A Psychohistorical Analysis of the Japanese American Internment

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I. INTRODUCTION

One of the most repressive actions ever taken by the US government was the incarceration (or “evacuation”) of Japanese Americans during World War II. Surprisingly, despite its obvious historical importance, this event has received only superficial psychological analysis. As a consequence, the accounts of this tragic episode remain somewhat incomplete. It is my purpose in this essay to explore some of the less obvious psychological motivations underlying this egregious failure to uphold the ideals of American society. In particular, through consideration of various historical documents I argue that a deeply rooted fear of sexual congress between the races consciously or unconsciously motivated some of the actions which led to the internment of 120,000 Japanese Americans.

I wish to make clear that I am not claiming that other interpretations of this period in American history are invalid; many of the works in the voluminous literature on this subject put forth what are certainly contributing factors. Multiple and reinforcing reasons exist for any historical event. However, the most popular explanations (e.g., fear of Japanese American economic superiority coupled with racism and wartime hysteria) overlook the underlying causes of those fears. Although the race prejudice argument is compelling, the elements of this racism have not been sufficiently analyzed. To understand the racist forces at work, it is necessary to study the

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1. Evacuation is a term that has been the subject of criticism because it implies a humanitarian purpose (this point is made in Steven Okazaki’s film, Unfinished Business (Mouchette Films, San Francisco, 1984)). I use it for the sake of simplicity but recognize that it is a misnomer.
sexual dimension of American racism. As I shall argue below, it was a combination of the ideas of eugenics and virulent racism that was partly responsible for the occurrence of one of America’s worst civil liberties disasters.

Following a brief historical overview comes a consideration of the standard explanations for the evacuation. There follows a brief discussion of the principles of eugenics and the resulting anti-miscegenation laws, and their applicability in this case. Next, I analyze the prevalent stereotypes and misperceptions of Japanese Americans with an eye towards their supposed sexual characteristics. I then provide some of the obvious contradictory evidence.

The main argument comes in the sections on the psychohistorical approach and the role of projection. I argue that the entire incident may have been fueled by projection or “projective inversion" on the part of the white population. This interpretation is substantiated by an analysis of prevalent stereotypes in popular culture and of the implementation of specific policies during the internment. However, it is important to acknowledge that it is difficult to prove the existence of unconscious motives; therefore, the evidence marshalled for their existence can only be indirect.

II. HISTORICAL OVERVIEW

Seventy-four days after the bombing of Pearl Harbor, Franklin Roosevelt signed the infamous Executive Order 9066 that provided the government’s sanction for the removal of Japanese Americans from their homes on the West Coast to camps in barren parts of California, Idaho, Utah, Oregon, Washington, Colorado, Arizona, Wyoming, and Arkansas.³ The proffered justification for the removal was military necessity. Over 100,000 Japanese Americans were placed in concentration camps. Nearly two-thirds of the internees were Nisei,⁴ native-born American citizens. Half of those in the

2. Alan Dundes, Interpreting Folklore 33–61 (1980). Projection refers to a direct on-to-one translation of a thought or wish onto an outward screen. In psychoanalytic parlance, it also refers to an inversion where, according to Freud, “I hate him," becomes “He hates me.” It is this later process which Dundes terms “projective inversion.” A boy's Oedipal wish to eliminate his father is expressed through projective inversion in myth as fathers (kings) trying to get rid of their sons. In this article I am using projection to refer to projective inversion. See id.

3. In view of the existence of elaborate historical treatments of the evacuation, I will not rehearse all the facts but merely set the stage for the analysis. Those interested in fuller accounts are urged to consult the literature. See, e.g., Roger Daniels, Concentration Camps USA: Japanese-Americans and WWII (1971); Richard Drinnon, Keeper of Concentration Camps: Dillon S. Myer and American Racism (1987); Michi Weglyn, Years of Infamy (1976).

camps were under the age of twenty-one. Approximately one quarter of those interned were young children and infants, and many internees were elderly. In some cases members of families were separated from each other.

Conditions in the so-called relocation centers were harsh. Initially placed in these temporary assembly centers, the Japanese Americans were sheltered in what were simply race tracks, fairgrounds, and livestock pavilions converted for military purposes. In some cases it was a matter of a few days between the time that the animals were removed and the internees were herded into facilities which had a stench of manure. The fact that the Japanese Americans were portrayed as animals in much of the World War II propaganda may have helped convince the American public that inhumane treatment was acceptable. Roger Daniels has pointed out that college dormitories would soon have been available and, therefore, that: “[i]t was probably more than the housing shortage that inspired them to select sites that had been intended to house livestock.” They remained in these filthy places in some cases for weeks and even months before being moved to the concentration camps.

Located on “godforsaken” sites and surrounded by barbed wire, the concentration camps were hardly any more hospitable than were the assembly centers. Rooms twenty feet by twenty-four feet were designed to accommodate families with five to eight members; smaller families were assigned to rooms sixteen feet by twenty feet. It is clear that the architects of the “evacuation” had little concern for privacy or family life. The barracks were poorly constructed, giving the internees little protection against the elements. Temperatures were sometimes as low as thirty degrees below zero in the winter and as high as 130 fahrenheit in the summer; sandstorms and blizzards pierced the pine boards. Bathrooms had no partitions and usually lacked hot water. The kitchens were unclean, and the food was unpalatable. Most oppressive perhaps, was having to suffer the humiliation of being treated like prisoners: “the sense of being debased

6. Dower, supra note 3, at 82.
7. Daniels, supra note 3, at 88.
8. Dower, supra note 5, at 82.
9. Daniels, supra note 3, at 96.
10. Weiglyn, supra note 3, at 84.
13. Daniels, supra note 3, at 89.
human beings was inescapable for a people being guarded night and day by soldiers up in guard towers.”

Some lost their lives as well as their dignity. Historians have recorded instances when guards shot and killed internees. Even children were sometimes targets.

Many Japanese Americans also lost their property. Because they received virtually no warning about the evacuation decision, many Japanese Americans were forced to try to sell their homes and businesses within a matter of days. This meant that they had to take whatever money was offered to them, or else abandon their property. They suffered further economic exploitation in the camps when some Japanese Americans served as cheap labor for the Caucasian personnel.

The Japanese Americans remained in the camps for several years, and in some cases until well after World War II was over. The overreaction of the US government and public merits further investigation.

III. TREATMENT OF OTHER GROUPS

It is important to note that while there had been hostility toward German and Italian Americans, they were not incarcerated. During World War I German Americans were harassed. They witnessed the renaming of German foods, towns, and streets and suffered the banning of German music. Language instruction in German was prohibited in the public schools.

Morton Grodzins, one of the earliest and most powerful critics of the evacuation, suggested that German Americans were distinguished from the Nazis and Italian Americans were distinguished from the Fascists. However, no differentiating nomenclature existed for the Japanese.

