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Chinese American Responses to the Japanese American Internment and Incarceration

JEREMY CHAN*

Introduction

After Japan bombed Pearl Harbor in December 1941 and anti-Japanese hysteria increased, Chinese Americans found themselves in a difficult position. Not only were they already victims of exclusion and other racially discriminatory laws, but they also were frequently perceived as Japanese Americans and thus faced anti-Japanese sentiment. Although some Chinese Americans spoke out against the Japanese American incarceration, many Chinese Americans instead distinguished themselves from Japanese Americans, and either implicitly or explicitly supported anti-Japanese efforts.

This paper will compare Chinese American support and opposition to the Japanese American internment and incarceration with the responses from other communities of color, including Korean Americans, African Americans, and Filipino Americans. It will also contrast Chinese American responses with other ethnic and non-ethnic based communities that supported Japanese Americans during World War II. Finally, it will compare Chinese American responses to the Japanese American internment and incarceration with contemporary solidarity efforts with American Muslims, and comment on why Asian American groups responded with support today when the majority did not support Japanese Americans during World War II.

History of Chinese American Immigration

Chinese immigrants emigrated from China, in particular the Guangdong province, to escape war, economic depression, and the declining Qing Dynasty. They hoped to find economic opportunity in the United States, starting with the California Gold Rush in 1849. Meanwhile, the United States sought to use Chinese immigrants as cheap labor for both Hawaii's sugar plantations and the transcontinental railroad. About 370,000

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Chinese people immigrated to the United States between 1840 and 1880, constituting twenty-five percent of California's workforce in 1870.¹

Economic jealousy motivated discrimination against Chinese immigrants. White workers did not unite with their fellow Chinese workers, but instead denounced them as "coolies" and criticized Chinese workers for working under horrific working conditions for low wages. This prompted hate crimes against Chinese people, with at least 300 documented murders of Chinese people in the western United States between 1860 and 1887, and many more unrecorded.² Chinese people could do little in response to these murders, as they were barred from testifying in court by the California Supreme Court in *People v. Hall*, 4 Cal. 399 (1854).

Legislatures also passed anti-Chinese laws to curb the economic mobility of Chinese people. California revised its state constitution in 1879 with Article XIX, banning Chinese workers from being employed and subjecting corporations to criminal liability if they employed Chinese workers. Legislators also passed ordinances harming Chinese business owners, such as the San Francisco laundry ordinances. Although these laws were facially neutral, they were aimed at shutting down Chinese-owned laundries. The law required non-brick or stone laundries to be approved by the board of supervisors, but Chinese owners found it impossible to get supervisor approval for their wooden laundries. Chinese people found some success protesting these laws in the courts. In response to California's Article XIX of the Constitution, the federal circuit court in *In re Tiburcio Parrott* held that the state lacked the power to regulate corporations and invade the individual rights of Chinese workers in this manner.³ For the laundry ordinances, the Supreme Court in *Yick Wo v. Hopkins* held that even though the ordinances were facially neutral, they violated the Equal Protection Clause because they were applied in a racially discriminatory manner against the Chinese-owned laundries.⁴

Anti-Chinese efforts ultimately culminated in the passage of the Chinese Exclusion Act in 1882, which banned Chinese laborers from entering the United States. Subsequent amendments required Chinese immigrants to provide a "reentry certificate" in order to return to the United States. However, Congress then passed the Scott Act in 1888, voiding all reentry certificates.⁵ Chae Chan Ping protested the validity of these laws, as he left the United States with a reentry certificate but was unable to use it because he returned after the Scott Act was passed. In *Chae Chan Ping v.*

1. ERIC K. YAMAMOTO ET AL., RACE, RIGHTS AND REPARATION: LAW AND THE JAPANESE AMERICAN INTERNMENT 24 (2013).

2. *Id.*

3. 1 F. 481 (C.C.D. Cal. 1880)

4. 118 U.S. 356 (1886).

5. YAMAMOTO ET AL., *supra* note 1, at 25.

United States, the Supreme Court upheld the Scott Act, establishing Congress's plenary power to restrict immigration for the purposes of national security.⁶ Congress followed up by passing the Geary Act, which allowed the government to deport Chinese laborers unless they could provide testimony from a white person to establish their residence in the United States.⁷ Chinese government officials and Chinese American community leaders were appalled, and they challenged the Geary Act in *Fong Yue Ting v. United States*.⁸ Once again, the Chinese American community lost, as the Court upheld Congress's ability to deport foreigners. Although Justice Field wrote the majority in *Fong Yue Ting*, Justice Brewer dissented, arguing that deportation was a much more severe action than exclusion.⁹

In both *Chae Chan Ping* and *Fong Yue Ting*, the justices used racist rhetoric, asserting the inferiority of Chinese people and unjustly criticizing them for not assimilating to the United States. In *Chae Chan Ping*, the Court stated that Chinese laborers had a "baneful effect upon the material interests of the state, and upon public morals," and that the amount of Chinese immigration was "approaching the character of an Oriental invasion."¹⁰ Even Justice Brewer, in his *Fong Yue Ting* dissent, referred to Chinese people as "the obnoxious Chinese."¹¹ The court in *Chae Chan Ping* stated that it is "impossible for [Chinese people] to assimilate with our people, or to make any changes in their habits or modes of living."¹² Yet, at the time, Chinese people were expressly prohibited from naturalizing and becoming citizens; but the court ignored this fact. Later cases regarding Japanese Americans would use both similar anti-Asian rhetoric as well as criticize them for not assimilating to the United States in spite of their inability to naturalize.

History of Japanese American Immigration

In response to Chinese exclusion laws, like the Chinese Exclusion Act, Scott Act, and Geary Act, Japanese immigration to the United States increased. Employers, especially Hawaii plantation workers, who had previously relied on cheap labor from Chinese workers, needed a new source of labor, so they turned to Japanese immigrants. About 400,000 Japanese people immigrated to Hawaii and mainland America between 1810 and

6. 130 U.S. 581 (1889).

7. JUAN F. PEREA ET AL., RACE AND RACES: CASES AND RESOURCES FOR A DIVERSE AMERICA 401-02 (2015).

8. 149 U.S. 698 (1893).

9. *Id.*

10. 130 U.S. 581 (1889).

11. 149 U.S. 698 (1893).

12. 130 U.S. 581 (1889).

1910.¹³ Japanese and Chinese immigrants were lumped together, collectively seen as an “Asian horde” or “yellow peril” whose immorality would corrupt the United States. These fears were exacerbated by Japan’s victory in the Russo-Japanese war, spurring a fear that Japan would invade the West Coast.¹⁴

Foreign policy and local discrimination came to a head in 1906, when the San Francisco Board of Education attempted to segregate Japanese public school students and force them to attend the segregated Chinese school. When Japanese Americans were unable to persuade the school board, they turned to the Japanese media and government officials, who in turn pressured President Theodore Roosevelt. Roosevelt did not want to cause an international incident with Japan, especially since Japan had emerged as a world power in the wake of the Russo-Japanese war. He entered negotiations with Japan which resulted in the Gentlemen’s Agreement of 1908, where California agreed not to segregate Japanese students in return for Japan denying visas to Japanese laborers seeking permission to emigrate to the United States.¹⁵ Though, here, Japanese American immigrants’ connection with Japan was a huge bargaining asset, it would later be used against them during World War II.

As Japanese immigrants became more economically successful, especially in agriculture, white workers turned against them. California led the nation in passing Alien Land Laws, which restricted non-citizens from owning land. Because Japanese Americans, like other Asian American immigrants, were unable to become citizens, they were restricted from owning land. Other states, like Louisiana and Kansas, followed suit, despite their minimal Japanese populations.¹⁶ The constitutionality of the alien land laws was upheld in *Terrace v. Thompson*, 263 U.S. 197 (1923), which held that such laws did not violate the equal protection clause. The Court punished Japanese Americans for their inability to legally become citizens, arguing that it was reasonable to prevent people who did not “intend” to become citizens from owning land.¹⁷ This mirrors the Court’s reasoning in *Chae Chan Ping*, where they characterized Chinese people as “impossible to assimilate” despite the fact that the United States legally barred them from becoming citizens.

