

Black Women and Girls and the Twenty-sixth
Amendment: Constitutional Connections, Activist
Intersections, and the First Wave Youth Suffrage
Movement

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* © 2019 Mae C. Quinn, Professor of Law and Director, Youth Justice Clinic, University of District of Columbia, David A. Clarke School of Law. I am deeply indebted to Mrs. Carolyn Quilloin Coleman, now a Commissioner for the Guilford County Board of Commissioners, North Carolina, not only for her life-long, steadfast commitments to social and racial justice including currently serving as secretary of the NAACP National Board of Directors, vice president of the North Carolina NAACP, and an active member of the Greensboro branch of the organization, but for taking the time to talk with me and review an earlier draft of this Article. Many thanks, also, to John Brittain, Mary Dowling, Jennifer Frost, Mary McDonnell, Etienne Toussaint, Deborah Weider-Hatfield and 2019 Law Women’s Writing Retreat participants Ann Bartow, Karla McKanders, Raquel Muniz, Carol Needham, Quiche Suzuki, and Erika Wilson for their comments, insights, and feedback. Additional gratitude to Dolores Watson, Nana Anoa Nantambu, and Renee Seab for their fellowship and encouragement during the Writing Retreat in Magnolia, Mississippi.

INTRODUCTION

As many across the United States celebrate the 100th anniversary of the Nineteenth Amendment, the country's standard suffrage story keeps getting repeated. The traditional tale goes something like this: In the beginning only white men could vote, then suffrage was expanded to African Americans in 1870, and finally, in 1920, women won the franchise.¹ Historical texts, legal scholarship, and even popular media have focused on Black men when talking about the Fifteenth Amendment² and white women when recounting the ratification story for the Nineteenth Amendment.³

Told in this way, the evolutionary story of United States voting rights lacks important additional layers and nuance.⁴ Black women are overlooked. And regardless of race or sex, youth as voters are left out.⁵

1. See *Elections...The American Way: Voting Rights for African Americans*, THE LIBR. OF CONG., <https://www.loc.gov/teachers/classroommaterials/presentationsandactivities/presentations/elections/voting-rights-african-americans.html> [<https://perma.cc/XBN5-96LV>] (providing separate page links for discussions of “The Founders and the Vote,” “Voting Rights for African Americans” under the Fifteenth Amendment, and “Voting Rights for Women” under the Nineteenth Amendment, without a similar page about youth voting rights and the Twenty-sixth Amendment); see also U.S. CONST., amend. XV; U.S. CONST., amend. XIX.

2. See, e.g., SUSAN BANFIELD, *THE FIFTEENTH AMENDMENT AND AFRICAN-AMERICAN MEN'S RIGHT TO VOTE* (1998); WILLIAM GILLETTE, *POLITICS AND PASSAGE OF THE 15TH AMENDMENT* (1965); Akhil Reed Amar, *The Fifteenth Amendment and “Political Rights,”* 17 *CARDOZO L. REV.* 2225, 2228 (1996); Gabriel J. Chin, *The “Voting Rights Act of 1867”: The Constitutionality of Federal Regulation of Suffrage During Reconstruction*, 82 *N.C. L. REV.* 1581, 1586–87 (2004); see also BRUCE WATSON, *FREEDOM SUMMER* (2010) (providing detailed account of continuing efforts to advance Black enfranchisement during the 1960s); Edith Y. Wu, *Reparations for African-Americans: The Only Remedy for the U.S. Government's Failure to Enforce the Thirteenth, Fourteenth, and Fifteenth Amendments*, 3 *CONN. PUB. INT. L.J.* 342 (2004) (describing continuing problems of Black voter suppression).

3. See, e.g., BERNADETTE CAHILL & ALICE PAUL, *THE NATIONAL WOMEN'S PARTY, AND THE RIGHT TO VOTE* (2015); AILEEN KRADITOR, *THE IDEAS OF THE WOMEN'S SUFFRAGE MOVEMENT: 1890-1920* (1981); Sandra Day O'Connor, *The History of the Women's Suffrage Movement*, 49 *VAND. L. REV.* 657, 669 (1996); see also NOT FOR OURSELVES ALONE: THE STORY OF ELIZABETH CADY STANTON AND SUSAN B. ANTHONY (PBS 1999) (highlighting white women as historical figuring during the women's suffrage movement).

4. See Juan F. Perea, *An Essay on the Iconic Status of the Civil Rights Movement and Some Unintended Consequences*, 18 *VA. J. SOC. POL'Y & L.* 44, 57–58 (2010) (warning about the ways we do harm by writing legal histories that exclude certain voices or experiences); Brent Staples, *How the Suffrage Movement Betrayed Black Women*, *N.Y. TIMES* (July 28, 2018), <https://www.nytimes.com/2018/07/28/opinion/sunday/suffrage-movement-racism-black-women.html> [<https://perma.cc/AH93-QCXY>] (warning against blindly “commemorat[ing] a movement in which racism clearly played a central role”).

5. See Julia Rose Kraut, *An Introduction to Civil Rights and Civil Liberties Law and History*, HIST. SOC'Y OF N.Y. CTS., <http://www.nycourts.gov/history/academiccenter/documents/HSNYC%20Middle%20School%20Curriculum%20-%20J.Kraut.pdf> [<https://perma.cc/ANG2-37Z7>]; see also JOYCE APPLEBY & ALAN BRINKLEY, *THE AMERICAN JOURNEY: RECONSTRUCTION TO PRESENT*, ch. 30 (2004) (popular middle and high school textbook offering overview on the Vietnam Era without

Black girls in particular are rendered invisible. The dominant narrative is bound up in binaries that work to ignore and erase.

The 1960s might sometimes be covered in passing in such accounts. But the decade is usually seen as a kind of constitutional footnote. Civil rights activists began to call for an Equal Rights Amendment to protect against sex-based discrimination and took on southern states that continued to disenfranchise Black voters.⁶ Still, two categories are the central concern: being Black, not white and being female, not male. Intersectionality is frequently ignored as a result of these dichotomies. And Black women and girls have remained largely missing as historical subjects.⁷

A few commentators, including Jenny Diamond Cheng, have noted that constitutional enfranchisement of young people has received relatively little scholarly consideration. This is nearly as true today as it was when Cheng wrote it in 2009.⁸ The seminal book on the subject was written by education expert Wendall Cultice more than twenty-five years

any mention of the 26th Amendment or youth voting rights). To be sure, others are elided by this telling as well—including Native American women who were not given the right to vote following the passage of the Fifteenth or Nineteenth Amendments. APPLEBY & BRINKLEY, *supra*, at 54–57; *see also* Stephen J. Wermiel, *Heroes of the Struggle for Voting Rights*, 39 HUM. RTS. 26 (2012) (describing how “Women, African Americans, American Indians, and immigrants” had to fight to win the vote—without any mention of youth); Peter Dunphy, *The State of Native American Voting Rights*, BRENNAN CTR. FOR JUST., (Mar. 13, 2019), <https://www.brennancenter.org/our-work/analysis-opinion/state-native-american-voting-rights> [<https://perma.cc/R58D-8BNJ>] (describing how Supreme Court cases of the 1940s granted Native Americans the right to vote in federal elections while some states retained restrictions until the 1960s).

6. *See, e.g., Reading Like a Historian: History Lessons*, STAN. HIST. EDUC. GRP., <https://sheg.stanford.edu/history-lessons> [<https://perma.cc/X2QE-F39X>].

7. Some other important exceptions have emerged over the last year, also using the anniversary of the Nineteenth Amendment as a moment to challenge existing accounts that focus almost exclusively on white women in connection with the 19th Amendment. *See, e.g.,* MARTHA S. JONES, *VANGUARD: HOW BLACK WOMEN BROKE BARRIERS, WON THE VOTE, AND INSISTED ON EQUALITY FOR ALL* (2020); SALLY ROESCH WAGNER, *THE WOMEN’S SUFFRAGE MOVEMENT*, at xxvii (2019) (new anthology seeking to include the voices and writings of Black women in the women’s suffrage canon).

8. *See, e.g.,* Jenny Diamond Cheng, *Uncovering the Twenty-sixth Amendment* (2008) (Ph.D. dissertation, University of Michigan) [hereinafter Cheng, *Uncovering the Twenty-sixth Amendment*] (“To say that the Twenty-sixth Amendment has been of limited interest to the scholarly world is a wild understatement.”). Cheng’s dissertation provides an excellent analysis of the context for the Twenty-sixth Amendment as reflected in congressional documents. She concedes other texts from the era—such as materials relied upon in this project—might shed further light on the youth voting movement. *Id.* at 12. Professor Cheng, now a law professor, has recently returned to the issue of youth voting rights in her scholarship. *See* Jenny Diamond Cheng, *Voting Rights for Millennials: Breathing New Life into the Twenty-sixth Amendment*, 67 SYRACUSE L. REV. 653 (2017) [hereinafter Cheng, *Breathing New Life*].

ago.⁹ Beyond these materials, youth suffrage generally, and the Twenty-sixth Amendment specifically, has received almost no in-depth attention in constitutional law, election law, or legal history publications—or popular culture.¹⁰

For instance, Frederick Douglass and Susan B. Anthony are household names when it comes to the Fifteenth and Nineteenth Amendments respectively.¹¹ But almost no one can name a single figure who laid the groundwork for the Twenty-sixth Amendment's ratification. Similarly, although many recent law school symposia have focused on the topic of voting rights, none have focused specifically on the issue of Black women or girls and suffrage or the Twenty-sixth Amendment.¹² Yet several graduate level and Ph.D. students,¹³ as well as law students¹⁴—perhaps those emerging scholars closest to the issue as a function of their age—have worked to shed some light on the Twenty-

9. See WENDELL W. CULTICE, *YOUTH'S BATTLE FOR THE BALLOT: A HISTORY OF VOTING AGE IN AMERICA*, at xi (1992) (noting in Preface that the text is “probably the first full treatment of the issue [of youth suffrage] aside from a compilation of references produced nearly a half-century ago”).

10. One particularly notable exception to this is Vivian E. Hamilton, *Democratic Inclusion, Cognitive Development, and the Age of Electoral Majority*, 77 *BROOK. L. REV.* 1447 (2012); see also AMENDMENT XXVI: LOWERING THE VOTING AGE (Silvia Engdahl ed., 2010) (anthology of essays relating to the ratification of the Twenty-sixth Amendment, intended for use with high school age students and young adults); Joshua A. Douglas, *In Defense of Lowering the Voting Age*, 165 *U. PA. L. REV.* 63 (2017) (short essay in support of lowering the voting age, relying heavily on the unpublished Ph.D. thesis of Jenny Diamond Cheng).

11. See, e.g., CLAIRE MURPHY, *MARCHING WITH AUNT SUSAN: SUSAN B. ANTHONY AND THE FIGHT FOR WOMEN'S SUFFRAGE* (2017); *Frederick Douglass*, *AM. HIST. FOR KIDS*, <https://www.americanhistoryforkids.com/frederick-douglass/> [<https://perma.cc/X6EN-VSX4>] (offering “fun” facts about Frederick Douglass to be taught to children).

12. See, e.g., Press Release, The University of Kansas, Law School Symposium to Explore Election Law, Voting Rights (Feb. 9, 2016), <https://news.ku.edu/law-school-symposium-explore-election-law-and-voting-rights> [<https://perma.cc/FPA3-REZY>]; *Rutgers Law Review Voting Rights Symposium Published*, *ELECTION L. BLOG* (Oct. 17, 2012), <https://electionlawblog.org/?p=41845> [<https://perma.cc/PK39-Q3RH>]; *Voting Rights Symposium*, *HOUS. L. REV.*, <https://houstonlawreview.org/section/1179-voting-rights-symposium> [<https://perma.cc/38MJ-UVKD>].

13. See Cheng, *Uncovering the Twenty-sixth Amendment*, *supra* note 8; see also Timothy J. G. Cole, *Under Age: Redefining Adulthood in 1970's America* (May 2016) (Ph.D., thesis, Temple University Department of History) (on file with author); Anne Frazier Yowell, *Ratification of the Twenty-sixth Amendment* (May 1973) (Master's thesis, Virginia Polytechnic Institute Political Science Department) (on file with author); Mark Leonard Newman, *The Millennial Generation: A New Group of Young, Political Actors on the Stage* (Dec. 1, 2008) (Ph.D. thesis, Georgetown University Graduate School of Arts and Sciences) (on file with author); James Russell Henderson, *The Twenty-sixth Amendment* (May 2016) (Ph.D. thesis, University of Mississippi History Department) (on file with author).

