gracia, and Vito Marcantonio's Collaboration in the Cause of Puerto Rico's Independence*, 23 CENTRO J. 87, 88 (2011).

²⁸ *Id.*

²⁹ See Harvard University Appointment Office Registration (May 3, 1916), Harvard University Faculty of Arts and Sciences Student Records, Box 120, UAIII 15.88.10, Harvard University Archives, Pusey Library [hereinafter FAS Student Records].

³⁰ In 1910, Vermont had a total population of 355,956 residents – 99.5% of those residents were white (the Census Bureau would not consider Latinos/Hispanics in the Census until

Despite the cultural adjustment, Campos excelled as a first-year college student – his grades were stellar. He received mostly As, including for German, Algebra, Geometry, Trigonometry, Chemistry, Agriculture, Military Science, and Public Speaking.³¹ His poorest subject was English where he received a B both semesters.³² Campos's professors saw enormous potential in the young man, and encouraged him to transfer to Harvard College.³³ In response to an inquiry sent by the J.G. Hart, Chairman of Harvard's Committee on Admission, the Secretary of the University of Vermont declared that Campos was in the first-third of his class and was a desirable student, both as to scholarship and character.³⁴ With this recommendation in hand, Pedro Albizu Campos began his path to Harvard University.

PART TWO: HARVARD COLLEGE AND HARVARD LAW SCHOOL

Pedro Albizu Campos prepared his application to transfer into Harvard College from the University of Vermont on May 6, 1913.³⁵ That application shows hints at Campos's early interests in social justice: as one of his six group electives, he opted for Social Ethics.³⁶ The application also shows an appetite for diverse learning opportunities, including courses in Chemistry and French.³⁷ The Harvard Committee on Admission permitted Campos to start as an unclassified student³⁸ pursuing a Bachelor of Arts in the Fall of 1913,³⁹ under the condition that he pass fourteen courses with at least a C grade.⁴⁰ To help finance his studies at Harvard, Campos received the Price Greenleaf Award, which was a need-based scholarship designed to help low-

later). See U.S. CENSUS BUREAU, STATISTICS OF POPULATION SUPPLEMENT FOR VERMONT 577 (1913).

³¹ University of Vermont and State Agricultural College, Registrar's Certification (July 9, 1913), FAS Student Records.

³² *Id.*

³³ See Anthony De Jesús, *I Have Endeavored to Seize the Beautiful Opportunity for Learning Offered Here: Pedro Albizu Campos at Harvard a century ago*, 9 *LATINO STUD.* 473, 475 (2011).

³⁴ Secretary of the University of Vermont to J.G. Hart, Chairman of the Committee on Admission (June 28, 1913), FAS Student Records.

³⁵ See Committee on Admission, Admission from Other Colleges and Scientific Schools (June 24, 1913), FAS Student Records.

³⁶ *Id.* Social Ethics included courses such as "Social Problems and Social Policy," "The Housing Problem," and "Child-Helping Agencies." *HARVARD UNIVERSITY*, 10 *OFFICIAL REG. HARV. U.* 120–21 (2d. 1913).

³⁷ *Id.*

³⁸ Unclassified status likely meant that Albizu Campos's grades from the University of Vermont presented issues of categorization for purposes of his class standing. He would remain unclassified until Harvard could determine his proper standing. See WILLIAM R. THAYER, *THE HARVARD GRADUATES' MAGAZINE* 268 (1911).

³⁹ *STUDENT COUNCIL OF HARVARD COLLEGE*, 40 *HARV. U. REG.* 415 (B. P. Whitney, ed., 1913) (listing P. Campos of Ponce as an unclassified student).

⁴⁰ See Pedro Albizu Campos to The Committee of Admissions (June 15, 1916), FAS Student Records.

income students, and he lived in the College House of Mt. Auburn Avenue, which was a “run-down” dorm for “students of modest means.”⁴¹

While Campos certainly found himself in a highly homogenized society at Harvard, not unlike Vermont, he was not “the first Puerto Rican to be admitted to Harvard College” as claimed by Nelson Denis.⁴² For example, in the 33rd Volume of the Harvard Register, which encompasses 1906–1907, a Puerto Rican man named G. Colón-Torres is listed as a special student at Harvard College.⁴³ Mr. Colón-Torres would go on to graduate in the College Class of 1909, and would serve in the diplomatic service.⁴⁴ Despite not being the first Puerto Rican to be admitted into Harvard and to graduate from the College, Campos made an impact during his undergraduate studies. He was heavily involved in a vast array of extracurriculars and took on work to help fund his way through college.

During his first year at Harvard College, Pedro Campos reconnected with his biological father in Ponce, Puerto Rico. Alejandro Albizu y Romero, who abandoned the young Campos and his ailing, impoverished mother shortly after Campos’s birth,⁴⁵ appeared to have had a change of heart when he discovered that his son was a man of Harvard.⁴⁶ This change of heart legally legitimized Campos and allowed him to adopt the first surname of Albizu.⁴⁷ It took twenty-three years, a Harvard education, and the death of his father’s legal wife for Pedro Albizu Campos to be declared his father’s son.⁴⁸ Albizu Campos returned from the christening and continued his studies.

Pedro Albizu Campos likely felt displaced in white, Anglo-Saxon, Protestant New England. But he was not alone. Before his arrival at Harvard, a movement of cosmopolitanism grew on college campuses throughout the United States.⁴⁹ This movement manifested itself in the creation of the Cosmopolitan Club. These clubs, which appeared organically in the early 1900s with little to no coordination from a central body, appeared first in the Midwest, at the University of Wisconsin, and then came east to New England and the Mid-Atlantic.⁵⁰ Over time, the various clubs would come together for conventions that would invite representatives advocating for thousands

⁴¹ De Jesús, *supra* note 33, at 475.

⁴² DENIS, *supra* note 16, at 111.

⁴³ HARVARD UNIVERSITY, 33 HARV. U. REG. ORGS & ATHLETIC EVENTS 223 (B. Moore, ed., 1907).

⁴⁴ *Senior Class Occupations*, HARV. CRIMSON (Jun. 25, 1909), <https://www.thecrimson.com/article/1909/6/25/senior-class-occupations-pthe-following-is/>, archived at <https://perma.cc/2W9P-YXKY>.

⁴⁵ Meyer, *supra* note 27, at 88.

⁴⁶ See Santiago-Valles, *supra* note 24, at 110–11.

⁴⁷ ROSADO, *supra* note 12, at 13–14.

⁴⁸ See *id.*

⁴⁹ See Madeline Y. Hsu, *Chinese and American Collaborations Through Educational Exchange During the Era of Exclusion, 1872–1955*, 83 PACIFIC HIST. REV. 314, 323–24 (May 2014).

⁵⁰ *The Cosmopolitan Clubs Movement*, 70 ADVOC. OF PEACE 255, 255–56 (1908).

of international students throughout the United States.⁵¹ The purpose of these clubs was to bring together young college students from different parts of the world to “learn the customs, viewpoints and characteristics of other nationalities, to remove national prejudices and establish international friendships.”⁵² Although each chapter put on different activities throughout the school year, most of the Cosmopolitan Clubs would encourage individual members to host events where they could introduce other members to their traditions and oral histories.⁵³ And similar to modern affinity groups at today’s law schools, the clubs would throw receptions for admitted students at the beginning of each academic year to help acclimate foreign students newly arrived in the United States.⁵⁴ The cosmopolitan call would eventually reach Harvard.

In a powerful editorial written by Henry Wilder Foote, Class of 1897, to the *Harvard Bulletin*, a call was made to “aid foreign students” by creating an “international fraternity, without the secrecy characterizing the Greek letter brotherhoods.”⁵⁵ Foote invoked the creation of Cosmopolitan Clubs at Cornell, Michigan, and other peer schools in his call for the formation of a similar club at Harvard.⁵⁶ In a particularly poignant appeal, Foote called out the exclusionary nature of established fraternities and societies, e.g., the Final Clubs at Harvard, that “very seldom[ly] admitted” international students, and argued that a Cosmopolitan Club would offer a “pleasant and helpful social center” that would benefit Harvard “as a source of information and a center of attraction for students from abroad.”⁵⁷ Because of Harvard’s status having “more foreign students . . . than any other university in the land,” Foote contended that the creation of this club would be a great service “both to the University and to many ‘a stranger in a strange land.’”⁵⁸

Harvard’s Cosmopolitan Club began in 1908.⁵⁹ In its first year it attracted fifty-three members and acclaim from Harvard President Charles William Eliot.⁶⁰ Its membership consisted of two-thirds international students and one-third domestic students;⁶¹ students from both groups took on leadership positions.⁶² Students from Asia, Europe, South America, and North America made the Cosmopolitan Club home in its early years, and

⁵¹ *The Cosmopolitan Clubs: A Convention of the Foreign Students Held in Wisconsin*, WASH. POST, Dec. 29, 1907, pg. R7.