Japanese Americans nevertheless came up with creative ways around these laws, such as having their citizen children own land. The legislature

13. YAMAMOTO ET AL., *supra* note 1, at 25.

14. Emily Anderson, *Anti-Japanese Exclusion Movement*, DENSHO ENCYCLOPEDIA (Mar. 20, 2014, 7:01 PM), http://encyclopedia.densho.org/Anti-Japanese_exclusion_movement/.

15. Cherstin M. Lyon, *San Francisco School Segregation*, DENSHO ENCYCLOPEDIA (July 31, 2015, 2:51 AM), http://encyclopedia.densho.org/San_Francisco_school_segregation/.

16. PEREA ET AL., *supra* note 7, at 410–12.

17. *Terrace v. Thompson*, 263 U.S. 197 (1923).

and the courts attempted to curtail these efforts. California added a provision to their Alien Land Law preventing Japanese Americans from leasing land, which the Supreme Court upheld in *Porterfield v. Webb*.¹⁸ The Supreme Court in *Frick v. Webb* also upheld California's ban on selling shares of a landholding corporation to non-citizens.¹⁹

Economic tensions between Japanese Americans and white Americans continued to rise throughout the early 1900s, which eventually fueled support to imprison Japanese Americans in concentration camps.

The Japanese American Internment and Incarceration

Prior to the bombing of Pearl Harbor, the United States federal government prepared for potential war with Japan by compiling a list of resident Japanese non-citizens who could be arrested under the Alien Enemy Act of 1798. This "ABC list" consisted of virtually all of the first generation "Issei" leadership, including civic leaders, businesspeople, Buddhist priests, and language teachers.²⁰ In March 1941, the Justice Department and War Department also developed a secret agreement to intern "enemy aliens," but not American citizens. As opposed to the eventual mass incarceration, this initial plan instead provided for arrest under warrant issued by a federal prosecutor, a preliminary hearing, and a determination by the Justice Department of each individual's loyalty.²¹

Anti-Japanese tensions were exacerbated on December 7, 1941, when the Japanese Navy bombed Pearl Harbor. The Justice Department, in response, immediately arrested thousands of noncitizens, including a handful of German and Italian people but mostly Japanese people. Fearing the possibility that Japanese and Japanese Americans on the West Coast would be a "fifth column" supporting imperial Japan, the government discussed the idea of imprisoning Japanese Americans located on the West Coast in concentration camps.

Economic racism, which continued from the early 1900s, was also a key motivation in the imprisonment of Japanese and Japanese Americans. People like the manager of the Salinas Vegetable Grower-Shipper Association admitted that they supported the internment for "selfish reasons."²² He stated, "If all the Japs were removed tomorrow, we'd never miss them in two weeks, because the white farmers can take over and produce

18. 263 U.S. 255 (1923).

19. 263 U.S. 326 (1923); PEREA ET AL., *supra* note 7, at 416.

20. YAMAMOTO ET AL., *supra* note 1, at 85.

21. *Id.* at 86.

22. Frank J. Taylor, *The People Nobody Wants*, SATURDAY EVENING POST, May 9, 1942, at 24, 66.

everything the Jap grows. And we don't want them back when the war ends, either."²³

These tensions led President Franklin D. Roosevelt to sign Executive Order 9066, imprisoning about 120,000 Japanese Americans, about two-thirds of them U.S. citizens, in ten desert concentration camps scattered across the West Coast.²⁴

Chinese American Opposition to Japanese Americans

Many Chinese Americans responded to the Japanese American incarceration by attempting to distinguish themselves from Japanese Americans. The Chinese consulate in San Francisco, along with other Chinese American organizations, distributed identification cards. Chinese people wore buttons that said "I am Chinese" or "China" or showed the Chinese flag. Chinese merchants actively prevented Japanese people from buying these buttons, selling only to people who could speak Cantonese or another Chinese dialect.²⁵

These efforts were encouraged by both Chinese American and United States media. Editors of the *Chinese Press* stated, "For your own protection, the authorities MUST distinguish you from the Japanese, a people at war and an enemy of China and the United States."²⁶ *Life Magazine* published *How to Tell Japs from the Chinese* which contrasted visual diagrams of a Chinese and Japanese man. The article claimed that Chinese faces had a "parchment yellow complexion," lack of rosy cheeks, a "scant beard," and a "longer, narrower face" while Japanese faces had an "earthy yellow complexion," "sometimes rosy cheeks," a "heavy beard," and a "broader, shorter face."²⁷ This pseudo-scientific analysis had little basis in fact and did not shield Chinese people from being mistaken as Japanese. In one reported instance, this even occurred interethnically, as Filipino Americans in Los Angeles assaulted Chinese Americans, thinking they were Japanese.²⁸

Some Chinese Americans used the internment as a means to economically profit by taking over Japanese American-owned businesses. In San Francisco's Chinatown, Chinese American residents had long resented the presence of Japanese American owned businesses, so they used the internment to move into vacated properties.²⁹ These efforts were also

23. Taylor, *supra* note 22.

24. YAMAMOTO ET AL., *supra* note 1, at 89.

25. K. SCOTT WONG, AMERICANS FIRST: CHINESE AMERICANS AND THE SECOND WORLD WAR 80 (2005).

26. *Id.*

27. *How to Tell Japs from the Chinese*, LIFE, Dec. 22, 1941, at 81-82.

28. WONG, *supra* note 25, at 81.

29. *Id.* at 83.

supported by non-Chinese Americans. The *Chinese Press* published a letter to the editor signed by David E. Snodgrass, Dean of the University of California, Hastings College of the Law, which stated, “Every Japanese store on Grant Avenue is there under false pretenses, making the implied representation that it is a Chinese store and selling goods to tourists on that false and fraudulent base.”³⁰ Similar efforts also occurred in other Japanese American communities along the West Coast. The *Nihonmachi* (Japantown) in Portland, Oregon was slowly converted into Portland’s second Chinatown, as Chinese American residents and business owners occupied the properties formerly owned by Japanese Americans.³¹ Chinese Americans also led boycotts of Japanese owned businesses. For the Japanese American-owned Ota Tofu Company in Portland, these boycotts led to a huge drop in Chinese patrons, when previously, people from the neighboring Chinese American community had formed a sizeable part of their customer base.³²

In some cases, Chinese American economic efforts led to taking over entire industries. One example is the fortune cookie, which is a hallmark Chinese American fast food today, but actually started as a Japanese American invention. San Francisco’s Japantown mochi bakery Benkyodo made fortune cookies for the Golden Gate Park Japanese Tea Garden for visitors to eat alongside their tea. These fortune cookies were based off of *senbei* (Japanese rice crackers), but modified and made sweeter to suit European palates.³³ After the internment of Japanese Americans, Chinese Americans entered the market, leading to its contemporary ubiquitous association with Chinese American takeout.

The incarceration also created new job opportunities for Chinese Americans. For example, the United States Employment Services called for Chinese Americans to replace incarcerated Japanese Americans as farm workers in California and along the West Coast. The *Chinese Press* argued that Chinese Americans should answer this call, stating that, “Food is just as important as machine-guns to help win the war. . . . This is an opportunity for all Chinese with farm experience to develop a business as well as perform a patriotic duty.”³⁴

Chinese Americans also found new jobs in the film industry as a result of World War II. The war on the Pacific front became a popular film topic,

30. WONG, *supra* note 25, at 83–84.

31. Heather Arndt Anderson, *The Secret History of America’s Oldest Tofu Shop*, SLATE (Sept. 18, 2017, 10:50 AM), <https://slate.com/news-and-politics/2017/09/ota-tofu-the-secret-history-of-americas-oldest-tofu-shop.html>.