14. See Sarah Fearon-Maradey, Comment, *Disenfranchising America's Youth: How Current Voting Laws Are Contrary to the Intent of the Twenty-sixth Amendment*, 12 *U.N.H. L. REV.* 289 (2014); Eric S. Fish, Note, *Twenty-sixth Amendment Enforcement Power*, 121 *YALE L.J.* 1168 (2012); Caitlin Foley, Comment, *A Twenty-sixth Amendment Challenge to State Voter ID Laws*, 2015 *U. CHI. L.F.* 585 (2015); Nancy Turner, Comment, *The Young and the Restless: How the Twenty-sixth Amendment Could Play a Role in the Current Debate over Voting Laws*, 64 *AM. U. L. REV.* 1503 (2015).

sixth Amendment. They seem to recognize the importance of this subject to our shared constitutional history. Yet, they also provide accounts that largely overlook the contributions of Black women and girls.¹⁵

On this 100th anniversary of the Nineteenth Amendment—and on the cusp of the fiftieth anniversary of the Twenty-sixth Amendment—this article seeks to expand the voting rights canon.¹⁶ It complicates our understanding of voting rights history in the United States, adding layers to the history of federal constitutional enfranchisement and encouraging a more intersectional telling of our suffrage story in the days ahead.

Thus, this work not only seeks to acknowledge the Twenty-sixth Amendment as important constitutional content, as was the goal of the article I wrote with my law student colleagues for a conference held at the University of Akron School of Law last year;¹⁷ it also expands upon the historical sections in that work to draw connections among different civil rights movements and move beyond the limited dualistic narratives that have been offered to date regarding suffrage in this country.¹⁸ Although there is much more to learn and tell, this Article advances the important ongoing project of lifting up and celebrating the multilayered identities and contributions of Black women and girls who impacted United States youth enfranchisement—including Diane Nash, Carolyn Quilloin, and Philomena Queen.¹⁹

I. WHITE MEN TWENTY-ONE YEARS OF AGE AS HISTORIC POLITICAL CITIZENS

As Wendell Cultice describes in his youth suffrage history, English common law historically held that “full maturity and discretion” occurred

15. My law students and I co-wrote an article for the University of Akron School of Law’s Nineteenth Amendment Symposium, which sought to break from this tradition by introducing a more intersectional analysis of the history of the Twenty-sixth Amendment—what we refer to as the “first wave youth suffrage movement”—while focusing on the contemporary “second wave youth suffrage movement.” Mae C. Quinn et al., *Youth Suffrage: In Support of the Second Wave*, 53 AKRON L. REV. 355 (2019) (invited article conceived by this author and co-written with four law students). As further described below, I expand on that historical work here.

16. In this way, this project also seeks to build upon my earlier work relating to feminist legal realism, intersectionality, and childism. *See generally* Mae C. Quinn, *Feminist Legal Realism*, 35 HARV. J.L. & GENDER 1 (2012); *see also* Quinn et al., *supra* note 15 (applying childism as a concept to rethink our understandings of citizenship in the context of voting rights).

17. *See generally* Quinn et al., *supra* note 15.

18. This Article further develops the pre-Twenty-sixth Amendment historical events that I briefly introduced as part of my contributions to last year’s Akron Law Symposium on the Nineteenth Amendment, *see* Quinn et al., *supra* note 15, at 359–50, and that I presented in person in greater detail at the Symposium.

19. *See generally infra* Parts II to V. Carolyn Quilloin, now married, goes by the name of Carolyn Quilloin Coleman. Since this article focuses on her activism and NAACP work undertaken prior to marriage, this Article will use the name Carolyn Quilloin.

once an individual turned twenty-one years of age.²⁰ Many claim this was tied to British customs around the required age for knighthood and serving the crown—and little else.²¹ Yet this criteria was used to establish the voting cutoff for men in Great Britain.²² And that practice was, by and large, continued in colonial America—where only white men could vote.²³ However, as early as 1819, states began to consider the possibility of lowering the voting age to eighteen. Here again, the motivation seemed to be tied to official government service. In this instance it was the return of soldiers from the War of 1812.²⁴

During the Civil War, men age twenty or older were legally eligible for conscription.²⁵ Many teens fought on both sides of the war, which again generated discussion about giving younger men the right to vote when they returned from the battlefield.²⁶ Nevertheless, such proposals did not gain ground at the time.²⁷ When the women's suffrage movement took hold forty years later, lowering the voting age was not a part of its official platform either.²⁸

Interestingly women's involvement in the first World War may have helped pave the way for expanding the right to vote.²⁹ Although they did not participate in battle, women served as military nurses and supported the war effort at home by working in factories and taking on jobs previously held by men.³⁰ Shortly after World War I, in 1920, women were

20. CULTICE, *supra* note 9, at 2.

21. *Id.* *But see* Cheng, Uncovering the Twenty-sixth Amendment, *supra* note 8, at 37 (claiming this is an “unsubstantiated historical tidbit” that “became accepted wisdom”).

22. CULTICE, *supra* note 9, at 2–3; F.M. BREWER, THE VOTING AGE, 2 ED. RSCH. REPS. n.2 and accompanying text (1944), <https://library.cqpress.com/cqresearcher/document.php?id=cqresrre1944090900> [<https://perma.cc/9R9Z-CX6U>].

23. CULTICE, *supra* note 9, at 2–3.

24. *Id.* at 7 (describing how Connecticut, in 1819, Missouri, in 1820, and New York, in 1821, all considered allowing white men to vote at age eighteen during state constitutional convention discussions).

25. *Id.* at 12–13.

26. *Id.*

27. *Id.* at 14. Indeed, when the Fourteenth Amendment was passed in 1868 as part of the Civil War Amendments, it provided that states were prohibited from preventing male citizens age twenty-one or older from voting. *Id.*; *see also* U.S. CONST. amend. XIV, §2.

28. CULTICE, *supra* note 9, at 16; *see, e.g.*, Lynda G. Dodd, *Parades, Pickets, and Prison: Alice Paul and the Virtues of Unruly Constitutional Citizenship*, 24 J.L. & POLS. 339, 350 (2008) (describing Alice Paul as “one of the most influential leaders in the United States suffrage movement” whose followers maintained a singular focus on women's voting rights).

29. CULTICE, *supra* note 9, at 16.

30. *Id.* at 16–17; *see also* Abigail Higgins, *American Women Fought for Suffrage for 70 Years. It Took WWI to Finally Achieve It*, HIST. (June 4, 2019), <https://www.history.com/news/wwi-women-suffrage-connection> [<https://perma.cc/ZR6Z-6ME3>] (describing how World War I helped women's efforts to seek the vote).

provided with the right to vote by way of the Nineteenth Amendment.³¹ But in practice the privilege extended almost exclusively to women seen as white.³² And those under the age of twenty-one regardless of their race, sex or gender—even those who served on the front lines when draft registration age was dropped to eighteen—could not participate in elections.³³

It was not until World War II hit, and more young men were sent to fight, that calls for reducing the voting age to match lawful battle age got louder and increased in number.³⁴ In this way, the first modern effort to advance youth enfranchisement—which I have previously referred to as the First Wave Youth Suffrage Movement—began to take hold.³⁵

Wendell Cultice asserted that over a thirty-year period, starting with World War II, “young people would virtually shoot their way into the voting booth.”³⁶ In her more recent work, Jenny Diamond Cheng agrees that the mantra of “young enough to fight, young enough to vote” was prevalent and persuasive during this period. However, Cheng argues that ratification of the Twenty-sixth Amendment was not a particularly grass roots movement and mostly “driven by a small group of federal legislators whose motivations and rationales were quite complex and not necessarily fully understood by young sympathizers.”³⁷ Others have also claimed young people were not involved in the early years of the first modern movement for youth suffrage.³⁸

To be sure, the road to ratification of the Twenty-sixth Amendment involved many twists and turns between the 1940s and 1970s, with the nation’s long-standing commitment to racial discrimination as constant context.³⁹ For instance, in 1943 Georgia amended its constitution to permit

31. CULTICE, *supra* note 9, at 16–17. Native American men who served in the war were also granted full citizenship. *Id.* at 16. Yet many persons age twenty-one and older were still considered second class citizens without voting privileges. *See* Dunphy, *supra* note 5 and accompanying text.

32. *See, e.g.*, Martha S. Jones, *For Black Women the 19th Amendment Didn’t End Their Fight to Vote*, NAT’L GEOGRAPHIC (Aug. 7, 2020), <https://www.nationalgeographic.com/history/2020/08/black-women-continued-fighting-for-vote-after-19th-amendment/> [<https://perma.cc/4GTA-UM8V>] (describing how poll taxes and literacy tests were deployed to prevent Black women from voting even after the Nineteenth Amendment was ratified).

33. CULTICE, *supra* note 9, at 16–17. The British “granted the franchise to men of 19 and 20 years who served in World War I.” BREWER, *supra* note 22, at n.4.

34. CULTICE, *supra* note 9, at 16–17.

35. *See generally* Quinn et al., *supra* note 15.

36. *Id.* at 359–60.

37. Cheng, *Uncovering the Twenty-sixth Amendment*, *supra* note 8, at 5; *see also* Quinn et al., *supra* note 15, at 360.

38. *See, e.g.*, Hamilton, *supra* note 10, at 1464–65 (asserting “[t]he nation’s youth did not begin to mobilize until the early 1960s, when the nation’s involvement in the Vietnam War galvanized their efforts”).

39. Further work exploring the role racism may have played in resisting youth suffrage would be an important contribution to legal historical scholarship in the days ahead.

those age eighteen and up to vote in state elections.⁴⁰ Kentucky lowered its state voting age to eighteen in the mid-1950s.⁴¹ And towards the end of the 1950s, both Alaska and Hawaii adopted lower voting ages as they became states; Alaska used age nineteen and Hawaii enacted twenty-year-old voting.⁴² Such state-level changes took place even while Black Americans continued to face discrimination en route to, and at, the polls.⁴³ And on the federal level, the ballot box was opened only to those twenty-one and over, despite several failed efforts to expand youth suffrage to age eighteen nationwide.⁴⁴

From the beginning of the First Wave, young people played a significant role in advocating for voting rights expansion. For example, the United States Student Assembly, comprised of college students from around the country, passed a resolution in 1943 urging a reduced national voting age.⁴⁵ In the 1950s, the College Federation of Young Republicans and the Young Democratic Club of Americas also demanded the franchise for those eighteen and up.⁴⁶

High school students in many parts of the country were also involved. During the 1940s, such students publicly lamented a lack of concern for youthful viewpoints. They claimed they were being ignored by an older generation of voters that was growing given extended lifespans.⁴⁷ During the 1950s high school students, it was reported,

40. See *Georgia Lowers Voting Age to 18*, PRESCOTT EVENING COURIER, Aug. 4, 1943, at 5 (“The [Democratic] governor let the campaign for adoption of this constitutional amendment under the slogan ‘old enough to fight, old enough to vote’”); see also BREWER, *supra* note 22 (“[E]xtension of the franchise to the 18–20 year age group by this state in the heart of the Solid South is only one of many evidences of a growing movement to grant voting rights to the generation which is now playing an important role in defense of democracy on the field of battle.”).

41. CULTICE, *supra* note 9, at 55–56.

42. *Id.*

43. See, e.g., *King v. Chapman*, 62 F. Supp. 639 (M.D. Ga. 1945) (describing and striking down Georgia state primary voting rules that discriminated based upon race); BREWER, *supra* note 22 (noting that Georgia’s racially discriminatory poll taxes did not apply to new voters under the age of twenty-one at the time suffrage was extended to those age eighteen to twenty-one).

44. See BREWER, *supra* note 22 (recounting seven separate attempts, between 1942 and 1944 alone, to lower the voting age on the national level); Cheng, *Uncovering the Twenty-sixth Amendment*, *supra* note 8, at 11 (asserting that “eighteen-year-old voting proposals were more or less stymied by the implacable opposition of Representative Emanuel Celler (D-NY), who chaired the House Judiciary Committee continuously from 1955 to 1972”); CULTICE, *supra* note 9, at 82–83 (summarizing decades of efforts to lower the federal voting age).

45. See BREWER, *supra* note 22; see also CULTICE, *supra* note 9, at 51 (describing high school and college student support for lowering the voting age to eighteen).

46. See, e.g., *College GOP Group Backs Vote for 18s*, THE DAILY ARGUS LEADER, Dec. 6, 1954, at 15; *Iowa Young Demo Challenge to GOP*, COUNCIL BLUFFS NONPAREIL, May 28, 1954, at 18.

47. See, e.g., Phyllis Stauffer, *Lower Voting Age to 18 Years, Medford High School Student Suggests in Journal Editorial*, MEDFORD MAIL TRIB., Mar. 23, 1948, at 6; see also BREWER, *supra* note 22 (“A declining birth rate and longer life span among the people of this country is tending, it is

strongly supported teen voting. For instance, one seventeen-year-old-girl told the press “because boys and girls of today have had more experience and schools are better than they used to be . . . they are old enough to know the importance of voting and to know how and what to vote for.”⁴⁸

This is not to say all youth fully supported First Wave efforts at the start.⁴⁹ Indeed, it is unclear from most of the preceding studies and accounts whether the voices and opinions of Black youth were being included and considered. And adult-led groups were the most vocal during the first decades of the initiative.⁵⁰ One study from the 1940s found that a majority of teens opposed, or were neutral on, youth voting rights because they felt unready for such a weighty responsibility.⁵¹ However, the National Education Association (NEA) and American Association of School Administrators (AASA), purporting to align themselves with the desires of students, declared their support for extended franchise.⁵² Additionally, military groups like the Veterans of Foreign Wars (VFW) also claimed to stand with young people, advancing the theory that suffrage for service was an appropriate *quid pro quo*.⁵³

One of the most powerful adult voices was that of the President. During his 1954 State of the Union Address, former U.S. Army general Dwight D. Eisenhower declared:

For years our citizens between the ages of 18 and 21, in time of peril, have been summoned to fight for America. They should participate

pointed out, to give the aged an added influence in political affairs, which may prove detrimental to the building of a new postwar world, and which would be offset by the addition of young citizens to the voting population.”).