The type of racism directed towards the Japanese Americans was significantly different in character from that experienced by European Americans. California Attorney General Earl Warren, later a famous champion of civil rights as Chief Justice of the US Supreme Court, argued that loyalty was racially based:

15. Id. at 79.
16. For more detail concerning these incidents, see Harry Kitano & Roger Daniels, Asian Americans: Emerging Minorities 62 (1988); Drinnon, supra note 3, at 43; Daniels, supra note 3, at 108.
17. Weclyn, supra note 3, at 295.
18. Drinnon, supra note 3, at 47.
We believe that when we are dealing with the Caucasian race we have methods that will test the loyalty of them, and we believe that we can, in dealing with the Germans and the Italians, arrive at some fairly sound conclusions because of our knowledge of the way they live in the community and have lived for many years. But when we deal with the Japanese we are in an entirely different field and we cannot form any opinion that we believe to be sound.22

The modern reader finds startling the absence of any major public outcry against the internment.23 Critics of the public policy were indeed few, but there were some who had sympathy for Japanese Americans.24 For instance, Governor Ralph Carr of Colorado offered to accept Japanese Americans and to protect their constitutional rights.25

Most liberals, including Earl Warren, supported the decision to incarcerate Japanese Americans. Warren is said to have been one of the individuals most responsible for effecting the evacuation by convincing the West Coast Military Commander, General DeWitt, that the evacuation was necessary.26


23. Another striking fact is that Hawaii refrained from isolating Japanese Americans. See Warm M. McAfree, America’s Two Japanese-American Policies During World War II, 69 S. CAL. Q. 151–64 (1987). See also Gary Y. Okiro, CANE FIRES: THE ANTI-JAPANESE MOVEMENT IN HAWAII (1991). Despite the proximity of the Hawaiian Islands to naval bases and air stations, the Japanese were not interned. Supposedly the Japanese were considered too important for the local economy. See Trager, supra note 12, at 10. There was no impending gubernatorial election, as there was for Earl Warren. In addition to economic and political explanations, there is the possibility that ethnic differences were simply more widely accepted. Finally, the military commander is reported to have been more open minded. The greatest support for the Japanese Americans came from the Quakers and the Southern California affiliate of the ACLU. See, e.g., Daniels, supra note 3, at 78; Weglyn, supra note 3, at 104–05. Even the Communist Party, which had a few Japanese American members, expelled them and supported the internment. See, e.g., David J. O’Brien & Stephen Fugita, The Japanese American Experience 47–48 (1991).


25. Trager, supra note 12, at 10.


Many have tried to understand Warren’s involvement in the evacuation, termed “the biggest discontinuity” in his career. James J. Rawls, The Earl Warren Oral History Project: An Appraisal, 56 Pac. Hist. Rev. 95 (1987). It has been suggested that Warren’s subsequent activism on behalf of civil rights might have been motivated by his recognition of the regrettable and decisive role he played in promoting the evacuation. One journalist speculated that “the Nisei may have paid the ransom that finally liberated the blacks.” Wilson & Hosokawa, supra.
Warren was himself popular at least in California where he won the California governorship in 1942 and was re-elected twice before becoming Chief Justice of the US Supreme Court.27

The American Civil Liberties Union (ACLU) also failed to mount a campaign against the evacuation. The membership of the ACLU was deeply divided over the question of whether it was desirable to bring any test cases.28 Those who were against challenging the constitutionality of Executive Order 9066 were apparently concerned about undermining Roosevelt's authority. In the end, the ACLU board instructed then Executive Director Roger Baldwin to inform West Coast affiliates that "local committees are not free to sponsor cases in which the position is taken that the government has no constitutional right to remove citizens from military areas."29 The ACLU authorized only constitutional challenges to General DeWitt's orders based on racial grounds. If lawyers refused to comply with the policy, they would have to withdraw as ACLU counsel. Peter Irons emphasizes that "none of the lawyers who represented the Japanese Americans had the backing of the national ACLU."30 He explains the ACLU failure to protect the rights of Japanese Americans by suggesting that it had more pressing agenda items, it wanted to support the war efforts against Nazism and Fascism, and it was based in New York, far from Japanese Americans on the west coast.31

Warren, according to one biography, "acquired his town's (Bakersfield) xenophobic dislike of Orientals." The red light district in Bakersfield was called "Jap Alley." Schwartz, supra at 8. For many years Warren had actively participated in the Native Sons of the Golden West, a racist organization, which advocated the exclusion of Japanese from American citizenship. Id. at 11. And it was during his first campaign for governor of California that he supported the evacuation policy. Id. at 10.

He went to great lengths to avoid criticism of the policy. In fact, according to a relative of Morton Grodzins, Warren actually intervened at the University of California Press to prevent the publication of Grodzins' doctoral dissertation Americans Betrayed. Personal Communication, Ann Lipow, Librarian, University of California, Berkeley, Summer 1990. Grodzins' dissertation was later published by the University of Chicago Press.

While he lived, Warren never issued any sort of apology. In his memoirs, which were published posthumously, he finally offered one: "I have since deeply regretted the removal order and my own testimony in advocating it, because it was not in keeping with our American concept of freedom and the rights of citizens." Id. at 113. Apparently, he felt great remorse. According to one source, during one interview: "Warren begins to weep as he describes the faces of the children separated from their parents by relocation." Rawls, supra at 96. For an interesting attempt to explain Warren's involvement in the evacuation and belated apology, see Edward G. White, The Unacknowledged Lesson: Earl Warren and the Japanese Relocation Controversy, 55 Va. Q. Rev., 613–629 (1979). White emphasizes the fact that Warren grew up when powerful racist stereotypes were prevalent on the West Coast. Id. at 617.

27. Trager, supra note 12, at 15.
28. For details, see Irons, supra note 11.
29. Id. at 130.
30. Id. at 132.
31. Id. at 133–34.
The decision to remove the Japanese from the West Coast and to place them in concentration camps was a highly popular one and was upheld by the US Supreme Court.\textsuperscript{32} With the benefit of hindsight, we know that it was completely unnecessary, because no acts of espionage ever occurred. How then can we account for this act in a country which espouses the doctrine of equal protection of the law?

\textbf{IV. STANDARD EXPLANATIONS}

In most sources a triumvirate of reasons for the incarceration appear: wartime hysteria, economic motives, and race prejudice. In his research in the 1980s, Peter Irons demonstrated the failure in United States political leadership as an additional explanation for the Japanese American internment.\textsuperscript{33} Irons showed that evidence proving the lack of any threat from the resident Japanese community was suppressed. Internal Justice Department memoranda indicate that the Alien and Enemy Control Unit withheld critical information from the Supreme Court.\textsuperscript{34} In addition, the judiciary is ordinarily reluctant to challenge executive and military decision making. There were also paternalistic claims that Japanese Americans should be isolated for their own good. Since hostile citizens attempted to run them over and shoot at them in town, this might have seemed somewhat plausible.

\textbf{A. WARTIME HYSTERIA}

Much of the literature concentrates on the possibility of Fifth Column activity by the Japanese. This wartime hysteria argument is not without force. After all, Americans had been attacked at Pearl Harbor in a “sneak” attack, though not by Japanese Americans. Moreover, American tradition apparently countenances the suppression of civil liberties during wartime.\textsuperscript{35}


\textsuperscript{33} Irons, supra note 11.

\textsuperscript{34} Id.

Various characterizations of the Japanese were put forward at the time to substantiate the claim of subversive activity. For instance, Americans found the Japanese Americans to be seclusive. This was compounded by their language, which Americans could not easily understand. Though inaccurate, Americans attributed to the Japanese a religious fanaticism, evidenced by an obsessive worship of the Emperor who was the religious as well as the secular head of the nation. All of these cultural perceptions contributed to the assumption that Japanese Americans could not be trusted. Forced to make a choice, the argument went, they would remain loyal to Japan.

The delusional nature of American thinking is illustrated by reports that Japanese Americans arranged their crops in a militarily suspect fashion: “Rumors about Japanese fields of flowers and vegetables planted ‘arrowlike’ pointing to nearby military installations reverberated through California and beyond.”

B. Economic Motives

The second standard explanation for the incarceration is that greedy Caucasian farmers wanted to eliminate economic competition. By 1910 Japanese Americans produced 70 percent of California strawberries, though they controlled less than 1 percent of the state’s total farm acreage. Although they owned only 1 percent of the cultivated land in California by 1919, Japanese Americans produced more than 10 percent of the state’s total produce. By the end of 1941, they controlled 42 percent of the commercial truck crops grown in California, 22 percent of the nation’s total. Though they tilled only 3.9 percent of the state’s farmland, they produced as much as 90 percent of California’s artichokes, cauliflower, celery, cucumber, peppers, spinach, strawberries, and tomatoes. The Japanese were known for having revolutionized California’s fishing industry, introducing superior potato seed, and pioneering land reclamation. Indeed, Japanese Americans provided economic benefits to the public at large by lowering the cost of fresh produce for all. Japanese Americans had been model citizens, fulfilling the American dream by moving from rags to riches.