⁵² *The Cosmopolitan Clubs Movement*, *supra* note 50, at 256.

⁵³ *See id.*

⁵⁴ *See id.*

⁵⁵ *See* Editor of the *Harvard Bulletin* from Henry Wilder Foote, November 13, 1907, Records of the Harvard Cosmopolitan Club 1908–1915, Box 2135, HUD 3299, Harvard University Archives, Pusey Library [hereinafter HCC Records].

⁵⁶ *See id.*

⁵⁷ *See id.*

⁵⁸ *Id.* (quotation omitted).

⁵⁹ *See The Harvard Cosmopolitan Club*, 13 HARV. ALUMNI BULL. 1, 473–76 (1910).

⁶⁰ *See id.* at 473–74.

⁶¹ *The Cosmopolitan Club*, HARV. CRIMSON (Feb. 13, 1908), <https://www.thecrimson.com/article/1908/2/13/the-cosmopolitan-club-pwith-the-election/>, archived at <https://perma.cc/Y7E5-84FM>.

⁶² *See The Harvard Cosmopolitan Club*, *supra* note 59, at 475.

faculty support empowered the Club, with individuals such as Professors A.B. Hart, Bishop Lawrence, and Eugen Kühnemann, taking roles as associate members.⁶³ The Club's activities at Harvard occurred primarily at 5 Holyoke House.⁶⁴ The Holyoke House displayed emblems, symbols, and flags of various countries and cultures, as well as a portrait of President Eliot.⁶⁵ Activities would range from the casual, such as a "beer night," to the prolific: on its third anniversary, the Club hosted a Friday evening dinner with the French Ambassador to the United States as its guest of honor.⁶⁶ For newcomers, the Club would also host pre-orientation events outside of Boston, so that individuals could meet with established Harvard students and form bonds before arriving at Cambridge.⁶⁷ This group, while supported by the University, thrived vis-à-vis the unpaid labor of students that wanted to find a home and a community. Their efforts helped Albizu Campos situate himself among the pomp and riches⁶⁸ of Harvard College.

Pedro Albizu Campos joined the Cosmopolitan Club early on during his time in Cambridge. The Harvard University Register⁶⁹ lists P. Campos, '16 as a Member of the Cosmopolitan Club for the term between 1914–15.⁷⁰ In that year, the Cosmopolitan Club would host weekly social meetings on Sunday evenings and would "bring together men of different nationalities for their mutual benefit socially and intellectually."⁷¹ It was an active club, with fifty-one due-paying members and several affiliate counselors, one of whom was a professor.⁷² Albizu Campos engaged with fellow classmates from the College through this Club, but also met students from the Harvard Law School and Harvard's various graduate schools.⁷³

Like modern college (and law) students, Albizu Campos found himself facing a buffet of extracurricular options in his first year at Harvard and eagerly signed up for multiple clubs. These included the Cosmopolitan Club,⁷⁴ the Social Politics Club,⁷⁵ and the International Polity Club,⁷⁶ as well

⁶³ *See id.* at 474.

⁶⁴ *See id.*

⁶⁵ *See id.* at 473–74.

⁶⁶ *See id.* at 473.

⁶⁷ *See id.* at 475.

⁶⁸ DENIS, *supra* note 16, at 111–12 (describing the opulence found at Harvard College during Albizu Campos's time there).

⁶⁹ The Register was an annual publication that purported to give a concise and complete record of Harvard activities, as well as a reference and general information regarding student clubs and organizations. The Register was purchased by the Student Council in 1911 and was edited directly by undergraduates upon its purchase by the Student Council. *See The Harvard Cosmopolitan Club*, *supra* note 59, at 1–2.

⁷⁰ STUDENT COUNCIL OF HARVARD COLLEGE, 41 HARV. U. REG. 105, 105–06 (A. Little ed., 1914). By cross-referencing the last name of "Campos" with the Register's Geographical University Directory, we find P. Campos '16, resident of Ponce, Porto [sic] Rico, and assuredly Pedro Albizu Campos. *See id.* at 235.

⁷¹ *See id.* at 105.

⁷² *See id.* at 106.

⁷³ According to the Cosmopolitan Club's roster, F. Chang was an active member of the club and a first-year law student at Harvard Law School. Other graduate students included S. J. Van Heerden, H. Sun, and I. Young. *Id.*

⁷⁴ *Id.*

as other organizations that were not officially recognized by the University.⁷⁷ He also took on a leadership position as Head of Associated Charities in the Social Service Committee of the Phillips Brook House,⁷⁸ an organization that continues to serve the Boston and Cambridge communities today.⁷⁹ A common thread can be tied throughout these affiliations – Albizu Campos demonstrated clear commitment to social justice. The Social Politics Club lauded a mission of “bring[ing] together men who believe the world is not finished.”⁸⁰ The International Polity Club “promote[d] the thoughtful study and discussion of modern international problems; with a view to the definition of an American foreign policy which will be a contribution to the peace and better government of the world.”⁸¹ The Social Services Committee explicitly allocated University resources “to give [students] ‘laboratory practice’ in serving the community,”⁸² not unlike the clinical programs now prevalent in many law schools across the United States.⁸³

His affiliation with these groups paints a picture of a young man on two distinct but related missions: to serve the community and to radically change the world. His leadership of the Cosmopolitan Club, however, paints a different picture: a desire to belong and to create friendships.

Pedro Albizu Campos ran for the presidency of the Cosmopolitan Club during the 1915–16 term. Interestingly, there is a competing account about who came out victorious. In the 42nd edition of *The Harvard University Register*, R.N. Williams II is listed as the president of the Club.⁸⁴ But in the *Harvard Alumni Bulletin* published in 1915, Pedro Campos is listed as president.⁸⁵ The error likely can be resolved in favor of the *Alumni Report* for three reasons. First, the *Bulletin* was published in parts and intervals, whereas the *Register* was published annually.⁸⁶ Second, the *Bulletin* provides many more details about the activities of the Cosmopolitan Club for that school year. In the *Bulletin*’s 14th volume number of its 18th edition, it was announced that the National Association of the Cosmopolitan Clubs

⁷⁵ *Id.* at 109.

⁷⁶ See De Jesús, *supra* note 33, at 475.

⁷⁷ See *id.*

⁷⁸ See STUDENT COUNCIL OF HARVARD COLLEGE (1914), *supra* note 70, at 76–77.

⁷⁹ See generally 2019 Annual Report, PHILLIPS BROOKS HOUSE ASSOC., <https://www.pbha.org/annual-reports-56>, archived at <https://perma.cc/LQ7W-37JZ>.

⁸⁰ See HARVARD UNIVERSITY STUDENT COUNCIL (1914), *supra* note 70, at 108.

⁸¹ STUDENT COUNCIL OF HARVARD COLLEGE, 43 HARV. U. REG. 115, 116 (W. B. Southworth, ed., 1916).

⁸² *Id.* at 76 (quotation omitted).

⁸³ See Stephen Wizner, *The Law School Clinic: Legal Education in the Interests of Justice*, 70 FORDHAM L. REV. 1929, 1933–34 (2002) (describing the rise of clinical education in American law schools).

⁸⁴ STUDENT COUNCIL OF HARVARD COLLEGE, 42 HARV. U. REG. 86 (Robinson Row, ed., 1915).

⁸⁵ Harvard Bulletin, Inc., *University Notes*, 18 HARV. ALUMNI BULL. 485, 502 (1916).

