

THE SOCIAL JUSTICE MINISTRY

OF

MOUNT OLIVE A.M.E. CHURCH

PRESENTS

The

BISHOP HENRY MCNEAL TURNER

and

DR. CHARLES HAMILTON HOUSTON

SYMPOSIUM

on

CHURCH AND CIVIL JUSTICE REFORM



The *TURNER--HOUSTON*
CHURCH & CIVIL JUSTICE REFORM SYMPOSIUM



Henry McNeal Turner (1834- 1915)
Trinity College
Member of Georgia House of Rep. (1868-1869)
President, Morris Brown College (1876-1880)
Bishop of the A.M.E. Church (1880- 1915)



Dr. Charles Hamilton Houston (1895-1950)
A.B. Amherst College '15
LL.B., S.J.D., Harvard Law School, '23
Dean, Howard University Law School (1929-1935)
NAACP Chief Legal and Special Counsel (1935- 1940)

MOUNT OLIVE A.M.E. CHURCH (TAMPA, FL.)



Mount Olive A.M.E. Church
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ABOUT MOUNT OLIVE A.M.E

The Mount Olive A.M.E. Church in Tampa is a constituent part of the historic African Methodist Episcopal Church (A.M.E.) that was founded in 1787 in Philadelphia, Pennsylvania. Its pastor is Reverend Gregory Gay. Today, Mount Olive A.M.E. is home to people of all ages and backgrounds who are committed to growing relationships with Jesus Christ.

The main focus of Mt. Olive's mission is to connect people to Christ. Once that initial connection is made, the pastor and other clergy, leaders, and fellow members are available to support you in strengthening that connection.

Our Church is designed to increase your spiritual awareness and prepare you to include God into every aspect of your life. Once you receive this foundation of knowledge and understanding, you are encouraged to use your special talents and spiritual gifts to serve in Mt. Olive and the community as only you can.

Mt. Olive A.M.E. Church has been serving in the West Tampa community for over 100 years. We are a Bible-based, God-directed Christ-centered and Holy Spirit-led Church reaching, teaching and preaching the Word of God for all God's people.

In addition to regularly attending worship service, Bible Study, and Church School members are encouraged to join a ministry. The Social Justice Ministry, which hosts the Charles Hamilton Houston Church & Civil Justice Reform Symposium, is a vibrant and engaging ministry at Mt. Olive A.M.E.

ABOUT THE SYMPOSIUM

The Turner- Houston Church & Civil Justice Reform Symposium (CCJRS) is a vibrant and engaging ministry program of Mt. Olive A.M.E. Church in Tampa. CCJRS is the premier social-justice forum for pastors, theologians, doctors of philosophy, social activists, lawyers, judges, community leaders, and concerned citizens who are concerned about social problems within the community and who wish to formulate ideas, resolutions, solutions, and recommendations for social justice, including public policies and measures for public officials to adopt in order to improve disadvantaged communities and the poor.

For this reason, CCJRS is deeply rooted in the Gospel of Christ, as exemplified in the “Parable of the Good Samaritan” in Luke 10:25-37. It is also in keeping with the Methodist tradition of life-long sanctification through charity (e.g., social service); and, furthermore, in keeping the A.M.E. Church tradition of social uplift of the marginalized and the poor.

To that end, the CCJRS represents the vital link between the Church (i.e., morals, values, community norms) and the State (i.e., the civil government). At times, the Church must speak to the State about vital questions of concern to the community, and particularly the Church must be the voice of the voiceless.

Simultaneously, the CCJRS allows the Church to summon the expertise of others within the community who have expertise in a variety of disciplines such as law, history, economics, government, military science, education, social work, medicine, the physical sciences, and other disciplines, in order to present solutions to some of our most vexing and dire social problems.

The Gospel of Christ, which is “truth” itself, must and can be articulated in the form of secular knowledge so as to convey to the State (i.e., the civil government) what the key problems are and vital solutions should be. The CCJRS is designed to facilitate the social justice mission of the Church by bringing thought leaders and experts together within a forum for ecumenical discussion and problem-solving.

The CCJRS forum will be presented in a variety formats, both formally and informally, including:

1. Guest speakers at regular church service;
2. Guest speakers at non-regular church gatherings;
3. Community events with a Panel of Experts;
4. T.V. Shows; Radio Shows, with Special Guests to discuss vital topics that relate to the Church, the Community, and Social Justice.