48. See Virginia Simkins, *Members of the Senior English Class at Southside School in Agreement*, THE ROBESONIAN (Lumberton, N.C.), Oct. 30, 1957, at 7 (quoting Ester Moore in support of suffrage at age eighteen); see also Eugene Gilbert, “Lower Voting Age,” *Say Teen-Agers*, THE ROBESONIAN, Oct. 30, 1957, at 7 (President of Gilbert Youth Research Company reporting on group’s study, showing over 90% support of teens nationwide for reducing voting age).

49. Cheng, *Uncovering the Twenty-sixth Amendment*, *supra* note 8, at 5; see also Quinn et al., *supra* note 15, at 360 (“Young people were not always the most vocal proponents during the youth suffrage movement’s first wave[.]”).

50. See generally Cheng, *Uncovering the Twenty-sixth Amendment*, *supra* note 8 (analyzing complex landscape of teen voting rights supporters and their arguments).

51. See, e.g., H.H. Remmers & Associates, *Many High Schoolers Say They’re Not Ready to Vote*, TAMPA BAY TIMES, Aug. 1, 1948, at 43 (article by Remmers Group of Purdue University about its study, showing that 45% of teens supported lowering the voting age, 46% opposed the change, and 9% were undecided); see also Harry Shaw, *Now the 18-Year-Olds Can Vote, How Many Are Actually Voting?*, THE COURIER-J. (Louisville, Ky.), May 24, 1959, at 68 (reporting that 75% of college students in Kentucky able to vote were doing so, while many fewer high schools students age eighteen and up exercised the right).

52. BREWER, *supra* note 22; MARTIN PACKMAN, *EIGHTEEN-YEAR-OLD AND SOLDIER VOTING*, 1 ED. RSCH. REPS. 151–50 (1954), <https://library.cqpress.com/cqresearcher/document.php?id=cqresre1954022400&type=hitlist&num=0> [<https://perma.cc/5YLX-3NTC>].

53. CULTICE, *supra* note 9, at 50.

in the political processes that produce this fateful summons. I urge Congress to propose to the states a constitutional amendment permitting citizens to vote when they reach the age of 18.⁵⁴

It thus seemed Eisenhower, a fellow veteran, also believed those old enough for battle earned this privilege, apparently regardless of race or sex. On the other hand, politics and the road to further Republican victories was surely in Eisenhower's mind, too.⁵⁵

President Harry Truman, a Democrat who previously supported eighteen-year-old suffrage, changed his position during the 1950s. In response to Eisenhower's suggestion, Truman declared young citizens were not sophisticated enough to meaningfully utilize the voting process.⁵⁶ Other Democrats, such as Senator John F. Kennedy, expressed concern that expanding the franchise for youth was really a state rights issue.⁵⁷ Thus, Eisenhower's call for constitutional amendment, requiring approval by two-thirds of each house before state ratification could be sought, was thwarted by both direct and indirect opposition.⁵⁸

II. TAKING CHARGE OF AN AGE: NASH AND QUILLOIN AS BLACK TEEN ACTIVISTS IN THE 1960S

Ultimately young people, including Black teenage girls, played a significant role in lowering the nation's voting age.⁵⁹ They accomplished this task through direct advocacy, indirect influence on national thinking via activism, and by working in collaboration with adults, including President Kennedy, and other likely and unlikely allies. Youth voting privileges were thus ultimately expanded under the Constitution of the United States in 1971 with the ratification of the Twenty-sixth Amendment, reducing the voting age nationwide from twenty-one to eighteen.⁶⁰

54. *Id.* at 51.

55. See PACKMAN, *supra* note 52 (reporting that "Republicans believe that a majority of the soldiers who were able to vote in 1952 cast their ballots for Gen. Eisenhower and that younger citizens would have done likewise").

56. See *id.*; see also CULTICE, *supra* note 10, at 58, 64–65.

57. See CULTICE, *supra* note 9, at 65; PACKMAN, *supra* note 52 (noting that in 1954 that "[a]rdent supporters of states' rights oppose federal action on the voting age as unwarranted invasion of the prerogatives of the states in determining the makeup of their electorates").

58. See THOMAS H. NEALE, CONG. RSCH. SERV., 83–103, THE EIGHTEEN YEAR OLD VOTE: THE TWENTY-SIXTH AMENDMENT AND SUBSEQUENT VOTING RATES FOR NEWLY ENFRANCHISED AGE GROUPS 11 (1983) (recounting failure of federal youth suffrage effort during Eisenhower years); see also PACKMAN, *supra* note 52 (describing the ratification process, which ultimately required approval by three-fourths of the states).

59. See Quinn et al., *supra* note 15, at 360 (acknowledging the NAACP as contributing to the ratification of the Twenty-sixth Amendment and specifically mentioning Carolyn Quilloin as a leader in that effort).

60. U.S. CONST., amend. XXVI (1971).

Winning the vote in 1960 as the nation's youngest president, John F. Kennedy was automatically seen by many citizens as aligned with young people.⁶¹ In addition, throughout the 1960s youth effectively drew Kennedy and his appointees, including his brother as United States Attorney General, into their civil rights activism. These efforts, most notably for this article, those led by young Black women under the age of twenty-one, very much contributed to the Twenty-sixth Amendment becoming national law.

Yet many accounts of the ratification of the Twenty-sixth Amendment begin in the 1970s and do not address this period.⁶² Other accounts jump from the 1950s to the late 1960s with minimal details about the years in between.⁶³ But the movement for realization of Black voting rights during this period, driven in large part by young women of color, is very much relevant to our intersectional suffrage story, which includes the expansion of youth enfranchisement.⁶⁴

President Kennedy took office in the wake of the United States Supreme Court's decision in *Boynton v. Virginia*, which made clear that racial discrimination in connection with interstate travel was unlawful.⁶⁵ Young people from around the country, largely students of color, drove a range of public actions to ensure *Boynton's* promise.⁶⁶ Demanding racial equality and equal access in cities across the country, many protested

61. See generally BILL ADLER, JOHN F. KENNEDY AND THE YOUNG PEOPLE OF AMERICA (1965) (compilation of letters written to President Kennedy by children and teens, along with the President's responses); CATHERINE CORLEY ANDERSON, JOHN F. KENNEDY: THE YOUNG PEOPLE'S PRESIDENT (1991) (biography written for youth).

62. One notable exception here is the work of James Russell Henderson, *The Twenty-sixth Amendment* (Jan. 1, 2016) (Ph.D. Thesis, University of Mississippi History Department) (on file with author).

63. See, e.g., Cheng, *Breathing New Life*, *supra* note 8, at 670 ("From the mid-1950s through the late 1960s, the minimum voting age remained a low-level but perennial issue."); see also David L. Wright, *The Twenty-sixth Amendment as a Teachable Moment: Young Adult Voter Turnout in U.S. Elections, 1972–2006*, at 21–22 (May 23, 2013) (Ph.D. thesis, Columbia University) (on file with author); *The 26th Amendment*, HIST. (July 15, 2019), <https://www.history.com/topics/united-states-constitution/the-26th-amendment> [<https://perma.cc/YG5L-8AFG>] (essentially jumping from the Eisenhower years to the late 1960s).

64. Cf. Cheng, *Uncovering the Twenty-sixth Amendment*, *supra* note 8, at 80–82 (suggesting that the United States lived through a period of optimism until the late 1960s, when "racial tensions" were on the rise and youth actions against injustice became more prominent).

65. *Boynton v. Virginia*, 364 U.S. 454, 463 (1960).

66. See Josh Getlin, *A Burning Legacy*, L.A. TIMES (June 15, 1989), <https://www.latimes.com/archives/la-xpm-1989-06-15-vw-2604-story.html> [<https://perma.cc/KTK2-PNKD>] (noting very few college students in the 1980s were aware of the Freedom Summer actions and movies like *Mississippi Burning* "grossly ignored the leadership—and courage—of blacks in fighting Southern racism" during that period).

under the banner of the National Association for Advancement of Colored People (NAACP).⁶⁷ This included countless youth.

In March 1960, Carolyn Quilloin and two other Black high school students, youth members of the NAACP, refused to leave a segregated Savannah lunch counter in Levy's Department Store.⁶⁸ Their brave acts, resulting in arrests for civil disobedience, in the face of hatred, galvanized Savannah's Black community and adult leadership of the NAACP.⁶⁹ As one Executive Board member, Curtis Cooper, noted, "I guess it was just a case of a little child leading us . . . when they did it [and] they got in jail, we began to respond."⁷⁰ Because of this, Quilloin, while still a teenager, was soon acknowledged as an inspiring figure and powerful organizer, both locally and beyond.

Indeed, NAACP leadership and local churches protested the arrests with a fifteen-month economic boycott of the city's downtown businesses and a massive voter registration drive to try to unseat racist local officials.⁷¹ Because Georgia remained only one of two states that allowed for eighteen-year-olds to participate in state elections, NAACP youth members were a big part of these activities, too. And, of course, Quilloin helped organize fellow classmates at Alfred Eli Beach High school, who were given rides on NAACP's "ballot bus" to the local courthouse to register to vote as soon as they turned eighteen.⁷² Photographs

67. See, e.g., Minutes, Student Nonviolent Coordinating Committee Meeting, Baltimore, Md. (July 14–16, 1961), https://www.crmvet.org/docs/6107_sncc_minutes.pdf [<https://perma.cc/TYC8-XJY3>] (describing how young boys and girls from Baltimore's Jackie Robinson Youth Council of the NAACP protested against the local utility company for discriminating against Black employees).

68. Dash Coleman, *State Historical Marker to Commemorate Savannah Civil Rights Struggle*, SAVANNAH MORNING NEWS (Sept. 21, 2016), <https://www.savannahnow.com/news/2016-09-21/state-historical-marker-commemorate-savannah-civil-rights-struggle> [<https://perma.cc/3K3Y-YFWC>].

69. FREDERICK BALDWIN, FREEDOM'S MARCH: PHOTOGRAPHS OF THE CIVIL RIGHTS MOVEMENT IN SAVANNAH 11 (2008).

70. *Id.*

71. ANDREW BILLINGSLEY, MIGHTY LIKE A RIVER: THE BLACK CHURCH AND SOCIAL REFORM 55–57 (1999); Charles Lwanga Hoskins, *1963: The Second Siege in Savannah*, SAVANNAH HERALD (Sept. 4, 2013), <http://savannahherald.net/the-second-siege-of-savannah-p5491-1.htm> [<https://perma.cc/8DEE-76SR>]. The boycott included a mass meeting where Black residents spontaneously threw down their store "credit" cards in an act of solidarity; this powerful gesture greatly concerned store owners. Interview with Carolyn Quilloin Coleman (Apr. 21, 2020).

72. BALDWIN, *supra* note 69, at 7–8, 13 (describing how the NAACP's "Ballot Bus" would pick up students and drive them to the courthouse to register to vote); see also STEPHEN G. N. TUCK, BEYOND ATLANTA: THE STRUGGLE FOR RACIAL EQUALITY IN GEORGIA, 1940–1980, at 134 (2001) (referring to Quilloin's involvement in various NAACP movement efforts as a student in Savannah during the early 1960s, including being in charge of "ride ins" to try to desegregate buses).

and coverage of these efforts became part of the local and national news landscape.⁷³

In October 1961, the efforts of Quilloin and her colleagues bore fruit. Under the leadership of a new mayor,⁷⁴ the Savannah City government repealed local laws that segregated restaurants and other public accommodations, consistent with *Boynton's* mandate, and took other actions over the coming months to desegregate the city.⁷⁵ Months of persistent efforts by Quilloin, other local youth, and adult allies, resulted in Dr. Martin Luther King referring to Savannah as the least segregated city in the South as he rang in the New Year in 1964.⁷⁶

The Student Non-violent Coordinating Committee (SNCC), a group of young activists, mostly Black,⁷⁷ many under twenty-one years of age, also built a highly organized structure to deploy students across the country to press for racial justice during this time.⁷⁸ Starting with a small group in 1961, SNCC was hundreds strong by the mid-1960s, with many members and volunteers leaving college entirely to move to the deep south and work towards equal citizenship for Black America.⁷⁹ Students from

73. See, e.g., *Savannah Arrests 3 in Student Sit Down*, ATLANTA CONST., Mar. 17, 1960, at 14 (reporting on the Levy lunch counter arrests, but erroneously claiming Quilloin was a college student by the name of “Carolyn Quilliand”). Quilloin also made news for being threatened by a white man with a knife because of her NAACP bus “ride in” work. See, e.g., Trezzvant W. Anderson, *Massive Bus Blitz Hits Savannah*, PITT. COURIER, Feb. 4, 1961, at 4; see also Zeke J. Miller, *Why Martin Luther King Jr.’s Lessons About Peaceful Protests Are Still Relevant*, TIME (Jan. 12, 2018), <https://time.com/5101740/martin-luther-king-peaceful-protests-lessons/> [<https://perma.cc/ED9L-7PLE>] (“Children provided the movement with some of its most powerful images . . .”).

