

AT THE INTERSECTION OF POST-911 IMMIGRATION PRACTICES AND DOMESTIC POLICIES: CAN KATRINA SERVE AS A CATALYST FOR CHANGE?

MICHÈLE ALEXANDRE*

First they came for the Communists, but I was not a Communist so I did not speak out. Then they came for the Socialists and the Trade Unionists, but I was neither, so I did not speak out. Then they came for the Jews, but I was not a Jew so I did not speak out. And when they came for me, there was no one left to speak out for me.¹

INTRODUCTION

One of the continuing challenges in our era is to find effective ways to unleash the otherwise silenced voices of oppressed groups. The Katrina disaster in the fall of 2005 accentuated the need for an honest analysis of the hidden strata of global poverty. This article investigates how the application of interest conver-

* B.A. Colgate University, J.D. Harvard Law School. Michèle Alexandre is an Assistant Professor of Law at the University of Memphis Cecil C. Humphreys School of Law. This essay is the result of a presentation at the 2005 Oxford Round Table in Oxford England in July 2005. The author thanks the University of Memphis Cecil C. Humphreys School of Law for funding her trip to the 2005 Oxford Round Table.

1. Martin Niemoeller, Jewish Virtual Library, *quoted in* ROBERT S. WISTRICH, *WHO'S WHO IN NAZI GERMANY* (Routledge Press 1995) (1982), <http://www.jewishvirtuallibrary.org/jsource/biography/niemoeller.html>.

Martin Niemoeller was a Protestant pastor born January 14, 1892, in Lippstadt, Westphalia. He was a submarine commander in World War I. He was anti-communist and initially supported the Nazis until the church was made subordinate to State authority.

In 1934, he started the Pastors' Emergency League to defend the church. Hitler became angered by Niemoeller's rebellious sermons and popularity and had him arrested on July 1, 1937. He was tried the following year and sentenced to seven months in prison and fined.

After his release, Hitler ordered him arrested again. He spent the next seven years in concentration camps in 'protective custody.' He was liberated in 1945 and was elected President of the Protestant church in Hesse and Nassau in 1947. He held the title until 1964. He was also a President of the World Council of Churches in the 1960's.

Niemoeller was a pacifist who spoke out against nuclear weapons. He is best known for his powerful statement about the failure of Germans to speak out against the Nazis . . . He died in Wiesbaden on March 6, 1984. *Id.*

gence and a redefinition of public purpose in redevelopment cases can help address racial stratifications in domestic and immigration policies. The article also uses the Katrina disaster to illustrate the mirror-effect of domestic and immigration policies on non-white groups both inside and outside of the United States. Ultimately, this article hopes to show that recognition of a race/class pattern in these two spheres can lead us not only to prevent Katrina-like disastrous treatment of non-whites in the United States but at the borders as well. Technological advances and international business dealings all confirm that borders are fast becoming illusive demarcations and that domestic decisions made in one country often have resounding effects in another. Such is the case with the implementation of race/class based policies in the United States. The treatment of non-whites in the United States has influenced the United States' immigration policies and dealings with majority non-white countries. Such race/class based dealings in turn often causes an influx of immigration to the United States, which in turn result in the proliferation of race/class based practices, which themselves fortify the adherence to race-class based policies in domestic arenas. Thus, this vicious cycle forever continues.

The race/class issues that already underlie the discourse of post-Katrina redevelopment and immigration efforts reveal the necessity for immediate implementation of inclusive and non-oppressive stratagems. The rebuilding of New Orleans should force governmental entities and the United States at large to determine how to balance the desire for economic gain that underlie redevelopment efforts and the needs of the poor populations in these areas who ordinarily are displaced by these same efforts due to lack of financial resources. While post-redevelopment displacement of poor communities is not unusual in the United States, the New Orleans effort has afforded us with the momentum to address this issue. The Katrina disaster also gives us the opportunity to lend a voice to otherwise voiceless groups by taking advantage of the sustained, even if dwindling, national attention given to poor communities in New Orleans.

