White Slavery and the Color Line: Redefining Sexuality in People v. Belle Moore

In the late nineteenth century, the United States were hit by what political activist Emma Goldman called “an epidemic of virtue” (192). This outbreak evolved into a national hysteria in the years preceding World War I, when some groups of Progressive reformers waged an unprecedented war against the ultimate evil of the so-called “White-Slave Traffic.”\(^1\) In the same years, despite the relatively small numbers of African Americans that were settling in northern urban areas, the beginning of the Black Migration represented a strongly perceived social challenge which supplemented the grievances of metropolitan life with the specter of interracial sexuality (Mumford 100). Against this social background, I wish to develop Kevin Mumford’s and Brian Donovan’s interpretations of the peculiar turn that the prostitution issue took in the years preceding WWI. Both scholars argue that the white slavery scare contributed to the re-establishment of a sexual color line while the Black Migration was enlarging its flow and the growing phenomenon of slumming was blurring the boundaries of traditionally segregated entertainment.

This article discusses and exemplifies how in Progressive Era New York, the agitation around white slavery became functional in carrying out adjudications and laws apparently meant to combat sexual exploitation, but which ended up setting standards of ethical sexuality that effectively re-implemented the color line and redefined feminine ideals while fostering the influence on State powers on the part of some private socialities. In this regard, I expand Mara Keire’s suggestion that the white slavery scare and its appendages may be ascribed to the metaphorical arsenal deployed in the Progressives’ critique “against trusts and their perceived control of the federal government” (“The Vice Trust” 7). In particular, I will second her hypothesis that anti-vice reformers voiced some private concerns by shaping a powerful legislative agenda. By interrogating the

\(^1\) I am here reporting the denomination of the phenomenon as it figured in the White-Slave Traffic Act of 1910, a Statute passed to counter a purported international trade of sexually enslaved girls. The expression “white slavery,” in all its variants, became a code word for forced prostitution in general. For a comprehensive survey on the dominant interpretations of the phenomenon, see Connelly and Rosen.
legal context through an analysis of the illustrative white slavery trial of 1910, *People v. Belle Moore*, I endeavor to show how the creative force of the metaphor “white slavery” overflowed from the social into the legal realm, and compounded the matter of the myth into hard legal substance—and in equally hard legal subjects.

While Donovan has proposed a reading of this case that considers its reverberations on discourses of gender, sexuality, and race from a sociological perspective, I will argue my interpretation through the dyad performance/performativity, since most of the case study unravels at the intersection of these categories. The different implications of the search for moral order, as well as their connection to the legal realm, will be analyzed by simultaneously considering the aspects pertaining to the production of crime through the employment of adjudication (that is through performative speech acts) and the dynamics triggered by the dramaturgical elements in the trial (that is the legal performance itself). My approach is performative; it posits assumptions of race and gender not only as objects but as instrumental forces of contingent legal formations; it challenges the binary reformers/reformed that often defines readings of the Progressive Era. The purpose is to illuminate the ambiguities of the cultural landscape swept by the administration of justice at a particular historical moment.

**From Crime Prevention to Crime Branding**

Between 1890 and 1910, the number of African Americans residing in New York City nearly tripled, and it increased further after the completion of the Panama Canal in 1914; however, with respect to the city’s inhabitants, by 1920 the black population only amounted to 2.7 percent (Osofsky 17−20). New York City and State presented, at least on paper, strong provisions against racial discrimination and the original Statute of 1873 guaranteeing “full and equal enjoyment of any accommodation...or places of public amusement,” was increasingly expanded in the following years up to 1909 (Fronc 102). Nonetheless, it became increasingly common, among private citizens, to consider the separation of races necessary for the restoration of a waning moral order. Quite symptomatically, despite the extensive civil rights code, by 1913 a series of restrictive measures against black citizens was propounded. Among them was the Carswell Act, a bill proposed—but not passed—with the intent to nullify marriages between Caucasians and “the negro or black race.”

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2 For a general assessment of the case see Donovan 89-109. Trial transcripts will be cited parenthetically in the text.

3 Some additional segregating measures were represented by the New York state Boxing Commission’s rule to prohibit interracial sparring sessions even in licensed boxing clubs and by the refusal on the part of the New York National Guard to start a black regiment (Fronc 103).
re-segregational impulse escalated, a strong anti-prostitution sentiment was being rekindled with the vigor of a spirit which had been underway since the first “preventive societies” had started to operate in New York City.