74. See generally Tom Barton, Opinion, *Former Savannah Mayor Gets Long Overdue Recognition*, SAVANNAH MORNING NEWS (Nov. 28, 2017), <https://www.savannahnow.com/column/opinion/2017-11-28/tom-barton-former-savannah-mayor-gets-overdue-recognition> [<https://perma.cc/4NCW-EUDE>] (chronicling the life of former Mayor Malcolm McLean, a Harvard Law School graduate and World War II veteran, who helped desegregate Savannah and died in 2001).

75. See *The Georgia Civil Rights Trail: The Savannah Protest Movement*, GA. HIST. SOC’Y (Sept. 29, 2016), https://georgiahistory.com/ghmi_marker_updated/the-georgia-civil-rights-trail-the-savannah-protest-movement/ [<https://perma.cc/KWX3-RPDS>] (describing the historical marker in downtown Savannah that currently exists to memorialize the action of Quilloin and her high school student colleagues).

76. See Stephen Tuck, *Civil Rights Movement*, NEW GA. ENCYCLOPEDIA, <https://www.georgiaencyclopedia.org/articles/history-archaeology/civil-rights-movement> [<https://perma.cc/GTJ7-9MGZ>].

77. See HOWARD ZINN, SNCC: THE NEW ABOLITIONISTS 3 (1965); see also *Student Nonviolent Coordinating Committee*, STAN. U.: THE MARTIN LUTHER KING JR. RSCH. & EDUC. INST., <https://kinginstitute.stanford.edu/encyclopedia/student-nonviolent-coordinating-committee-sncc> [<https://perma.cc/P748-UVMX>] (describing initial convening of 200 Black college students that ultimately led to SNCC’s creation).

78. See, e.g., Minutes, Student Nonviolent Coordinating Committee Meeting, Louisville, Ky. (June 9–19, 1961), https://www.crmvet.org/docs/6106_sncc_min.pdf [<https://perma.cc/E68M-BB7H>] (outlining group’s short and long term plans, and concluding with election of South Carolina State College student Charles McDrew as temporary chairperson).

79. See ZINN, *supra* note 77, at 3.

Spelman and Morehouse, divinity schools, and elsewhere came together to lead marches and sit-ins in places like Atlanta, Georgia, where eighty students from Black colleges were arrested during one such demonstration.⁸⁰ They also partnered with local NAACP youth groups in Baltimore and beyond.⁸¹

SNCC's work inspired demonstrations by other youth groups. For instance, in the fall of 1961 the Student Committee Against Demonstration, comprised of mostly young white men, organized a boycott of businesses along Route 40 between Delaware and Maryland that refused to admit Black patrons. Distributing flyers throughout the region entitled "Am I My Brother's Keeper?" the students shared the names and addresses of all the restaurants that refused to serve African Americans.⁸² One of the group's leaders, University of Delaware student James White, wrote to President Kennedy to inform the administration of their concerns and efforts.⁸³ Harris Wofford, Special Assistant to the President, responded in writing a few weeks later to thank White, note the State Department's support of such actions, and urge the students to provide updates on their progress.⁸⁴

Working in collaboration with the Congress of Racial Equality (CORE), a racial justice advocacy group founded by James Farmer in the 1940s, SNCC's students also played a major role in the 1961 "Freedom Rides." CORE's initial efforts were met with arrests and vicious physical attacks.⁸⁵ But, under the leadership of student-organizer Diane Nash, SNCC students were undaunted.⁸⁶ A petite Black woman from Chicago, Nash began her racial justice work like Quilloin: participating in southern lunch counter sit-ins while a teenager.

But after that work in Nashville in 1959 at Fisk College, she soon took her activism on the road, leading Freedom Rides throughout the

80. *Id.* at 39.

81. See Minutes, Student Nonviolent Coordinating Committee Meeting, Baltimore, Md. (July 14–16, 1996), https://www.crmvet.org/docs/6107_sncc_minutes.pdf [<https://perma.cc/2DR7-H4G5>].

82. Flyer, "Am I my Brother's Keeper" (Nov. 14, 1961) (on file at John F. Kennedy Presidential Library and Museum).

83. Letter of James L. White, University of Delaware (Sept. 26, 1961) (on file at John F. Kennedy Presidential Library and Museum).

84. Letter of Harris L. Wofford, White House (Nov. 14, 1961) (on file at John F. Kennedy Presidential Library and Museum).

85. *Freedom Rides*, STAN. U.: THE MARTIN LUTHER KING JR. RSCH. & EDUC. INST., <https://king.institute.stanford.edu/encyclopedia/freedom-rides> [<https://perma.cc/2SCJ-XXWP>]; *The Freedom Rides*, CONG. OF RACIAL EQUAL., <http://www.core-online.org/History/freedom%20rides.htm> [<https://perma.cc/4LVT-C5KJ>].

86. See *Student Nonviolent Coordinating Committee*, *supra* note 77.

south.⁸⁷ Even after the White House contacted Nash directly in May 1961, to warn her of the dangers of continuing the Freedom Rides, she persisted. Under her plan, Black and white students boarded interstate buses together



to demand integration and equal rights for Black citizens in southern states.⁸⁸ According to Nash, if SNCC students gave in to threats of violence, “we wouldn’t have been able to have any kind of movement for voting rights, for buses, public accommodations or anything after that.”⁸⁹

*Matthew Walker, Peggy Alexander, Diane Nash, and Stanley Hemphill in May 1960, eating lunch at a previously “white only” lunch counter in the Greyhound bus station in Nashville.*⁹⁰

Nash’s failure to heed warnings to stand down also forced President Kennedy’s brother, Robert Kennedy, as head of the United States Department of Justice (DOJ), to intervene to provide at least some limited protection and assistance to Freedom Ride efforts.⁹¹ This served as the beginning of the Kennedy administration’s reluctant entry into supporting

87. See Thad Morgan, *How Freedom Rider Diane Nash Risked Her Life to Desegregate the South*, HIST. (Apr. 1, 2019), <https://www.history.com/news/diane-nash-freedom-rider-civil-rights-movement> [<https://perma.cc/GL4B-QJLF>]; see also *id.* (accompanying video interview with Nash, explaining the activism she took on in her new role)

88. *Diane Nash*, SNCC DIGITAL, <https://snccdigital.org/people/diane-nash-bevel/> [<https://perma.cc/68FU-RX99>].

89. Morgan, *supra* note 87.

90. Gerald Holly, Photograph of Matthew Walker, Peggy Alexander, Diane Nash & Stanley Hemphill, in Matthew Walker Jr. Over the Years, THE TENNESSEAN (Apr. 15, 2016), <https://www.tennessean.com/picture-gallery/news/2016/04/15/matthew-walker-jr-over-the-years/83089012/> [<https://perma.cc/MZ6D-NGWC>].

91. See Nicole Moore, *Who the Hell Is Diane Nash?*, NAT’L CTR. FOR CIV. & HUM. RTS. (Mar. 8, 2019), <https://www.civilandhumanrights.org/fw-diane-nash/> [<https://perma.cc/Z2W9-2VZ9>].

racial justice initiatives, which increased over the next two years as the NAACP and SNCC turned their attention to Black voting rights in the south.⁹² And through such racial justice efforts during the early 1960s, activist female student leaders like Nash and Quilloin also indirectly and directly helped expand youth voting rights a decade later.

III. DRAWING IN PRESIDENTS KENNEDY AND JOHNSON AS UNLIKELY FIRST WAVE ALLIES

President Kennedy established the President's Commission on Registration and Voting Participation (the Voting Commission) in 1963. He recognized the Voting Commission as "one of the most important assignments given to any group of citizens."⁹³ However, President Kennedy initially directed this influential group to focus its attention on a relatively white-washed directive. He clearly understood the importance of voter turnout and publicly lamented that United States voting numbers stood in stark contrast to international election returns, including a 90% voter turnout reported in Italy.⁹⁴ But rather than talk about youth voting rights or racial discrimination in southern voting practices, President Kennedy asked the Voting Commission to study the issue of political engagement and voter apathy generally, without mentioning the words race or youth.⁹⁵

Given its discomfort with directly addressing racism, the Kennedy administration was properly criticized by Thurgood Marshall and other influential racial justice leaders for failing to act quickly and decisively on the civil and voting rights front.⁹⁶ Further, as the Voting Commission gathered data over several months, racist acts of violence continued to

92. Press Release, U.S. Dep't of Just., Justice Department Commemorates 50th Anniversary of Robert F. Kennedy's Swearing in as Attorney General (Jan. 21, 2011), <https://www.justice.gov/opa/pr/justice-department-commemorates-50th-anniversary-robert-f-kennedy-s-swearing-attorney-general> [<https://perma.cc/9ZSB-QL75>] (describing fifty-seven voting rights lawsuits filed by Kennedy's Department of Justice, in addition to efforts undertaken to protect freedom riders).

93. See Press Release, Off. of the White House, Remarks to President's Commission on Registration and Voting Participation (May 8, 1963) [hereinafter Remarks to the President], <https://www.jfklibrary.org/asset-viewer/archives/JFKPOF/044/JFKPOF-044-007> [<https://perma.cc/Y6TQ-VMZG>].

94. See *Small Voter Turnout Puzzles JFK*, DEMOCRAT & CHRON., May 9, 1963, at 3; see also CHARLES E. JOHNSON, NONVOTING AMERICANS 8 (1980) (explaining that Kennedy's close presidential victory, involving the highest number of voters historically, still meant he was supported by only 31% of the electorate).

95. See Remarks to the President, *supra* note 93.

96. See *id.* (further noting critiques of the Kennedys offered by Thurgood Marshall and other racial justice leaders); see also Candace Allen, *How John F. Kennedy's Assassination Spurred the Drive for Racial Equality*, THE GUARDIAN (Nov. 13, 2013), <https://www.theguardian.com/world/2013/nov/19/john-f-kennedy-assassination-racial-equality-jfk> [<https://perma.cc/P92W-B283>] (opining that Kennedy Administration was extremely cautious to the detriment of Black America, slow walking its civil rights agenda for fear of alienating political supporters).

endanger Black lives. Military veteran and NAACP voting rights activist, Medgar Evers, was shot and killed outside of his Mississippi home in June 1963.⁹⁷ His death prompted President Kennedy to send expansive civil rights legislation to Congress for its consideration.⁹⁸ Four children lost their lives in a Ku Klux Klan bombing attack on a Baptist Church in Alabama in September 1963.⁹⁹ This attack finally spurred further support in Washington D.C. for Kennedy's proposed civil rights bill.¹⁰⁰

But many civil rights advocates believed Kennedy's support for their efforts was still too little, too late. Meanwhile, white segregationists saw Kennedy as a threat to their desired world order.¹⁰¹ In November 1963, three weeks after his brother promised to punish southern establishments that ignored *Boynton*,¹⁰² President Kennedy was assassinated in Dallas, Texas.¹⁰³

Just a few weeks later, the Voting Commission released its findings regarding political engagement and voter apathy. The findings were celebrated by Lyndon B. Johnson as one of his first official acts as Commander-in-Chief after being elevated to the position following

97. See Mae C. Quinn, *Missouri *@!!?*@! – Too Slow*, 62 ST. LOUIS U. L.J. 847, 848 (2016) (recounting the horrific homicidal attack on Evers and protests that followed, including Nina Simone's performance of Mississippi, Goddamn at Carnegie Hall).

98. See Louis Menand, *How Women Got in on the Civil Rights Act*, NEW YORKER (July 14, 2014), <https://www.newyorker.com/magazine/2014/07/21/sex-amendment> [<https://perma.cc/D5PW-TGFZ>]; see also *The Civil Rights Act of 1964: A Long Struggle for Freedom*, LIBR. OF CONG.: EXHIBITIONS, <https://www.loc.gov/exhibits/civil-rights-act/civil-rights-era.html> [<https://perma.cc/75SJ-KBHU>] (noting the comprehensive nature of Kennedy's bill).

99. Robin Young et al., *4 Little Girls Died in the 16th Street Baptist Church Bombing in 1963. A 5th Survived*, WBUR: HERE & NOW (Apr. 30, 2019), <https://www.wbur.org/hereandnow/2019/04/30/16th-street-baptist-church-bombing-survivor> [<https://perma.cc/RUM5-WWTS>].

100. See JOHN F. KENNEDY PRESIDENTIAL LIBRARY AND MUSEUM: CIVIL RIGHTS MOVEMENT, <https://www.jfklibrary.org/learn/about-jfk/jfk-in-history/civil-rights-movement> [<https://perma.cc/XE-K6-PS2S>] (noting that in fall of 1963, the "comprehensive civil rights bill cleared several hurdles in Congress and won the endorsement of House and Senate Republican leaders," but did not make it to the White House until after Kennedy's death).