⁸⁶ The section in the *Bulletin* that declared Campos president was published on March 29, 1916, whereas the *Register* for the same academic year was published on October 10, 1915 with “information [] correct to July 1, 1915.” See STUDENT COUNCIL OF HARVARD COLLEGE (1916), *supra* note 84, at 3.

hosted its ninth annual conference in Cambridge on December 27, 28, and 29th.⁸⁷ Campos gave a speech at the conference, welcoming seventy-five delegates from over twenty-two countries to Harvard.⁸⁸ In a later volume number, the Bulletin provides colorful detail about the Club's "eighth annual 'international night'" that was presided by "Pedro Albiza [sic] y Campos '16 of Ponce, Porto Rico, president of the club."⁸⁹ This night included recitations of Edgar Allen Poe's "The Tell Tale Heart" by Puerto Rican first-year law student, Manuel Matienzo, the singing of "Vittoria" by Italian sophomore V.B. Kellett, and the invocation of Rabindrarath Tagore by Sowendra Chandra Deb Barman, a first-year graduate student from Tipperah, India.⁹⁰

Perhaps the best proof of Pedro Albizu Campos's ascension to the presidency of the Cosmopolitan Club is his own words. In a letter to the Harvard Committee of Admissions, Albizu Campos provides direct testimony about his involvement in clubs at the College.⁹¹ These include the International Polity Club, the Speaker's Club, the Catholic Club, and the Cosmopolitan Club.⁹² He goes on to write that he was "president of the Cosmopolitan Club this year and under my administration the Convention of the [illegible] Cosmopolitan Clubs of the United States was held at Harvard," confirming the Bulletin's reporting.⁹³

This petition serves as an illuminating, first-hand account about Albizu Campos's activities in Cambridge. His transfer from the University of Vermont to Harvard College was conditioned upon his completion of fourteen courses with at least a "C" average per course.⁹⁴ He wrote his nine-page petition because out of fifteen classes, only thirteen classes hailed a C or above.⁹⁵ His petition, which was to excuse a "D" he received in a chemistry course so as to meet the condition and streamline his application to Harvard Law School, can be broken down into four main parts: (1) health; (2) course selection; (3) activities outside of the classroom; and (4) financial aid.

Albizu Campos attested in his petition that during his second year at Harvard he suffered from a serious illness in his eye.⁹⁶ This illness affected

⁸⁷ Harvard Bulletin, Inc., *Cosmopolitan Club*, 18 HARV. ALUMNI BULL. 245, 259 (1916).

⁸⁸ *See id.*

⁸⁹ Harvard Bulletin, Inc., *Cosmopolitan Club*, 18 HARV. ALUMNI BULL. 505, 520–21 (1916). What's particularly interesting about this edition of the Bulletin is that it is the first to highlight the impact of the First World War on Harvard University. An entire section of its introduction is dedicated to "the art of war" and describes the "elective pamphlet" that Harvard students could select classes from. Pedro Albizu Campos likely had war on his mind throughout his tenure as the Cosmopolitan Club's president and would go on to enlist. But more on that later.

⁹⁰ *See id.*

⁹¹ *See* Albizu Campos, *supra* note 40.

⁹² *Id.*

⁹³ *Id.*

⁹⁴ *Id.* *See also* Chairman of the Committee on Admission to Pedro Campos (July 19, 1915), FAS Student Records ("[Albizu Campos] may register next year as a Senior, required to complete for your degree with grades above D five approved courses").

⁹⁵ *See* Albizu Campos, *supra* note 40.

⁹⁶ *Id.*

his capacity to read before his lectures for a period of six weeks.⁹⁷ It does not appear that the University accommodated his illness. The young man also highlighted that he took the path less traveled academically. Rather than inflating his grades with courses in Spanish and Portuguese, “both of which [he] know[s],” he sought out courses in German and political science, “most of them [] advanced courses.”⁹⁸ He was not concerned with getting the best scholarships or the best awards upon graduation. Instead, he sought to “seize[] something of the spirit of this great institution.”⁹⁹

The third line of argument employed by Albizu Campos centered on the extracurriculars that he engaged in while at Harvard. In addition to the clubs he joined, Albizu Campos was “a regular reporter for two Porto Rico papers,” regularly gave lectures in Boston and other nearby cities on “Latin-American questions,”¹⁰⁰ and was invited to “address in the name of the University . . . all foreign students at Harvard.”¹⁰¹ While Albizu Campos “endeavored to seize the beautiful opportunity for learning offered [at Harvard],”¹⁰² it is apparent from this petition that he also prioritized “social service work.”¹⁰³

Last, Albizu Campos makes clear in his petition that the vestiges of his childhood poverty did not dissipate upon entering Harvard’s gates. His petition goes into explicit detail about his indigence. To afford living in Cambridge, Albizu Campos was “compelled to earn . . . about three hundred and fifty dollars . . . tutoring Spanish and French.”¹⁰⁴ In a letter to his sister, written around the same time as his petition, Albizu Campos explicitly mentions his futile efforts in securing a loan to help him survive another year of school.¹⁰⁵ And in the margins of a report card during his time at Harvard Law School, it appears that his financial situation did not improve as a graduate student when an administrator wrote “unsatisfactory account at Bursar’s Office.”¹⁰⁶ After graduating from the law school, and completing two exams in Puerto Rico, Albizu Campos continued to experience financial struggles, and likely asked Richard Ames of Harvard Law School for forbearance on

⁹⁷ *Id.*

⁹⁸ *Id.*

⁹⁹ *Id.*

¹⁰⁰ The topic of these lectures shows the origins of Albizu Campos’s nationalist ideology. In an address to Boston Socialist Club, he discussed the Monroe Doctrine; to the American Society of Colonial Families, he centered on the assimilation of immigrants; to the Lynn City Club, he harked on U.S. military interventionism in the Caribbean; to the Public Opinion Club, he presented his thoughts on being Black in Latin America. *See* Santiago-Valles, *supra* note 24, at 139.

¹⁰¹ *See id.*

¹⁰² *Cf.* De Jesús, *supra* note 33, at 478 (adopting Albizu Campos’s language as the title of his article).

¹⁰³ *See* Albizu Campos, *supra* note 40.

¹⁰⁴ *Id.*

¹⁰⁵ *See* Rosado, *supra* note 12, at 54–55.

¹⁰⁶ Pedro Albizu Campos Report Card, HLS Report Cards, Box 10, 14258, Harvard University Archives, Pusey Library [hereinafter PAC Report Card].

his loans.¹⁰⁷ Albizu Campos, however, would not allow his poverty to limit his opportunities at Harvard. “[I]n spite of the financial needs under which [Albizu Campos] labored,”¹⁰⁸ he seized every opportunity that interested him at the College. This is especially remarkable given the explicit racism he faced as a Black Latino student.

After graduating from Harvard College, Albizu Campos applied for teaching positions through the Harvard Appointment Office to secure funding for law school. By this point he was an experienced teacher: he taught at Walpole High School over the winter term of 1913–14 and at County Day School in Newton between 1914–15 (and was paid “five dollars a class”).¹⁰⁹ In forms he filled out to secure a position, he listed several Harvard references, including Professors Holcomb, Bullock, Whipple, Richards, Forbes, and Mr. Raiche.¹¹⁰ The responses of these Harvard-affiliates drip with racism. Holcombe describes Albizu Campos as a “gentlemanly Porto Rican, not brilliant intellectually but of good habits and appearance.”¹¹¹ Bullock, despite describing him as an “excellent student . . . diligent in his work, and attentive in the class room,” seems aghast at the idea of Albizu Campos teaching in the continental United States, and repeatedly stresses that “we could recommend him for a good position in Porto Rican schools.”¹¹² Forbes, in perhaps the most damning recommendation, writes “Albizu-y-Campos . . . pursued courses in Chemistry, together with languages, Government, and Economics in a manner entirely creditable, especially when one considers that he is a Porto Rican.”¹¹³ Despite these overt prejudices, it appears that Albizu Campos received appointments to teach at Boston Public School and Milton Academy on September 30 and November 7, 1916.¹¹⁴ He would not accept these appointments, however, opting to enroll in R.O.T.C. and Harvard Law School.

Pedro Albizu Campos entered Harvard Law School on September 25, 1916.¹¹⁵ Almost six months later, President Wilson asked Congress to declare war and join the First World War, catalyzing a significant portion of law school students to enlist.¹¹⁶ Albizu Campos was one such student. According to his submission to the Third Class Report of the Harvard College

¹⁰⁷ See Richard Ames to Pedro Albizu Campos (July 26, 1922), reprinted in ROSADO, *supra* note 12, at 455.

¹⁰⁸ See Albizu Campos, *supra* note 40.