32. *Id.*

33. Gary T. Ono, *Japanese American Fortune Cookie: A Taste of Fame or Fortune – Part 2*, DISCOVER NIKKEI (Nov. 1, 2007), <http://www.discovernikkei.org/en/journal/2007/11/1/fortune-cookie/>.

34. WONG, *supra* note 25, at 83.

which created a demand for Chinese actors to portray both Chinese as well as Japanese characters. Anti-Japanese sentiment both encouraged Chinese American actors to accept and refuse these roles. Some who refused the roles did so because they did not want to portray the enemy, highlighting their loyalty to the United States. Mei Lee Foo, a San Franciscan Chinese opera and concert singer, decided to portray a Japanese geisha because “the geisha girl is symbolic to many people of the moral decadence of Japan,” thereby using the role as a method of criticizing Japan.³⁵

The Chinese American press played an important role in encouraging anti-Japanese sentiment. Chinese American newspapers reinforced the idea that Japanese Americans were acting as a “fifth column” to aid Japan. The *Chinese Press* reported on a lecture from economics professor Dr. Gordon S. Watkins of the University of California, Los Angeles, who argued that, “Pearl Harbor’s fall was mainly caused by fifth column work by American-born Japs.”³⁶ In their reporting on previously Japanese-owned businesses on Grant Avenue, the *Chinese Press* stated that one building had a large hall containing “chairs and tables all set up for (could be fifth columnist) conferees.”³⁷ Chinese American newspapers also neglected to directly cover the internment of Japanese Americans. When asked why he did not cover the internment, Thomas Chinn, founder of the *Chinese News*, replied, “My papers were for and about Chinese Americans.”³⁸

This reporting by Chinese American newspapers lumped Japan and Japanese Americans together, masking the reality that most Japanese Americans supported the United States. In addition, they neglected to draw connections between the types of discrimination that Chinese Americans and Japanese Americans faced. For example, their reporting on Watkins’ lecture at the University of California, Los Angeles, highlighted his argument that Japanese parents used language schools and Buddhist priests to prevent their children from assimilating, but ignored that these same arguments were used to paint Chinese Americans as unassimilable. The Chinese American press also failed to highlight that both Chinese Americans and Japanese Americans were legally barred from owning land and becoming citizens, two major barriers that paved the way to the Japanese American internment. The press could have potentially united Chinese Americans and Japanese Americans over these similar institutions of systemic racism.

Instead, Chinese American editors actively defended instances in which Chinese and Japanese people were lumped together. The *Chinese News* encouraged Chinese Americans to forgive instances when they were

35. WONG, *supra* note 25, at 86.

36. *Id.* at 84.

37. *Id.*

38. *Id.*

mistaken as Japanese, arguing that, “The average American cannot tell the difference between Chinese and Japanese. With this thought in mind, we wish to caution every Chinese to bear with patience if the salesgirl does not wait on you”³⁹

Motivations for Opposition to Japanese Americans

Chinese Americans held several different motivations to oppose Japanese Americans. Some were motivated by economic gain, using the internment as an opportunity to advance professionally. Economic motivations ranged from the intentional, such as the Chinese Americans who seized upon taking over Japanese American businesses and properties, to the opportunistic or complicit, such as the Chinese Americans who advanced in the film industry or who heeded the United States’ labor call to replace Japanese American farmers. Others opposed Japanese Americans out of survival, in an effort to be seen as loyal Americans and not to be mistaken for being Japanese. For example, Filipino American Bill Santos wore an “I am Filipino” button because he was bullied at school for being mistakenly perceived as Japanese. Some were motivated by patriotism and saw themselves as loyal Americans who wanted to support the war effort. However, like Chinese Americans, many Japanese Americans saw themselves as loyal Americans who supported the war effort.

Japanese Invasion of Manchuria and the *Jiuguo Zijiu* Movement

The Japanese invasion of Manchuria in September 1931 was a huge catalyst towards the anti-Japanese movement among Chinese Americans. The Japanese Kwantung Army, which had been stationed in Manchuria since the early 1900s, launched a surprise attack that forced Chinese troops and government officials out of northeastern China.⁴⁰ Japan renamed Manchuria as Manchukuo, with Pu Yi, last emperor of China from the Manchu dynasty, as its puppet ruler. In 1932, in response to a Shanghai mob which attacked five Japanese Buddhist priests and killed one of them, Japan bombed Shanghai, killing tens of thousands of civilians. The incident drew international criticism, causing Japan to withdraw from the international community, as well as the League of Nations.⁴¹ In 1933, Japan occupied northern China’s Rehe province and threatened to cross the Great Wall.⁴²

39. WONG, *supra* note 25, at 81.

40. RENQIU YU, TO SAVE CHINA, TO SAVE OURSELVES: THE CHINESE HAND LAUNDRY ALLIANCE OF NEW YORK 77–78 (1992).

41. IRIS CHANG, THE RAPE OF NANKING: THE FORGOTTEN HOLOCAUST OF WORLD WAR II 29 (1997).

42. YU, *supra* note 40, at 78.

Despite concerns from Chinese people both within China and abroad, the ruling Kuomintang (KMT) party-state, led by Chiang Kai-shek, did not respond to the Japanese attacks. Instead, Chiang followed the policy of *annei rangwai*, meaning “first pacification [of Communists and warlords], then resistance.”⁴³ Chiang devoted his military efforts to this policy, organizing five “bandit annihilation campaigns” against Communist forces in southern China.⁴⁴ This act of de facto civil war began to increasingly outrage Chinese people both within China and abroad, as they called for national unity in the face of Japanese military aggression.⁴⁵

Although the ruling KMT party pursued a policy of nonresistance in response to the Japanese invasion, Chinese American leaders took a more active stance, and they organized under the principle of *jiuguo ziji*, meaning “to save China, to save ourselves.” Organizations such as the Anti-Japanese Associations, National Salvation Associations, and National Salvation Fund Savings Societies led anti-Japanese rallies and parades to raise funds to support China. Many people contributed all of their wages and life savings for this purpose. However, the early anti-Japanese movement faced resistance from the Overseas Chinese Affairs Commission (*Qiaowu Weiyuanhui*), which was set up by the KMT to regulate overseas Chinese communities. The Overseas Chinese Affairs Commission sought to maintain political loyalty, solicit financial donations, and suppress party opposition. One of their main targets was the KMT control over the Chinese Consolidated Benevolent Association and various clan and family organizations assisted them in quelling party opposition and anti-Japanese sentiment among the Chinese American community. However, although these organizations did not publicly criticize the nonresistance policy, they did not enthusiastically support it either, as they donated money to Chinese troops that were fighting the Japanese troops.⁴⁶

The Chinese Hand Laundry Alliance (CHLA) then emerged as a prominent Chinese American organization that groups could rally behind to criticize the KMT and support a military campaign. The Chinese Hand Laundry Alliance’s campaign of *jiuguo ziji* (“to save China, to save ourselves”) inextricably linked Chinese nationalism with Chinese Americans’ struggle to survive in America. Many Chinese Americans already had a stake in the Japanese invasion of China since they had relatives and family members who they continued to send remittances to. However, many Chinese Americans were also concerned about the situation because they believed that the discrimination they faced in America was linked to

43. YU, *supra* note 40, at 77–79.

44. *Id.*

45. *Id.* at 77–79.

46. *Id.* at 77–80.