This article is divided into four sections. Part one demonstrates the ways in which immigration policies have perpetuated a hierarchical race-class based structure, thereby creating a vicious cycle of oppression and subordination. Parts two and three offer suggestions as to how an interest convergence theory and a redefinition of public purpose can help ameliorate policies in both domestic and immigration spheres. Part four offers suggestions as to how to encourage a more honest debate about the effect of race and class on domestic and immigration policies and part five concludes.

I. PARALLELS BETWEEN THE TREATMENT OF NON-WHITES
DURING THE KATRINA DISASTER AND THE TREATMENT OF
NON-WHITES IN IMMIGRATION SETTINGS

The events surrounding the Katrina disaster in September 2005² not only highlighted the race/class based hierarchy existing in the United States, but also perpetuated the idea of non-whites as sub-class citizens of the world inherent in American immigration policies. A dissection of the discourse surrounding the Katrina disaster showed an underlying commonality between the United States' immigration and domestic policies. This commonality was particularly exposed in comments that depicted New Orleans as foreign to the United States. Among these statements: "I cannot believe this is America"³ (uttered in shock at the sight of the New Orleans' disaster), "New Orleans is a scene from the Third World,"⁴ "U.S. Handles the crisis like a third world country,"⁵ and "bodies floating on water reminiscent of Africa"⁶ (description of the post-Katrina desolation). It is interesting that individuals were only able to make sense of the federal government's lack of response to New Orleans' needs in the first four days after the disaster by likening New Orleans to a foreign territory. Additionally these comments reveal a rapprochement between America's domestic policies and its immigration policies that should open the doors to a more honest discourse about race/class based American policies. This paper proposes to demonstrate how, using an interest convergence analysis, public purpose arguments can be used to overcome the race/class stratifications present in the application of immigration and domestic policies.

The perception of non-white immigrants as a suspect class has been heightened since September 11, 2001. Racial profiling facilitated by the Patriot Act has exacerbated the unequal treatment received by non-white immigrants at American borders. Similarly, the events in New Orleans have exposed a hierarchical system based on race and class. The initial reaction to the stranded poor populace in New Orleans during Katrina reveal systemic attempts to place the disaster in an immigration context. Placing these attempts in an immigration context rather than the

2. Hurricane Katrina was one of the most devastating storms in the United States. It displaced hundreds of thousands of people, killed hundreds and adversely affected the majority of New Orleans' black population who could not evacuate on time.

3. Mukoma Wa Ngugi, *New Orleans and the Third World*, COUNTERCURRENTS, Sept. 9, 2005, <http://www.countercurrents.org/us-ngugi090905.htm>.

4. *Id.*

5. *Id.*

6. *Id.*

actual and domestic context to which it belonged somehow helped to detach these disturbing events from what is generally viewed as the authentic American experience. These detachment efforts stem from the fact that generally mainstream Americans prefer to associate the United States with a country where all dreams are possible and where hard work is rewarded. Consequently, it was necessary for many individuals to categorize the New Orleans' victims of Katrina as "others"—as an inexplicable manifestation of failure amidst the apparent well-oiled machinery that is considered to be the United States.

On November 3, 2004, Reverend Danticat, an uncle of the Haitian writer Edwidge Danticatt, died while in custody of United States' Immigration at the Krome Detention Center.⁷ He arrived in the United States seeking political asylum armed with a valid U.S. visa.⁸ Reverend Danticat⁹ had a long history of visiting the United States since the 1970's. He spoke through a voice box and did not seem threatening.¹⁰ The immigration officers detained Mr. Danticat and confiscated his much needed medicine.¹¹ It is reported that "the popular Baptist minister died handcuffed to a hospital bed on November 3, five days after federal authorities confiscated his medicine, dismissing them as illegitimate and voodoo-like."¹² No sense of obligation was felt by the immigration officers or the government as no apology was issued.¹³