¹⁰⁹ Harvard University Appointment Office Registration, *supra* note 29; see also J. W. Kingsman to Harvard University Appointment Office (May 10, 1916), FAS Student Records (describing Albizu Campos in a referral letter from Walpole High School as excellent in scholarship, pleasing in personality, and excellent as a disciplinarian, and recommending him as highly qualified to teach).

¹¹⁰ See Committee on Admission, *supra* note 35.

¹¹¹ Aggregate Recommendations (1916), FAS Student Records.

¹¹² *Id.*

¹¹³ *Id.*; see also De Jesús, *supra* note 33, at 478–80 (recounting the biases of Albizu Campos’s college professors).

¹¹⁴ See Harvard University Appointment Office Registration, *supra* note 29.

¹¹⁵ See PAC Report Card, *supra* note 106.

¹¹⁶ BRUCE A. KIMBALL & DANIEL R. COQUILLETTE, *THE INTELLECTUAL SWORD: HARVARD LAW SCHOOL, THE SECOND CENTURY* 129 (2020).

Class of 1916, Albizu Campos joined “the first R.O.T.C. in the U.S.” once it was organized; upon completion of R.O.T.C, he was recommended the rank of 1st Lieutenant.¹¹⁷ At the start of his second year of law school, Albizu Campos “volunteered to serve in the infantry” but “The War Department advised [him] to stay at the Law School to utilize, later, [his] services with the Porto Rican troops.”¹¹⁸ After some delay, Albizu Campos was ordered to Camp Ilus Casa, in San Juan, where he was commissioned as 1st Lieutenant.¹¹⁹ He was ready for combat and “received orders to prepare for mobilization,” but was spared two weeks later when the Armistice arrived.¹²⁰ He, along with four others, was appointed “to wind up the affairs of the regiment,” and was discharged in March 1919.¹²¹

Like many World War I veterans of color,¹²² Pedro Albizu Campos experienced and witnessed racism while serving in the American military,¹²³ which left a tremendous impact on his psyche and shaped his political ideology.¹²⁴ Albizu Campos’s military experience in Puerto Rico was segregated: he served in an all-Black regiment.¹²⁵ There is no question that the experience of segregation deeply devastated Campos. Following Albizu Campos’s alleged conspiracy to assassinate President Truman, Carroll Binder, the editor of the *Minneapolis Tribune* and a Harvard College classmate of Albizu Campos, would state to *The Boston Daily Globe* that although he remembers Campos as “a gentle, idealistic, studious and deeply religious person,” he suspects that Campos’s “anti-Americanism dates from World War I when he was subjected to the segregation practices then prevalent in the Armed Forces.”¹²⁶ Although, as Binder writes, “Albizu Campos was not ashamed of his mixed blood, he regarded it as insulting to be denied the free association he enjoyed at Harvard.”¹²⁷ This segregation proved to be an epiphany¹²⁸ for Albizu Campos and fortified his perception “of the United States as hypo-

¹¹⁷ HARVARD UNIVERSITY, HARVARD COLLEGE CLASS OF 1916 SECRETARY’S THIRD REPORT 3 (Wells Blanchard ed., 1922).

¹¹⁸ *Id.*

¹¹⁹ *Id.*

¹²⁰ *Id.*

¹²¹ *Id.*

¹²² See generally ARTHUR E. BARBEAU, *THE UNKNOWN SOLDIERS: AFRICAN-AMERICAN TROOPS IN WORLD WAR I* (1996); HENRY FRANQUI-RIVERA, *SOLDIERS OF THE NATION MILITARY SERVICE AND MODERN PUERTO RICO, 1868–1952* (2018).

¹²³ DENIS, *supra* note 16, at 113.

¹²⁴ In an FBI report summarizing Albizu Campos’s life, a field agent wrote that Albizu Campos was “much embittered by the decision of the United States Army Examining Physician that he was of the colored race, and therefore subject to assignment with Negro troops.” The agent goes on to write that “competent observers believe that Albizu Campos’ anti-American attitude, and . . . condemnation of racial prejudice in the United States stem mainly from this experience. FBI Files, Subject: Pedro Albizu Campos, File Number SJ 3-1, quoted in DENIS, *supra* note 16, at 303.

¹²⁵ Meyer, *supra* note 27, at 88.

¹²⁶ *Army Treatment Sourced Albizu, Says Classmate*, BOS. DAILY GLOBE, NOV. 3, 1950.

¹²⁷ *Id.*

¹²⁸ See e.g., Notes on Pedro Albizu Campos, *infra* note 130 (assuring Puerto Rican’s loyalty to United States against Germany’s tyranny and arrogance).

critical in its pretensions of democracy.”¹²⁹ Lewis Gannett, another classmate of Campos’s, this time from the law school, would write in his private journal something similar: “Though a college graduate, a Law School student, he was put in a segregated unit of common laborers. I believe that his bitterness dates from that experience.”¹³⁰ This experience of segregation surely impacted Albizu Campos’s understanding of the law as it was being taught at Harvard Law School upon his return to Cambridge on September 27, 1919.¹³¹

The experience of government- and military-sponsored racism served as a catalyst for Pedro Albizu Campos’s political awakening. During his first year at Harvard Law School, Albizu Campos penned an editorial to the Harvard Crimson titled “Porto Rico and the War.”¹³² The editorial attempts to capture the attitude of Puerto Rico towards the United States as war rages in Europe.¹³³ It does so by going through the modern history of the island, and describes the United States as the island’s “liberator,” having freed its people from Spanish occupation in the aftermath of the Spanish-American War.¹³⁴ The editorial, however, does not completely tie Puerto Rico’s future to that of the United States. It recognizes “vital questions” such as “the relations between the island and the United States” and “the curbing of the omnipotence of corporations.”¹³⁵ And it establishes a clear preference for Puerto Rico to adopt “the status of Cuba,” with Puerto Rico enjoying full independence while under the protectorate of the United States.¹³⁶ Such a status would create “deepest affection” between “precious Antille and this colossus.”¹³⁷ Nevertheless, Albizu Campos continues:

Although these wishes are not realized . . . let me assure you and the American people of our loyalty to the United States. The original charter of Porto Rico was granted by Spain because our loyalty had been tested, and it remained unbroken through the many vicissitudes that she had to suffer. We have seen our coasts bombarded and invaded by all her powerful past enemies, England, Holland, France and our country we never allowed to fall under their heels. We welcomed the American flag in 1898 because we believed it, and still believe it, to be a symbol of democracy and justice. It was conceived in that spirit. We want Americans to know the facts of our situation that they may be true to themselves and find a just solution for our relations. But so far as this war is concerned, there is no division among us, we detest German tyranny and arrogance,

¹²⁹ See *Army Treatment Sourced Albizu, Says Classmate*, *supra* note 126.

¹³⁰ Notes on Pedro Albizu Campos, A.M.S. and TS. (1950), Lewis Gannett papers, (Box 37, MS Am 1888-1888.4, Houghton Library).

¹³¹ See PAC Report Card, *supra* note 106.

¹³² Pedro Albizu Campos, *Porto Rico and the War*, HARV. CRIMSON, Apr. 14, 1917.

¹³³ See *id.*

¹³⁴ See *id.*

¹³⁵ See *id.*

¹³⁶ See *id.*

¹³⁷ See *id.*

and we will give good account of ourselves in actual voluntary military co-operation with the United States.¹³⁸

Almost five years after writing this op-ed, Albizu Campos would join the Nationalist Party of Puerto Rico and advocate for a complete and unequivocal break with the United States.¹³⁹ Albizu Campos also engaged in several independence movements upon his return from the military to Cambridge. While primary materials that would confirm his involvement proved difficult to find, several of his law school classmates and biographers recount his revolutionary activities as a law student. Edward J. Harrigan, Harvard Law School '21, attested that Albizu Campos heavily engaged in the pro-Irish independence movement at the law school campus in order to “needle the more staid members of the faculty and student body.”¹⁴⁰ Campos also “led in the formation of a Harvard Chapter for the Recognition of the Irish Republic,”¹⁴¹ potentially teaming up with one of his undergraduate professors, Professor Holcombe, as faculty sponsor.¹⁴² Several sources claim that Albizu Campos, while at Harvard Law School, met with independence leaders from across the world, such as Subhas Chandra Bose, a nationalist leader in India, and Éamon de Valera, of Ireland.¹⁴³ However, none of these sources give primary citations to these meetings¹⁴⁴ and the Archives at Harvard University contain no records about these reunions, making the interactions impossible to verify. Nonetheless, as former-President of the Cosmopolitan Club and active member of independence movements at Harvard Law School, it is plausible that these engagements occurred. It also contributes neatly to the narrative of Pedro Albizu Campos as a revolutionary hero, bearing the torch of liberty after having received it from fellow independence fighters from Ireland and India. One myth, however, cannot stand review: Pedro Albizu Campos’s status as valedictorian of his class.