Since the post-bellum period, moral reform had passed from the hands of women to those of men-run “preventive societies,” most famous among them The Society for the Prevention of Crime and the Society for the Suppression of Vice. In New York City the connection between legal agency and private initiative was particularly important since, in the last decade of the century, the municipality had started to extend law enforcement powers to private groups which, with refreshed energies and stronger instruments, took over all those areas where they found the local government lacking. Preventive societies embraced their assignment, Timothy Gilfoyle summarizes, together with a tendency to overtly blame the inefficiency and misconduct of police forces (638). The new century saw the development of more modern private societies that, even more forcefully, took under their aegis the morality of the city—most famously the short-lived Committee of Fifteen and its long-standing successor, the Committee of Fourteen.\(^4\)

Less evangelically minded than their predecessors, these new organizations conducted their reformative work using local and political spheres of influence. Moreover, they were animated by the outspoken belief that the existence of racially mixed places of entertainment would always provide “a chance for trouble” (Fronc 93). Being economically and socially stronger than their precursors, these groups had more ambitious designs with respect to the regulation of the public sphere and aimed at substituting rational, routinized bureaucracy for a corrupted political machine. In addition, the knowledge collected by their undercover investigators provided the toehold for the infringement of those freedoms accorded to the private and quasi-private sphere of individual citizens. In brief, these Committees began to tackle those issues that democratic legislation did not, and could not, necessarily regulate: morality, sexual practices, leisure behavior, and political belief.

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\(^4\) The first preventive society in the U.S. was founded in 1866 to prevent cruelty to animals (ASPCA); in 1872, its spin-off followed: the Society for the Prevention of Cruelty to Children. The Society for the Suppression of Vice was established by Anthony Comstock in 1873, and the Society for the Prevention of Crime by Reverend Charles Pankhurst in 1878 (Gilfoyle 639).

\(^5\) The Committee of Fifteen was a private group of notable New Yorkers that lobbied for the elimination of prostitution and gambling. It was established in November 1900 and disbanded in 1901. It was succeeded by the Committee of Fourteen, a group founded on January 16, 1905 by members of the New York Anti-Saloon League with the goal of opposing the Raines Law hotels. This latter Committee only dissolved in 1932 for lack of funding. The Committee of Fourteen was the prototype of the Vice Commissions that were subsequently formed in many U.S. cities (see Fronc 25-27 and Dowling).
By drawing on Beatrice Hibou’s treatment of the privatization of the State, Jennifer Fronc argues that “even though they were not official parts of the government qua government, [these organizations] had made themselves part of the state by the period of World War I” (27). They did so by going beyond the immediate political ends and the systemic critique of society adumbrated in their white slavery crusades, but always wielding this hyperbolic discourse as a wedge to effectively penetrate the polity. What these new civic reformers used to their advantage was the awareness of the importance accorded to custom and judicial precedent in a common-law system. History had proved that, by influencing a few meaningful sentences, one could effectively disseminate arbitrary moral standards into society; an example of the power of case law was the landmark decision in *Plessy v. Ferguson* (1896). These Committees were under the correct impression that an efficient way to shape social behavior entailed branding as crimes those practices they found deplorable. To do so, the legal machine had to be started exactly through the performance of the contested deed. In the absence of the meticulous codes of the civil law, a jury and a judge had to be involved to authorize the claims the Committees would put forth, and morph them, through the power granted by the State, into incontrovertible normative substance. If, as Hayden White suggests, we understand the legal apparatus as “the form in which the subject encounters the social system in which he enjoins to achieve full humanity” (14), then the activity of this particular brand of reformers constitutes an attempt to precipitate a dominant definition of humanity in the enduring structures of society.