China's international reputation as a weak and backwards country. To that end, they enthusiastically supported any sort of reform that would improve China's international status and turn it into a world power, such as Sun Yat-sen's revolution in 1911. Indeed, as the United States press mocked China's state of chaos during the 1930s, people in the United States also humiliated Chinese Americans. As a result, many Chinese Americans believed that the public humiliation of China amplified the discrimination that they faced in America.⁴⁷ This made it challenging for Chinese Americans to sympathize with Japanese Americans.

Just like the press played a crucial role in influencing responses to the Japanese American incarceration, so too did the press influence and lead the anti-Japanese movement. The Chinese left newspaper *The Chinese Vanguard* scrutinized donations that the Chinese Consolidated Benevolent Association collected, questioning whether they were going to the KMT party and their policy of nonresistance or the Chinese troops fighting the Japanese soldiers.⁴⁸ *The Chinese Vanguard* became such a thorn in the side of the KMT that they banned the paper and denounced its readers as Communists, and allegedly sent agents to surveil the organization.⁴⁹

Japanese aggression in China culminated with the Nanking Massacre in 1938. The Japanese organized a three-prong attack against the city of Nanking, which was led by Nakajima Kesago, Matsui Iwane, and Yanagawa Heisuke. The three forces destroyed villages and cities on the way to Nanking, including cutting the population of Suchow (present day Suzhou) from 350,000 to only under 500. As Japanese troops entered Nanking, they were given the order to kill all Chinese captives.⁵⁰ Although the 50,000 Japanese soldiers were outnumbered by about 90,000 Chinese troops and over 500,000 civilians, the Chinese soldiers provided little resistance.⁵¹ Many of them had thrown away their weapons while attempting to flee the city, so they surrendered in hopes for better treatment. This allowed the Japanese forces to easily execute the surrendering Chinese soldiers *en masse*. The Japanese army also killed Chinese civilians as they conducted door-to-door searches for Chinese soldiers.⁵²

American journalists played a huge role in shaping Western response to the Nanking Massacre. Frank Tillman Durdin of the *New York Times*, Archibald Steele of the *Chicago Daily News*, and C. Yates McDaniel of the

47. YU, *supra* note 40, at 119–21.

48. *Id.* at 39.

49. *Id.* at 80.

50. CHANG, *supra* note 41, at 35–38.

51. *Id.*

52. *Id.* at 42–47.

Associated Press all reported on the Japanese attack on Nanking.⁵³ Some actively participated in their own stories, such as McDaniel, who guarded the embassy from Japanese soldiers, spent hours retrieving well water for Chinese servants of the embassy who were hiding there, and attempted to locate missing relatives. McDaniel solemnly wrote, “My last remembrance of Nanking—dead Chinese, dead Chinese, dead Chinese.”⁵⁴ After foreign correspondents left, the Japanese army prevented any reporters from entering the area and began issuing propaganda about Nanking.⁵⁵

The Chinese Hand Laundry Alliance (CHLA) conducted a fundraising campaign prior to and following the Nanking Massacre. Chinese hand laundries collected money in donation boxes across New York City, and the CHLA used those funds to purchase four ambulances to send to China. The CHLA’s ambulance campaign demonstrates the unique way that Chinese Americans were influenced by Japanese aggression in China. The ambulances’ practical value was minimized due to the guerilla warfare in China, but the campaign provided other benefits. For example, as the ambulances were paraded at rallies in support of China, they became powerful symbols of US-China relations and persuaded white Americans to support China. Furthermore, the campaign served to counteract stereotypes of Chinese people as passive and disorganized, and instead portrayed Chinese Americans as a united, proactive, and advocating force.⁵⁶ The campaign demonstrates how Chinese Americans’ desire to improve their lives in the face of discrimination was a powerful motivating force in the anti-Japanese movement.

Their campaign showed success in both respects. The President of the Borough of Manhattan, Stanley M. Isaacs, expressed his support for China by lauding the “gallant struggle of the Chinese people for national freedom,” which contrasted the negative stereotypes of Chinese people as immoral. Also, by late 1938, the United States government began to support China against Japan, supported by reports of the brutal Japanese attack on Nanking and other parts of China.⁵⁷

Chinese American Support for Japanese Americans

Prior to World War II, there were a handful of examples of Chinese Americans and other minority groups working with Japanese Americans. At

53. Suping Lu, *The Nanjing Atrocities Reported in the U.S. Newspapers, 1937-38*, READEx REPORT (Apr. 2012) <https://www.readex.com/readex-report/nanjing-atrocities-reported-us-news-papers-1937-38>.

54. CHANG, *supra* note 41, at 144–46.

55. *Id.* at 147, 149.

56. YU, *supra* note 40, at 102–04.

57. *Id.* at 113–14.

a convention in April 1929 for the New Americans Citizens League, a precursor to the Japanese American Citizens League (JACL), two Chinese American speakers expressed their support for Chinese and Japanese American solidarity. Kenneth Fung, secretary of the Chinese American Citizens League, congratulated the budding group on their success and called for stronger ties between the two organizations. Victor Kwong, a San Francisco journalist, discussed his desire for cooperation in Asia as a stepping stone for both world peace, and discussed how Chinese and Japanese people in America faced similar issues of discrimination. Neither of these speeches were met with much fervor, indicating that pan-Asian and interracial solidarity proposals were both rarely offered and not necessarily received well.⁵⁸

Likewise, during World War II, there were limited examples of Chinese Americans supporting Japanese Americans. The Chinese Workers Mutual Aid Association actively refused to wear “I am Chinese” and similar buttons, on the basis that many Japanese people were pro-China and anti-Axis, and they wanted to show solidarity with these people.⁵⁹

Although there are limited examples of Chinese American solidarity with Japanese Americans, some Chinese Americans started to reflect on their relationships with other minority groups. In Xiao Lin’s *We and the Oppressed Nations*, published in the *China Daily News* in the 1940s, Lin called for unity with Black and Jewish communities, paralleling the types of discrimination they face.⁶⁰ He contrasted the criticism of Harlem as “full of thieves” with Chinatown as a “den of vice,” categorizing both remarks as deliberate exaggerations by anti-Black and anti-Chinese newspapers.⁶¹ Lin also remarked that both Jewish and Chinese people are negatively stereotyped as “cunning and stingy.” Both communities had also expressed support towards China’s resistance to Japan, so Lin called for reciprocal unity with these other “oppressed nations” over their struggles against discrimination.⁶² The Chinese Hand Laundry Association included Black organizations as part of their “people’s diplomacy” community outreach, working with organizations in Harlem.

Another example of Black-Chinese solidarity came in response to a Black boycott of Chinese restaurants in Washington DC due to discrimination against Black customers. The *Chinese Daily News* responded by publishing two editorials calling for the discrimination to end and urging Chinese Americans to support local Black communities, especially because

58. BILL HOSOKAWA, JACL IN QUEST OF JUSTICE 30–31 (1982).

59. WONG, *supra* note 25, at 80.

60. YU, *supra* note 40, at 119–21.

61. *Id.*

62. *Id.*

Black leaders and the Black press were sympathetic to China and donated money to the resistance against Japan. Liu Liangmo wrote a special column in the Black newspaper *Pittsburgh Courier* criticizing Chinese leaders “who dared not speak out for the struggle of Blacks for justice and equality because they did not want to offend the Southern politicians who oppressed Blacks.”⁶³ Their analysis drew a connection between international affairs and racial politics in the United States. These efforts, despite their limitations, indicated a self-awareness towards the benefits and importance of solidarity with other communities of color. However, although some Chinese leaders were interested in working with Black communities, the Japanese invasion of China made it more challenging to sympathize with Japanese Americans.