36. Trager, supra note 12, at 10. For example, Roger Daniels cites a headline “Caps on Japanese Tomato Plants Point to Air Base.” DANIELS, supra note 3, at 33.
37. HOSOKAWA, supra note 22, at 66.
38. IRONS, supra note 11, at 10.
39. Trager, supra note 12, at 12.
40. DANIELS, supra note 3, at 9.
41. Success Story: Outwitting the Whites, NEWSWEEK, 21 June 1971, at 24–25. This article emphasizes the Horatio Alger theme and shows the persistence of this perception of Japanese Americans.
Caucasian farmers resented the success of the Japanese and were among the first to call for the evacuation. A number of special interest groups agitated for the removal of Japanese Americans. Sometimes claims were made that Japanese used unfair or unethical business practices. For example, the American Legion produced the film, Shadows of the West, in which one Japanese character “controlled the statewide vegetable market over a wireless apparatus” and other Japanese “were shown dumping vegetables into the harbor to maintain high prices.”

Whether or not the economic considerations were influential in the formulation of the evacuation policy, the result of the policy was a devastating loss for the Japanese Americans. Almost all internees lost their homes, jobs, businesses, or farms. Japanese Americans lost an estimated $400 million, of which only $40 million was returned in depreciated dollars. A study conducted for the Wartime Relocation Commission noted that the economic losses of the internees might be as high as $6.2 billion in 1983 dollars with inflation and interest added. Japanese Americans did receive compensation of $38 million under the Evacuation Claims Act of 1948. But, the last payment made from that source was in 1965, and overall, they have received little in the way of compensation. Although the US government finally adopted the recommendation of the Commission on the Wartime Relocation and Internment of Civilians, many elderly Japanese Americans died before they could receive the $20,000 in reparations authorized by Congress.

Although economic motivations played some part in the decision to relocate Japanese Americans, it seems unlikely that they were a dominant factor. Other less drastic ways existed by which an expropriation of Japanese American private assets might have been more easily accomplished. Furthermore, the way in which the concern over Japanese American farm products was often expressed reflects wartime hysteria and race prejudice. For example, a rumor circulated that Japanese farmers were lacing their produce with arsenic in order to poison American housewives.

42. Some Caucasian farmers “made no secret of the fact that they had axes to grind that had little to do with national security.” Irons, supra note 11, at 39.
45. Trager, supra note 12, at 9.
46. Id. at 15; Weclyn, supra note 3.
48. Daniels, supra note 3, at 168–69.
50. This was noted in many newspaper articles.
C. Race Prejudice

When race prejudice is mentioned as a motivating factor for the evacuation policy, it is seldom analyzed in any depth. Oblique reference is made to the entire tradition of anti-Asianism on the West Coast, but, apart from mere mention of the so-called "Yellow Peril," almost no incisive analysis of the role that racism played in the Japanese American incarceration can be found in the literature.52

From the outset there was concern about the morality of Japanese immigrants and the threat that they posed to the purity of American women. The California nativist movement, after securing passage of the Chinese Exclusion Act of 1882, turned to the issue of Japanese immigration.53 The leader of the movement was Denis Kearney, himself a recent immigrant from Ireland. He argued that the Japanese who attended public school were: "fully developed men" who sought to "debauch their female classmates."54

Other kinds of racist arguments were also advanced. One was that the Japanese had a racial predisposition to be saboteurs.55 Another common fear was that other races would damage the germ plasm of the American (Caucasian) people. It is this issue of the relationship between eugenics and race that requires elucidation.

V. Eugenics

Sir Francis Galton coined the term eugenics in his 1883 work *Inquiries into Human Faculty,*56 The pseudo-scientific theory of eugenics held that in order to protect the human race, defective genetic material should be removed from the world's "germ plasm."57 This theory gained popularity in the early twentieth century, especially during the 1920s. The height of the movement was 1925 at which time it had taken on the attributes of a fad.58

52. But see Ogawa, supra note 43.
53. Irons, supra note 11, at 9.
54. Id. at 10.
57. Even before the eugenics movement began formally, similar “nativist” and “progressive” ideas were circulating. As early as 1791, Henry Cabot Lodge, a prominent Bostonian and Republican, urged his fellow Congressmen “to protect the blood of the nation from the contamination of ‘inferior’ racial strains by passing a bill to limit the influx of immigrants.” Haller, supra note 56, at 55–56; Donald K. Pickens, *Eugenics and the Progressives* (1968).
The racist version of eugenics held that the "superior" races had to be protected from the "inferior" races. Wilson and Hosokawa give a lucid characterization of this doctrine: "Eugenics held that racial differences are established genetically and are relatively unchanging. Therefore, the influx of non-Nordics was dangerous to the racial purity of the original American stock; interbreeding with this inferior stock was tantamount to 'race suicide.'" Haller, in his classic work, *Eugenics: Hereditarian Attitudes in American Thought*, suggests that it was, in fact, the racist aspect of eugenics which appealed to Americans: "In its racist side, eugenics perhaps touched most closely the thoughts and emotions of large groups of the American public. Eugenic concepts reached into the halls of Congress and state legislatures, sounded on the political hustings, and filled numerous popular books and articles." Haller states that educated Americans since the 1930s "have generally looked with deep suspicion upon efforts to frame a hereditarian interpretation of human nature." Even if one were to grant this sudden change of heart, educated Americans account for only a small proportion of the general population. Eugenics appears to have served as an ideological weapon for racists. It almost certainly contributed to the social acceptance of the Japanese American evacuation.

Eugenics was not merely a dangerous theory. In the last two decades of the nineteenth century and the first decade of the twentieth century, Galton and his followers argued that eugenic principles ought to be incorporated into various reform programs. Eugenics provided the justification for various repressive public policies. It led to such significant policy proposals as restrictive immigration. The basic idea was that the United States should be protected against the influx of defective "germ plasm."

Another policy which resulted from eugenics was state-imposed sterilization. The US Supreme Court sanctioned the involuntary sterilization of "mentally feeble minded" persons in the landmark case of *Buck v. Bell*. Since that time, thousands of Americans have been the victims of compulsory sterilization authorized under statutes based upon a model law that was also used by Hitler. In this country, those sterilized were primarily the

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59. WILSON & HOSOKAWA, supra note 26, at 132–33.
60. HALLER, supra note 56, at 159.
61. Id.
62. Reilly, supra note 56, at 123.
63. PICKENS, supra note 57.
poor and unwed mothers. Despite growing political opposition to eugenics, sterilizations continue to be performed in great numbers today.

VI. ANTI-MISCEGENATION

Intimately intertwined with eugenics and eugenicists was the enactment of anti-miscegenation statutes. These statutes were explicitly designed to preserve the "racial integrity" of whites. Initially the laws made it a crime for a black person to marry a white person, but subsequently, intermarriage between "mongolians" and Caucasians was prohibited as well.

Laws against racial intermarriage and intermixture date back to the early 1600s. Franklin warned against allowing a "nation of mulattoes," while Jefferson maintained that the amalgamation of whites with other races "produces a degradation to which no lover of his country, no lover of excellence in human character can innocently consent."

66. Reilly, supra note 56, at 126.
67. Miscegenation is a term that has negative and emotional overtones. For an interesting discussion of its etiology, see Alexander Thomas & Samuel Seiden, Racism and Psychiatry 111 (1979). Despite its pejorative connotations, it continues to be the term used in the literature.