101. See generally Todd E. Saucedo, *The Fire Within: The Baldwin Meeting and the Evolution of the Kennedy Administration's Approach to Civil Rights* (2007) (Master's thesis, University of Central Florida) (on file with author) (noting that members of Kennedy's administration were seen as ineffectual by Black activists and their allies while characterized as instigators of unrest by southern politicians and others).

102. Marian Smith Holmes, *The Freedom Riders, Then and Now*, SMITHSONIAN MAG. (Feb. 2009), <https://www.smithsonianmag.com/history/the-freedom-riders-then-and-now-45351758/> [<https://perma.cc/QV7F-XKS6>] (recounting how Attorney General Kennedy pressed the Interstate Commerce Commission to enforce desegregation of southern businesses through fines).

103. See generally Rachel Siegel, *JFK in the 'City of Hate': How Dallas Earned its Ugly Label Before the Assassination*, WASH. POST (Nov. 22, 2017), <https://www.washingtonpost.com/news/retropolis/wp/2017/11/22/jfk-in-the-city-of-hate-how-dallas-earned-its-ugly-label-before-the-assassination/> [<https://perma.cc/4X4V-YDL8>] (describing history of conservative hostility directed towards Kennedy).

Kennedy's assassination.¹⁰⁴ He lauded the Commission for shedding light on "disturbing" practices across the country that were suppressing voter turnout.¹⁰⁵ The Voting Commission called for an end to poll taxes and other state-level practices that caused "involuntary nonvoting" in Black communities.¹⁰⁶ It also recommended reducing the voting age to eighteen for all persons across the country, regardless of race or sex.¹⁰⁷

Perhaps as a feature of the country's discomfort with tackling racial injustice head-on, the Voting Commission's youth franchise proposal drew far more press attention than the proposals affecting Black voting rights.¹⁰⁸ Yet the overall impact of the findings influenced the public and politicians, forcing them to confront the idea of suffrage generally and youth voting in particular.¹⁰⁹

Other events during Johnson's five-year administration also drew heightened attention. This included not just the deaths of countless soldiers in Vietnam, but the continued life-threatening dangers encountered by those advancing Black voting rights on United States soil. Significantly, both imperiled many persons who had not yet reached the age of twenty-one.

Even so, most accounts spend little time considering how exactly racial justice actions of the early to mid-1960s impacted youth suffrage.¹¹⁰ Some commentators have suggested the desire to end racially discriminatory voting practices in the south provided an analytical parallel

104. UNITED STATES, REPORT OF THE PRESIDENT'S COMMISSION ON REGISTRATION AND VOTING PARTICIPATION (1963) [hereinafter REPORT OF THE PRESIDENT'S COMMISSION]; see also CULTICE, *supra* note 9, at 80–85.

105. *LBJ Suggest Move to Ease Voter Curbs*, SACRAMENTO BEE, Dec. 20, 1963, at 8.

106. Shamefully, the Commission did not reach a unanimous decision about elimination of literacy tests. REPORT OF THE PRESIDENT'S COMMISSION, *supra* note 104, at 51–60.

107. *Id.*

108. See CULTICE, *supra* note 9, at 85; see also *Study Group Scores Poll Tax, Wants 18-Year-Olds to Vote*, NW. ARK. TIMES, Dec. 20, 1963 (describing Johnson's presentation of the report from the White House); *Minimum Age for Voting Is Proposed*, HUNTSVILLE TIMES, Dec. 20, 1963 (reporting on Census Director Richard Scammon's declaration that "the recommendation applied both to state and federal elections").

109. See Matthew Weil, *JFK's Contribution to Election Administration Modernization*, BIPARTISAN POL'Y CTR. (Nov. 20, 2013), <https://bipartisanpolicy.org/blog/jfks-contribution-election-administration-modernization/> [<https://perma.cc/466C-E9XV>] (outlining ways in which the impact of Kennedy's Voting Rights Commission continued long after his death); see also CULTICE, *supra* note 9, at 83–85.

110. See *supra* notes 64–66 and accompanying text. Cf. NEWMAN, *supra* note 13, at 3–17 (describing youth activism throughout the 1960s as a lead up to the ratification of the Twenty-sixth Amendment, but joining others in suggesting that youth did not impact effort to reduce the voting age until the 1970s).

for the youth suffrage movement.¹¹¹ More than this, however, peaceful actions and voter registration campaigns led by Black students and other young activists throughout the south raised the profile of young people as empowered and engaged citizens. Their actions, covered by nearly every newspaper and television station in the country, helped them gain recognition and a great deal of moral sway.¹¹²

For instance, Diane Nash convinced Dr. King to allow school youth to march in Birmingham. She persuaded him that if the children were old enough to go to church, then they were old enough to march for freedom.¹¹³ The nation was deeply impacted by witnessing violent attacks on these young people, as well as their strength and determination in the face of such injustice.¹¹⁴ Their fortitude also clearly generated fear in segregationists.¹¹⁵

Youth themselves gained a greater understanding of the power of the ballot and their power as political agents through these activities.¹¹⁶

111. See FISH, *supra* note 14, at 1185–86, 1231 (offering that “the civil rights movement drew political attention to the issue of voting rights and provided advocates of a lower voting age with a morally powerful analogy”); see also Cheng, *Uncovering the Twenty-sixth Amendment*, *supra* note 8, at 78 (describing congressional floor arguments drawing moral parallels between denying eighteen-year-olds the right to vote and denying blacks or women the right to vote).

112. Hugh Mulligan, *Neither Side Lets Up in ‘Freedom Rider’ Disputes*, ROCKY MOUNT TELEGRAM, July 16, 1961, at 4 (North Carolina newspaper reporting on non-violent student protest activities, including those of twenty-year-old Black divinity student Bernard Lafayette, which were met with mob violence); see, e.g., Crary Pullen, *Freedom Riders: Bruce Davidson on His Awakening*, TIME (May 24, 2011) (describing the work and experience of a news photographer who documented for Time magazine the early 1960s protest activities of young Freedom Riders in their trip south); see also *Court Explores Federal Role in Freedom Rides*, NEWS J., Jun. 1, 1931, at 27 (Delaware newspaper reporting on actions of CORE, seeking to “swamp” the jails of Jackson, Mississippi with student Freedom Riders from around the country, and university faculty support for the student efforts).

113. See David A.J. Richards, *Ethical Religion and the Struggle of Human Rights: The Case of Martin Luther King, Jr.*, 72 FORDHAM L. REV. 2105, 2145 (2004).

114. See, e.g., *Congress and the Voting Rights Act of 1965*, NAT’L ARCHIVES: CTR. FOR LEGIS. ARCHIVES, <https://www.archives.gov/legislative/features/voting-rights-1965> [<https://perma.cc/M8PZ-Q5YZ>] (“News cameras filmed the violence in what became known as ‘Bloody Sunday.’”); see also William G. Thomas III, *Television News and the Civil Rights Struggle: The Views in Virginia and Mississippi*, S. SPACES (Nov. 3, 2004), <https://southernspaces.org/2004/television-news-and-civil-rights-struggle-views-virginia-and-mississippi/> [<https://perma.cc/6RQ7-RC3E>] (analyzing television news coverage of civil rights activities of the 1960s including its impact on opinions in the south).

115. See, e.g., Dixie Birdsong, *Freedom Riders Are Red*, S.F. EXAMINER, June 30, 1961 (quoting General T.B. Birdsong, head of the Mississippi Highway Patrol, as declaring the Freedom Riders were “directed, planned and inspired by known Communists”).

116. Holmes, *supra* note 102 (recounting that most of the 300 Freedom Riders who were arrested in the south were college students, representing forty different states, with no singular race or gender). See generally WATSON, *FREEDOM SUMMER*, *supra* note 2 (recounting how in 1964 college students and other young Americans from around the country joined forces with those in the south to register voters and create “Freedom Schools” to advance and support Black citizenship and empowerment).

One SNCC volunteer, a nineteen-year-old white student from California, noted:

A relatively short time ago I began to awake after at least an eighteen-year sleep . . . I needed the Negro revolt to make me reflect, question, examine, probe a little deeper—in fact a great deal deeper . . . the student or citizen begins to become conscious that he is immediately at odds with society instead of becoming a packaged good citizen . . . [the South] seems to be the most . . . crucial, and important place to try to enlarge the freedom of humanity.¹¹⁷

Diane Nash also grew her power through SNCC. After she led the Freedom Rides, she repeatedly made national news as she pressed for change. In 1962, for instance, she was arrested while pregnant for engaging in desegregation efforts at a local courthouse.¹¹⁸ Although she was afraid of spending months in jail as a new mother, she remained committed to her position of “jail, no bail,” which conflicted with the views of elders in the racial justice movement, including Thurgood Marshall.¹¹⁹ The judge ultimately released Nash after ten days, which added to her reputation as one of the most steadfast and powerful leaders SNCC had ever seen.¹²⁰

To be sure, SNCC’s multi-front efforts both energized and traumatized many of its members. These efforts included voter education and registration efforts in Mississippi during the “Freedom Summer” of 1964.¹²¹ On the education front, SNCC tutored Black adults to try to help them pass literacy tests administered by Mississippi voting administrators.¹²² SNCC also set up “Freedom Schools” to offer coursework and summer activities to help Black children develop greater self-esteem, despite facing hatred and dangers on a daily basis.¹²³ Thousands of children, including high school students who had been

117. See ZINN, *supra* note 77, at 232.

118. *Diane Nash, Activist Born*, AFR. AM. REGISTRY, <https://aaregistry.org/story/diane-nash-activist-born/> [<https://perma.cc/J85L-PDS2>].

119. Christopher W. Schmidt, *Divided by Law: The Sit-ins and the Role of the Courts in the Civil Rights Movement*, 33 L. & HIST. REV. 93, 127–128 (2015).

120. AFR. AM. REGISTRY, *supra* note 118 (explaining Nash broke with SNCC in 1965 after it departed from its nonviolent beginnings); see also Heidi Hall, ‘Because of You:’ *Diane Nash Refused to Give Her Power Away*, THE TENNESSEAN, Apr. 26, 2013, <https://www.tennessean.com/story/news/local/2017/03/02/diane-nash-refused-give-her-power-away/98198804/> [<https://perma.cc/6WK3-YPMG>].

121. See WATSON, *supra* note 2; see also Hall, *supra* note 120 (Patricia Jenkins-Armstrong, a Black Nashvillian who joined the Freedom Rides as a seventeen-year-old, referring to SNCC protest work as “traumatic” but something she felt she had to do “to make a difference in the city and all over the country”).

122. See ZINN, *supra* note 77, at 66–67 (recounting how SNCC would prepare Black voter registrants to be tested on obscure sections of the Mississippi Constitution).

123. See WATSON, *supra* note 2, at 227.

expelled for engaging in racial justice activities, flooded make-shift classrooms set up in church basements and other temporary settings across Mississippi to take part in these activities.¹²⁴

Obviously SNCC and its allies managed to capture the attention of two different White Houses.¹²⁵ As one of his last official acts, President Kennedy appointed Nash to a federal committee working on draft civil rights legislation.¹²⁶ And on June 21, 1964, when three SNCC volunteers disappeared in Mississippi—two of whom were under the age of twenty-one—the federal administration intervened.¹²⁷ But it was not only their status as young people that produced such reaction.

James Chaney, a Black volunteer, had been accompanied by two white volunteers, Michael Schwerner and Andrew Goodman when the group disappeared. As Michael's young wife, Rita Schwerner, powerfully declared to the press at the time, "If [Michael] and Andrew Goodman had been Negroes, the world would have taken little notice of their deaths. After all, the slaying of a Negro in Mississippi is not news. It is only because my husband and Andrew Goodman were white that the national alarm has been sounded."¹²⁸ Thus, Rita Schwerner correctly noted the problem of Black lives being too often overlooked.

On August 4, the bodies of all three of the young men were found—shot dead and buried under remote clay mounds on a Mississippi farm.¹²⁹ And as the historical marker in Neshoba County indicates, their horrific death at the hands of Ku Klux Klan members seems to be what finally led

124. *Id.*; see also ZINN, *supra* note 77, at 75–76.

125. WATSON, *supra* note 2, at 226 (Johnson referring to SNCC's efforts, to establish a new Freedom Democrat caucus for the national Democratic convention, as "a ticking time bomb"); see also Stacey Chandler, "When It Was So Rough You Couldn't Make It": Voting Rights in the Early 1960s, NAT'L ARCHIVES: REDISCOVERING BLACK HIST. BLOG (Apr. 12, 2016), <https://rediscovering-black-history.blogs.archives.gov/2016/04/12/when-it-was-so-rough-that-you-couldnt-make-it-voting-rights-in-the-early-1960s/> [<https://perma.cc/R3GF-5W98>] (documenting direct communications of Julian Bond, a founder of SNCC, with the White House).