Korean American Response to the Japanese American Incarceration

Although there are many similarities in how Chinese Americans and Korean Americans responded to the Japanese American incarceration, Korean American responses differed due to Korea’s colonial relationship with Japan. Because Korea was subject to Japanese occupation since 1910, Korean immigrants were considered Japanese subjects and therefore classified as enemy aliens by the United States.⁶⁴ The association of Japanese and Korean people was reflected in anti-Korean sentiment in the United States, such as the formation of the Japanese and Korean Exclusion League⁶⁵ in 1905.⁶⁶ Many Korean Americans not only resented being associated with their colonizer, but they also resented being physically mistaken for being Japanese. One Korean American remarked, “For years we’ve been fighting the Japanese and now they tell us that we’re Japs. It’s an insult and we refuse to be so classified!” Like the Chinese Americans who wore pins that asserted their Chinese ethnicity, so too did Korean Americans’ desire to not be physically misidentified. In an account of her daily bus ride, one Korean woman lamented, “Everyone looks at me as though I’m Japanese and I feel so mad and guilty because I can’t change my face, and I have no way to tell them I’m just the opposite of Japanese.” In response to Korean American protest, the Department of Justice removed restrictions on enemy aliens who were subjects of the Axis Powers, but this only applied to Korean Americans

63. YU, *supra* note 40, at 121–23.

64. Lili M. Kim, *The Limits of Americanism and Democracy: Korean Americans, Transnational Allegiance, and the Question of Loyalty on the Homefront During World War II*, 29 *AMERASIA J.* 79, 80 (2004).

65. The Japanese and Korean Exclusion League later became the Asiatic Exclusion League in 1907, to include South Asians and Chinese immigrants.

66. PEREA ET AL., *supra* note 7, at 410.

in the continental United States, Puerto Rico, and the Virgin Islands, and excluded the vast majority of Korean Americans who lived in Hawaii.⁶⁷

In contrast with efforts by the US media and military to distinguish Chinese Americans from Japanese Americans, the Military Governor of Hawaii justified the enemy alien status of Korean Americans in Hawaii under the guise of national security. One official argued that, “Koreans as a class are . . . shrewd and unscrupulous opportunists who have been used as spies by the Japanese in the past. . . .”⁶⁸ Another argued that it was impossible to physically distinguish Korean people from Japanese people, and that there was a risk that Japanese people who spoke Korean might try to represent themselves as Korean.⁶⁹ Even the motivations of Korean people were seen as suspect. Whereas Chinese American support of the war effort was celebrated, Korean Americans were accused of using the war effort to support the movement for Korean independence, with one field reporter remarking that Koreans were “taking advantage of the present emergency to harp on the desire for independence.”⁷⁰

These arguments highlight the ulterior motives behind the shifting racialization of Asian Americans. Motivated by the alliance between the US and China, the media distanced Chinese people from previous racial caricatures and stereotypes, and invented pseudo biological differences between Chinese and Japanese people. By contrast, Korean people were lumped with Japanese people and did not receive the same benefit, and their issues were viewed unsympathetically because they did not directly benefit the United States. The United States would continue to change the way it racialized these ethnicities following World War II.

Filipino American Responses to the Japanese American Incarceration

Filipino Americans shared similarities with both Chinese Americans and Korean Americans in their response to the Japanese American incarceration. Like the Chinese Americans who wore buttons asserting their Chinese ethnicity, Filipino Americans also wore buttons that said “I am Filipino.” Bob Santos recalled that he had to wear these buttons for his own safety. For example, in the first grade, he and his Filipino classmates were harassed by classmates and adults for being “Japs.”⁷¹

Filipino Americans, like Korean Americans, also had to negotiate a colonial relationship with Japan. Japanese forces invaded and took control

67. Kim, *supra* note 64, at 80, 83.

68. Kim, *supra* note 64, at 84.

69. *Id.*

70. *Id.* at 84–86.

71. KAREN L. ISHIZUKA, *SERVE THE PEOPLE: MAKING ASIAN AMERICA IN THE LONG SIXTIES* 40 (2016).

of the Philippines on December 8, 1941, one day after Pearl Harbor. Japan then established a puppet government in the Philippines. Filipino Americans spurned these invasions, and they sought to demonstrate their loyalty to the United States. For some, they expressed this via decorated military service, comprising some of the over 260,000 Filipino Americans who fought in World War II for the United States and later received Congressional Gold Medals for their sacrifices.⁷² Others resorted to anti-Japanese violence, such as incidents in Los Angeles of Filipino Americans physically attacking local Chinese Americans who they mistakenly thought were ethnically Japanese.⁷³

African American Responses to the Japanese American Incarceration

Black newspapers were among the few institutions of color that opposed the mass incarceration of Japanese Americans. Langston Hughes, as a columnist for the African American newspaper the *Chicago Defender*, wrote, “What has happened lately to the American Japanese and what has happened all along to us, puts American Negroes and American Japanese in the same boat.” The *California Eagle* in Los Angeles criticized the incarceration as the “greatest disgrace of Democracy since slavery.” Evoking lynching, the *Northwest Enterprise* in Seattle wrote, “The same mob spirit which would single them [Japanese Americans] out for slaughter has trailed you through the forest to string you up at some crossroad.”⁷⁴ In all three examples, African American writers drew direct parallels between the discrimination that Japanese Americans and African Americans faced.

Conversely, Japanese Americans who were imprisoned in the Jerome and Rohwer concentration camps in Arkansas were able to witness firsthand racism in the Jim Crow South. Asian American activist Yuri Kochiyama, who was incarcerated in Jerome, witnessed segregation between blacks and whites while performing a play that she composed to white audiences outside of the concentration camps. Witnessing this segregation may have influenced her later involvement in Afro-Asian solidarity.⁷⁵

72. Chris Fuchs, *Congressional Gold Medal for Filipino World War II Vets is an Honor ‘75 Years in the Making’*, NBC NEWS (Oct. 25, 2017, 4:13 PM), <https://www.nbcnews.com/news/asia-america/congressional-gold-medal-filipino-world-war-ii-vets-honor-75-n814436>.

73. WONG, *supra* note 25, at 81.

74. ISHIZUKA, *supra* note 71, at 43.

75. Cathlin Goulding, *Playing with History: A New Videogame Turns Its Focus on Japanese Internment Camps in the Racially Segregated South*, HYPHEN (Nov. 8, 2011), <https://hyphenmagazine.com/magazine/issue-24-survival-winter-2011/playing-history>.

Japanese American Solidarity with Other Communities of Color

Prior to World War II, there are a handful of instances with Japanese Americans worked with other communities of color. In the early 1890s, the indigenous Yakama Nation in Washington rented/leased land to early Japanese settlers, as they were not bound by the restrictions of the Alien Land Laws. Japanese immigrants helped to clear the land, dig irrigation canals, and establish farms. Japanese communities ended forming near several Yakama Reservation towns, including Yakima, Wapato, and Toppenish.⁷⁶ In Fresno, Dr. Yatabe united Japanese Americans, Armenian Americans, German Americans, and other minorities. Although there was only a small number of Japanese Americans, by uniting with other minority groups, they were able to advocate at city hall for better paving and street lighting in their neighborhood.⁷⁷

Several Japanese American solidarity efforts centered around labor. In Oxnard, Japanese Americans and Mexican Americans formed the Japanese-Mexican Labor Association (JMLA), one of America's first multiracial labor unions. On February 11, 1903, they conducted the first successful agricultural strike in Southern California, protesting reduced wages from the American Beet Sugar Company (ABSC). The American Federation of Labor (AFL) later issued a charter to formally recognize the JMLA as a union, but they barred membership to Chinese and Japanese workers. The Mexican American workers of the JMLA refused this restriction, sending back the charter unsigned. Unfortunately, the AFL refused to change their position, and a change in the labor contractor system forced the JMLA to dissolve.⁷⁸

In 1920 on the Hawaiian island of Oahu, Japanese and Filipino workers, along with some Spanish and Portuguese laborers, went on strike against the Hawaii Sugar Planter's Association. They succeeded in ending race-based wages, slightly increasing wages, and slightly improving worker housing and sanitation.⁷⁹ When the National Union of Marine Cooks and Stewards sought to bar Chinese and Japanese workers, Black and Asian workers fought back, forming the Colored Marine Employees Beneficial Association of the Pacific

76. Tammy Ayer, *Family Keepsakes Tell the Story of Japanese-American Life in Yakima Valley*, DISCOVER NIKKEI (Jan. 15, 2019), http://www.discovernikkei.org/en/journal/2019/1/15/family-keepsakes-tell-story/?fbclid=IwAR1c0bEzB6ZlbG0Qyu8ctQ-r_d9u6CaZT6GvlgPdoRY5SQAC9gBgW5uutuI.