The treatment received by the stranded people in New Orleans strangely resembled the treatment that non-white immigrants, like Reverend Danticat, receive when attempting to enter the United States. During his detention, Mr. Danticat was stripped of his humanity and treated by the immigration officials as a non-human, an "alien" who was seeking benefits to which he was not entitled. Comparatively, the non-white residents of New

7. Leslie Casimir, *A Death in Custody: Homeland Security officials investigate treatment of novelist Edwidge Danticatt's Uncle, who died seeking asylum*, BLACK ISSUES BOOK REVIEW (Mar.-Apr. 2005), available at http://www.findarticles.com/p/articles/mi_m0HST/is_2_7/ai_n12937368.

8. *Id.*

9. Award-Winning Novelist Edwidge Danticatt Blasts "Discriminatory and Brutal" U.S. Asylum Policy in Death of Uncle (Democracy Now! radio broadcast, Dec. 1, 2004), available at <http://www.democracynow.org/article.pl?sid=04/12/01/1536230&mode=thread&tid=25>.

(Reverend's Danticat's name is apparently not spelled the same way as her niece, Edwidge Danticatt).

10. *Id.*

11. Casimir, *supra* note 7.

12. *Id.*

13. Nalo Hopkinson, *Writer Edwidge Danticatt's Uncle Dead in Custody of U.S. Immigration*, Jan. 6, 2005, available at <http://www.sff.net/people/nalo/writing/2005/01/writer-edwidge-Danticatts-uncle-dead-in.html>; David Adams, *Haitian pastor dies on U.S. doorstep*, ST. PETERSBURG TIMES ONLINE, Nov. 19, 2004, available at http://www.sptimes.com/2004/11/19/Worldandnation/Haitian_pastor_dies_o.shtml.

Orleans suffered from similar treatment in the first four days of the crisis. Overnight, New Orleans metamorphosed from one of the most cherished cities of the United States to being described as “third world-like,” a term which is usually charged with contempt and condescension. Time and time again commentators marveled that such misery was indeed taking place in America. President Bush himself used words that seemed to depict New Orleans as a foreign country. At various points, he described New Orleans as a “devastated country”¹⁴ and referred to residents of New Orleans as “the people of this part of the world.”¹⁵ During Katrina, the truth about the hierarchy of race and class in America was revealed to the world. Commentators were shocked at the New Orleans occurrence, but only a few were willing to denounce the event as a perpetuation of the United States race/class based domestic policies. Even fewer were willing to hold the United States accountable for implementing race/class based hierarchical structures that created poor communities like the ones in New Orleans.

The Katrina disaster and Danticat’s story are examples of how immigration and domestic policies serve to marginalize people of color in America. The common thread between immigration and domestic policies is that both serve to protect the interests of some at the expense of others. Unfortunately, these policies all reveal that the interests protected are often that of the white and rich at the expense of the non-white and the poor. The result of this dichotomy is a world where one class of people is openly celebrated and granted all available protections and where other unfortunate subclasses of people are either treated as invisible or as suspects.

This last dichotomy was clearly displayed in the events surrounding the Katrina disaster. The stranded New Orleans inhabitants were often portrayed as anomalies as many marveled at the fact that they could have ever lived in such poverty. In fact, former First Lady Barbara Bush was even quoted on CNN as remarking that the shelters to which the evacuees were transported probably provided better accommodations than the evacuees might have ever known in their former lives.¹⁶ To assume that life in an overcrowded shelter, with no privacy and no possessions, would be better than the lives the evacuees knew before Katrina denotes a complete de-valorization of them and their lives.

14. Ngugi, *supra* note 3.

15. *Id.*

16. *Elder Bush, Clinton team up again for relief effort: Former presidents create fund for hard-hit states*, CNN, Sept. 6, 2005, <http://www.cnn.com/2005/US/09/05/katrina.fund/index.html>. (Barbara Bush stating that the Houston shelter is “working very well” for the poor).