**The Moore Case: Performing White Slavery**

All the factors so far mentioned—resegregation, the privatization of public powers, surveillance, local politics, and the anti-prostitution crusade—determined the series of events which culminated with the white slavery trial of our interest, and the first link in the chain was a magazine article. In November 1909, muckraking journalist George Kibbe Turner published in *McClure’s Magazine* “Daughters of the Poor, a Plain Story of the Development of New York City as a Leading Centre of the White Slave Trade of the World under Tammany Hall.” Turner’s goal of discrediting Tammany Hall in the upcoming elections emerged as a main intent of the journal, which timed the publication accordingly (Keire 10). The anti-Tammany onslaught was contained in the Trojan horse of a tearjerking depiction of poor young girls, abducted and enslaved by the thousands by politically protected traffickers. Although such tone completely resonated with the sensational taste and melodramatic sensibility of the time, the indictment was taken seriously and, only two months later, a Tammany-supporting judge appointed John D. Rockefeller as foreman of a Grand Jury that
would investigate Turner’s allegations. The so-called Rockefeller Grand Jury, despite its great efforts, could find no trace of the surmised international traffic, and even Turner withdrew his charges. Frustrated at the lost opportunity to shine as defenders of public safety and decorum, Rockefeller and local D.A. James Bronson Reynolds commissioned two undercover investigations that they hoped would substantiate, and strike against, the white slave trade. They hired two private detectives, a man and a woman, who posed as brothel owners and were able to buy two Jewish girls from a Russian Jew and two white girls from a mulatto woman, Belle Moore. While the Jewish man negotiated a lenient sentence, the mulatto woman was found guilty of compulsory prostitution and sentenced to the maximum term. Her appeals to higher courts lamenting entrapment were rebuked, and the first sentence was reconfirmed.

This trial, shot through with an urgency that exceeded the criminal act perpetrated by Moore, magnified an unspoken collective desire to legally determine a definition of humanity which encompassed gender-role prescriptions and racially inflected restrictions. Rockefeller’s personal funding of the supplementary operations attested to the great significance of such an impulse and to the origin of its underlying predicaments. Prostitution being a “victimless crime,” the trial revolved, quite obviously, less around evidence than around the performance aimed at convincing the jury. The compatibility of the defense narrative with the social values shared by the actors detaining decisional power was consequently decisive. To illuminate these dynamics, I wish to consider the peculiarly performative nature of the trial according to “J.L. Austin’s efforts to distinguish between performative and constative utterances, and in his companion efforts to fix our attention on the illocutionary forces of our words” (Gould 19).

By relying on the Austinian categorization of performative speech, we can define the discursive representations pervading the socio-historical context in which the trial takes place as merely constative—in fact no acts occur in virtue, and in the very moment of, articles being written or scandals being fueled. A shift takes place when, in response to Turner’s provocation, the Grand Jury is formed and the door to the realm of the law opens. Before the tribunal the

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6 The Rockefeller investigation was only one aspect of the city’s fight against prostitution. For a more comprehensive view see Chauncey (36) and Keire, “The Committee.”

7 The Grand Jury had been appointed to meet for thirty days but they refused to adjourn and continued working for six months. After the depletion of the original funding, the operations continued thanks to a personal donation of $250,000 on the part of Rockefeller himself. See Donovan (91).

8 Austin’s contrast between constative—purely descriptive—and performative utterances is enriched by a further subdivision of the latter category into illocutionary and perlocutionary acts: the former are utterances in which actions are performed directly by words, while the latter involve actions carried out as consequences of words.
“constative” concoction of tacit knowledge and fabrication creative in the extra-legal context becomes performative. In this particular instance the “thing done by words” is the creation of one single criminal identified in the person of an entrapped mulatta who procures two willing adult professionals for undercover agents. In short, white-slavery-the-myth becomes white-slavery-the-fact in the moment in which the sentence is issued, but the discrepancies between the two versions are more eloquent than the correspondences.

Moore’s figure as mute actress and ventriloquized defendant emerges from the different voices as the projection of many fantasies. Broadly speaking, she appears to be a New Woman, rather than a classic mulatto stereotype: she is in turn the negro slave trader, the lewd procuress, the reformable fallen woman, the dancing entertainer, and Bohemia’s female entrepreneur. In inhabiting and giving meaning to the urban scenarios evoked around her, Moore is also a lapsed Virgil who guides the jury through infernal circles where other types of New Women thrive. With her, the jurors visit the Black-and-Tan sporting resorts with their mixed couples and queer dwellers; they become acquainted with the changing world of white femininity made of consensual prostitutes and women adrift; they catch a glimpse of middle-class free-spirited ladies such as divorcees, college graduates and professionals. The disproportion of the context with respect to the sheer boundaries of the criminal action foregrounds the theatrical quality of the trial itself.