77. HOSOKAWA, *supra* note 58, at 28.

78. Natasha Varner, *How Japanese and Mexican American Farm Workers Formed an Alliance that Made History*, PUBLIC RADIO INTERNATIONAL (Aug. 15, 2016, 9:30 AM), <https://www.pri.org/stories/2016-08-15/how-japanese-and-mexican-american-farm-workers-formed-alliance-made-history>.

79. Natasha Varner, *Strikers, Scabs, and Sugar Mongers: How Immigrant Labor Struggle Shaped the Hawai'i We Know Today*, DENSHO (Aug. 22, 2017), <https://densho.org/strikers-scabs-sugar-mongers-immigrant-labor-struggle-shaped-hawaii-know-today/>.

(CMEBA) to advocate for workers of color. After a 1934 maritime strike which consisted of both white workers and workers of color, the CMEBA merged with the National Union of Marine Cooks and Stewards, eventually turning the union into majority people of color by the 1950s.⁸⁰ Though these victories were important, they did not translate into widespread opposition against the Japanese American incarceration.

In some instances, these alliances were merely temporary. In the early 1900s-1910s, Greek and Japanese miners banded together, as both groups were assigned dangerous dynamiting jobs, and shared the hobbies of gambling and wrestling. Their dangerous working conditions as well as being banned from the Western Federation of Miners union spurred both groups into collective action. However, once the Western Federation of Miners began to admit Greek miners to strengthen its anti-Asian and anti-Mexican position, Greek miners neglected to advocate for their former Japanese American allies. Though Japanese and Greek miners shared common goals, the Western Federation of Miners was able to divide the two groups based on race, specifically the Greeks' proximity to whiteness. This response would parallel the US government's World War II policy of incarcerating Japanese Americans as opposed to the "white" German and Italian Americans.

Other Efforts to Support Japanese Americans

The National Japanese American Student Relocation Council (NJASRC) was created by the War Relocation Authority (WRA) to facilitate the resettlement of Japanese American college students. It was led by the American Friends Service Committee (AFSC), an organization founded by Quakers that began to tackle racial issues in the mid 1920s. The Council had to navigate organizational dynamics both within and outside of the concentration camps. Inside the camps, the Council had to handle changing policies on military criteria for release and which universities were available for Japanese American students. Sometimes even individual administrators and high school teachers discouraged Japanese Americans from pursuing higher education. However, other high-ranking government officials, such as Secretary of War John J. McCloy and Assistant to the Secretary of the

80. *Waterfront Workers History Project: Marine Cooks and Stewards*, HARRY BRIDGES CENTER FOR LABOR STUDIES – UNIVERSITY OF WASHINGTON, http://depts.washington.edu/dock/marine_cooks.shtml (last visited Mar. 30, 2019).

81. ISHIZUKA, *supra* note 71, at 176–77.

Navy Adlai Stevenson, helped to smooth the process of approving students for release.⁸²

Outside the camps, the NJASRC faced several financial and logistical difficulties. Although the AFSC and the government provided some funding, the Council relied on foundations, such as the Carnegie Corporation and the Columbia Foundation, church mission boards, as well as fundraising efforts within the camps to provide funding for administrative costs and student scholarships. The Council worked with a number of organizations—including churches, local Young Men’s Christian Associations and Young Women’s Christian Associations (YMCA and YWCA), as well as supportive college administrators and faculty—to find schools open to Japanese Americans and help support students transitioning to new communities. Both Japanese American students and the government saw resettled students as “ambassadors of good will” who could help pave the way for other students and Japanese Americans to be released from the concentration camps. However, Japanese Americans often took this one step further—Japanese Americans saw themselves not just as ambassadors of good will, but also as ambassadors of multiculturalism. They resisted pressure to assimilate and instead promoted their Japanese American culture and heritage.⁸³

Governor Ralph Carr of Colorado was one of the few politicians to directly speak out against the Japanese American incarceration. Carr came to know the Japanese and Japanese American communities living in Denver and the San Luis Valley in Colorado, which had increased due to the lack of an alien land law preventing non-citizens like Japanese immigrants, who were barred from becoming citizens, from owning land.⁸⁴ When the War Department asked Western governors about establishing concentration camps for Japanese Americans, Carr was the only one who said yes, but on the basis that if Japanese Americans were going to be incarcerated, they should still be treated fairly. In response, nearly 2000 Japanese Americans traveled to Colorado in early 1942 to avoid being formally imprisoned in concentration camps. Carr received hate mail and threats for his support of Japanese Americans, and his actions ultimately cost him his political career. Carr lost his Senate race in 1942 to Democrat “Big” Ed Johnson, who criticized Carr’s support of Japanese Americans as part of his campaign.⁸⁵

82. Allan W. Austin, *National Japanese American Student Relocation Council*, DENSHO ENCYCLOPEDIA, http://encyclopedia.densho.org/National_Japanese_American_Student_Relocation_Council/ (last updated Apr. 16, 2014, 7:53 AM).

83. *Id.*

84. Gil Asakawa, *Resettlement in Denver*, DENSHO ENCYCLOPEDIA, http://encyclopedia.densho.org/Resettlement_in_Denver/ (last updated June 29, 2015, 9:04 PM).

85. Jesse Paul, *In Gov. Ralph Carr, Colorado has a Shining Light in the Painful History of Japanese Internment*, DENVER POST (Dec. 6, 2016, 12:01 AM), <http://www.denverpost.com/2016/12/06/ralph-carr-colorado-japanese-internment/>.

Japanese American religious organizations found support from neighboring religious organizations. For example, the Buddhist Church of San Francisco was able to return to their property after the war because it was maintained by neighboring Christian churches. Similarly, other Japanese American religious organizations, like the Pine United Methodist Church, were able to reopen after the war thanks to the support of neighboring churches.

The International Longshoremen's and Warehousemen's Union (ILWU) was also among the few organizations to speak out against the Japanese American internment. ILWU leader Louis Goldblatt, who later became the organization's Secretary-Treasurer, stated, "This entire episode of hysteria and mob chant against the native-born Japanese will form a dark page of American history. It may well appear as one of the victories won by the Axis powers." Many members were motivated by their commitment to solidarity with workers' rights and socialist or communist values of equality. The ILWU also defended Japanese members within its ranks. Japanese and Japanese Americans were among the Stockton, California chapter prior to World War II. When Japanese Americans released from the concentration camps attempted to join the Stockton division, they refused, and in response, Goldblatt along with ILWU President Harry Bridges revoked the Stockton division's charter until they offered membership to Japanese Americans.⁸⁶ This decision contrasts with the aforementioned Greek miners of the Western Federation of Miners who, once admitted into the union, did not advocate for their former Japanese allies. Continuing that trend, most labor organizations actively or implicitly supported the internment, due to economic jealousy towards Japanese Americans for taking their jobs.