The media also contributed to the portrayal of the New Orleans' residents as "foreign" and "illegal." The media portrayed the stranded black occupants as suspects by labeling them as "looters" when they were seen in possession of grocery bags, in contrast describing white occupants as "finders" when seen in similar situations. In addition, some individuals used the criminal element that is necessarily present in all chaotic circumstances to imply that the New Orleans residents deserved their fate. The commentators never discussed how American policies have marginalized poor communities which would contextualize the chaos.

Mr. Danticat's experience is an example of how immigration policies have also served to marginalize non-white immigrants. Non-white immigrants are often perceived as suspects, while immigrants from majority white countries undergo less scrutiny. While national security and border protections are necessary goals, they should not be implemented via unequal and disparate practices. Increasingly, it seems that the need for protection in the United States has translated into a need for protection against non-whites, who are generally perceived as potential threats or viewed as potentially harboring anti-American sentiments. The Patriot Act¹⁷ further helped crystallize discriminatory policies inherent in American immigration policies. The racial profiling elements present in the implementation of the Patriot Act have been addressed in legal scholarship,¹⁸ but very few have denounced the Act's role in helping to concretize the hierarchy of white status as worthy of privilege and in need of protections against "second" and "third world" non-whites.

This categorization was not of course created after September 11, 2001. Stories of harassment and cruel treatment received by non-whites at immigration borders and by immigration agencies abound not only in the United States but also in other predominantly white countries. Many non-whites can recount stories of having been detained in U.S. immigration offices under suspicion of fraud despite having all the requisite papers for entry. These unnecessary detentions consist of hours, sometimes days of grueling questioning, nerve-racking waiting periods and abusive physical searches.

The cases of Haitian immigrants seeking asylum in the 1990s are perfect examples of the United States' exclusion of non-

17. Patriot Act, Pub. L. No. 107-56, 115 Stat 272 (2001).

18. See Raquel Aldana-Pindell, *The 9/11 'National Security' Cases: Three Principles Guiding Judges Decision-Making*, 81 OR. L. REV. 941 (2002). See also Lawrence M. Lebowitz & Ira L. Podheiser, *A Summary of the Changes in Immigration Policies and Practices After the Terrorist Attacks of September 11, 2001: The Patriot Act and Other Measures*, 63 U. PITT. L. REV. 873 (2002).

whites. In the 1990s, the United States refused to grant political refugee status to Haitians fleeing the mass killings occurring in Haiti after the overthrow of Aristide.¹⁹ Between 1992 and 1996, “the United States Coast Guard interdicted on the high seas, Haitians bound for the United States and returned them directly to Haiti.”²⁰ Subsequently in 1994, the United States was still “not allowing the Haitian migrants to enter to the United States, but was not returning them directly to Haiti.”²¹ During the same period, the United States granted asylum to Russians and other members of the former Soviet Union. The Haitians who attempted to enter the United States were detained in abusive conditions at Guantanamo Bay before being finally deported home.²² In contrast,

in August 1994, the United States “negotiat[ed] with the Cuban government to halt the flow of migrants to the United States. These diplomatic negotiations culminated on September 9, 1994, in an accord with the Cuban government. In this accord, the United States agreed . . . [that] a minimum of 20,000 persons are to be allowed to the United States each year, not including immediate relatives of American citizens who are under no numerical restrictions.”²³

The granting of asylum to white Cubans at the time also demonstrated that the race/class based hierarchical structure is sometimes applied to make distinctions between non-whites. This distinction is often also guided by specific political agendas. For example,

[d]uring the 1980s, the government denied 97% of Salvadoran and 99% of Guatemalan asylum applications, in spite of the fact that there were civil wars raging in both countries. At the same time, the government routinely granted applications from people fleeing countries whose governments the Reagan Administration opposed, such as Nicaragua and Cuba.²⁴

A discussion of immigration policy necessitates an analysis of how these policies reduce the civil liberties of immigrants. For example, on August 12, 2002 the Justice Department issued regulations that required men residing in the United States on temporary visas from 25 predominantly Muslim countries (and North Korea) “to meet special registration requirements.”²⁵ The Rule

19. *Cuban Am. Bar Ass’n v. Christopher*, 43 F.3d. 1412, 1419 (11th Cir. 1995).