There is no question that Albizu Campos was a capable student who entered his graduate studies with great potential.¹⁴⁵ This was an age at Harvard Law School when many students did not graduate.¹⁴⁶ In fact, ac-

¹³⁸ *Id.*

¹³⁹ *See infra* Part III.

¹⁴⁰ Albizu, *as Student, Led Move for Irish Freedom*, BOS. DAILY GLOBE, NOV. 3, 1950.

¹⁴¹ *Id.*

¹⁴² *Professor Holcombe Will Preside at Meeting of Harvard Chapter of Association for Recognition of Irish Republic*, HARV. CRIMSON (Apr. 6, 1921), <https://www.thecrimson.com/article/1921/4/6/to-hold-discussion-of-irish-question/>, archived at <https://perma.cc/FDF4-ZTJL>.

¹⁴³ *See e.g.*, ROSADO, *supra* note 12, at 70–71; DENIS, *supra* note 16, at 113–14; HUGO D. MENENDEZ, *ABUSE OF PROCESS* 131 (2013); De Jesús, *supra* note 33, at 481.

¹⁴⁴ *See generally* KIMBALL & COUILLETTE, *supra* note 116.

¹⁴⁵ Interestingly, Harvard Law School’s admissions requirements were extremely lax, if nonexistent, for the graduates of “first-tier colleges” such as Harvard College. Graduation was the only thing that seemed to be required. This changed in September 1927, upon the vote of the law school faculty to apply tiered standards to all students entering the law school. *See* KIMBALL & COUILLETTE, *supra* note 116, at 160.

¹⁴⁶ *See* KIMBALL & COUILLETTE, *supra* note 116, at 158–59 (demonstrating how the Law School’s “preference for attrition over selective admissions reinforced the Spartan culture” at the Law School and fed into the “social Darwinism of the era”).

ording to a comprehensive history of the school, “one-third or more” first-year students at Harvard Law School dropped out during the deanship of Roscoe Pound, which lasted between 1916–1936 and coincided entirely with Albizu Campos’s time studying law.¹⁴⁷ Albizu Campos made it to the finish line.¹⁴⁸ But Pedro Albizu Campos could not have been the Harvard Law School valedictorian.

It is unclear where the claim of his valedictorian status originated, but the myth’s recounting appears on the Albizu Campos Wikipedia page,¹⁴⁹ books that recount his life in detail,¹⁵⁰ his wife’s autobiography,¹⁵¹ and countless websites. However, by looking at his law school report card, and comparing his report card to that of his peers, the myth of his first-in-class status can most likely be dismissed. Albizu Campos was required to take the “Big Five” courses in private law during his first year: Civil Procedure, Contracts, Criminal Law and Liability, Property, and Torts.¹⁵² Interestingly, his first-year grades do not appear on his report card.¹⁵³ The omission can likely be attributed to Albizu Campos’s military service. As Kimball and Coquillette recount, the law school faculty during World War I, in response to students leaving Cambridge to join the front, “excuse[d] second- and first-year students [from exams], who would then be entitled to return in ‘regular standing’ upon discharge.”¹⁵⁴ The policy, a remarkable blunting of the intellectual sword by the old guard at the law school, garnished criticism from Dean

¹⁴⁷ *Id.* at 160.

¹⁴⁸ See Richard Ames to Pedro Albizu Campos, reprinted in ROSADO, *supra* note 12 (“I am glad to tell you that you were successful in your examination and that the degree will be voted to you at the next meeting of the Corporation at which degrees are voted, sometime in February”); see also PAC Report Card, *supra* note 106 (on the last page of his report card, an administrator writes Albizu Campos’s LL.B. degree conferral as February 26, 1923).

¹⁴⁹ *Pedro Albizu Campos*, WIKIPEDIA, https://en.wikipedia.org/wiki/Pedro_Albizu_Campos#cite_note-16 archived at <https://perma.cc/E9T9-8QP3>.

¹⁵⁰ DENIS, *supra* note 16, at 114 (“In 1921, Albizu graduated law school as class valedictorian”); MENENDEZ, *supra* note 143, at 132 (“The reason for this ‘delay’ was openly racist: Albizu was about to graduate with the highest grade-point average in his entire law school class. As such, he was scheduled to give the Valedictory speech during the graduation ceremonies”). *But see* De Jesús, *supra* note 33, at 482 (noting that Albizu Campos, in public and in private, always defended Harvard against the allegation of having mistreated him); ROSADO, *supra* note 12, at 50 (recognizing Meneses’s allegations but suggesting that Albizu Campos was not able to take his final exams because he did not have the funds to remain in Boston).

¹⁵¹ LAURA MENESES DE ALBIZU CAMPOS, PEDRO ALBIZU CAMPOS Y INDEPENDENCIA DE PUERTO RICO 22 (1964) (“At Harvard he obtained the highest distinctions”) (translated by the author from Spanish).

¹⁵² KIMBALL & COUILLETTE, *supra* note 116, at 161.

¹⁵³ See PAC Report Card, *supra* note 106.

¹⁵⁴ KIMBALL & COUILLETTE, *supra* note 116, at 129 (quoting Resolutions of the Harvard Law School Faculty (April 24 and May 3, 1917), Harvard University Archives). This was not the last time the Harvard Law School Faculty changed the law school’s grading system in response to a significant crisis. During the spring semester of 2020, in response to the Covid-19 pandemic and significant student activism, the law school moved to a credit/no credit grading system that covered all enrolled students for that single semester. See Kelsey J. Griffin, *Harvard Law School Shifts to Mandatory Credit-Fail Grading System*, HARV. CRIMSON (Mar. 21, 2020), <https://www.thecrimson.com/article/2020/3/21/harvard-coronavirus-law-school-credit-fail/>, archived at <https://perma.cc/95BD-7P9P>. An interesting research paper could be

Pound when he wrote, “everyone whose record is weak is trying to find some way of getting out of our examinations.”¹⁵⁵

The first grades that appear on Albizu Campos’s report cards are from January and June 1920.¹⁵⁶ In what would be considered his second year of law school, he took Conflict of Laws (final grade of 63), Constitutional Law (final grade of 56), Admiralty (final grade of 30), Restraint of Trade (final grade of 35), International Law (final grade of 58), and Roman Law (final grade of 60).¹⁵⁷ During his third year, he took Insurance (final grade of 56), Sales (final grade of 59), Trusts (final grade of 56), Partnership (final grade of 57), Bankruptcy (final grade of 29), and Municipal Corporations (final grade of 30).¹⁵⁸ He then took two exams after leaving Cambridge and returning to Puerto Rico: Evidence¹⁵⁹ (final grade of 55) and Corporations¹⁶⁰ (final grade of 57).¹⁶¹ According to Kimball and Coquillette, students would receive the overall average of their numerical course grades, rather than their grades for individual courses.¹⁶²

When one compares Albizu Campos’s grade with the grades of his classmates that won the Fay Diploma – “the school’s highest academic accolade” that “was awarded to the student with the best average on graduation”¹⁶³ – it demands a conclusion that Albizu Campos could not have been his class’s valedictorian. The recipients of the Fay Diploma in 1921 were Richard C. Curtis and William E. McCurdy; Sidney P. Simpson won the Diploma in 1922.¹⁶⁴ Unlike Pedro Albizu Campos, the three men went straight through the law school: their studies were not interrupted by war.¹⁶⁵ McCurdy went on to get a graduate degree.¹⁶⁶ Curtis’s grades during his second year were 82, 82, 79, 75, 80, and 83,¹⁶⁷ and his third-year grades were

written about how the Faculty responds to world crises and how student activism triggers that response.

¹⁵⁵ Roscoe Pound to A. Lawrence Lowell (May 2, 1918) in KIMBALL & COUILLETTE, *supra* note 116, at 129.

¹⁵⁶ See PAC Report Card, *supra* note 106.

¹⁵⁷ *Id.*

¹⁵⁸ *Id.*

¹⁵⁹ A mandatory course normally administered in the second year at the law school. See KIMBALL & COUILLETTE, *supra* note 116, at 161.