Chinese Perceptions of Race and Racism

The way that race was and continues to be perceived in China is different than how race is perceived in the United States. Initially, Chinese perceptions of identity were focused more on ethnicity as opposed to race. The term *minzu*, sometimes translated as race and sometimes translated as nationality, could refer to a specific group of "Chinese" people, defined by supposed blood ties, kinship, or descent.⁸⁷ Some scholars have mused as to whether there are "no Asians in Asia," given that Asian American pan-ethnic identity developed as a result of how Asian Americans were collectively

86. Peter Cole, *When America Was Overcome with Anti-Japanese Xenophobia During WWII, One Union Fought Back*, IN THESE TIMES (Nov. 23, 2015, 5:00 PM), <http://inthesetimes.com/working/entry/18631/japanese-internment-world-war-ii-ilwu-labor-unions>.

87. Frank Dikotter, *Radical Identities in China: Context and Meaning*, 1994 CHINA Q. 404, 405-06 (1994).

racialized in the United States.⁸⁸ As discussed in the earlier Court cases like *Chae Chan Ping* and *Terrace*, Chinese Americans and Japanese Americans alike were grouped together and similarly spurned for their different languages, religions, and cultures, and seen as conniving, diseased, immoral, and unassimilable to the United States.

However, Chinese officials started to focus more on racial categories of analysis and identity in the late 1800s. Chinese reformers Liang Qichao and Kang Youwei created a racial hierarchy where “yellows” competed with “whites” at a higher level, above “browns,” “blacks,” and “reds.” Writer Tang Caichang asserted that “Yellow and white are wise, red and black are stupid; yellow and white are rulers, red and black are slaves; yellow and white are united, red and black are scattered.” These categories of race were further supported by dubious studies of anatomy. Chen Yucang, director of the Medical College of Tongji University and a secretary to the Legislative Yuan, asserted that cranial weight indicated the degree of civilization, and that “the civilized are somewhat heavier than the savages, and the Chinese brain is a bit heavier than the European brain.” Liang Boqiang argued that the Chinese race’s purity came from the blood’s “index of agglutination,” and the absence of body hair indicated a biological boundary separating the “Chinese race” from other races. These were contrasted with pseudo-scientific studies of black anatomy and physiology, such as the argument that the “black race” had a “rather long head . . . and a quite low forehead, so that their face is inclined towards the back,” which indicated “a shameful and inferior way of thinking.” These studies also entered school curriculum, with textbooks asserting that “[t]he yellow and white races are relatively strong and intelligent. Because the other races are feeble and stupid, they are being exterminated by the white race. Only the yellow race competes with the white race.”⁸⁹ In this way, perceptions of race in China were used to assert the dominance of the “Chinese race” over other races.

Even the notion of Asians as a “yellow” race arguably comes from a position of dominance or positive association. Yellow was seen as a positive symbol of imperial nobility, as it was the color of the “Yellow Emperor” of the Middle Kingdom, who was thought to have originated from the valley of the Yellow River. Noble people were said to have been made from “yellow mud” in contrast to “vulgar rope.”⁹⁰ For many Chinese scholars, the categorization of being a “yellow race” was seen as positive rather than negative.

88. Frank H. Wu, *There Are No Asians in Asia, Are There?*, HUFFPOST (May 5, 2014, 8:44 PM), https://www.huffpost.com/entry/there-are-no-asians-in-as_b_5392390.

89. Dikotter, *supra* note 87, at 407–08.

90. *Id.* at 410.

This hierarchy bares many similarities to how race is contemporarily constructed in the United States, in which Asian Americans, previously perceived as degenerate and immoral, were propped up as a “model minority” after World War II. This perception creates a wedge between Asian Americans and African Americans or Latinx Americans based on the misguided argument that if Asian Americans can succeed in spite of being a minority group, then so can African Americans and Latinx Americans. This argument minimizes the types of discrimination that Asian Americans, African Americans, and Latinx American communities all collectively and individually face.⁹¹

Because of the similarities in how race is perceived in China and the United States, it might have been easier for Chinese Americans and Japanese Americans to find common ground on the types of discrimination they faced for their collective racial identity. However, many Chinese scholars seem to use the phrases “yellow race” and “Chinese race” almost interchangeably, or use the phrase “yellow race” to refer to Chinese people. This indicates an analysis of identity that is both racial and ethnocentric. This ethnocentric perception of identity may have contributed to the difficulty in forming coalitions between Chinese Americans and Japanese Americans.

Contemporary Parallels

Islamophobia in the United States increased in the wake of the attack on the World Trade Center and the Pentagon on September 11, 2001 by the terrorist organization al-Qaeda. Hate crimes against Muslims or those perceived to be Muslim spiked, with 296 incidents reported to the FBI in 2001.⁹² These sentiments only increased further in 2013 due to the rise of the Islamic State of Iraq and Syria (ISIS), a terrorist organization whose roots can be traced by to al-Qaeda. In 2016, there were 127 reported Muslim victims of assault, surpassing the previous peak of 93 during 2001.⁹³ Because hate crime data is voluntarily submitted by law enforcement agencies, these numbers are likely undercounted.⁹⁴ One example of these increased hate crimes against Muslims or those perceived to be Muslim happened on February 22, 2017 in Olathe, Kansas. Adam Purinton, a white American

91. Kat Chow, *'Model Minority' Myth Again Used As a Racial Wedge Between Asians and Blacks*, NPR: CODE SWITCH (Apr. 19, 2017, 8:32 AM), <https://www.npr.org/sections/codeswitch/2017/04/19/524571669/model-minority-myth-again-used-as-a-racial-wedge-between-asians-and-blacks>.

92. Katayoun Kishi, *Assaults Against Muslims in U.S. Surpass 2001 Level*, PEW RESEARCH CENTER (Nov. 15, 2017), <http://www.pewresearch.org/fact-tank/2017/11/15/assaults-against-muslims-in-u-s-surpass-2001-level/>.

93. *Id.*

94. *Id.*

man, shot two Indian men, Srinivas Kuchibhotla and Alok Madasani, killing the former. Prior to shooting them, Purinton yelled, “[G]et out of my country.”⁹⁵ This growing discrimination against Muslims is also reflected at the policy level. In response to growing concerns about ISIS, President Donald Trump in December 2015 proposed a travel ban on Muslim-majority countries and defended this policy by alluding to the Japanese American internment camps. He argued that, “What I’m doing is no different than FDR,” referring to President Franklin Delano Roosevelt’s signing of Executive Order 9066.⁹⁶ He later implemented this travel ban against seven Muslim-majority countries on January 27, 2017.⁹⁷ Trump’s anti-Muslim rhetoric stands in stark contrast to President Bush. Bush similarly implemented programs which negatively affected American Muslims, such as the National Security Entry-Exit Registration System (NSEERS), which required noncitizens from predominantly Muslim majority countries to register. However, he also refused to condemn Muslims as a whole. In a speech following the September 11 attacks, he stated, “The enemy of America is not our many Muslim friends.”⁹⁸ The rise of Islamophobia parallels the rise of discrimination against Japanese Americans during World War II.

The discrimination that early South Asian immigrants to the United States faced also parallels the discrimination that Japanese Americans faced prior to World War II. South Asians were the target of economic racism. For example, in 1907, white residents of Bellingham, Washington rioted against South Asian migrant workers who worked in the lumber mills, most of them Sikh and Hindu, and imprisoned them in the basement of the local city hall. South Asian immigrants, like Japanese immigrants, were also seen as unassimilable. The Bellingham Herald declared that, “The Hindu is not a good citizen. It would require centuries to assimilate him, and this country need not take the trouble.” The law prevented South Asians, like Japanese Americans and other Asian Americans, from naturalizing and becoming citizens.⁹⁹

95. Mark Berman & Samantha Schmidt, *He Yelled ‘Get Out of My Country,’ Witnesses Say, and then Shot 2 Men from India, Killing One*, WASH. POST (Feb. 24, 2017), https://www.washingtonpost.com/news/morning-mix/wp/2017/02/24/get-out-of-my-country-kansan-reportedly-yelled-before-shooting-2-men-from-india-killing-one/?utm_term=.17ea96db95d3.