126. See Asia Simone Burns, *AJC Sepia Black History Month: Diane Nash Was Fearless in Battle to Desegregate Lunch Counters, Buses*, THE ATLANTA J.-CONST. (Feb. 8, 2020), <https://www.ajc.com/lifestyles/diane-nash-was-fearless-battle-desegregate-lunch-counters-buses/mZaQd0LLFpU274orZsKIFN/> [<https://perma.cc/CNA3-V6GZ>].

127. WATSON, *supra* note 2, at 74–211; see also ZINN, *supra* note 77, at 243 (describing James Chaney as eighteen, Andrew Goodman at twenty, and Michael Schwerner as twenty-five years old on June 21, 1964, the day the group disappeared).

128. See Nikole Hannah-Jones, *A Brutal Loss, but an Enduring Conviction*, PROPUBLICA (July 22, 2014), <https://www.propublica.org/article/a-brutal-loss-but-an-enduring-conviction> [<https://perma.cc/5W9Y-CGNE>]; see also Douglas Martin, *Fannie Lee Chaney, 84, Mother of Slain Civil Rights Worker, Is Dead*, N.Y. TIMES (May 24, 2007), <https://www.nytimes.com/2007/05/24/obituaries/24chaney.html> [<https://perma.cc/GX7N-AC3T>] (noting that James Chaney's mother agreed with Rita Schwerner's sentiments—that if her son was not killed along with white volunteers, no action would have been taken by the federal government or otherwise).

129. *Bodies of Chaney, Goodman, and Schwerner Discovered*, SNCC DIGITAL, <https://snccdigital.org/events/bodies-chaney-goodman-schwerner-discovered/> [<https://perma.cc/HSN8-ELTZ>].

to the passage of the nation's Civil Rights Act—legislation initially introduced during the Kennedy administration.¹³⁰

Before Freedom Summer ended, President Johnson signed long-resisted civil rights legislation into law. Picking up where Kennedy left off, he repeatedly declared that “Americans of every race and color,” who for decades had fought the nation's wars, deserved personal liberty and human dignity.¹³¹ Focused on ending the “racial poison” infecting the nation, the law also prohibited sex-based discrimination based upon a somewhat surprising last-minute amendment to the bill proposed by Howard Smith—an eighty-year-old Republican from Virginia.¹³² Despite warnings that passage of the bill would lead to the end of Johnson's presidency, he won the 1964 election with overwhelming support.

The next year, SNCC members and other youth joined Dr. Martin Luther King to march from Selma, Alabama, to demand respect for the 1964 Civil Rights Act. Again, violence was visited upon their Black bodies and those of their allies—and again life was senselessly taken in the name of racist hate and resistance to equal justice.¹³³ Johnson again urged the country to come together to uphold its promises to all citizens.¹³⁴ That speech helped lead to the passage of the 1965 Voting Rights Act, considered “the most significant statutory change in the relationship between the Federal and state governments in the area of voting since the Reconstruction era.”¹³⁵ Not only did that Act play a significant role in advancing Black voting rights, but it also came to feature prominently in the youth suffrage movement and the road to the ratification of the Twenty-sixth Amendment in the 1970s.

130. Carly Blake, *54th Commemorative Service Is Put on for Civil Rights Workers*, ABC 11 NEWS (June 17, 2018), <https://www.wtok.com/content/news/54th-Commemorative-Service-is-put-on-for-Civil-Rights-workers-485788041.html> [<https://perma.cc/K7QQ-B3MR>].

131. President Lyndon Johnson, Remarks upon Signing the Civil Rights Act of 1964 (July 2, 1964), in *The Civil Rights Act of 1964: A Long Struggle for Freedom*, LIBR. OF CONG.: EXHIBITIONS, <https://www.loc.gov/exhibits/civil-rights-act/multimedia/johnson-signing-remarks.html> [<https://perma.cc/ZDA9-FUGV>].

132. See Menand, *supra* note 98 (describing the curious and controversial effort on the part of Smith to add sex to the bill).

133. *Selma to Montgomery March*, STAN. U.: THE MARTIN LUTHER KING JR. RSCH. & EDUC. INST., <https://kinginstitute.stanford.edu/encyclopedia/selma-montgomery-march> [<https://perma.cc/X96M-DZM7>] (describing the events of “Bloody Sunday,” including violent attack on SNCC members, and the murder of James Reeb, a white minister who had joined Dr. King in solidarity).

134. See *id.* (recounting President Johnson's “special message” to the nation in response to these events, where he declared: “Their cause must be our cause too. Because it is not just Negroes, but really it is all of us, who must overcome the crippling legacy of bigotry and injustice. And we shall overcome”).

135. See *Congress and the Voting Rights Act of 1965*, NAT'L ARCHIVES: CTR. FOR LEGIS. ARCHIVES, <https://www.archives.gov/legislative/features/voting-rights-1965> [<https://perma.cc/M8PZ-Q5YZ>].

IV. POWERFUL BLACK GIRLS BECOMING POWERFUL BLACK WOMEN:
ADDITIONAL INTERSECTIONAL FIRST WAVE MOVES
BY NASH AND QUILLOIN

The actions and activism of Black women and girls were largely responsible for bringing about the successful passage of the Twenty-sixth Amendment. However, these connections have been largely overlooked both inside and outside of academic circles. This is exemplified in the story of Carolyn Quilloin.

As suggested, President Johnson's enactment of laws to enforce the rights of African Americans and women also overlapped with a far less hopeful situation for the country—the ramp-up of the Vietnam War. By 1965, Johnson sent 200,000 soldiers to the region, many of whom were just teens drafted right out of high school.¹³⁶ This development drew strong reactions from many groups, including those who resurrected the refrain “old enough to fight, old enough to vote,” with new fervor. This chapter of the story is one that frequently focuses on protests led by anti-war college protesters—usually young white men.

For instance, many have written about Tom Hayden, a white college student who established the Students for a Democratic Society (SDS) and organized a 1965 march on Washington to protest the Vietnam War. Hayden is regarded as someone who helped to lift up the interests and concerns of the nation's young people.¹³⁷ The march took place the year after Dr. King did the same and drew 20,000 mostly student activists.¹³⁸ It is often described as connecting military draft and voting age by drawing attention to the thousands under the age of twenty-one who were killed while deployed.¹³⁹ But it should not be forgotten that Hayden honed his organizing skills as a SNCC volunteer in McComb, Mississippi, during the Freedom Summer.¹⁴⁰

More than this, most of the protesters involved in Hayden's 1965 anti-war march, and others like it, were not particularly interested in

136. Kent Germany, *Lyndon B. Johnson: Foreign Affairs*, UVA MILLER CTR., <https://millercenter.org/president/lbjohnson/foreign-affairs> [<https://perma.cc/2ACM-3KR2>].

137. See, e.g., Maya Rhodan, *Tom Hayden Helped Define 1960s Student Activism with This Manifesto*, *TIMES* (Oct. 24, 2016), <https://time.com/4542668/tom-hayden-port-huron-statement/> [<https://perma.cc/7LKS-EVPA>] (noting in Hayden's obituary that by the late 1960s, 35,000 students on 350 college campuses were affiliated with SDS).

138. See, e.g., ELAINE CAREY, *PROTESTS IN THE STREETS: 1968 ACROSS THE GLOBE* (2016); see also *The March on Washington*, MICH. IN THE WORLD, http://michiganintheworld.history.lsa.umich.edu/antivietnamwar/exhibits/show/exhibit/the_teach_ins/national_teach_in_1965 [<https://perma.cc/S334-TJCX>] (part of the exhibition entitled “Resistance and Revolution: The Vietnam War Movement at the University of Michigan, 1965–1972”).

139. See CAREY, *supra* note 138.

140. *Students for a Democratic Society (SDS)*, SNCC DIGITAL, <https://snccdigital.org/inside-sncc/alliances-relationships/sds/> [<https://perma.cc/3QL3-KX5W>].

voting.¹⁴¹ By the end of the 1960s many Vietnam protesters largely called for revolutionary actions outside of any ballot box.¹⁴² As one white male leader in the movement has recently recounted:

Alienated and enraged, we moved on to widespread civil disobedience, rejection of mainstream lifestyles, violent clashes with police and militant opposition to the government. Our strategy, less coherent than in earlier stages, was to force an end to the war by creating instability, chaos and disruption at home.¹⁴³

Skil Amar has offered that “[t]he three great currents of the late 1960s”—the civil rights movement, anti-war movement, and efforts to lower the voting age by way of legislation—“swirled together in complex ways” to result in the ratification of the Twenty-sixth Amendment.¹⁴⁴ But the messages conveyed by the most prominent draft dodgers and anti-war protesters—largely rejecting the legitimacy of the United States government—were actually antithetical to supporting the Twenty-sixth Amendment.¹⁴⁵ Indeed, Hayden’s own written work, recounting the radical ways and means of the Vietnam protests that took place between 1965 and 1975, does not once mention lowering the voting age as a goal of that movement or the Twenty-sixth Amendment as a victory.¹⁴⁶

141. CAREY, *supra* note 138, at xxvi; *see also* 15,000 White House Pickets Denounce Vietnam War, N.Y. TIMES, April 18, 1965, at 1 (reporting that SDS students from over sixty campuses were joined by groups such as SNCC and Women Strike for Peace, along with faculty and other supporters).

142. *See* KIRKPATRICK SALE, SDS: THE RISE AND DEVELOPMENT OF THE STUDENTS FOR DEMOCRATIC SOCIETY 22 (1973) (noting that Hayden and his compatriots argued “the sham and shabbiness of the liberal tradition in which they all had grown up was slowly coming to be felt” and a form of radicalism was essential to respond to existing conditions). After being prosecuted as part of the Chicago 7, Hayden married Jane Fonda and somewhat ironically went on to have a successful career as an elected official. *See* Michael Finnegan, *The Radical Inside the System: Tom Hayden, Protester-Turned-Politician, Dies at 76*, L.A. TIMES (Oct. 23, 2016), <https://www.latimes.com/local/obituaries/la-me-tom-hayden-snap-story.html> [<https://perma.cc/J5GZ-CCRS>].

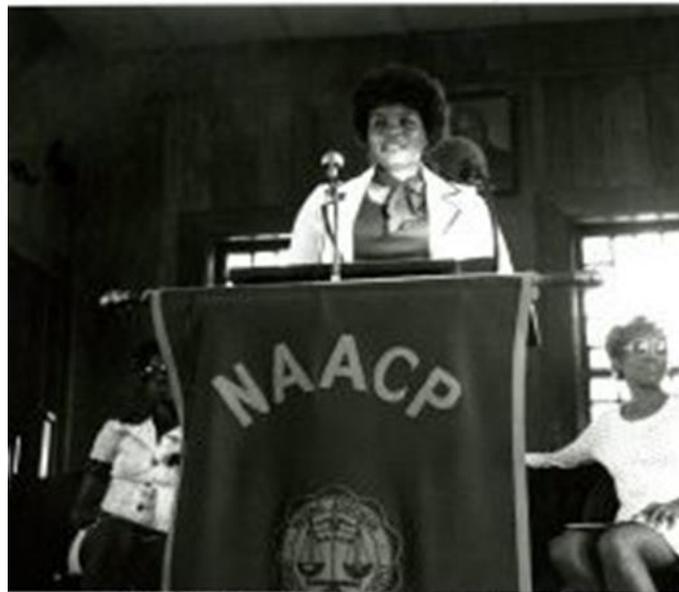
143. Bill Zimmerman, *The Four Stages of the Antiwar Movement*, N.Y. TIMES (Oct. 24, 2017), <https://www.nytimes.com/2017/10/24/opinion/vietnam-antiwar-movement.html> [<https://perma.cc/6JR7-66LH>].

144. AKHIL REED AMAR, AMERICA’S CONSTITUTION: A BIOGRAPHY 444, 445, 447 (2012).

145. *See* SALE, *supra* note 141, at 304 (quoting Hayden as lauding the 1968 Columbia University student protests that demonstrated students were not interested in existing structures but wanted entirely new forms of community and governance).

146. *See* Tom Hayden, *The Forgotten Power of the Vietnam Protest: 1965-1975*, TOM HAYDEN PEACE & JUST. RSCH. CTR. (Apr. 27, 2015), <http://tomhayden.com/home/the-forgotten-power-of-the-vietnam-protest-1965-1975.html> [<https://perma.cc/K4L5-9JP5>]; *see also* Quinn et al., *supra* note 15, at 359 (challenging claims that anger about the Vietnam War draft exclusively drove ratification of the Twenty-sixth Amendment).

Instead, young Black activists like Diane Nash who, through nonviolent means pressed for dignity and human rights for African-Americans, were more directly responsible for positively influencing the nation’s views on the capacities of young people.¹⁴⁷ Carolyn Quilloin—who had previously inspired adults to join with her desegregation protest efforts in Savannah—was particularly important to the success of expanding youth suffrage nationwide.