¹⁶⁰ An elective course normally administered in the third year at the law school. See KIMBALL & COUILLETTE, *supra* note 116, at 161.

¹⁶¹ See PAC Report Card, *supra* note 106.

¹⁶² See KIMBALL & COUILLETTE, *supra* note 116, at 531.

¹⁶³ See *id.* at 757 n. 53.

¹⁶⁴ Email from Lesley Schoenfeld, Public Services & Visual Collections Administrator, Historical & Special Collections, Harvard Law School Library (Mar. 21, 2022, 16:15 EST) (on file with author) (sharing a compiled list of Fay Diploma Recipients from 1909–2005, with an incomplete list of recipients from 2006–2019).

¹⁶⁵ See Richard C. Curtis Report Card, HLS Report Cards, Box 15, 14258, Harvard University Archives, Pusey Library [hereinafter RCC Report Card]; William E. McCurdy, HLS Report Cards, Box 40, 14258, Harvard University Archives, Pusey Library [hereinafter WEM Report Card]; Sidney P. Simpson Report Card, HLS Report Cards, Box 57, 14258, Harvard University Archives, Pusey Library [hereinafter SPS Report Card].

¹⁶⁶ WEM Report Card, *supra* note 165.

¹⁶⁷ He took Bills & Notes, Equity, Evidence, Property II, Sales, and Trusts, respectively. See RCC Report Card, *supra* note 165.

79, 82, 81, 77, 86, and 75.¹⁶⁸ In all, his first-year average was a 79, his second-year average was an 80, and his third-year average was an 80. William McCurdy received similar grades: his first-year average was a 79, second-year average was a 79, and third-year average was an 81.¹⁶⁹

If Albizu Campos's grades were being compared to the graduates of the class of 1921, then his second-year average of 60 and third-year average of 57, while commendable, would not come close to winning the enviable Fay Diploma. If his grades were being compared to the class of 1922, then he would also fall short. Sidney Post Simpson's first-year average was an 80.¹⁷⁰ He took Agency, Equity, Evidence, Property II, Sales, and Trusts during his second year, and received a 78, 80, 82, 80, 77, and 72, respectively, coming out to an average of 78.¹⁷¹ During his third year, he took Conflict of Laws, Corporations, Equity, Property III, Municipal Corporations, Administrative Law, and Taxation, earning an 88, 83, 83, 82, 38, 83, and 39, respectively, for an average of 83.¹⁷² These data points demonstrate that Albizu Campos was not in the running for the Diploma. What cannot, and should not, be dismissed are charges of racism against Albizu Campos's law school professors.

It is conceivable, and likely, that Albizu Campos experienced racist treatment from a law school professor as his wife wrote in her memoir.¹⁷³ Harvard Law School, under Pound's tenure, comprised a highly homogenized society.¹⁷⁴ There were only a few Latino students, a couple of Black students, very few Asian students, no women, and no openly gay students.¹⁷⁵ There were also openly racist university administrators and law school professors. Harvard University, when Albizu Campos was a student, was run

¹⁶⁸ During his third year he took Conflict of Laws, Constitutional Law, Corporations, Equity, Property III, and Suretyship & Mortgage. *See id.*

¹⁶⁹ WEM Report Card, *supra* note 165.

¹⁷⁰ SPS Report Card, *supra* note 165.

¹⁷¹ *Id.*

¹⁷² *Id.*

¹⁷³ *See* MENESES DE ALBIZU CAMPOS, *supra* note 151, at 22.

¹⁷⁴ *See* KIMBALL & COQUILLETTE, *supra* note 116, at 162.

¹⁷⁵ *See id.* at 182–83.

by President A. Lawrence Lowell – a notorious bigot,¹⁷⁶ sexist,¹⁷⁷ and homophobe.¹⁷⁸

This environment likely empowered the worst impulses of Edward H. “Bull” Warren, a sexist,¹⁷⁹ and most likely racist, man himself. Professor Edward Warren, known as “the Bull,” lauded a “Spartan” blend of legal education, strongly adhering to the popular social Darwinism approach to education where the strongest (brightest) survive.¹⁸⁰ While the Bull’s time revolved around the classroom and his practice,¹⁸¹ he dedicated one year to serve as temporary law school dean.¹⁸² His administration, while Dean Pound was on leave, reveals an unsavory history of racist policies that, in coordination with Lowell, he helped implement. When he served as acting Dean, recount Kimball and Coquillette, Warren shared data with Harvard President Lowell¹⁸³ that reported to the president “the number and percentages of proposed [Harvard Law School] Jewish students at various dates between 1899–1900 and 1921–22.”¹⁸⁴ In the same letter, he wrote “I am not unmindful of how residential sections and private schools have frequently been seri-

¹⁷⁶ Lowell attempted to implement an explicit ceiling on the admission of Jewish students in 1922; when that failed, he introduced “character, personality, and promise” factors to Harvard College’s admissions procedure in order to subtly reduce the population of Jewish undergraduates. See John D. Lamb, *The Real Affirmative Action Babies: Legacy Preferences at Harvard and Yale*, 26 COLUM. J. L. & SOC. PROBS. 491, 494–95 (1993). Lowell also imposed a system of Jim Crow at the College and prohibited Black freshmen from living in the College freshmen dormitories. See Nell Painter, *Jim Crow at Harvard: 1923*, 44 NEW ENG. Q. 627, 627–28 (1971).

¹⁷⁷ Cecilia Payne-Gaposchkin, a British-American astronomer, who revolutionized science in her doctoral thesis examining the composition of stars, was filibustered, likely on the basis of her sex, for a faculty position at Harvard by President Lowell who declared that “Miss Payne should never have a position in the University as long as he was alive.” See DONOVAN MOORE, WHAT STARS ARE MADE OF 194 (2020); see also KIMBALL & COUILLETTE, *supra* note 116, at 30 (Lowell expressed fear that if women were to attend Harvard Law School, it would weaken the “peculiar efficiency of our law school”).

¹⁷⁸ Lowell, in 1920, set up a “Secret Court” to purge the undergraduate population of gay students. For a comprehensive, albeit heartbreaking, account of the Secret Court and its impact on Harvard students – see generally WILLIAM WRIGHT, HARVARD’S SECRET COURT: THE SAVAGE 1920 PURGE OF CAMPUS HOMOSEXUALS (2005). Included in Lowell’s inquisition was Joseph E. Lumbard (LL.B. 1925): expelled from Harvard College in 1920 after a “conviction” by the Secret Court, he would go on to graduate from Harvard Law School and become Chief Judge for the U.S. Court of Appeals, Second Circuit in 1959. See KIMBALL & COUILLETTE, *supra* note 116, at 182.

¹⁷⁹ The Bull vigorously opposed the admission of women to Harvard Law School. See KIMBALL & COUILLETTE, *supra* note 116, at 31, 163.

¹⁸⁰ See EDWARD H. WARREN, *Spartan Education*, 40 (1942); KIMBALL & COUILLETTE, *supra* note 116, at 159–61.

¹⁸¹ See KIMBALL & COUILLETTE, *supra* note 116, at 43–44.

¹⁸² See WARREN, *supra* note 180, at 17 (“In 1921–22, Dean Pound took a sabbatical, and both President Lowell and he asked me to serve as Acting Dean. I complied, but with regret . . .”).

¹⁸³ In the history of Harvard University presidents, few individuals are as pernicious as Lowell. He segregated the dormitories at the University. He imposed a *de jure* and *de facto* ceiling on Jewish students from full admissions to the College. And despite his racist, homophobic policies, his name is proudly displayed as one of Harvard College’s twelve undergraduate houses.

¹⁸⁴ See KIMBALL & COUILLETTE, *supra* note 116, at 141.

ously harmed through a large increase of Jews,” but seemed to recognize it was the law school policy under Dean Pound to not discriminate against Jewish students.¹⁸⁵ His anti-Semitism likely transferred to his perceptions of other racial minorities, including a student he likely taught several times: Pedro Albizu Campos.