ABOUT OUR MISSION AND THE BLACK CHURCH AT-LARGE

Mount Olive A.M.E. Church is not unmindful of how the African Methodist Episcopal Church grew out of a parachurch, mutual aid organization called the Free African Society in Philadelphia. This society was organized and ran by two great clergymen, Absalom Jones (Episcopalian) and Richard Allen (Methodist). Richard Allen would go on to found the A.M.E. Church in Philadelphia in 1787. The Henry McNeal Turner--Charles Hamilton Houston Church & Civil Justice Reform Symposium was conceptualized to carry out Mt. Olive's social justice mission.

Moreover, aside for the A.M.E. Church, the legacy of the African American Church in North America is great and profound. It has been misjudged and misrepresented as a tool of colonial subjugation, but in reality its positive impact upon the community has been unsurpassed by any other institution within the African American community. For starters, the black church pre-dates and pre-exists the Declaration of Independence and the Constitution of the United States. Its commission comes from Jesus Christ and, as such, it has provided a safe-haven against the institution of slavery, racism, discrimination, government intrusion, and white supremacy. The Black Church was the first to found schools and colleges; to coordinate the receipt and distribution of white philanthropy; to provide buildings for community meetings and events; and to promote professional development and achievement among the black population.

In the field of civil rights, the Black church's contributions are unsurpassed. Not even the National Association for the Advancement of Colored People (NAACP), which was founded in 1909, can compare with the impact of the Black Church upon civil rights. And today, the need to coordinate the Black Church's resources for the vindication of civil and human rights and for the delivery of basic legal aid to communities of color is great.

To that end, the Social Justice Ministry at Mt. Olive A.M.E. seeks to work with a variety of church denominations both within and outside of the African American community, including:

* A.M.E.Z., C.M.E., United Methodists, Wesleyan Church, and various other Methodist churches

- * Pentecostal churches
- * Holiness/ Apostolic churches
- * Baptist churches
- * Independent or Non-Denominational churches
- * Bible Institutes and Private Colleges

For these reasons, and carrying out the visionary of legacy of Dean Charles Hamilton Houston, the CCJRS is committed to supporting and strengthening the mission of the Black Church, as a vital component to “Houstonian social engineering,” which is to use law and the administration of justice to promote human rights and to change society for the better.

ABOUT BISHOP HENRY MCNEAL TURNER



Henry McNeal Turner (February 1, 1834 – May 8, 1915) was a minister, politician, and the 12th elected and consecrated bishop of the African Methodist Episcopal Church (AME). An African American, he was a pioneer in Georgia at organizing new congregations of African Americans after the American Civil War.

Born free in South Carolina, Turner learned to read and write and became a Methodist preacher. He joined the AME Church in St. Louis, Missouri, in 1858, where he became a minister. Later he had pastorates in Baltimore, Maryland, and Washington, DC.

In 1863 during the American Civil War, Turner was appointed as the first black chaplain in the United States Colored Troops. Afterward, he was appointed to the Freedmen's Bureau in Georgia. He settled in Macon and was elected to the state legislature in 1868 during Reconstruction. He planted many AME churches in Georgia after the war. In 1880 he was elected as the first southern bishop of the AME Church after a fierce battle within the denomination.

Angered by the Democrats' regaining power and instituting Jim Crow laws in the late nineteenth century South, Turner began to support black nationalism and emigration of blacks to Africa. He was the chief figure to do so in the late nineteenth century; this emigration movement increased after World War I.

EARLY LIFE

Henry McNeal Turner was born free in Newberry, South Carolina, to Sarah Greer and Hardy Turner, both of African and European ancestry. Some sources say he was born in Abbeville, South Carolina.

His paternal grandparents were a white woman planter and a black man. According to the principle of *partus sequitur ventrem* under slave law, her mixed-race children were born free, because she was.

According to the family's oral tradition, his maternal grandfather, renamed David Greer, had been enslaved in Africa and imported to South Carolina. Traders subsequently noticed that he had royal Mandingo tribal marks, so they released him from slavery. According to the same family lore, Greer then began to work for a Quaker family. He ultimately married a free woman of color. Henry Turner grew up with his mother and maternal grandmother.

At the time, South Carolina law prohibited teaching blacks to read and write. When he was apprenticed to work in cotton fields beside slaves, Turner ran away to Abbeville. He found a job as a custodian for a law firm in Abbeville.