*Carolyn Quilloin, 1975, who was arrested in the early 1960s during an NAACP action, and in April 1969, helped lead the NAACP Youth Convening to Expand Youth Suffrage.*¹⁴⁸

In 1969, Carolyn Quilloin, who rose as a leader in the NAACP after her participation as a teen in the Savannah lunch counter sit-ins, became the group’s National Coordinator for Youth Mobilization for lowering the voting age.¹⁴⁹ Working with James Brown Jr., the National Youth Director

147. See Perea, *supra* note 5, 46–51 (urging legal historians to avoid describing events in a way that “excludes many key figures in African-American struggles for equality, justice, and freedom from white oppression”); see also Richards, *supra* note 113, at 2150 (noting that legal scholars have only recently begun to better account for the contributions of women leaders in the civil rights movement of the 1960s).

148. Courtesy of the City of Savannah Municipal Archives.

149. *NAACP Youth Assembly*, 76 *THE CRISIS* 213, 214 (1969).

for the NAACP, she traveled the country to attend regional NAACP and other events to generate further interest in the cause.¹⁵⁰

As Quilloin spoke to local press during these visits she demonstrated savvy as a strategist, herself deploying the popular “old enough to fight, old enough to vote” catchphrase.¹⁵¹ However, she also promoted her belief that expanded youth suffrage and voting rights for African-Americans were related and intertwined issues—both were needed for “shifts in influence” in society and the ability to hold government officials accountable.¹⁵²

Ultimately, Quilloin planned and convened a massive two-day gathering in Washington D.C., the NAACP’s Youth Mobilization Summit, which remarkably brought together 2,000 students from thirty-three states in support of lowering the national voting age in April 1969.¹⁵³ The event was intended to serve as an organizing launch for collective advocacy, pulling together an array of groups from around the country to work together to reduce the voting age.¹⁵⁴ Like Quilloin, many in attendance also drew a straight line between the work of youth who had educated and registered Black voters generally—and youth earning the right to enter the voting booth themselves.¹⁵⁵ For instance, Maryland State Senator Clarence Mitchell thanked the youth for their efforts, which he believed helped him get elected at just age twenty-two with the support of Black voters.¹⁵⁶

The NAACP invited Ian MacGowan—a young white advocate from the National Education Association (NEA) to participate as a luncheon speaker.¹⁵⁷ The NEA had tapped MacGowan, Les Francis, Mel Myler, and several other young men to lead its youth voting advocacy efforts using the name the Youth Franchise Coalition (YFC).¹⁵⁸ It had also recently

150. See generally Emil Dansker, *NAACP Urges Support for Youth, Model Cities*, DAYTON DAILY NEWS, Apr. 1, 1969, at 2.

151. *Id.*

152. *Id.*

153. *Id.*; see also, e.g., *S.C. NAACP Sends Youths to Meeting*, CHARLOTTE OBSERVER, Apr. 18, 1969 (noting 100 youth from South Carolina were to attend the event in Washington D.C.); *Six From NAACP to Attend Convention*, SPRINGFIELD NEWS LEADER, Apr. 18, 1969, at 16 (reporting that six youth from Missouri would attend Quilloin’s Youth Mobilization Summit).

154. See, e.g., *Youth Council Joins Drive to Vote at 18*, SPRINGFIELD NEWS LEADER, Apr. 3, 1969 (reporting that 10 local youth were seeking funds to help them participate in the NAACP’s Youth Mobilization event in Washington D.C., “which will launch the drive to get Congress to pass a law establishing 18 as the legal voting age”).

155. *NAACP Youth Assembly*, *supra* note 149, at 213–14.

156. *Id.*

157. *Id.* at 213.

158. See Lyn Shepard, *Novices Asking Vote at 18 Attract Attention*, CHRISTIAN SCI. MONITOR, Apr. 3, 1969 [hereinafter *Novices Attract Attention*] (reporting on the newly formed lobbying team consisting of Les Francis, Mel Myler, Tom Hipple, and Paul Minarchenko); see also *NEA Assumes Militant Role*, COURIER-J. (Louisville, Ky.), July 10, 1969, at A11 (noting that the NEA allocated \$40,000 towards its youth suffrage advocacy budget).

deployed what it called “Project 18,” as an organizing strategy to bring together youth in support of lowering the national voting age.¹⁵⁹ The young NEA representatives found some early support in a small group of legislators.¹⁶⁰ But with limited funding and a nearly all-white male staff, the NEA’s spokesmen were apparently struggling to reach diverse audiences across the country—including in the Black community.¹⁶¹ Thus, the NAACP conference served as a powerful platform for YFC, Project 18, MacGowan, and the NEA.

Indeed, nearly forty different entities accepted invitations to Quilloin’s NAACP Youth Mobilization event. Representatives were present from a wide range of groups, including the Young Democrats of America, the Young Republicans of America, the United States Youth Council, the Young Women’s Christian Association (YWCA), the Young Men’s Christian Association (YMCA), and the Let Us Vote (LUV) coalition.¹⁶² Thus, Quilloin’s intersectional strategizing was on full display.

More than this, on the second day of the event, under Quilloin’s leadership, the entire convening moved to the United States Senate auditorium where attendees heard from more than ten federal legislators who promised to support a bill to expand voting rights all across the country to those aged eighteen, nineteen, and twenty.¹⁶³ Among those who declared their allegiance were Senators Thomas Eagleton, Birch Bayh, and Jacob Javits, with the latter praising the NAACP for its organizational efforts and acknowledging the group was no “fly-by-night-organization” but was instead clearly “here to stay.”¹⁶⁴

For her part, Quilloin pledged to help lead the NAACP’s college and youth divisions to spread word of the legislation on the local and state levels.¹⁶⁵ She noted that while some groups were simply out “rabble-

159. See *40 Years Ago...NEA Rocked the Vote*, NAT’L EDUC. ASS’N, <http://www.nea.org/home/42731.htm> [<https://perma.cc/5HLV-TVAB>] (recounting YFC’s establishment in 1969 as the lobbying arm for the Project 18 youth suffrage consortium, which was seeking constitutional amendment to lower the voting age).

160. *Image Problem: Youth Told Militant Stance Must Go if Voting Age Is to Be Lowered*, CINCINNATI ENQUIRER, Feb. 6, 1969, at 28 (describing meeting at NEA headquarters where Senators Jennings Randolph and Birch Bayh spoke with a group of youth identified as the YFC).

161. See Timothy J. G. Cole, *Under Age: Redefining Legal Adulthood in 1970s America* 108 (May 2016) (Ph.D. dissertation, Temple University) (on file with author).

162. See GLENN H. UTTER, *YOUTH AND POLITICAL PARTICIPATION: A REFERENCE HANDBOOK* 226–27 (2011); see also Thomas Arrandale, *Coalition Calls for 18 Year Old Vote*, LEADER TELEGRAM (Wis.), June 12, 1969, at 13A.

163. See *NAACP Youth Assembly*, *supra* note 149, at 214.

164. *Id.*

165. *Id.*

rousing,” the NAACP was on the “front lines” of concrete actions around voting rights, committed to getting “meaningful results.”¹⁶⁶

Yet, despite the historic nature and enormity of the NAACP gathering, it appears mainstream white media did not cover the program.¹⁶⁷ Addressing the youth who were present at the mobilization meeting, Representative Louis Stokes, the first African-American congressman elected in Ohio,¹⁶⁸ commented on the lack of reporter presence. After lamenting that if youth were out burning buildings the press would be there, he continued: “There must be something wrong with America when hundreds of youth are pursuing their aims through the democratic process are unnoticed by the news media.”¹⁶⁹

To be sure, some press provided coverage heading into the event—for instance, by noting that 2,000 local youth were planning to participate.¹⁷⁰ And some local papers reported on the return of local youth organizers who attended.¹⁷¹ But Quilloin’s important leadership role in NAACP’s youth suffrage efforts received little mainstream attention or recognition then or in more recent years.

166. *Id.*

167. *See id.* (Representative Louis Stokes of Ohio, who addressed the Black youth, noted how unfortunate it was that the press was not present to cover the two-day event but was quick to appear when there were alleged riots led by youth); *see also Lack of Coverage at Youth Confab Blasted*, PITT. COURIER, May 10, 1969, at 2.

168. Denis Hevesi, *Louis Stokes, Congressman from Ohio and Champion of the Poor, Dies at 90*, N.Y. TIMES (Aug. 19, 2015), <https://www.nytimes.com/2015/08/20/us/louis-stokes-ohio-first-black-congressman-dies-at-90.html> [<https://perma.cc/8ARW-PT3H>].

169. *NAACP Youth Assembly*, *supra* note 149, at 213.

170. *See NAACP Conference to Lobby for Youth*, DAILY OKLAHOMAN, Apr. 19, 1969, at 10 (providing a two paragraph write up about plans for the 2,000-person event).

171. *Id.* (reporting on attendance by local NAACP youth director at the D.C. Mobilization, and noting local group’s adoption of the youth suffrage platform presented there).

Novices asking vote at 18 attract attention

By Lyle Shepard
Staff correspondent of
The Christian Science Monitor

Washington
When a group of political novices recently urged the Youth Franchise Coalition here, some seasoned observers snickered that another children's crusade was afoot among voters.

But the guffaws from Capitol Hill may soon be silenced.

Already this national alliance of youth and adult groups in quest of 18-year-old voting rights is proving itself a lobbying force with which to be reckoned.

If successful, the coalition's cadre will root the 81st Congress into amending the Constitution and then press three-fourths of the Legislatures now ratifying the act.

"Never before has anyone tried to do that we are," explains Paul Minarchenko, the movement's youthful president. "That is, to focus national attention on the 18-year-old voting issue."

When state efforts to lower the voting age in Hawaii, North Dakota, and Nebraska narrowly failed last year, the proposal's backers attributed defeat to lack of national concern and support. Mr. Minarchenko says that the picture is fast changing.

"There has been more state action in 1969 than ever before," he observes. "I estimate that we, as a coalition, can't take credit for that happening. But it does indicate a climate of receptiveness that we can build on."

West sees more action

The coalition's executive director, Tom Hipple, finds many of the most hopeful leads in the West. For example:

- Montana and Wyoming Legislatures have passed bills permitting a 1970 referendum on lowering the voting age to 18.

- Nevada lawmakers cleared an 18-year-old voting proposition but must reapprove it in their 1970 session to place the issue on the 1970 ballot.

- Teenage voting proposals are pending in Oregon and New Mexico with door action imminent in each state.

- Every state but Mississippi has devoted

coalition's member groups in their own campaigns in behalf of the reform measure.

Network takes form

"Congress isn't going to act unless it feels the heat from home," the young Californian declares. Thus a district-by-district information network is slowly taking form.

A check on each senator's and representative's views on 18-year-old voting already is under way in Washington. That data will be relayed to home-district workers. They in turn will petition, write, visit, or phone their Washington lawmakers when such pressure is deemed necessary.

"The main thing is to be in Capitol Hill so that there's only one way to vote on this issue," maintains Mel Myler, the Student NCA's spokesman on the coalition's board of directors.

Lobbyists' help planned

Whenever a vote is near—either in the Judiciary committee or on the floor of either house—the coalition will pull out all stops.

"We expect to see 100 top-flight professional lobbyists to be helping us when the time comes," Mr. Hipple predicts. Some key figures like the NAACP's Clarence Mitchell Jr., and the AFL-CIO's Andrew Stern, are veterans of past congressional struggles for college-age legislation. They will be in the middle of the fray.

The NAACP's James Brown Jr., who heads the organization's youth and college divisions, is laying plans for an April 24-25 mobilization day here. It aims to rally black support for 18-year-old voting rights.

States report activities

Other alliance members, as Mr. Myler puts it, "will do their own thing." In the meantime, state organizations will continue to lobby their legislators. A few of the noteworthy efforts:

- In California, LUV (Let Us Vote), a coalition affiliate, already has launched a costly public-relations campaign to hasten action in Sacramento as well as establish a national dialogue.

- The first state Youth Franchise Coal-



Youth-recruit leaders

Youth is no barrier to these three determined members of the Youth Franchise Coalition. Les Francis (front), Mel Myler (left rear), and Tom Hipple, who along with coalition president Paul Minarchenko (lower right) are leaders in a national movement for 18-year-old voting rights.

Les Francis (front), Mel Myler (left rear) and Tom Hipple, along with coalition president Paul Minarchenko (from the Christian Science Monitor, April 2, 1969).¹⁷²

In contrast, the young men leading YFC not only received press coverage during the month of the NAACP Youth Mobilization but also received much more credit in the months that followed. Just a few days before the NAACP convened, they were interviewed by the Christian Science Monitor in an article that declared the novices were drawing a great deal of attention.¹⁷³ YFC's members even admitted to the Christian Science Monitor interviewer that they were not responsible for the recent shift in support of expanded youth suffrage. Instead they described a larger effort that would include the national meeting hosted by the NAACP's Youth and College Division later that month.¹⁷⁴ But Quilloin's name was not mentioned.¹⁷⁵

172. Photograph of Les Francis, Mel Myler, Tom Hipple & Paul Minarchenko, in *Novices Asking Vote at 18 Attract Attention*, CHRISTIAN SCI. MONITOR, Apr. 2, 1969.