Haller notes that by the time the eugenicists became politically active, twenty-eight states had already banned interracial marriage and that few such marriages occurred in other states. Haller, supra note 56, at 158. Consequently, eugenicists did not see the need to lobby for legislation of this kind.
68. Reilly, supra note 56, at 135.
Eugenicists relied on pseudo-scientific arguments to confirm their view that race mixture was undesirable.72 In a collection of university lectures by scientists from various disciplines a geneticist presented the standard view:

The admixture of white blood clearly improves the offspring in mental efficiency but there is no evidence to indicate that such offspring is better in any way than the white parent, and it is reasonable to assume that they would be inferior. . . . Nothing would seem to the writer more regrettable than the general amalgamation of the races of the world.73

Assertions were made that the offspring were more susceptible to certain diseases and were less moral.74 Often an analogy was drawn to the animal world:

The most superior individuals among cattle, horses and all domestic animals are those of pure breed, and the best breeders are strongly opposed to the crossing of breeds. The general inferiority of a mongrel lot is well recognised.75

72. American writers Lothrop Stoddard and Madison Grant revived the discredited racist theories of the French Count Gobineau to lend "a veneer of scholarly sanction to the image of the yellow peril." Jacobus ten broeck et al., prejudice, war and the constitution 27 (1954). Their obsession with the threat posed to the Nordic races by Asians received considerable attention.

Madison Grant urged: "[t]he laws against miscegenation must be greatly extended if the higher races are to be maintained." He advised the Virginia legislature to forbid marriage of a white person to another person with any trace "of blood other than Caucasian." Haller, supra note 56, at 159. In 1924 the state adopted a white supremacist law which was not overturned by the US Supreme Court until Loving v. Virginia, 388 U.S. 1 (1967).

In his introduction to Lothrop Stoddard's book, the rising tide of color against white world-supremacy, Grant wrote: "Democratic ideals among an homogeneous population of Nordic blood, as in England or America, is one thing, but it is quite another for the white man to share his blood with, or intrust his ideals to, brown, yellow, black, or red men." Lothrop Stoddard, the rising tide of color against white world-supremacy xxxii (1920). In his own book, the passing of the great race, originally published in 1918, Grant expressed regret that Nordic influence had declined in the United States and in Europe. Madison Grant, the passing of the great race (1970) (originally published 1918).

73. H.T. Webber, Eugenics from the point of view of the geneticist, in Eugenics: Twelve University Lectures 164, 166 (Morton A. Aldrich et al. eds., 1914).

74. Id. at 164.

75. Id. at 167. The term "mongrel" is frequently encountered in the literature and reflects the contempt displayed toward the offspring of interracial unions.

Oddly though, despite Webber's apparent disdain for the "half breed" whose "viciousness . . . is notorious in literature and experience" he concludes that "[t]he Mongolian-Caucasian cross so far as I am informed cannot be considered inferior but is certainly to be pitied." Id. at 168.

It is interesting to note that the term Mongolian is etymologically related to the disorder known as mongolism or mongolian idiocy, the latter so named because of the perceived resemblance of persons with certain genetic abnormalities to persons belonging to the so-called Mongoloid races. This unfortunate nomenclature has undoubtedly contributed to the racist predispositions of many.
The phenomenon of hybrid vigor (the crossing of two species to produce a more viable amalgamation) was well known in the nineteenth century. To some Americans this provided some hope that intermarriage with immigrants would produce a superior people. However, this was challenged in the twentieth century. One point of view concerning interracial mixing was based on what nineteenth century agricultural breeders called reversions. A reversion refers to a hybrid from two domestic strains which appears to have the characteristics of a wild variety. Haller explains the kinds of arguments put forward by the proponents of this view: "closely related races (like the Nordic strains that produced the American type) could safely interbreed but . . . widely varying races (like Nordics and Mediterraneans, or whites and Negroes) should not be crossed, since the result would be a reversion to the lowest type. . . . Thus the analogy with agricultural breeding gave scientific support to an exaltation of racial purity that in fact had no scientific foundation." 76

One of the leading eugenicists, Paul Popenoe, expressed the commonly held belief that miscegenation was biologically wrong. 77 Because eugenics had an aura of scientific respectability and was discussed in technical language, this lent credence to the movement, despite the absence of any scientific support for its tenets.

It should be noted that these ideas were discussed widely and publicly accepted. William Faulkner reportedly "contended with entire seriousness that the cross between the white man and the Negro woman always resulted, after the first crossing, in sterility." 78 One radio program in 1944 featured a debate about whether interracial mixing was biologically possible. 79 One side concluded: "It is because we feel that the Japanese, unlike all the rest of the races or peoples of the world are so fundamentally different that it's impossible to assimilate by intermarriage—which is necessary to have assimilation—which is not the case with the other races and religions of mankind. (Applause.)" 80

President Roosevelt himself was apparently imbued with eugenical notions. He asked an "idiosyncratic" Smithonian anthropologist to "undertake a study of race-crossing of Asian and European stocks." 81 It has been

76. Haller, supra note 56, at 148–49.
77. Pickens, supra note 57, at 97.
79. McWilliams et al., supra note 24.
80. McWilliams et al., supra note 24, at 18. See also Roger Daniels, Asian America: Chinese and Japanese in the United States Since 1850 117 (1988).
suggested that Roosevelt’s racist assumptions may have made it easier for him to rationalize his decision to issue Executive Order 9066.82

There was widespread acceptance of the notion that the preservation of the white race depended on protecting the purity of Caucasian women. In fact, race prejudice in the United States was based in large part on this idea. If males from other racial groups were to become involved with white women, then racial purity would be jeopardized. I contend that the internment decision, which removed all males of Japanese ancestry from American society, was partly motivated by concern over the alleged deleterious effects of interracial mixing. But, eugenics alone cannot account for the treatment received by the Japanese in particular. If Japanese American males were uninterested in Caucasian women, then concern about interracial mixing would have been unnecessary. Therefore, what was critical to ensure virtually universal acceptance of the internment policy were specific stereotypes of Japanese American males as being, among other things, hypersexual.

VII. STEREOTYPES OF JAPANESE AMERICANS

In a highly perceptive but little cited study, From Japs to Japanese: The Evolution of Japanese-American Stereotypes,83 Dennis Ogawa presents four major stereotypes of Japanese Americans: highly un-American, inferior citizens, sexually aggressive, and part of an international menace.84 While all four may have influenced policy makers and the public, for the purposes of the argument advanced here, the two stereotypes of particular relevance are the notions that Japanese Americans are highly un-American and sexually aggressive.

A. “Un-American”

A common stereotype was that Japanese Americans were un-American. They were not and could never be properly assimilated into the American way of life.85 An example of this perception is found in the testimony of V.S. McClatchy, a powerful figure in the Japanese Exclusion League who lobbied for an immigration law to exclude “Orientals:”

82. Id.
83. OGAWA, supra note 43.
84. Id. at 8.
85. SPICKARD, supra note 69, at 35.
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The Japanese are less assimilable and more dangerous as residents in this country than any other of the peoples ineligible under our laws... with great pride of race, they have no idea of assimilating in the sense of amalgamation. They do not come here with any desire or any intent to lose their racial or national identity. They come here specifically and professedly for the purpose of colonizing and establishing here permanently the proud Yamato race. They never cease being Japanese.86

It is apparent that immigrants were expected to shed their prior cultural identity in order to become good citizens. General DeWitt also espoused the notion that the Japanese could not be assimilated. When he testified before the House Naval Affairs Subcommittee in 1943 on the "relocation" of the Japanese, he said:

A Jap’s a Jap. They are a dangerous element, whether loyal or not. There is no way to determine their loyalty... It makes no difference whether he is an American; theoretically he is still a Japanese and you can’t change him... You can’t change him by giving him a piece of paper.

The Japanese race is an enemy race and while many second and third generation Japanese born on U.S. soil, possessed of U.S. citizenship have become "Americanized," the racial strains are undiluted.87

The irony is that anti-miscegenation statutes, segregated schools, and other public policies legally prevented assimilation. By forcing the Japanese to inhabit a separate sphere and reinforcing group solidarity, whites facilitated their claims that Japanese harbored feelings of racial animosity. To the extent that the premise that loyalty is based on race (an innate and immutable characteristic) was accepted, there was no way to overcome such a deterministic argument. In The Valor of Ignorance,88 a book analyzing the "Japanese problem" in California, Homer Lea claimed "a nation may be kept intact only so long as its ruling element remains homogeneous."89 In the face of such public policies and ideology, it is no wonder that Japanese Americans were accused of being incapable of assimilation.