EARLY CAREER

At the age of 14, Turner was inspired by a Methodist revival and swore to become a pastor. He received his preacher's license at the age of 19 from the Methodist Church South in 1853 (the national church had divided in 1844 over the issue of slavery). Turner traveled through the South for a few years as an evangelist and exhorter.

In 1858 he moved with his family to Saint Louis, Missouri. The demand for slaves in the South made him fear that members of his family might be kidnapped and sold into slavery, as has been documented for hundreds of free blacks. The

Fugitive Slave Law of 1850 increased the incentives for the capture of people who escaped slavery and required slave traders and people they hired as slavecatchers to provide little documentation to prove their slave status. In St. Louis, Turner became ordained as a minister in the African Methodist Episcopal Church (AME) and studied the classics, Hebrew and divinity at Trinity College.

He also served in pastorates in Baltimore, Maryland, and Washington, DC, where he met influential Republicans. When the Civil War broke out, Turner was still training in Baltimore. In April 1862 he was assigned to the largest AME church in Washington, D.C., Israel Church on Capitol Hill, near both the heart of government and the war in Virginia. Congressmen and army officers visited to hear Turner preach.

MARRIAGE AND FAMILY

In 1856, Turner married Eliza Peacher, daughter of a wealthy black contractor in Columbia, South Carolina. They had 14 children, four of whom lived to adulthood. After Eliza's death in 1889, Turner married Martha Elizabeth DeWitt in 1893. She died, and he married Harriet A. Wayman in 1900. She died, and he married Laura Pearl Lemon in 1907. He outlived three of his four wives.

CIVIL WAR

During the American Civil War, Turner organized one of the first regiments of black troops (Company B of the First United States Colored Troops), and was appointed as its chaplain. Turner urged both free-born blacks and "contrabands" to enlist. Turner regularly preached to the men while they trained and reminded them that the "destiny of their race depended on their loyalty and courage". It was not uncommon for the regiment to march to Turner's church to hear his patriotic speeches. In July 1863, the regiment had completed its formation and was preparing to leave for war. In November of that year, Turner received his commission as chaplain, becoming the only black officer in the 1st USCT.

Turner discovered that the duties of a Union army chaplain in the Civil War were not well defined. Before the war, chaplains only taught school at army posts. During the war, the duties expanded to include holding worship services and

prayer meetings, visiting the sick and wounded in hospitals, and burying the dead. Each chaplain had to work out his role in his regiment according to the expectations of the men in his care and his own talents. For Turner, this appointment allowed him to grow in influence among the African-American population.

Turner was a chaplain for two years. Not long after reporting for duty, he caught smallpox and spent months in the hospital. He returned in May, just in time for his company to participate in its first Battle of Wilson's Wharf on the James River. From May through December, his unit participated in the fighting around Petersburg and Richmond. At the end of the year, they participated in the massive amphibious attack against Fort Fisher.

Turner spent the spring of 1865 with his men as they joined Sherman's march through North Carolina. When the fighting ended, he was sent to Roanoke Island to help supervise a large settlement of ex-slaves. Discharged in September, he received another army commission as chaplain of a different African American regiment, which was assigned to the Freedmen's Bureau in Georgia. Shortly after arriving he resigned and left the army. He turned his attention to politics, civil rights, black nationalism, and the development among the Southern freedmen of the AME Church.

In his role as chaplain, Turner developed some of the ideas, attitudes, and skills that became manifest in his later career, in which he became a Reconstruction politician, a powerful churchman, and a national race leader. While serving in the army, Turner refined his thinking about the African race and its future. Two specific activities propelled him to wide attention among both blacks and whites in both North and South. First, his newspaper letters from the battlefield attracted many readers and admirers in the North, and they launched him on a lifetime of journalism. Second, in the first months after the war ended, he used his position as army chaplain to lead emancipated freedmen into his all-black church; this represented a significant culture shift for the ex-slaves and left a permanent mark on the South. Turner was the first of the 14 black chaplains to be appointed during the war.

After the war, Turner was appointed by President Andrew Johnson to work with the Freedmen's Bureau in Georgia during Reconstruction. White clergy from the North also led some Freedmen's Bureau operations.