During his first year, from September 24, 1916 to May 16, 1917,¹⁸⁶ Pedro Albizu Campos would have been required to take Property.¹⁸⁷ Edward H. Warren, according to the Harvard Register, taught Property that academic year.¹⁸⁸ The Bull likely taught Albizu Campos Evidence two years later: Albizu Campos was in residence at Harvard from September 27, 1919 to June 24, 1920,¹⁸⁹ the same year that Professor Edward H. Warren taught Evidence.¹⁹⁰ And then, during Albizu Campos’s enrollment from September 23, 1920 to June 23, 1921, the Register records Professor Warren as Harvard Law School’s Corporations professor for the 1920–21 academic year.¹⁹¹ Albizu Campos’s report card demonstrates that he likely took Corporations during his last year at law school.¹⁹²

Pedro Albizu Campos left Cambridge, Massachusetts for Puerto Rico on June 23, 1921 without a law degree in hand from the Harvard Law School.¹⁹³ His report card suggests that he left without concluding his examinations for Evidence and Corporations.¹⁹⁴ It is conspicuous that the exams Pedro Albizu Campos “missed” during his in-residence time at the Law School were the exams likely administered by Professor Edward Warren. Was the Bull the racist professor vilified in his wife’s memoir?¹⁹⁵ Unfortunately, Edward H. Warren’s personnel files will not see the light of day until February 1, 2023, per Harvard’s 80-year archival blackout rule.¹⁹⁶ Some sources suggest that the reason he returned to Puerto Rico without the completion of his two exams was predominantly financial.¹⁹⁷ All signs, however, buttress his wife’s allegations of racism against the unnamed law school pro-

¹⁸⁵ Bull Warren to A. Lawrence Lowell (May 12, 1922) in KIMBALL & COUILLETTE, *supra* note 116, at 179.

¹⁸⁶ ROSADO, *supra* note 12, at 457.

¹⁸⁷ KIMBALL & COUILLETTE, *supra* note 116, at 161.

¹⁸⁸ *Descriptive Catalogue 1916–17*, 14 OFFICIAL REG. HARV. U. 1, 411 (1917), Box 31, HU 75.25 A, Harvard University Archives, Pusey Library.

¹⁸⁹ ROSADO, *supra* note 12, at 457.

¹⁹⁰ *The Law School 1919–20*, 16 OFFICIAL REG. HARV. U. 1, 6 (1919), Box 35, HU 75.25, Harvard University Archives, Pusey Library.

¹⁹¹ *The Law School 1920–21*, 17 OFFICIAL REG. HARV. U. 1, 7 (1920) Box 37, HU 75.25, Harvard University Archives, Pusey Library.

¹⁹² See PAC Report Card, *supra* note 106.

¹⁹³ See ROSADO, *supra* note 12, at 50.

¹⁹⁴ See PAC Report Card, *supra* note 106.

¹⁹⁵ See MENESES DE ALBIZU CAMPOS, *supra* note 151, at 22 (“To the surprise of all, a professor, due to racial prejudices, deferred his exam”) (translated by the author).

¹⁹⁶ See Email from The Reference Staff, Harvard University Archives, Pusey Library (Mar. 8, 2022, 17:44 EST). Since the Bull stopped teaching at School in 1943, thirty-nine years after he began, his faculty personnel files will be closed for research for 80-years after his departure from Harvard. See Zechariah Chafee, Jr., *Edward Henry Warren. A Biographical Sketch*, 58 HARV. L. REV. 1109, 1111 (1945).

¹⁹⁷ See De Jesús, *supra* note 33, at 482.

fessor, and provide an example of how Albizu Campos experienced racist treatment from individuals and in institutions that he once held in high esteem.

Nevertheless, Albizu Campos persevered. He would earn his Harvard Law degree after completing his Corporations and Evidence examinations in Puerto Rico under the supervision of the “Honorable John A. Torres.”¹⁹⁸ The extraterritorial administration of two law school exams beyond Harvard Law School’s campus triggers additional questions. Why was it allowed? In a series of correspondences after Albizu Campos’s Cambridge departure between Richard Ames, Secretary of the Harvard Law School Faculty at the time, and Albizu Campos, tantalizing details are uncovered. In a letter sent from Ames to Albizu Campos on December 17, 1921, Ames writes “I appreciate the predicament in which you are left and wish very much that I could help you out of it in the way you suggest it.”¹⁹⁹ Yet Ames appears to draw a firm line against accommodations when he writes: “it is a hard and fast rule and one which is not departed from however severe the circumstances may be, that no special examinations shall be given.”²⁰⁰ A little over six months later, however, Ames congratulates Albizu Campos for a job well done on his examinations (taken in Puerto Rico) and informs him that his law degree will be rubber stamped by the Harvard Corporation in February 1923.²⁰¹ In the same letter, Ames writes, “Do not worry about your loans. I understand the situation and know that I can count upon your meeting the obligations just as soon as you can.”²⁰² What was this “situation”? Was it tied to an oppressive, racist law professor? Was it only his indigency? Uncovering Albizu Campos’s letters to Ames may offer answers. But the whereabouts of those letters appears to be another mystery.²⁰³

In the many years Albizu Campos was at Harvard, he proved to be a leader, an activist, and a soldier. His grades, which preclude him from being first in his class, nevertheless constitute high marks for that era at Harvard Law School.²⁰⁴ His leadership in the Cosmopolitan Club demonstrates a desire to build community in a distant place. His experience of racism in the military and at Harvard triggers in Albizu Campos what his fellow Harvard

¹⁹⁸ See Richard Ames to Pedro Albizu Campos (Apr. 14, 1922), reprinted in ROSADO, *supra* note 12, at 454.

¹⁹⁹ Richard Ames to Pedro Albizu Campos (Dec. 17, 1921), reprinted in ROSADO, *supra* note 12, at 453.

²⁰⁰ *Id.*

²⁰¹ See Richard Ames to Pedro Albizu Campos (July 26, 1922), reprinted in ROSADO, *supra* note 12.

²⁰² *Id.*

²⁰³ The Richard Ames files held by Harvard University are extensive. A search on Harvard University’s archival search tool, Hollis for Archival Discovery, for “Richard Ames” yields approximately 430 results. At the Harvard University Archives, held in the Pusey Library, I searched two volumes of records under the “Records of the Secretary, 1895–1958” Collection, Boxes 11 and 13, UAV 512.50.3. Those boxes were supposed to contain correspondences to Richard Ames from students and other notables between 1921–1922. Albizu Campos’s letters to Ames, however, do not appear.

²⁰⁴ Conversation with Daniel Coquillette, J. Donald Monan, S.J., University Professor, in Cambridge, Mass. (Apr. 5, 2022).

alumnus, W.E.B. Du Bois, named double-consciousness.²⁰⁵ While Du Bois's double-consciousness focuses on racial oppression, Albizu Campos's double-consciousness likely bears witness to two planes of oppression: American yet colonized; Harvard-educated military veteran, yet Black, Latino, and othered. These experiences set the path which Pedro marched on upon his return home.

PART THREE: A REVOLUTIONARY LAWYER

Albizu Campos returned to Puerto Rico and married Laura Meneses, a fellow Harvard acolyte, in July 1922.²⁰⁶ Several biographers, along with his wife, claim that Albizu Campos rejected offers to clerk on the Supreme Court and to work for the American military.²⁰⁷ Independent verification of those claims, however, is impossible – the only citations the biographers offer is to Meneses's autobiography, which contains no citations, and the Law School Historical Collections do not possess any primary archives regarding Albizu Campos.²⁰⁸

The Supreme Court of Puerto Rico, at the time the licensing body for lawyers on the island, granted Albizu Campos his law license on February 11, 1924.²⁰⁹ Albizu Campos, his license in hand, moved back home to Ponce and founded the equivalent of a legal aid office that served indigent clients.²¹⁰ That same year Albizu Campos began his relationship with the Nationalist Party of Puerto Rico, a pro-independence party, which he would eventually lead.²¹¹ Participation in the electoral process in 1932 convinced Albizu Campos that electoral activities only perpetuated colonial rule, which led to the Nationalist Party's boycott of elections.²¹² Political abstention would turn to political violence.

On October 24, 1935, a rally of Nationalist Party college students was violently broken up by police officers, leading to the shooting and killing of several Nationalists.²¹³ The massacre in turn led to the assassination of the chief of police who ordered the killings.²¹⁴ In response the United States Federal District Court in Puerto Rico ordered a round-up of prominent Na-

²⁰⁵ See W.E.B. DU BOIS, *THE SOULS OF BLACK FOLK* 3, 7-8, 41 (1903) (“One ever feels his twoness,—an American, a Negro”; “two souls, two thoughts, two unreconciled strivings; two warring ideals in one dark body, whose dogged strength alone keeps it from being torn asunder”).