Taking the cue from Erving Goffman’s terminology, we cannot but acknowledge the abundance of “dramaturgical” factors at work, especially if we consider his definition of performance as all the activity of an individual which occurs during a period marked by his presence before a particular set of observers and which serves to influence in any way any of the other participants (15). The scenarios change, but Belle Moore is continually present and our set of observers, the jury, is often invited by the defense to ponder the transgressive nature of the scenes that are materialized through sworn narrations. On his part, the defense attorney Alexander Karlin, tries to expose the investigators’ performance not as a necessary masquerade in the service of the State, but as the contrived act of confidence men (Goffman 58-59). His effort, albeit infelicitous, turns the classical defense move of discrediting the witness into a more general attempt to blur the distinction between the scripted act of the faux criminals—the undercover agents—and the criminal intentions behind that act. In other words, Karlin calls attention to the violations of the expected consistency between setting, appearance and manner, where appearance and manner constitute the “personal front” of the individuals while the setting is the socio-urban environment as conjured up though testimony.
Derivative Justice and Sexual Commodities

Since the socio-historical circumstances behind the legal occurrence play a paramount role, the Moore case is “an event that lends itself to narrative representation” (White 13); at the same time, it strictly abides by the rules of the legal genre, and the exact nature of the felony being contested assumes therefore a crucial role. The legal code object of transgression and the judge’s final sentence are two documents that present a few eloquent silences. Some elements, in fact, are forcefully excluded from the core of the trial—first and foremost the international white slave traffic. The salience of this muted topic invokes some considerations on the irreducibly derivative nature of justice.

Wai Chee Dimock reminds us that justice emerges as a concept that “etymologically as well as historically... [is] given primacy only under the rule of law, only with the legal mediation of human relations” (5). Justice being a “virtue” among others, defined by a porous language whose central premise is “commensurability,” we necessarily have to take into account also the category of residues: “residues unsubsumed and unresolved by any order of the commensurate, residues that introduce a lingering question...into any program of justice” (5). Elaborating on John Stuart Mill, Dimock stresses this central premise in order to define justice as the “reification of commensurability” based on the utopian dream—inherent in all adjudication—of the perfect equivalence, say, between offence and punishment. In order to ponder the elements “measured” in the Moore decision—and consequently have a glimpse of the “dream” they envision—I propose an analysis of the mechanisms of “objective” adequation which are adumbrated in the description of the contested allegation. The trial opens with a clear statement:

[Belle Moore] feloniously did procure and place in the charge of one George A. Miller two certain women, one Alice Milton and one Belle Woods, with the consent of the said two women, and each of them, for immoral purpose...that said George A. Miller should shortly thereafter...procure each of them to enter and become inmate of a certain house of prostitution...against the form of the statute in such case made and provided, and against the peace of the people of the State of New York. (4)

The transcripts virtually end with the same paragraph in the guise of a sentence, the only meaningful addition being a definition of white slavery (290)—crime of which Moore is declared not guilty—and the mentioning of money: “You [Moore]...placed, with their consent two immoral women in his [Miller’s] charge for immoral purposes, and received from him money in the belief that he was paying you for procuring them (violation of sec.2460 Penal Law)” (291). As this wording suggests, the object of commensurability, that is, the violation against which a punitive compensation is demanded, is the successful completion of an
economic transaction. The decision is somehow in tune with Belle Moore’s self-perception: she seems to consider herself primarily a businesswoman and acts accordingly. Her words are always and only reported, but, among the silences and the echoes of the sources, Moore’s irritation reaches the posthumous reader undeflected:

Miller: ...Alex Anderson then said “Leave it to Belle Moore...She has been in the business nine years, and I broke her in myself.” She then laughed and said “He did.” And she said, “If I had had some sense, I would have some money now, I would be rich; as it is, I got furniture for one flat stored, besides the furniture I have here.” (12)

Instead of expressing the old grief of experienced abuse, Moore regrets not having performed successfully in her line of work. Although frustrated, she still indicates to Miller some meager signs of conspicuous consumption as a way to validate her potential in the field, almost to prove that she has not been completely idle, but simply lacking “some [business?] sense.” In a formal letter to the female detective Foster, Moore reports the progress made in the procurement and closes with a plea for reliance, “you can depend on me” (155), not wanting to lose a client who can help her on the way to economic redress. In the same way she seems to be pretty adroit with her “merchandise” when she demonstrates her understanding of the girls’ psychologies and her ability to valorize their selling potential. In the game of contingent identities that has Moore at its center, the role of the entrepreneuse seems to be the one favored by the defendant herself, as if the rituals and the mechanics of the free market had become the backbone of her “work ethics.” The only aspect that Moore has miscalculated seems to be the ownership of the commodity in which she deals.