20. *Id.*

21. *Id.*

22. *Haitian Ctrs. Council v. Sale*, 823 F. Supp. 1028, 1033 (E.D.N.Y. 1993) (INS action violates due process where Haitians had a protected liberty interest).

23. *Cuban Am. Bar Ass’n*, 43 F.3d at 1418.

24. ACLU, Position Paper, *The Rights of Immigrants* (Sept. 8, 2000), available at <http://www.aclu.org/ImmigrantsRights/ImmigrantsRights.cfm?ID=12413&c=22>.

25. 67 Fed. Reg. 155 (Aug. 2002).

required selected immigrants to report to government officials 30 days after arrival, every 12 months after arrival, after every change of home or school address, and prior to leaving the country. These men were interrogated, fingerprinted, and photographed. This legislation did not result in location of terrorists, but instead, it allowed for easier deportation of nationals from the named countries on non-terrorist charges. The list of countries to which this regulation applies encompasses almost no predominantly white countries.

The requirement made, being a non-white and Muslim immigrant a crime, thereby making them a suspect class without any further evidence.²⁶ In addition, the broad powers awarded to the Attorney General via Section 411 of the Patriot Act allowed for the certification of individuals as threats to national security upon reasonable grounds to be determined by the Attorney General. Under Section 411 of the Patriot Act, once certified, detention is mandatory with no prior notice of arrest and no other recourse than a Habeas Corpus Motion and a Motion for Reconsideration. Under the same Section 411, the Attorney General is also able to expand the range of organizations or groups designated as a threat to national security.²⁷ These regulations defied the United Supreme Court's rulings that "the Constitution's guarantees apply to every person within U.S. borders, including aliens whose presence in this country is unlawful."²⁸

The persons who have been most adversely affected by these new rules are non-whites. A person who is not fully aware of the obligation to register or who, as immigrants do, regularly send money home, might be certified as a threat and detained under the vague guise of security even though there are no actual facts showing a national threat or risk of flight. Stories abound where immigrants have lost their businesses and have been forced out of the country because of vague allegations of financing terrorist organizations by virtue of having sent money home to their families. Since Section 412 of the Patriot Act does not require limiting certification or detention to persons who are believed to be dangerous or a flight risk, vague accusations of terrorist involvement is often enough to destroy an immigrant's dream of a better life

26. National Security Entry-Exit Registration System (NSEERS) (June 2002), available at http://usinfo.state.gov/is/Archive_Index/EntryExit_Registration_System.html; see also International Students and Scholars Office Notice, Brandeis University (Jan. 2004), available at http://www.brandeis.edu/isso/travel/NSEERS_After_December_2003.pdf.

27. Shirin Sinnar, *Patriotic or Unconstitutional? The Mandatory Detention of Aliens Under the USA Patriot Act*, 55 STAN. L. REV. 1419, 1422, (2003); see Aldana-Pindell, *supra* note 18. See also Lebowitz & Podheiser, *supra* note 18.

28. See ACLU, Position Paper, *supra* note 24.

in America.²⁹ The Patriot Act helped to further deepen the disparity between the treatment given to whites in immigration practices and that given to non-whites.