96. Meghan Keneally, *Donald Trump Cites These FDR Policies to Defend Muslim Ban*, ABC NEWS (Dec. 8, 2015, 10:01 AM), <http://abcnews.go.com/Politics/donald-trump-cites-fdr-policies-defend-muslim-ban/story?id=35648128>.

97. *Timeline of the Muslim Ban*, ACLU WASH., <https://www.aclu-wa.org/pages/timeline-muslim-ban> (last visited Mar. 30, 2019).

98. *Transcript of President Bush’s Address*, CNN (Sept. 21, 2001, 2:27 AM), <http://edition.cnn.com/2001/US/09/20/gen.bush.transcript/>.

99. DEEPA IYER, WE TOO SING AMERICA: SOUTH ASIAN, ARAB, MUSLIM, AND SIKH IMMIGRANTS SHAPE OUR MULTIRACIAL FUTURE 9–10, 133 (2015).

Victims of this type of racial discrimination in the present day have created new categories to recognize their shared experiences. Indians, Pakistanis, Bangladeshis, Nepalis, and Sri Lankans began to identify as “South Asian,” especially those who were the children of post-1965 immigrants. In addition, the political identity “AMEMSA” was formed to highlight the shared experiences of Arab, Middle Eastern, Muslim, and South Asian communities.¹⁰⁰ This categorization is incredibly broad—the term itself encompasses two geographies (Middle Eastern, South Asian), an ethnicity (Arab), and a religion (Muslim). Furthermore, any one of these identities is incredibly varied in terms of socioeconomic status, language proficiency, immigration status, education, and other factors. Nevertheless, the groups share common experiences regarding racial profiling and government surveillance, and despite their differences, they are often racialized under the same lens, especially due to being perceived as Muslim.¹⁰¹ However, members of these groups, rather than highlight their non-Muslim identity, have instead expressed solidarity with Muslims and spoken out against racial discrimination. For example, when Jagmeet Singh, a Canadian politician who identifies as Sikh, was heckled by an anti-Muslim protestor, he declined to clarify his religious identity, and said, “While I’m proud of who I am, I purposely didn’t go down that road because it suggests their hate would be OK if I was Muslim.”¹⁰² Individuals like Singh recognize that distancing themselves from Muslims is an ineffective strategy because it does not prevent them from being discriminated against.

American Muslims have also received support from Japanese Americans, who were among the first to speak out against anti-Muslim hate. After the September 11 attacks, Fred Korematsu, who protested the constitutionality of the internment in *Korematsu v. United States*, spoke out against racial profiling, stating, “No one should ever be locked away simply because they share the same race, ethnicity, or religion as a spy or terrorist. If that principle was not learned from the internment of Japanese Americans, then these are very dangerous times for our democracy.”¹⁰³ Other Asian American organizations have also spoken out against anti-Muslim discrimination. In 2016 at the National Japanese American Memorial to

100. IYER, *supra* note 99, at 94.

101. AMEMSA Fact Sheet, ASIAN AMERICANS/PACIFIC ISLANDERS IN PHILANTHROPY (AAPIP) (Nov. 2011), <https://aapip.org/sites/default/files/incubation/files/amemsa20fact20sheet.pdf>.

102. Amara McLaughlin, *Jagmeet Singh Praised for ‘Calm and Positive’ Reaction to Anti-Muslim Heckler*, CBC NEWS (Sept. 11, 2017, 6:21 PM), <http://www.cbc.ca/news/canada/toronto/jagmeet-singh-stands-against-hate-1.4284473>.

103. *Fred Korematsu: Why His Story Still Matters Today*, AL JAZEERA (Jan. 31, 2017), <http://www.aljazeera.com/indepth/features/2017/01/fred-korematsu-story-matters-today-170130133315836.html>.

Patriotism in Washington D.C., the Japanese American Citizens League (JACL) joined a number of National Council of Asian Pacific Americans (NCAPA) organizations to express solidarity with Muslim, Sikh, Arab, and South Asian communities.¹⁰⁴

The rise in Asian American solidarity can be traced back to the Third World Liberation Front (TWLF), where students at San Francisco State University and the University of California, Berkeley pushed for Asian American studies, recognizing the shared history of discrimination among Asian American ethnicities. The murder of Vincent Chin, a Chinese American automobile worker who was murdered because he was mistaken as Japanese, also prompted a rise in people identifying as Asian American, due to the recognition that Asian Americans, regardless of ethnicity, experience similar forms of discrimination in being seen as perpetual foreigners.

However, some of the interethnic conflicts from World War II remain. The creation of a “comfort women” memorial in San Francisco, for the about 200,000 women from Asian countries including China, Korea, and the Philippines, evoked both support and opposition from members of the Japanese American community. Some Japanese American leaders feared that the memorial would lead to a backlash against Japanese Americans,¹⁰⁵ whereas others supported the memorial, drawing a connection between the incarceration of Japanese Americans and the human rights violations that the comfort women faced.¹⁰⁶

Solidarity for the AMEMSA community is not uniform across Asian Americans. Even though South Asians are just as likely to consider themselves as Asian American compared to other ethnicities, 15% of Asian Americans would not classify Indian Americans as Asian Americans, and 27% of Asian Americans would not classify Pakistani Americans as Asian Americans.¹⁰⁷ Even the term “AMEMSA” has not become widespread within AMEMSA communities. Many people identify only by their country of origin or faith, and the term is primarily used by organizations to refer to shared experiences and policy goals following the September 11 attacks.¹⁰⁸

104. Priscilla Ouchida, *JACL Stands with Asian American Leaders to Rally Against Anti-Muslim Hate*, JAPANESE AMERICAN CITIZENS LEAGUE (Dec. 16, 2015), <https://jacl.org/jacl-stands-with-asian-american-leaders-to-rally-against-anti-muslim-hate/>.

105. Tomo Hirai, *S.F. Board of Supes Unanimously Passes ‘Comfort Women’ Memorial Resolution*, NICHIBEI (Oct. 1, 2015), <https://www.nichibei.org/2015/10/s-f-board-of-supes-unanimously-passes-comfort-women-memorial-resolution/>.

106. *‘Comfort Women’ Memorial Unveiled in San Francisco*, RAFU SHIMPO (Oct. 6, 2017), <https://www.rafu.com/2017/10/comfort-women-memorial-unveiled-in-san-francisco/>.

107. Alton Wang & Karthick Ramakrishnan, *Who We Count as Asian American: #BrownAsians*, AAPI DATA (Nov. 20, 2017), <http://aapidata.com/blog/who-we-count-as-asian-american-brownasians/>.

108. IYER, *supra* note 99, at 99.

Regardless of the barriers, solidarity for American Muslims from the Asian American and AMEMSA communities exceeds the support Japanese Americans received during World War II.

Takeaways

People of color have often been pitted against each other in order to uphold white supremacy. Asian Americans are often contrasted with other racial minorities. Chinese, Japanese, and Filipino immigrants were each successively bought in to break the strike of previous workers and maintain cheap immigrant labor. Justice Harlan, in his dissent in *Plessy v. Ferguson*, professed to uphold Black civil rights while simultaneously characterizing Chinese immigrants as barbaric foreigners. And the model minority myth has been used to highlight Asian Americans, especially East Asians, at the expense of other Asian ethnicities as well as Black and Latinx Americans.

By contrasting the Chinese American response to the Japanese American internment and incarceration with contemporary responses to Islamophobia, we can see what factors contribute to solidarity efforts among oppressed groups. An increased awareness of history stands out as a key factor. Knowledge of communities' histories of oppression and racial discrimination, and the connections between those histories and today, led to the creation of "Asian American" and other coalition identities, and made it easier for people to draw connections between the Japanese American incarceration and Islamophobia.