In her more general discussion of consent and sexual rights, Pamela Haag points out how one of white slavery’s innovations, both popularly and juridically, “was to identify the impersonal, economic association in sexual commerce...as its primary violence, the thing that defined and was synonymous with the offence” (82). In the language of the transcripts this “impersonal and commercial” dimension of the felony is articulated as the only transgression deserving juridical attention since no other form of abuse or illegality mentioned in the course of the trial is considered worthy of notice. If we agree with Haag that Progressivism could be seen as “a problem of contract, an attempt to separate legitimate from illegitimate forms and conditions of expropriation through reconceptualization of public responsibility and freedom” (201) then, in this case,
procurement is coded as an illegitimate expropriation of one’s right to autonomously enter a house of prostitution. Hence Karlin’s attempts to shift responsibility for the procurement onto the investigators. This move goes beyond the usual discrediting of the witnesses: it amounts to accepting the nature of the crime and to determining the actor who technically carried out the expropriation: “I am trying to show that this witness [Miller] and not this defendant did the procuring on that night” (86), Karlin explains. Since the women’s consent is irrelevant to the indictment as well as to the verdict, it is not from their hands that the right is extracted through procurement.

The proprietorial mode underpinning the decision seems to suggest that the “victim” dispossessed of the right attached to female capital is a generalized old-order father figure, in this case subsumed by the State. As Margit Stange argues in her acute study of white slavery literature, “in the booming market economy of the early twentieth century, woman constituted a form of private property acquired through the market” (2). This conception had a long history, but during the Progressive Era it asserted the necessity of reaffirming “woman as property” at a time when the self-owning person seemed to be the guiding model of individuality within market capitalism.10 In the rhetoric of American white slavery discourse, fair access to the exchange value of the white slave becomes the interest of the State, where the State is a plural version of all those male nationals that Karlin designates with a highly suggestive “we.” Prostitutes, even adult and willing ones, are gathered in a daughterly category that any man of a certain “fatherly” status and can claim as his “own.”

In the course of the case we are also reminded of the specific trats defining this valuable feminine commodity; in this way the law reveals itself, as Scott Herring suggests, as a “complementary medium of sexual taxonomy” (11). When detective Miller meets Moore for the first time he lists precise requirements for the girls he will purportedly employ:

I will tell you about those girls; I don’t want colored girls; I want white girls; girls weighing less than one hundred pounds, not more than one hundred and ten at the most; must be naturally good looking, well built and be able to get twenty or twenty-five dollars in any whorehouse. (9) [my emphasis]

In detective Foster’s testimony more explanatory details come forth:

[I told her] my backers had asked me to bring them young girls, simply because the fast women in the West are older women. I even told Miss Moore that, if she could procure me a girl that had never been touched, I would like to have her. I was told that there are

10 Dimock frames this principle with Lawrence Friedman’s definition of nineteenth century law as a system emphasizing “the protection of property rather than morality.”
girls of that sort to be gotten in New York City. ...I said I did not want a girl that showed any stain of colored blood, because I was afraid to put her in my house with white girls. (143) [my emphasis]

We are here presented with the whole imaginary of the white slavery tracts, an imaginary that rehearses along very distinct racial lines what, in the fictional, was simply left unsaid. The daughters of the nation, whose exchange value is requisitioned by the father-State, have to abide the “one drop rule” of racial purity. Black or mulatto prostitutes cannot even be imagined as sharing the same physical space with white ones, in spite of the soaring occurrence of black and tan resorts; in Foster’s account proximity generates unmanageable anxiety and the necessity of segregation is invoked to fend off irrational fears.

The hierarchy of values qualifying good daughterly merchandise goes hand in hand with the definition of the proper age, a requirement disturbingly related to the notion of beauty. In some occasions the investigators specify that the girls have to be “under eighteen,” but in more frequent remarks youth seems to be equated with aesthetic canons rather than with birth certificates. The visual politics of beauty are subsumed by the physical appearance of miniature women, for a “well built” girl under one hundred pounds must be either petite, or so slender that her sexual attributes bespeak, in my view, a correlation between the idealization of female identity and its forceful infantilization.