B. Sexual Aggressiveness

The stereotype that appears to have been most significant for the evacuation decision, though, was that of sexual aggressiveness. In general, Caucasians

87. OGAWA, supra note 43, at 11 (emphasis added).
88. The book was first published in 1909 and reissued just after Pearl Harbor with "much fanfare." DANIELS, supra note 86, at 72.
89. OGAWA, supra note 43, at 10.
have been concerned about the sexual prowess of male members of minority groups. Hypersexuality is attributed not only to Japanese Americans but to many other groups. Ogawa suggests that there is a common pattern to ethnic and racial stereotyping: "One of the most visceral images in the Anglo mind is that of intercourse between a white woman and a man

90. Thomas & Sillen, supra note 67, at 101; Takaki, supra note 71, at 114.
of another race. Nothing strikes more at the white man's heart than his women being molested by Blacks, Browns, or Yellows."91 Daniels and Kitano comment on this notion in passing: "The sex bugaboo, the ravishing of pure white women by lascivious Oriental men, had always lurked in the background of the anti-Oriental movements in California."92 Chuman also mentions the stereotypes of the Japanese reinforced during a propaganda campaign in 1920: "They were accused of having a high birthrate, of being spies instead of farmers, of being sex fiends and rapists, and of mongrelizing white women."93 Ogawa reaches the same conclusion with respect to the stereotype of the Japanese male: "Driven by a beastly sexual urge, the Jap would endanger the white female and the purity of the Anglo American stock."94 Spickard agrees that "[t]he idea of a sexual threat from Japanese men loomed large in many White men's minds."95

It is not possible to grasp the subtleties of race prejudice in the United States without recognizing that what is at stake is white women and thereby racial purity.96 It was precisely the trait of sexual aggressiveness that led Caucasians to be suspicious of Japanese Americans.

1. Sexual Stereotypes of the Japanese in Popular Culture

Considerable evidence exists that the stereotype of the lascivious Japanese male was readily accessible to most Americans. Some examples come from the press, such as the following 1920 editorial in the San Francisco Chronicle, at the time considered the most influential paper on the West Coast:97

95. Spickard, supra note 69, at 35.
96. An example of an expression of this fear appears in 1913 hearings that were held on the alien land bills in the California legislature:

Near my home is an eighty-acre tract of as fine land as there is in California. On that land lives a Japanese. With that Japanese lives a white woman. In that woman's arms is a baby. What is that baby? It isn't a Japanese. It isn't white. I'll tell you what it is. It is the germ of the mightiest problem that ever faced this state; a problem that will make the black problem of the South look white.

97. Hosokawa, supra note 22, at 82. Research on the press indicates that it played some role in the dissemination of the stereotype of a "yellow peril," though scholars disagree as to its influence. Morton Grodzins' exhaustive study of the California press found that, with
The Japanese boys are taught by their elders to look upon . . . American girls with a view to future sex relations. . . . What answer will the fathers and mothers of America make? . . .

The proposed assimilation of the two races is unthinkable. It is morally indefensible and biologically impossible. American womanhood is by far too sacred to be subjected to such degeneracy. An American who would not die fighting rather than yield to that infamy does not deserve the name. 98

Headlines reinforced the imagery pattern, for example, “Jap Attacks Girl, Beaten by Mother.” 99 Roger Daniels, in The Politics of Prejudice, cites a few “menacing headlines” which were part of the 1905 campaign by the San Francisco Chronicle: “Japanese a Menace to American Women” and “The Yellow Peril—How Japanese Crowd Out the White Race.” 100

The abduction of Caucasian women by sadistic Japanese men and their subsequent valorous rescue by Caucasian men appears to have been a common theme in popular culture in the early twentieth century. Comic strips further reinforced this image of the lascivious Japanese male. One particularly striking example is an episode in Captain America that appeared in June 1944 after the evacuation was underway, but which indicates the sort of characterizations that were commonplace. In that episode, Lieutenant Hale is about to be married to the daughter of Henry Crawford, owner of the Big Bomber Plant. At the same time hooded (Japanese) figures race through the town “ruthlessly firing the houses in their path.” Because “something fiendish is happening,” Captain America is called in and discovers that the disguised men are Japanese. But they escape, which delays the marriage of Hale and Crawford’s daughter. The Japanese kidnap the bride and her father. When the father refuses to disclose the hour at which the guards change at the plant, torture is suggested: “Perhaps if girl is given taste of whip’s bite?” “I can take it father! Don’t talk.” 101 Eventually Captain America and Lieutenant Hale rescue Crawford and “the girl.” Hale punches a Japanese: “This is for stealing my girl . . . and we still have time for that wedding.” 102

only two exceptions, no newspaper columnists of the time trusted Japanese Americans. Grodzins, supra note 24. For a different interpretation of the role of the press, see Gary Y. Okihiro & Julie Sly, The Press, Japanese Americans, and the Concentration Camps, 44 PHYLON 66–83 (1983), who conclude that the decision to relocate the Japanese was governmental and not favored by the press or the public. Id. at 83.

100. Daniels, supra note 86, at 25.
101. Captain America 8 (June 1944).
102. It is certainly the case that the Japanese were the villains in some of the comic strips with the widest circulation. For example, most of the villains in Terry and the Pirates, by Milton Caniff, were Japanese. Terry and the Pirates Invade New York Gallery, Ltr, 6 Jan. 1941, at 34. Occasionally, a comic portrayed Japanese Americans in a positive light.
An equally sinister portrait of the Japanese male, and one which apparently received considerable attention, was a cartoon poster of a Japanese soldier carrying off a naked white woman. After the poster was submitted to a “This Is the Enemy” contest in 1942, it was displayed at the New York Museum of Modern Art and reprinted in *Life*. John W. Dower comments that the picture reflects the “sexual fears” associated with “Yellow Peril” imagery.

John Dower provides additional evidence of the sexual images associated with Japanese males in popular culture: “Without question . . . the most common caricature of the Japanese by Westerners, writers and cartoonists alike, was the monkey or ape.” In Christian iconography the ape symbolizes lust, which would seem to explain why this particular bestial symbol captured the attention of Americans.

Films during this period also conveyed the message that Japanese men wanted white women. In *The Cheat* (1914), a white woman offers to become the mistress of a Japanese man to procure needed funds but later reneges on her promise. This leads the Japanese to acts of sadism: “The Oriental, furious, brands her on the shoulder. The husband is brought to trial for having attempted to kill the Japanese. The wife bares her branded shoulder in court and wins her husband’s acquittal.” The film provoked strong protests from Japanese Americans. One actor, in particular, complained that Asian actors were cast in roles calculated to stimulate race hatred.

After the outbreak of World War I, with China and Japan on the side of the Allies, films began to portray Asians somewhat more sympathetically.

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Under duress, Ham Fischer drew a single panel in which the Joe Palooka character recognized the loyalty of a Nisei in American Army uniform, but it appeared only in the *Seattle Times* and was too little too late. *Hosokawa*, supra note 22, at 250.

103. *Dower*, supra note 5, at 189.
104. *Id.* at 189. See also *Oehling*, supra note 92, at 199.
109. The Japanese Association of Southern California went to the Los Angeles City Council to protest against the showing of the film. When Paramount reissued the film in 1918, the character was Burmese and renamed. *The American Film Institute Catalog of Motion Pictures Produced in the United States* 134 (Patricia Hanson ed., 1988).
110. *Id.* at 30–31.
There were, however, some reversions to the stereotype, such as the 1916 motion picture, *Patra*, by the International Film Corporation, part of the Hearst empire. Part of the story line was that “Japanese troops invaded California, committing appropriate atrocities [notably the attempted rape of the heroine].”