III. INTEREST CONVERGENCE AND PUBLIC PURPOSE REDEFINED: A UTILITARIAN JUSTIFICATION FOR REFORMS IN DOMESTIC IMMIGRATION POLICIES

While each sovereign nation must protect its borders, the need for protection does not mandate that the policies must be unjustly applied to specific groups of people. Changes in immigration practices and policies might be triggered by a more concentrated focus on the experiences of non-white immigrants under post-9/11 immigration policies. The constitutional challenges presented by academic scholars against the Patriot Act, and the work started by the Supreme Court in *Zadvydas v. Davis*³⁰ and *Rasul v. Bush*³¹ have started this process. In addition to utilizing these types of constitutional challenges, stories that highlight the disparate treatment between whites and non-whites should be collected, compiled, and disseminated nationally and worldwide. Such revelations might cause a greater numbers of American citizens to protest these measures and demand that immigrants be treated with the same procedural protections and equal treatment at the borders. Once individuals realize that stories like that of Reverend Danticat and the tortures of Abu Graib are not isolated incidents but rather common practices, they might be motivated to act. Compiling these stories might also force the leaders of countries to bargain for more equal treatment of their nationals. In other instances, private citizens might be able to help dismantle the veil of fear around immigration issues by bringing these stories en masse to news papers, weblogs, and courts in the form of lawsuits, thereby pushing the courts to continue the work they have started in *Rasul*³² and *Zadvydas*.³³

Additionally, there is a need for more stringent requirements when determining probable cause under Sections 411 and 412 of the Patriot Act. A new standard should require specific facts proving terrorist activities. As it currently stands, the Attor-

29. *Id.*

30. See *Zadvydas v. Davis*, 533 U.S. 678 (2001) (recognizing unlawful indefinite detention as unconstitutional under the Fifth Amendment Right to Due Process, applicable to aliens present in the U.S. regardless of the lawfulness of their presence).

31. See *Rasul v. Bush*, 542 U.S. 466 (2004) (conferring district court jurisdiction to hear Guantanamo Bay's aliens' Habeas Corpus cases).

32. *Id.*

33. See *Zadvydas*, 533 U.S. 678.

ney General's subjective standard is sufficient to detain a suspect. The proposed standard would require the Attorney General's objective "reasonable interpretation" of threat and would mandate that all detention procedures be highly scrutinized for possible violations of the immigrants' recognized Due Process rights.³⁴ In addition, there is a need for a more consistent waiver of immunity against governmental officials and entities who physically and legally violate the rights of immigrants in the U.S. without just cause.

The people in the United States are better situated and have the most resources to force the U.S. government to terminate the unequal treatment received by non-white immigrants in America. Government officials from the immigrant's home country often have little bargaining power with the United States. Accepting the unjust detention of immigrants of color under the guise of security would legitimize all unequal treatment based on race and discredit the work accomplished by the Civil Rights Movement. Not protesting the unequal implementation of immigration policies in the United States sends the message that disparate treatment of non-whites in the rest of the world is acceptable.

African Americans have a utilitarian reason to protest the unequal implementation of immigration. As the Katrina disaster has shown, these policies if maintained set the tone for domestic treatment of African Americans and other non-whites in the United States. Additionally, African Americans should also be concerned that these sweeping and unequal applications of these policies might, one day, infringe on their freedom of association and rights to privacy. As members of a suspect class, African Americans are often scrutinized for speaking against the status quo. They have historically been vocal about their dissatisfaction with United States' domestic and global policies and consequently are at risk under subjective policies promoting national security. Thus, an alliance between immigrants and African Americans would provide a stronger task force against these unfair immigration policies. The Katrina disaster revealed a need to hold authorities accountable for the ways in which decisions adversely impact poor, disenfranchised non-white communities. That task extends beyond accountability for treatment of non-white residents of the United States and should include accountability for treatment of non-white immigrants as well because every mistreatment of a non-white immigrant is a statement that a non-white's worth is minimal.

34. *Id.*

Finally, Americans in general have a vested interest in lobbying against discriminatory immigration policies. In the past few years, the implementation of these policies has had a detrimental effect on the international image of the United States. While world respect and acceptance might not seem like a valid concern for the United States now, a good international image should be reasonably cultivated, if only out of self interest, in case future needs for international coalition building arise.