The construction of innocence, that ideological underpinning necessary to validate the vehemence of the whole judicial action, operates at an eminently linguistic and rhetorical level. The request for virginal girls, in fact, is only mentioned once in passing as the curiosity to substantiate an urban myth and it is dismissed almost the moment it is raised. Nevertheless, in the rest of the reported conversations the girls are referred to so often as “babies” and “kids” that Karlin feels obliged to expose the partiality of such language (“What was the necessity of this defendant telling you they were little babies” (132)) as well as to inquire about the reasons for the lapidary weight limit.11 The “necessity” is urgent, since, unlike the expectations created during the Grand Jury, no real “baby” appears in court. Prior to the trial, D.A. Reynolds had insistently described Alice Milton and Belle Woods as frightened, teddy-bear toting children (Donovan 95). Quite on the contrary, as the New York Times reported, Alice Milton “confessed to 23 and looked the part...[She wore] a mammoth

11 The insistence on slenderness almost becomes a mantra in the repetition of the “procuring assignment.” When Karlin finally asks “For the purpose of your work...will you kindly tell us what difference it was weather the girls weighed 100 or 300 pounds?” (78) Miller’s answer seems to reiterate a connection between weight, beauty and earning prospects in the brothel.
scarlet hat, and, throughout her testimony swung a patent-leather toe in the neighborhood of the stenographer’s left ear.” Belle Woods, as we know from the transcripts, even had a previous marriage in her vitae.

Alongside with the metaphorical child of the familiar appellations, a fictional one makes her way from the Grand Jury’s fabrications to the court of Law: her name is Helen Hastings and she is an eleven-year-old girl whose disappearance has been investigated by the police. D.A. Reynolds has claimed that Belle Moore is upholding the girl, but the conjecture is probably so unsustainable that he drops his allegations before the trial. Detective Miller nonetheless clings to this version of the facts and testifies that Moore, in the attempt to sell him the girl, has offered him the naked child as sexual companion for the night. The scene, which reads like an excerpt from a white slavery tract, presents a telling deviation from the stylistic standard: instead of the usual ethnic villain, the “pimp” is “an extremely light mulatto” directing the transaction under a showy floral hat.

Although this part of the story is quickly dismissed as impossible to corroborate, the message ensuing from the scene stigmatizes the living sign of racial mixing, the mulatto, as a propagator of corruption. Exactly because her blackness is not very apparent, Moore has to be publicly exposed in her utter immorality, so that any possibility of allowing her to pass—not for white, but for respectable—is irrevocably curtailed. Without a real child to protect, the court has to do away with the narrative of tutelage. What is left to protect is the “peace of the citizens of New York” and that seems to be only shaken by the “fear” of interracial relations. The court thus dutifully seeks to provide the citizens with protection from potential racial trespassers, and, in pragmatic terms, to provide protection to whiteness through the expulsion of the colored Other from the arena of social justice.

**Conclusion**

Reinterpreting the white slavery hysteria in the light of the recrudescence of racial tensions against the backdrop of increasingly powerful practices of private moral reform allows for a peculiar understanding of the Progressives’ legal legacy in matters of moral regulations and social control. A performative analysis of the eloquent Moore case demonstrates how the law became complicit in the reaffirmation of sexual taxonomies which, in weaving together discourses of gender, race and consent, reestablished patriarchal notions of ethical sexuality for white women and reiterated stereotypes of depravity for women of color.

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13 In her deposition detective Fuller denied the fact. Cf. 196-197
The cluster of prescriptions encapsulated in the case was amplified and congealed in the wording of the White-Slave Traffic Act (or Mann Act), a federal Statute written, debated and enacted by Congress concurrently with the Moore decision. The Bill’s enactment both took force from the white slavery scare, a hysteria that prevailed in Congress over the traditional fears of federal interference in the rights of the states, and in turn stimulated a revival of white slave fiction. The Mann Act, which made it a felony to transport women across state lines for immoral purposes, continued the criminogenic impulse initiated by the Committees of notables in the name of the protection of innocence. Its long life made the issues debated in the Moore case resonate for most of the twentieth century.

Works Cited