Another exception to the generally more positive depictions was *Shadows of the West* (1920). This diatribe was released by the American Legion as part of its campaign for an alien land law:

Invoking all the malevolent aspects of the stereotype the film described the Japanese in California as spies and cutthroats plotting to monopolize the vegetable market; and the climax was reached, not unpredictably with the kidnapping of two white girls, followed by a dramatic chase and rescue on the part of the Legionnaires.

Even films that portrayed the Japanese in a more sympathetic light would not sanction interracial union because of “the American taboo that Asian men must not touch white women.” One Japanese actor, Sessue Hayakawa, whose career began with villain roles (e.g., *The Cheat*), was “the only Oriental actor ever to play romantic leads in Americans films.” However, “he always had to relinquish the girl in the final reel.”

Ten Broeck, Barnhart, and Matson argue that after three decades of anti-Japanese agitation, the negative stereotype “was firmly embedded in the public consciousness and no longer depended for its existence upon its prodding of ‘pressure groups.’” The bombing of Pearl Harbor provided Americans with an excuse for acting on the anti-Japanese feelings they had held for decades.

111. DANIELS, supra note 86, at 76. OGAWA, supra note 43, at 18.
112. TEN BROECK ET AL., supra note 72, at 31.
114. TEN BROECK ET AL., supra note 72, at 30–31. See also Gong, supra note 107, at 39.
116. TEN BROECK ET AL., supra note 72, at 66–67. See also Oehling, supra note 92, at 197.
117. Some might question whether the stereotype of the Japanese male has changed or has remained the same. Stereotypes change over time and seem to go in cycles. OGAWA, supra note 43, at 26–39 (discusses the evolution in the traits ascribed to Japanese Americans). To explain the change from “the inferior Jap stereotype” to the “superior citizen” and “social equal,” Ogawa argues that the sexually aggressive stereotype had to be altered:

Many white Americans cannot yet accept the notion of a Mongoloid marrying or having sex with a white woman. The sexual dilemma in which these white men find themselves seems to be resolved by the stereotype of the “shy, quiet lover of gardens.” In this instance, the Japanese is elevated socially, and to prevent bastardization of the white race, is castrated. Non-masculinity permeates the stereotype of “quiet and shy, lovers of gardens.” This type of man is not a threat to the white woman. Indeed, the gardener can be left with the wife at home alone, while the man of the house goes to work assured that this shy fellow is really uninterested in white woman.
2. Actual Perceptions

The image of the sexually voracious Japanese was expressed not only in popular culture, but by policy makers and the public as well. One of the most common statements made about Japanese Americans was that they had a high breeding rate and therefore posed a threat to the "purity of the Anglo race." For example, the exclusionist McClatchy stated: "the biological fecundity of the Japanese is so great that in a limited time, I think 64 years, the entire state will be Japanese." On 20 January 1942, Dr. W.R. Livingstone in a speech in Oxnard, California warned that "unless adequate preventive measures are enforced, the Japs will eventually overrun California and the Pacific Coast just as the rabbits, brought to Australia, have


Even though the Asian American male is sometimes depicted as "sexless," presumably in order to render him nonthreatening, the earlier sexually aggressive stereotype remains. In the 1993 film, Rising Sun, the main Japanese male character is portrayed as a playboy who prefers white women. The Washington representative of the Japanese American Citizens League was quoted as saying: "The movie is another twist on the Japanese Invaders/Yellow Peril genre that has been around Hollywood for awhile." Elaine Dutka Asian-Americans: Rising Furies Over "Rising Sun," L.A. TIMES, 28 July 1993, at F9. The portrayal of playboy Eddie Sakamura indicates that the same stereotype of the sexually aggressive Japanese male voracious for white women persists. A 1993 NBC movie called Silent Cries focussed on a group of British, American, and Australian women captured by the Japanese armies and subjected to the cruelty of a camp commander. See the review, Dorothy Rabinowitz, No Whitewash for This War Atrocity WALL ST. J., 8 Mar. 1993, at A8. In addition considerable media attention focussed on Japan's admission that its pre-1945 government had recruited "comfort women" (from other Asian countries) to provide sex for soldiers. The headlines made reference to "sexual slavery." See, e.g., Jake Doherty, Conference to Focus on Plight of Wartime "Comfort Women" L.A. TIMES, 20 Feb. 1993, at B3; Sam Jameson, Japan Admits Sexual Slavery in WWII, Expresses Remorse, L.A. TIMES, 7 July 1992, at A1, A14; Teresa Watanabe, Japan Admits That WWII Sex Slaves Were Coerced, L.A. TIMES, 5 Aug. 1993, at A1, A6. Even though white women are not involved and even though the men are Japanese as opposed to Japanese Americans, the coverage might still reinforce the sexual stereotype of Japanese American men. (The public historically has tended not to distinguish between Japanese and Japanese American males.) It is curious that the media seem to perpetuate this imagery. See Stewart Kwoh & Julie Su, Individuals Lose When a Group is Demeaned, L.A. TIMES 25 Apr. 1995, at B7. See also Christine Choy, Images of Asian-Americans in Films and Television, in ETHNIC IMAGES IN AMERICAN FILM AND TELEVISION 145–55 (Randall M. Miller ed., 1978).

119. Ogawa, supra note 43. See also Thomas, supra note 118, at 12–13.
overrun that Island." The allegation that Japanese "breed like rabbits" is one which recurred.121

This view of the Japanese led to various policy recommendations. Among these was the suggestion that Japanese be offered a choice between sterilization or deportation.122 Another was that relocation camps be segregated by sex so that they would not become "breeding farms." 123

Actually, American public policy had been designed to prevent a population increase among Japanese immigrants. Between 1900 and 1920 Japanese American immigrants were primarily male. Approximately one-seventh of the 214,000 immigrants were female.124 Because there was a shortage of women, because anti-miscegenation laws precluded any possibility of intermarriage, and because ingroup marriage was preferred in Japanese culture,125 Japanese men sought to bring Japanese women to the United States. This led to an innovation in the traditional practice of arranged marriage. "Picture brides" were matched through correspondence to Japanese men in the United States. Perhaps surprisingly, the McClatchy newspapers and politicians launched a campaign against the "picture brides," as a consequence of which the Japanese government ceased the issuance of passports to them in 1920.126 One can conjecture that this was because the fear of a high birth rate was more intense than the fear of interracial mixing. Another possibility is that the authorities wished to ensure that the Japanese not settle permanently in the United States.127 Once the immigration policy changed and Japanese women arrived, Japanese American men were able to marry and start families. Because many children were then born, this might have contributed to the impression that Japanese Americans were fecund.128

Many of the prevalent beliefs about the Japanese were clearly unfounded. For instance, Japanese were hardly invading the United States. There were fewer Japanese immigrants than other ethnic groups. Japanese represented less than one percent of the immigrant population.129 Their birth

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120. Grodzins, supra note 24, at 49.
121. Kitano, supra note 51, at 31; Myer, supra note 19, at 13; Hosokawa, supra note 22, at 97.
122. Trager, supra note 12, at 12.
123. Grodzins, supra note 24, at 61.
124. Kitano, supra note 51, at 38.
126. Kitano, supra note 51, at 40.
127. Spickard, supra note 69, at 35.
128. Wilson & Hosokawa, supra note 26, at 126.
129. Kitano, supra note 51, at 33.
rate was also not particularly high: by 1940 in every West Coast state the birthrate was lower than that of the general population.\footnote{130}

Another false perception was that Japanese men preferred Caucasian women. This is as unlikely as it is racist. Hosokawa relates an amusing story from the 1860s on this issue. An American woman asked a Japanese officer whether American or Japanese women were “superior.” He replied: “American ladies are the more beautiful of the two with their fair complexions.” But he noted in his diary, ‘she and her companions looked well-pleased. They must be of a very believing nature.’\footnote{131} It seems unlikely that Japanese men sought Caucasian women because the Japanese have been described as one of the most exclusive ethnic groups with a very low rate of intermarriage with other ethnic groups.\footnote{132} While there is, of course, a difference between interracial sex and interracial marriage, it is possible that Japanese men were, in general, not all that interested in Caucasian women. Despite the falsity of the perceptions, stereotypes of Japanese American men as sexually aggressive might have influenced decisionmaking at the time of the Japanese American internment.