IV. KATRINA, A POTENTIAL CATALYST FOR CHANGING THE RACE/CLASS DISCOURSE

The Katrina disaster highlighted the racial disparity present in the United States in a way that has not been done in a long time. Perhaps not since the Civil Rights Movement have Americans been called to question their perception of African Americans as well as the poor. In the aftermath of the Katrina disaster, it is appropriate to determine whether the race/class discourse commenced during the disaster can be used productively.

An honest dialogue about the effect of race and class on the lives of Americans would reveal that the majority of Americans are affected on some level by disparate policies. Consequently, there might be a vested interest for groups to ally themselves not only along racial lines, but also economic lines and commonalities. Applying Derrick Bell's "interest convergence theory,"³⁵ many white Americans might now find that their interest for governmental transparency and efficiency converge with the interests of non-whites in being treated equally. Katrina should also reveal that many white Americans have vested interests in making sure that economic measures benefit a larger group of Americans rather than a smaller number. Finally, white Americans also have a vested interest in ensuring that security measures are not targeting certain groups in a discriminatory manner but are instead narrowly tailored to provide protection without any abuses of power. If discriminatory application of policies were to be maintained, the discriminatory application could one day directly affect white Americans as well.

New Orleans demonstrated that a huge number of the American population lives well below the poverty level and that, more than ever, race and class are tightly linked. In the surge of generosity that followed the disaster, one hopes that the old tendency to view the victims of poverty as irresponsible, lazy, and deserving of their fate will now be seen as flawed. Post Katrina

35. Derrick A. Bell Jr., *Brown v. Board of Education and the Interest Convergence Dilemma*, in *CRITICAL RACE THEORY: THE KEY WRITINGS THAT FORMED THE MOVEMENT* 20 (Kimberlé Crenshaw et al. eds., 1995).

discussions of poverty should center on the elements that contribute to the disenfranchisement of the poor and on how those elements can be defeated.

The Katrina disaster is similar to the revelation that occurred at the release of Jacob Riis' *How the Other Half Lives*³⁶ at the turn of the twentieth century. Like Riis' book, Katrina exposed issues that have been evaded, masked or avoided for a long time. It provided an outlet for individuals to investigate the ways racial constraints still manifest themselves in today's society. Over forty years after the Civil Rights Movement, the Katrina disaster should trigger studies geared toward understanding all the ways in which race and class interconnect. In addition, inquiries should also investigate how to reach a balance between free trade and placing a higher burden on industries for providing adequate wages and benefits to employees.

Finally, in this era of globalization, the Katrina disaster connected not only people, but also countries and governments in an unprecedented way. In the wake of Katrina, many countries donated money and resources to the United States. A number of poor countries along with political rivals of the United States, such as Cuba, gave money or offered assistance. This caused a role reversal that hopefully will cause Americans to realize that the hierarchy promoted by immigration and international policies should be re-evaluated. During Katrina, international leaders put a halt on their personal feelings about the United States as a superpower and connected with Americans on a human level. These actions indicate the possibility of mending some strained international relationships through communication rather than harsh immigration policies.

V. CONCLUSION

The openness and generosity resulting from the Katrina disaster will hopefully help erode the stigmatization of non-whites as suspects and dangerous. Such stigmatization manifests itself in both immigration and domestic policies and creates a badge of inferiority for non-whites. The de-humanization that results from being detained and abused is paralyzing and fosters resentment. This is similar to the stereotyping of poor blacks as criminal or lazy which also engenders paralysis and resentment. Dehumanization creates a vicious cycle where the victim is blamed and feels disempowered. As a consequence, the actual cause of the economic inadequacy is never explored, thus never leading to a re-

36. JAMES A. RIIS, *HOW THE OTHER HALF LIVES* (Sam Bass Warner, Jr. ed., Belknap Press of Harvard 1970). (A book of photographs about the atrocious conditions in the cities and slums).

evaluation of the policies and regulations that might contribute to a certain groups' poverty. Despite this pattern, one is hopeful that the Katrina disaster will help break the cycle. Breaking the cycle of blame will help raise the consciousness of the nation so to motivate individuals to deal with these issues of race and class more honestly and productively.