POLITICAL INFLUENCE

Following the Civil War, Turner became politically active with the Republican Party, whose officials had led the war effort and, under Abraham Lincoln, emancipated the slaves throughout the Confederacy. He helped found the Republican Party of Georgia. Turner ran for political office from Macon and was elected to the Georgia Legislature in 1868. At the time, the Democratic Party still controlled the legislature and refused to seat Turner and 26 other newly elected black legislators, all Republicans. (See Original 33.) After the federal government protested, the Democrats allowed Turner and his fellow legislators to take their seats during the second session.

In 1869, he was appointed by the Republican administration as postmaster of Macon, which was a political plum. Turner was dismayed after the Democrats regained power in the state and throughout the South by the late 1870s. He had seen the rise in violence at the polls, which repressed black voting. In 1883, the United States Supreme Court ruled that the Civil Rights Act of 1875, forbidding racial discrimination in hotels, trains, and other public places, was unconstitutional. Turner was incensed:

The world has never witnessed such barbarous laws entailed upon a free people as have grown out of the decision of the United States Supreme Court, issued October 15, 1883. For that decision alone authorized and now sustains all the unjust discriminations, proscriptions and robberies perpetrated by public carriers upon millions of the nation's most loyal defenders. It fathers all the 'Jim-Crow cars' into which colored people are huddled and compelled to pay as much as the whites, who are given the finest accommodations. It has made the ballot of the black man a parody, his citizenship a nullity and his freedom a burlesque. It has engendered the bitterest feeling between the whites and blacks, and resulted in the deaths of thousands, who would have been living and enjoying life today.”

In the late nineteenth century, he witnessed state legislatures in Georgia and across the South passing measures to disfranchise blacks. He became a proponent of black nationalism and supported emigration of American blacks to Africa. He thought it was the only way they could make free and independent lives for themselves. When he traveled to Africa, he was struck by the differences in the attitude of Africans who ruled themselves and had never known the degradation of slavery.

He founded the International Migration Society, supported by his own newspapers: *The Voice of Missions* (he served as editor, 1893-1900) and later *The Voice of the People* (editor, 1901-4). He organized two ships with a total of 500 or more emigrants, who traveled to Liberia in 1895 and 1896. This was established as an American colony by the American Colonization Society before the Civil War, and settled by free American blacks, who tended to push aside the native African peoples. Disliking the lack of economic opportunity, cultural shock and disease, some of the migrants returned to the United States. After that, Turner did not organize another expedition.

CHURCH LEADERSHIP

As a correspondent for *The Christian Reporter*, the weekly newspaper of the AME Church, he wrote extensively about the Civil War. Later he wrote about the condition of his parishioners in Georgia.

When Turner joined the AME Church in 1858, its members lived mostly in the Northern and border states; total members numbered 20,000. His biographer Stephen W. Angell described Turner as "one of the most skillful denominational builders in American history." After the Civil War, he founded many AME congregations in Georgia as part of a missionary effort by the church in the South. It gained more than 250,000 new adherents throughout the

South by 1877, and by 1896 had a total of more than 452,000 members nationally.

In 1880, Turner was elected as the first bishop from the South in the AME Church, after a hard battle within the denomination. Although one of the last

bishops to have struggled up from poverty and a self-made man, he was the first AME Bishop to ordain a woman to the order of Deacon. He discontinued the controversial practice because of threats and discontent among the congregations. During and after the 1880s, Turner supported prohibition and women's suffrage movements. He also served for twelve years as chancellor of Morris Brown College (now Morris Brown University), a historically black college affiliated with the AME Church in Atlanta.

During the 1890s, Turner went four times to Liberia and Sierra Leone, United States and British colonies, respectively. As bishop, he organized four annual AME conferences in Africa to introduce more American blacks to the continent and organize missions in the colonies. He also worked to establish the AME Church in South Africa, where he negotiated a merger with the Ethiopian Church. Due to his efforts, African students from South Africa began coming to the United States to attend Wilberforce University in Ohio, which the AME church had operated since 1863. His efforts to combine missionary work with encouraging emigration to Africa were divisive in the AME Church.

Turner crossed denominational lines in the United States, building connections with black Baptists, for instance. He was known as a fiery orator. He notably preached that God was black, scandalizing some but appealing to his colleagues at the first Black Baptist Convention when he said:

We have as much right biblically and otherwise to believe that God is a Negroe, as you buckra or white people have to believe that God is a fine looking, symmetrical and ornamented white man. For the bulk of you and all the fool Negroes of the country believe that God is white-skinned, blue eyed, straight-haired, projected nosed, compressed lipped and finely robed white gentleman, sitting upon a throne somewhere in the heavens. Every race of people who have attempted to describe their God by words, or by paintings, or by carvings, or any other form or figure, have conveyed the idea that the God who made them and shaped their destinies was symbolized in themselves, and why should not the Negroe believe that he resembles God.