²⁰⁶ See MENESES DE ALBIZU CAMPOS, *supra* note 151, at 17, 23.

²⁰⁷ See *id.* at 21; see generally ROSADO, *supra* note 12; DENIS, *supra* note 16, at 114.

²⁰⁸ See Email from KB Beck, Manager, Historical & Special Collections, Harvard Law School (Feb. 22, 2022, 15:39 EST) (expressing regrets regarding the limited archival records held by Harvard Law School on Albizu Campos's life and offering helpful insights into other potential avenues of research).

²⁰⁹ See ROSADO, *supra* note 12, at 76.

²¹⁰ See Santiago-Valles, *supra* note 24, at 111.

²¹¹ See *id.* at 111–14.

²¹² See Meyer, *supra* note 27, at 89.

²¹³ See DENIS, *supra* note 16, at 121.

²¹⁴ See *id.*

tionalists, including Albizu Campos.²¹⁵ He was arrested with conspiracy to overthrow the American government, convicted after a mistrial, and lost an appeal of his conviction to the First Circuit.²¹⁶ In 1943 he was released from prison because of medical issues, would spend some time hospitalized, and eventually return to Puerto Rico in 1947.²¹⁷ Three years later Pedro Albizu Campos ordered armed uprisings against American military attachés throughout Puerto Rico²¹⁸ and directed two men to carry out an assassination attempt on President Harry S. Truman at Blair House leading to another conviction and a sentence of eighty years.²¹⁹ He spent time at a maximum-security prison, where he was likely tortured.²²⁰ Two years later Albizu Campos received a pardon on health grounds.²²¹ But the pardon was revoked a year later after Nationalists raided the U.S. Capitol and shot several Congressmen.²²² He was pardoned once again in 1964 – at that time, a stroke had left him unable to walk or talk.²²³ He died on April 21, 1965.²²⁴

PART FOUR: REMEMBERING PEDRO ALBIZU CAMPOS

In Colombia, a bust of Simón Bolívar, Latin America's George Washington, looms over *Plaza Bolívar* in the capital city, Bogotá. The statue depicts Bolívar standing with the Colombian constitution in one hand and a sheathed sword in the other. Bolívar's facial expression appears calm; his sword points downwards. Next door in Caracas, Venezuela's capital, is another *Plaza Bolívar* with a statue of the great man. However, the bust of Bolívar in Caracas depicts a different persona. Bolívar in Caracas rears bravely upon his horse, sombrero raised high as if charging towards Spanish loyalists in a glorious revolution. If one asked a Colombian child and a Venezuelan child to draw a picture of Simón Bolívar, I believe the pictures would reflect the statues in the children's respective capitals. For Colombians, a timid Bolívar bound to the constitution comes to represent a steady government, working intentionally under the rule of law. For Venezuelans, whose government, at least at face value, ardently fights for equality of

²¹⁵ See *id.* at 122; WILLIAM H. MONTALVO, PEDRO ALBIZU CAMPOS: OBRAS ESCOGIDAS, 1923–1936, TOMO II 37 (1981).

²¹⁶ See *Albizu et al. v. United States*, 88 F.2d 139, 144 (1st Cir. 1937). There was a concerted effort by his Harvard classmate, Lewis Gannett, in coordination with the ACLU, to free Albizu Campos. This effort involved several letters sent to “Pete’s” Harvard friend asking them to petition the president for Albizu Campos’s release. See Lewis Gannett papers, Box 37, MS Am 1888-1888.4, Houghton Library.

²¹⁷ See De Jesús, *supra* note 33, at 484.

²¹⁸ See Meyer, *supra* note 27, at 109–10.

²¹⁹ See *id.*

²²⁰ See DENIS, *supra* note 16, at 340–41.

²²¹ See *id.*

²²² See *id.* It does not appear that he ordered this attack on the Capitol; he did, however, applaud the Nationalists’ “sublime heroism.” See *Pedro Albizu Campos, 73, Dies; Fiery Puerto Rican Nationalist*, N.Y. TIMES, Apr. 22, 1965.

²²³ See *Pedro Albizu Campos, 73, Dies; Fiery Puerto Rican Nationalist*, N.Y. TIMES, Apr. 22, 1965.

²²⁴ *Id.*

marginalized citizens, and who expect presidents to actively involve themselves in every aspect of a socialist platform, a Bolívar showjumping his horse fulfills a covenant promised to them of a more equitable society.²²⁵ The commemoration and glorification of a mythical figure is appropriated by both societies to effectuate the ends of a ruling elite.

I began this paper by mentioning the January 6 insurrection. This was done to highlight the controversial role that political violence played in the life of Albizu Campos. Blind commemoration of an individual with an association to, not to mention a conviction of,²²⁶ violent sedition should not go unexamined. But ignorance is harmful too. Ignorance allows political, economic, and powerful interests to shape narratives that in turn can consolidate their power and influence. Recounting a myth of one's superlative brilliance serves to deflect questions about the logic underlying the reasoning of one's policies, ideologies, and actions. Associating an individual with esteemed agents of change inoculates that individual from charges of transgressions and harms. Myths gone unchallenged fester caudillos and caudillos fester oppression.²²⁷

Remembrance of Albizu Campos can help disarm commemorations that would be used to promote violence and caudillismo. Of course, such remembrance should also account for the legitimacy of his charges against American imperialism and its racism. Remembrance of this man by marginalized students at law schools throughout the country can also serve to root these modern students to a shared legacy of struggle and perseverance.

Albizu Campos arrived at Harvard impoverished and alone. Even though his father likely received a graduate education, the reality of his family structure made Pedro a *de facto* first-generation, low-income student. In response to this isolation, Pedro sought out affinity groups where he could find like-minded students and build solidarity. He hustled to make ends meet, taking on jobs while being a full-time student. At different points of

²²⁵ I do not take credit for this analysis of *Plaza Bolívars* in Venezuela and Colombia. The idea comes from Lehigh University History Professor Maria Barbara Zepeda Cortes. I had the pleasure of talking to her as an undergraduate at Lehigh about the history of Simón Bolívar, and toward the end of the discussion she talked about the differences of the busts in Venezuela and Colombia.

²²⁶ Some researchers question the legitimacy of the first conviction following the assassination of the police chief because of a stacked jury in the second trial. See DENIS, *supra* note 16, at 121–23. His later conviction following the assassination attempt on President Truman seems more airtight.

²²⁷ Caudillismo or caudillaje refers to a system of political-social domination typically yielded by an executive figure. Caudillos do not share a certain ideology i.e., liberal v. conservative, but share common characteristics such as dictatorial power regimes, strongly charismatic features, strong proclivity toward clientelist politics, and the reliance on violence in political competition. Authoritarianism goes hand-in-hand. See Eric Wolf & Edward Hansen, *Caudillo Politics: A Structural Analysis*, 9 COMP. STUD. SOC'Y & HIST. 168, 169–70, 173 (1967); see also Jose A. Cheibub, Zachary Elkins & Tom Ginsburg, *Latin American Presidentialism*, 89 TEX. L. REV. 1707, 1729 (2011) (summarizing the relevance of the caudillo tradition in Latin America and demonstrating how emergency power is leveraged by strongmen to take power away from the legislature and dominate a period of executive tyranny).

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his academic life, he was forced to reveal intimate details about his poverty to faceless administrators only to receive loans and meager aid. Racist treatment at the hands of his professors did not stop him from performing exceptionally well, graduating from a coliseum of Spartan education when others perished. While fighting in the coliseum, he also fought outside it, waging battles in the name of oppressed people in Ireland and India. He faced the dilemma of choosing between an affluent legal career and serving his pueblo; he chose the latter, engaging in community-lawyering at a legal aid organization. And like so many of Harvard Law School's controversial alumni,²²⁸ Albizu Campos has been forgotten at the law school, possibly even erased given the complete dearth of records about his life in the Harvard Law School archives.

Commemoration and remembrance are different sides of the same coin. Whether to flip the coin from remembrance to commemoration is a normative question that will require research, debate, and reflection. But remembrance is pivotal to shield against the weaponizing of myths and to promote the solidarity between generations of marginalized people. The history of Pedro Albizu Campos at Harvard University deserves to be told.

²²⁸ See generally KIMBALL & COUILLETTE, *supra* note 116.