VIII. RACISM AND THE PSYCHOHISTORICAL APPROACH

The psychohistorical approach provides a way of understanding why the evacuation was such a popular policy. By analyzing the pervasive stereotypes of the Japanese that were circulating in the late nineteenth and early twentieth centuries, it becomes possible to gain insight into the worldview of actors in the 1940s. The approach suggests that attention ought to be placed on the psychological motivations, conscious or unconscious, of historical actors.\footnote{133} One of the central concepts for psychohistory is the group fantasy.\footnote{134} The question is whether there is sufficient evidence of a white fantasy about Japanese men to suggest that it might have affected policy makers at the time of the evacuation.

\footnote{130} Commission on Wartime Relocation and Internment of Civilians Act: Hearing Before the Committee on Governmental Affairs, United States Senate, 96th Cong., 2d Sess. 38 (1982). See also Hosokawa, supra note 22, at 97.
\footnote{131} Hosokawa, supra note 22, at 27.
\footnote{132} Audrey Girdner & Anne Loftis, The Evacuation of the Japanese-Americans During WWII 473 (1970); Harry H. Kitano, Race Relations 282 (1974); Ogawa, supra note 43, at 43.
\footnote{133} For examples of works using the psychohistorical approach, see Lloyd DeMause, Foundations of Psychohistory (1982); H. Stuart Hughes, History as Art and as Science 42–67 (1964); Joel Kovel, White Racism: A Psychohistory (1970); Peter Loewenberg, Decoding the Past: The Psychohistorical Approach (1983); Psychoanalysis and History (Bruce Mazlish ed., 1963); Michael Paul Rogin, Fathers and Children: Andrew Jackson and the Sublimation of the American Indian (1975).
\footnote{134} See DeMause, supra note 133.
In the case of racism, a number of analysts have generally argued that it has a sexual component. Racism, it is argued, is based on unresolved sexual conflicts and, in particular, the Oedipal complex. In their provocative work, Race and Psychiatry, Alexander Thomas and Samuel Sillen devote a chapter to "the Sexual Mystique" in which they evaluate the standard view: "In examining the professional literature, we find that much of it is dominated by the view that the vicissitudes and conflicts of sexuality provide the basic motive of racism."135 They deny that all race prejudice stems from Oedipal conflicts because this is an overly deterministic approach. Acceptance of this approach would mean that it would be impossible to bring about social change unless human beings evolved to the point that they were no longer afflicted with the Oedipal conflict.136 They do not, however, reject the possibility that sexual conflicts might be related to racism: "Rejection of the theory that sexual conflict is the root cause of racism does not negate the influence of sexual problems on racial attitudes in some people. Far from it. An individual with sexual anxieties may elaborate and exploit racist stereotypes to ameliorate his personal problem."137

The basic argument is that "race violence is . . . intimately linked to the white man's sexual fantasies."138 Most historical analysis of race relations concentrates on either black/white or Native American/white relationships. Nevertheless, the Caucasian view of minorities appears to follow a common pattern. Frequently hypersexuality is ascribed to the males of an ethnic group, just as a high birth rate is attributed to the group as a whole. Therefore, it seems appropriate to take these insights and apply them to the Japanese/Caucasian relationship.

The act of defining the sexual character of ethnic groups, particularly males, is a political act. Thomas and Sillen make this point eloquently: "the symbols of sexuality have been unceasingly manipulated to justify oppression and to fan fear and hatred."139 Arguably, this is the process that helped lead to the "evacuation."

A. Projection

To identify a pattern is one step; interpretation of the pattern that has been discerned is the next. It is my view that the Caucasian fantasy of minority males preying upon white women is in reality a classic example of

135. THOMAS & SILLEN, supra note 67, at 104.
136. id. at 106.
137. id.
139. THOMAS & SILLEN, supra note 67, at 103.
projection. Projection is a psychological device by means of which desires or anxieties are displaced onto another individual or group. In this case white males actually desire Japanese women but because of prevailing eugenical notions and other ideological forces cannot admit this and therefore project their sexual wishes onto Japanese men who, according to the fantasy, want white women.

Paul R. Spickard, in a major study of interracial relationships, contends that Caucasian men have been fascinated by Japanese American women and "[their] image of exotic sensuality." He states: "Japanese women came to be seen by many American men as exotic, erotic creatures able to please men in special ways."

This point often has been made in the context of slavery. Slave owners often took advantage of female slaves but executed any black male suspected of paying attention to a white woman. Gordon Allport in his classic work, The Nature of Prejudice, explains projection in the context of black/white relationships:

Or suppose the white male has taken his pleasure with Negro women. Such liaisons, being illicit, give rise to guilt. A wry sense of justice forces him to see that the Negro males, in principle, should have equal access to white women. Jealousy plus guilt create a disagreeable conflict. He, too, finds a way out by

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141. Spickard, supra note 69, at 39. It is interesting that on television Asian women are usually paired with Anglo male news anchors. Darrell Y. Hamamoto refers to this as the "Connie Chung" syndrome. He discusses the "overrepresentation of female Asian American anchorpersons and the near-total absence of their male counterparts." Hamamoto, supra note 117, at 245–47. See also K. Connie Kang, Separate, Distinct—and Equal, L.A. Times, 20 Aug. 1993, at A21.

142. Spickard, supra note 69, at 39. For a study of the impact of sexual stereotyping on the psyche of Asian American women, see Connie Chan, Asian-American Women: Psychological Responses to Sexual Exploitation and Cultural Stereotypes, 6 Women & Therapy 33–38 (1988). This seems to contribute to the phenomenon known as mail order brides. See Toko Serita, Mail Order Sexploitation, 9 Bridge 39 (1984) ("a sharp increase in the number of white men ordering brides through marriage agencies").

143. For example, Thomas and Sillen discuss this phenomenon as follows:

White men forced black women into their beds—and cried "Rape" when a Black man so much as glanced at White Womanhood on her pedestal of chastity. White men fathered black children—and asserted that there was a "natural repugnance" between the races. Whites castrated black men—and proclaimed that they were thus defending the values of Western civilization.

In no other area of human experience have the distortions of racism been more bizarre.

Thomas & Sillen, supra note 67, at 101. See also Bell, supra note 70, at 68; Charles Herbert Stember, Sexual Racism: The Emotional Barrier to an Integrated Society 40 (1976).
"projecting." It is the lecherous Negro male that is the real menace. He would deflower white womanhood. The deflowering of Negro womanhood is conveniently forgotten in the outburst of righteous indignation. The indignation is guilt-evading and restorative of self-respect.144

Allport suggests that such psychological processes result in unjust legal policy.145 He states that blacks have received disproportionately harsh penalties for sex transgressions with white women, despite the fact that whites are responsible for most transgressions. He cites statistics for the years 1938 to 1948 in thirteen southern states in which fifteen whites and 187 blacks were executed for rape.146

Specific relocation camp rules reveal the projective mechanism at work. An article by Paul Spickard, Injustice Compounded: Amerasians and Non-Japanese Americans in World War II Concentration Camps, provides some data on the treatment of interracial couples during the internment. A number of non-Japanese Americans, specifically the husbands and wives of Japanese and hundreds of children of interracial couples, were incarcerated.147 Eventually it was decided that interracial couples could leave the camps provided that they had minor children. The policy objective was to provide Amerasian children with the opportunity to be reared in a “non-Japanese” environment. Spickard discovered that “there was a not-so-subtle sexism that went with the racism in this selection system.”148 Children whose fathers were white and mothers were Japanese were permitted to return to the west coast, according to Spickard, because their homes were sufficiently “American.” If, however, children had white mothers and Japanese fathers, they could leave the camps, but could not go home to the jurisdiction of the Western Defense Command. Spickard suggests that was because their fathers made them “more than half Japanese.”