— *Voice of Missions, February 1898*

He died while visiting Windsor, Ontario in 1915. Turner was buried in Atlanta. After his death, W.E.B. Du Bois wrote in *The Crisis* magazine about him:

Turner was the last of his clan, mighty men mentally and physically, men who started at the bottom and hammered their way to the top by sheer brute strength, they were the spiritual progeny of African chieftains, and they built the African church in America.

ABOUT DR. CHARLES HAMILTON HOUSTON



Charles Hamilton Houston (September 3, 1895 – April 22, 1950) was a prominent African-American lawyer, Dean of Howard University Law School, and the NAACP's first special counsel, or Litigation Director. A graduate of Amherst College and Harvard Law School, Houston played a significant role in dismantling Jim Crow laws, especially attacking segregation in schools and racial housing covenants. He earned the title "The Man Who Killed Jim Crow."

Houston is also well known for having trained and mentored a generation of black attorneys, including Thurgood Marshall, future founder and director of the NAACP Legal Defense Fund and the first Black Supreme Court Justice. He recruited young lawyers to work on the NAACP's litigation campaigns, building connections between Howard's and Harvard's university law schools.

Early years

Houston was born in Washington, D.C., to a middle-class family who lived in the Striver section. His father William Le Pré Houston, the son of a former slave, had become an attorney and practiced in the capital for more than four

decades. Charles' mother, Mary (née Hamilton) Houston, worked as a seamstress. Houston attended segregated local schools, graduating from the academic (college preparatory) Dunbar High School. He studied at Amherst College beginning in 1911, was elected to the Phi Beta Kappa honor society, and graduated as valedictorian in 1915, the only black student in his class. He returned to D.C. and taught English at Howard University, a historically black college.

As the U.S. entered World War I, Houston joined the U.S. Army as an officer. The military was racially segregated. From 1917 to 1919, he served as a First Lieutenant in the United States Infantry, based in Fort Meade, Maryland, with service in France. Houston wrote later:

The hate and scorn showered on us Negro officers by our fellow Americans convinced me that there was no sense in my dying for a world ruled by them. I made up my mind that if I got through this war I would study law and use my time fighting for men who could not strike back.

After his return to the U.S. in 1919, he entered Harvard Law School. He was the first black student elected to the editorial board of the Harvard Law Review and graduated cum laude. Houston was also a member of Alpha Phi Alpha Fraternity, Inc. He earned a bachelor's of law (LL.B) in 1922 and a doctor of juridical science (S.J.D.) from Harvard in 1923. That same year he was awarded a Sheldon Traveling Fellowship to study at the University of Madrid. After his return, he was admitted to the Washington, DC bar in 1924 and joined his father's practice.

In 1924 Houston married Gladys Moran. They divorced in 1937. He next married Henrietta Williams. They had Houston's only child in 1940, Charles Hamilton Houston, Jr.

Career

When several black lawyers were refused admission to the American Bar Association in 1925, they founded the National Bar Association. Houston was a founding member of the affiliated Washington Bar Association.

He was recruited to Howard University by the first African-American president, Mordecai Johnson. From 1929 to 1935, Houston served as Vice-Dean

and Dean of the Howard University School of Law. He developed the school, beginning its years as a major national center for training black lawyers. He extended its part-time program to a full-time curriculum and gained accreditation by the Association of American Law Schools and the American Bar Association. Bringing prominent attorneys to the school as speakers and to build a law network for his students, Houston served as a mentor to a generation. He influenced nearly one-quarter of all the black lawyers in the United States at the time, including former student Thurgood Marshall, who became a United States Supreme Court justice. Houston believed that the law could be used to fight racial discrimination and encouraged his students to work for such social purpose.

Houston left Howard in 1935 to serve as the first special counsel for the National Association for the Advancement of Colored People (NAACP), serving in this role until 1940. In this capacity he created litigation strategies to attack racial housing covenants and segregated schools, arguing several important civil rights cases before the U.S. Supreme Court. Through his work at the NAACP, Houston played a role in nearly every civil rights case that reached the US Supreme Court between 1930 and *Brown v. Board of Education* (1954).

Houston worked to bring an end to the exclusion of African Americans from juries across the South. He defended African-American George Crawford on charges of murder in Loudoun County, Virginia, in 1933, and saved him from the electric chair.

In the related *Hollins v. State of Oklahoma* (1935), Houston led an all-black legal team before the US Supreme Court to appeal another murder case in which the defendant was convicted by an all-white jury and sentenced to death. The defense team had challenged the all-white jury during the trial, but the conviction was upheld by the appeals court. Hearing the case a certiorari, the Supreme Court reversed the lower court's decision and ordered a new trial. Hollins was tried a third time, again before an all-white jury, and was convicted in 1936. He was sentenced to life in prison, where he died in 1950. "It is now widely believed that he was innocent." At the time, Oklahoma and southern states systematically excluded blacks from juries, in part because they were not on the voter rolls, having been disenfranchised across the South since the turn of the century by state

barriers to voter registration. In the 21st century, attorneys continue to have to challenge prosecutorial strategies that exclude blacks from juries.

Houston's strategy on public education was to attack segregation by demonstrating the inequality resulting from the "separate but equal" doctrine dating from the Supreme Court's *Plessy v. Ferguson* (1897). He orchestrated a campaign to force southern districts to build facilities for blacks equal to those for whites, or to integrate their facilities. He focused on law schools because, at the time, mostly males attended them. He believed this would obviate the fears whites expressed that integrated schools would lead to interracial dating and marriage. In Missouri ex rel. *Gaines v. Canada* (1939), Houston argued that it was unconstitutional for Missouri to exclude blacks from the state's university law school when, under the "separate but equal" provision, no comparable facility for blacks existed within the state.

In the documentary "The Road to Brown", Hon. Juanita Kidd Stout described Houston's strategy related to segregated schools:

When he attacked the "separate but equal" theory his real thought behind it was that "All right, if you want it separate but equal, I will make it so expensive for it to be separate that you will have to abandon your separateness." And so that was the reason he started demanding equalization of salaries for teachers, equal facilities in the schools and all of that.

Houston founded a law firm, Houston & Gardner, with Wendell P. Gardner, Sr. It later included, as name partners, William H. Hastie, William B. Bryant, Emmet G. Sullivan, and Joseph C. Waddy, each of whom were later appointed as federal judges. The firm was prestigious but their work not well-compensated. Ten members of the firm advanced to become judges, including Theodore Newman, Wendell Gardner, Jr., the son of Wendell Gardner; and Emmet Sullivan.

Houston's efforts to dismantle the legal theory of "separate but equal" were completed after his death in 1950 with the historic *Brown v. Board of Education* (1954) ruling, which prohibited segregation in public schools. At one point Houston had carried a movie camera as he traveled across South Carolina, in order to document the inequalities of facilities, materials and teachers' salaries between African-American and white education. As Special Counsel to the NAACP,

Houston dispatched Thurgood Marshall, Oliver Hill and other young attorneys to work a litigation campaign of court challenges to equalize teachers' salaries.

Houston also directed the NAACP's campaign to end restrictive housing covenants. In the early 20th century, the organization had won a United States Supreme Court case, *Buchanan v. Warley* (1917), which prohibited state and local jurisdictions from establishing restrictive housing. Real estate developers and agents developed restrictive covenants and deeds. The Court ruled in *Corrigan v. Buckley* (1926) that such restrictions were the acts of individuals and beyond the reach of the constitutional protections. As the NAACP continued with its campaign in the 1940s, Houston drew from contemporary sociological and other studies to demonstrate that such covenants and resulting segregation produced conditions of overcrowding, poor health, and increased crime that adversely affected African-American communities. Following *Corrigan*, Houston contributed to what was a 22-year campaign, in concert with lawyers he had trained, in order to overturn the constitutionality of restrictive covenants. This was achieved in the US Supreme Court ruling in *Shelley v. Kraemer* (1948). The court ruled that "judicial enforcement of private right constitutes state action for the purpose of the fourteenth amendment." Houston's use of sociological materials in these cases lay the groundwork for the approach and ruling in *Brown v. Board of Education* (1954).

Death

Houston died from a heart attack on April 22, 1950, at the age of 54.

FOR MORE INFORMATION

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Attention: Executive Director, Social Justice Ministry @ Mt. Olive AME

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