I disagree with Spickard and would argue that the reason for the differential treatment of mixed offspring actually reveals a classic instance of projection at work. This differential policy appears to have been formulated on the basis of the group fantasy discussed above. Sexual liaisons between

144. Allport, supra note 140, at 353.
145. Other legal policies also reflected the white fantasy about predatory minorities. For example, nuisance laws formerly prevented the Japanese from hiring white girls. Kitano, supra note 132, at 216.
146. Allport, supra note 140, at 353–54.
147. Paul R. Spickard, Injustice Compounded: Amerasians and Non-Japanese Americans in World War II Concentration Camps, 5 J. AM. ETHNIC HIST. 5 (1986). Apparently most non-Japanese husbands chose to stay at home rather than join their Japanese wives in prison: “It was a rare non-Japanese husband who was willing to join his wife and children behind barbed wire.” Id. at 13. Spickard speculates that there were economic reasons for this.
148. Id. at 8. Spickard, supra note 69, at 54.
Japanese males and white females were socially unacceptable and were, therefore, to be punished.

B. Korematsu v. United States

The landmark case of Korematsu v. United States, in which the US Supreme Court held that the evacuation order was constitutional, fits the imagery pattern of the group fantasy. Fred Korematsu defied the evacuation order to remain with his fiancee, Ida Boitano, a Caucasian woman. There is, of course, no way of proving that the Justices in the majority were consciously or unconsciously influenced to any degree by either eugenics or a general fear of interracial mixing. But given the pervasive stereotypes in popular culture and political rhetoric, it is conceivable that some members of the Court might have been affected by the common group fantasy.

It is interesting that Korematsu challenged the order at a time in California history when he could not have married his fiancee in any case. California's anti-miscegenation statute was not struck down until 1948 in Perez v. Sharp. The US Supreme Court finally rejected all anti-miscegenation laws in Loving v. Virginia.

IX. CONCLUSION

There have been many attempts to explain one of the most frightening abuses of state power in the history of the United States. In this essay I have offered one interpretation of the event, drawing upon parts of the historical record. In particular, I have tried to show that racial stereotypes of Japanese Americans, especially the stereotype of sexual aggressiveness, might have provided a motivation (albeit unconscious) for the decision to incarcerate them. Japanese males, according to the white group fantasy outlined above, were eager to prey on Caucasian women. Therefore, to protect the purity of white women, Japanese Americans were sequestered. While it is not

149. 323 U.S. 214 (1944).
150. Irons, supra note 11, at 95; Chuman, supra note 93, at 191.
151. 198 F.2d 17 (1948).

Girdner and Loftis provide an intriguing historical detail. The Japanese American Citizens legal counsel, William Muritani, the first Nisei lawyer to argue before the Supreme Court, was asked to give an oral presentation in the Loving case in March 1967. Girdner & Loftis, supra note 132, at 441. It is also striking that in Loving the couple was a white man and a half Black, half Native-American wife.
possible to prove the extent to which group fantasies themselves directly motivate actors or influence events, the existence of a collective fantasy must have some significance. Insofar as images of Japanese men pervaded popular culture and captured public attention, they might have been at least a contributing factor in the internment.

It is certainly true that the Japanese are not the sole objects of racial discrimination by European Americans. Other minority groups have suffered the consequences as well. Furthermore, the idea of internment of racial groups is not a new one. In response to a few reports of bubonic plague in Chinatown in San Francisco at the turn of the century, thousands of Chinese Americans were placed in quarantine for several months. They were then induced, along with many Japanese Americans, to receive inoculations of a hazardous experimental vaccine.\textsuperscript{153}

Yet, it is possible that the Japanese arouse greater racial hatred than other minority groups. After all, the United States has dropped atomic bombs only on Japan. Furthermore, economic competition with Japan in the 1980s elicited some extraordinarily hostile responses. For example, unemployed automotive workers in Detroit brutally killed Vincent Chin because they mistakenly believed he was Japanese.\textsuperscript{154}

Even if there were greater animosity toward the Japanese, it would not mean that other groups could never be victimized in the same fashion. It might depend upon a mere historical accident, such as a national emergency. For instance, when Americans were being held hostage in Iran, placing Iranian students under surveillance in the United States was discussed as an option. In response to the AIDS epidemic, there has also been concern that the government might quarantine homosexuals.\textsuperscript{155} In 1991, when the United States waged war against Iraq, the FBI questioned many Arab Americans, supposedly in order to thwart terrorist activities.\textsuperscript{156} It

\begin{thebibliography}{9}
\bibitem{154} Caucasian Americans seem to have trouble distinguishing between Chinese and Japanese Americans. A 1941 \textit{Life} magazine noted: "U.S. citizens have been demonstrating a distressing ignorance on the delicate question of how to tell a Chinese from a Jap." \textit{How to Tell Japs From the Chinese, Life}, 22 Dec. 1941, at 81. To help avoid further confusion, \textit{Life} printed "a rule-of-thumb from the anthropometric conformations that distinguish friendly Chinese from enemy alien Japs." Milton Caniff also drew sketches to make this point which were originally published in military manuals. \textit{Speaking of Pictures . . . the Army Gets to Know a Lady Named Lace, Life}, 1 Mar. 1943, at 12.

Nevertheless, as Weglyn explains: "[t]he public became totally confused in their hatred . . . Chinese Americans and other Asians began wearing 'I am a Chinese' buttons in fear of being assaulted and spat upon." \textit{Weglyn, supra} note 3, at 36.
\bibitem{155} Mark Barnes, \textit{AIDS and Mr. Korematsu: Minorities at Times of Crisis}, 7 St. Louis U. Pub. L. Rev. 35–43 (1988).
\end{thebibliography}
would be wrong to assume that a mass internment could never happen again.157

The lesson we must draw from the Japanese internment is that civil rights and civil liberties are vulnerable. Even a political system with checks and an extremely strong judiciary will not always champion those rights successfully. The Justices of the US Supreme Court are themselves prisoners of culture. Thus, judicial review might not suffice to prevent powerful, negative stereotypes from shaping public policy.

Another insight gained from the study of the Japanese American internment is that villainy is not only to be found abroad. It might be argued that the United States obsessive concern with assimilation almost resulted in the cultural genocide of Americans of Japanese ancestry. Even though the US government did not actually exterminate the Japanese Americans (although there was fear that it might),158 the policy of internment certainly resulted in the devaluation of Japanese culture. To give but one example, internees, out of a sense of shame, often chose not to discuss their ancestry with their children. Although the United States, decades later, issued an apology as well as $20,000 checks, it can never repair the damage that was done.

It is crucial that scholars and politicians recognize the powerful effect of stereotypes. Stereotypes should be subjected to much closer political scrutiny so that it becomes clear how they are mobilized to legitimate inhumane policies. Because stereotypes are not always consciously articulated, it might be necessary to adopt an historical approach. The written record is replete with examples of racist thought that cannot be assumed to have disappeared. When these racial stereotypes are part of a group fantasy, they may be even more influential.

Group fantasies are an important subject for further scholarly research. They are particularly dangerous because they are unconscious. If the psychohistorical approach can reveal some of the underlying forces that shape public policy, it deserves further consideration. If and when the existence of projective inversion is identified, it might help to demonstrate the falsity of our perceptions. And it is only by constantly reexamining our perceptions that we can avoid repeating the tragic mistakes of the past.

158. Okazaki, supra note 1.