173. See *Novices Attract Attention*, *supra* note 158 (reporting on the newly formed lobbying team consisting of Les Francis, Mel Myler, Tom Hipple, and Paul Minarchenko); see also, e.g., Les Francis, *Support for Age 18*, THE FRESNO BEE, Feb. 27, 1969, at 14; Les Francis, *Educator Urges Voting Age of 18 as 'Only Logical Turning Point'*, L.A. TIMES, Mar. 3, 1969, at 38.

174. What is more, the Christian Science Monitor article only referenced NAACP's James Brown Jr. as being responsible for the event. See *Novices Attract Attention*, *supra* note 158.

175. See, e.g., Warren Weaver, Jr., *Bill to Lower the Voting Age to 18 by '71 Elections Approved in House*, 272-132, N.Y. TIMES, June 18, 1970, at 1 ("No group greeted the House action with any more satisfaction than the Youth Franchise Coalition, a group of young people organized to lobby for the lowered voting age.").

In the weeks and months after the NAACP Youth Mobilization program, young white men from the NEA dominated the conversation. In numerous interviews and media events, they identified themselves as the national leaders of youth vote organizing efforts under Project 18 and lobbying under the YFC banner.¹⁷⁶ For instance, in May 1969, one newspaper article reported, “In contrast to violent campus protest, conventional political tactics have been adopted by the Youth Franchise Coalition in Washington to seek voting rights for citizens age 18 to 20.”¹⁷⁷ It went on to note that Paul Minarchenko and Ian MacGowan were leading the charge on behalf of twenty-three different groups—including the NAACP’s Youth and College Division. And while Minarchenko offered thanks to mentors who were helping him to navigate Capitol Hill, including NAACP’s lobbyist Clarence Mitchell, the NEA’s representatives gave no credit to Quilloin or other Black women or youth.¹⁷⁸

By 1970, YFC and Project 18 often failed to mention the NAACP at all. For instance, during one February press interview, Ian MacGowan identified himself as the Executive Director of YFC while Les Francis was called the Director of Project 18.¹⁷⁹ Without any reference to Quilloin’s work, they declared it was the YFC, housed at the NEA, that had “launched the first national campaign to lower the voting age.”¹⁸⁰ They went on to talk about their own success connecting with community youth and ability to rally them to support for youth voting rights legislation.¹⁸¹ Again, there was no mention of Quilloin or the NAACP.

Even as the path forward for lowering the voting age became more complicated—with some arguing that constitutional amendment was the only appropriate approach while others said legislative enactment would be best—the NEA and its youth advocates, mostly young white men, continued to be lifted up as the leaders of the movement.¹⁸² In February, 1970, in public testimony before Senate Judiciary Committee on the issue of lowering the voting age, Ian MacGowan introduced himself as the

176. See, e.g., *Teenagers Push Battle for Early Voting Rights*, LONG BRANCH DAILY REC., Aug. 5, 1969, at 6.

177. See Congressional Quarterly, *National Coalition Will Lobby for 18-Year Old Vote*, JANESVILLE DAILY GAZETTE, May 27, 1969, at 21 (running a piece spotlighting Paul Minarchenko of YFC).

178. *Id.*

179. *Youth Concerned with Voting Rights*, COURIER-EXPRESS (Dubois Pa.), Feb. 10, 1970, at 9.

180. *Id.*

181. *Id.*

182. See *Vote Age Bill Brings Doubts*, ORLANDO EVENING STAR, Mar. 25, 1970, at 22 (referencing the work of YFC while noting although President Nixon would sign a youth voting bill if it was passed, he preferred to have the voting age issue decided by a constitutional amendment process rather than federal legislation).

“executive director of the Youth Franchise Coalition, Inc., the national coordinating campaign to lower the voting age to eighteen.”¹⁸³

From there, he explained that he was present on behalf of thirty-three different youth and educational groups—including the YMCA, the Young Democrats, the NEA, and the NAACP. MacGowan noted in passing that the NAACP had “sponsored mobilization programs in Washington, D.C. and in other States in order to organize young blacks who appear before State legislature[s] to seek passage of a lower voting age.”¹⁸⁴ However, he offered this recognition as part of a long list of acknowledgements to a wide range of less involved groups, and after declaring: “[T]he NEA has probably been in the foremost in the national movement to lower the voting age.”¹⁸⁵

MacGowan went on to introduce to the Senate Judiciary Committee three advocates from YFC who he brought with him as representative leaders and experts in the movement—Clark Wideman of Ohio, Earl Blumenauer of Oregon, and Alan DiScullio a student at Georgetown University in the District.¹⁸⁶ All three then testified under the banner of YFC. All appeared to be white males. And all three—in addition to MacGowan—failed to mention Carolyn Quilloin or her Black female cohorts.¹⁸⁷ Indeed, when one Senator noted the lack of female representation in the group standing before the Committee, MacGowan and his cohorts apparently laughed.¹⁸⁸

It is possible to imagine these absences as an intentional advocacy strategy. That is, jointly the various groups involved in advancing youth suffrage could have acknowledged that even as it emerged from the 1960s Civil Rights Era, white America was not likely to embrace young Black messengers seeking to expand the reach of the Constitution—much less young Black women. But subsequent events over the last fifty years would seem to belie a communal commitment to a shared legal realism plan.

183. *Hearing Before the S. Comm. on the Judiciary on Nomination of George Harrold Carswell, of Florida, to be Associate Justice of the Supreme Court of the United States*, 91st Cong. 43 (1970) (statement of Ian MacGowan, Executive Director, Youth Franchise Coalition).

184. *Id.* at 44.

185. *Id.*

186. *Id.* at 43–44.

187. *Id.* at 43–72.

188. *Id.* at 62. Perhaps because of this commentary, by 1970 Rosalyn Hester was publicly identified as the “Chairman” for the YFC. *See, e.g.,* Lee Mueller, *New Voters Aren’t All Students*, THE LAST-CHRON. (Clarksville, Tenn.), Feb. 23, 1971, at 4 (including Hester’s views as the YFC Chairman and describing how Hester’s contributions were celebrated by the NEA forty years later); Charlotte Astor, *Youth Suffrage Leader Sees Permanent Lobby*, THE CAP. (Annapolis, Md.), Apr. 15, 1970, at 26; Phil H. Storch, *States Must Fall in Line on Youth Voters*, THE MORNING CALL (Allentown, Pa.), Dec. 29, 1970, at 6.

V. DREAMS OF THINGS NEVER SEEN AND YOUTH TRUTH:
 QUEEN'S CONGRESSIONAL TESTIMONY IN SUPPORT OF
 LOWERING THE VOTING AGE

Indeed, three weeks after MacGowan and his compatriots appeared before the Senate Judiciary Committee, James Brown Jr. testified in person as National Youth Director for the NAACP.¹⁸⁹ More than this, he was joined by Philomena Queen, the Youth Regional Chairperson for the Middle Atlantic Region of the NAACP.¹⁹⁰

The only question that remains to be answered is: What tools of expression adult America is going to give its youth? The ballot is without question the most potent manner of expression in our democracy. Youth knows this and wants that voice. And we, in the NAACP, admit they should have it.

Thank you, Mr. Chairman.

Senator BAYH. Thank you very much, Mr. Brown.

Why don't we ask Miss Queen if she will give us her statement, and then if we have time I would like to ask you some questions, and I am sure other members of the panel will also.

Miss QUEEN. Good morning, Mr. Chairman and members of Senate Subcommittee on Constitutional Amendments.

I am Philomena Queen, youth regional chairman, Middle Atlantic Region of the National Association for the Advancement of Colored People and one who has yet to reach the age of 21.

It is my distinct pleasure to have this opportunity to appear before you to exercise the democratic process in seeking to bring swift and equitable redress to a grave injustice.

Like the overwhelming majority of young people between the ages of 18 and 21 and many millions of citizens over the age of 21, I strongly feel that the precious and sacred right to vote should be extended to include young citizens who have reached the age of 18, and I respectfully urge the immediate and favorable recommendation from this committee, that the voting age in Federal, State, and local elections be lowered to age 18.

*Excerpt from the official hearing before the Committee
 on the Judiciary of the United States Senate of the
 Ninety-first Congress, March 9, 1970, as it considered
 lowering the voting age.*¹⁹¹

Not yet twenty-one years of age, Philomena Queen presented persuasive testimony in support of what she referred to as “the sacred right to vote.”¹⁹² While she acknowledged that some saw youth suffrage as “revolutionary,” she noted the same concerns were raised when women

189. *Hearing Before the S. Comm. on the Judiciary on Nomination of George Harrold Carswell, of Florida, to be Associate Justice of the Supreme Court of the United States*, 91st Cong. 150 (1970) (statement by James Brown Jr., National Youth Director for the NAACP).

190. *Id.* at 152.

191. Official Hearing Before the Committee on the Judiciary of the United States Senate of the Ninety-First Congress (image), in *Hearing Before the S. Comm. on the Judiciary on Nomination of George Harrold Carswell, of Florida, to be Associate Justice of the Supreme Court of the United States*, 91st Cong. 150 (1970) (statement by James Brown Jr., National Youth Director for the NAACP).

192. *Id.*

sought the vote decades before.¹⁹³ Referring to youth between the ages of eighteen and twenty-one as the “voteless minority,” she argued they should be allowed to “determine [their] own destiny.”¹⁹⁴

Ticking off a list of concrete reasons why the current cut-off was arbitrary and irrational in light of other privileges and responsibilities of youth, she also powerfully proclaimed:

We see in our society wrongs which we want to make right; we see imperfections that we want to make perfect; we dream of things that should be done but are not; we dream of things that have never been done, and we wonder why not. And most of all we view all of these as conditions that we want to change, but cannot. You have disarmed us of the most constructive and potent weapon of a democratic system—the vote.¹⁹⁵

Such impactful presence on the part of Queen would hardly suggest Black teens and women, or any other member of the NAACP, had ceded their voice to the young men of the NEA’s YFC.

Just three days after Queen’s appearance before the Senate Judiciary Committee, the Senate took the unusual step of attaching to the then-pending 1965 Voting Rights Act extension an amendment to lower the voting age to eighteen nationwide.¹⁹⁶ By June, Congress passed the legislation.¹⁹⁷ The press reported on the bill’s surprisingly prompt success, noting that young YFC lobbyists were likely more excited by this turn of events than any other group in the nation.¹⁹⁸ Queen, Quilloin, and the NAACP were not mentioned.

Regardless of the excitement about the new federal law, the law was quickly and successfully challenged before the United States Supreme Court in December 1970 as encroaching upon states’ rights.¹⁹⁹ Because this move was anticipated,²⁰⁰ Congress promptly sprang into action again, and by January 1971, a Youth Voting Rights Amendment to the United States Constitution was introduced in an effort to ensure youth like Queen

193. *Id.*

194. *Id.*

195. *Id.*

196. NEALE, *supra* note 58, at 11. The decision to amend the Voting Rights Act rather than stick to the plan of constitutional amendment to lower the national voting age may have been motivated by a number of factors beyond the scope of this paper.

197. Weaver, *supra* note 175, at 1.

198. *Id.*

199. *Oregon v. Mitchell*, 400 U.S. 112, 127 (1970); *see also* Quinn et al., *supra* note 15, at 359 (debunking claim that the Twenty-sixth Amendment came about only because of the *Mitchell* decision).

200. *See* NEALE, *supra* note 58, at 12 (describing how President Nixon himself believed the youth voting provision to be unconstitutional but signed it into law fully anticipating constitutional challenge).

would be armed with the right to vote.²⁰¹ By March 1971 the necessary two-thirds votes in both the House and Senate were obtained, allowing for state ratification consideration to begin.²⁰² By July 1, 1971, the Twenty-sixth Amendment was approved by enough states to officially become a part of the Constitution, reflecting the quickest ratification process of any federal constitutional Amendment.²⁰³

On July 4, 1971, President Nixon invited a large youth choir to join him in the White House to officially mark passage of the Twenty-sixth Amendment to the United States Constitution.²⁰⁴ Queen's dream of youth voting privileges was realized. But it does not appear that she, Quilloin, or Nash were on hand to celebrate the victory they helped to bring about.

CONCLUSION

In the five decades since the Twenty-sixth Amendment to the United States Constitution finally became law, there have been plenty of opportunities to lift up the work of the young Black females—including Nash, Quilloin, and Queen—who helped lay the ground work for its ratification. Yet neither academics nor those more directly involved in the first wave youth suffrage movement have done so. As noted, the entire history of the Twenty-sixth Amendment has been wrongly overlooked in our voting rights canon. But even outside of academic conversations, Nash, Quilloin, Queen, and their cohorts appear to have been intentionally elided by their very allies within the youth suffrage movement.

In July 2011, the NEA launched an initiative to celebrate the fortieth anniversary of the Twenty-sixth Amendment.²⁰⁵ Among other things, it sought to acknowledge those individuals whose hard work resulted in the voting age being reduced nationwide in 1971.²⁰⁶ At a large convening, the NEA honored the contributions of Ian MacGowan, Les Francis, Mel Myler, and Rosalyn Hester Baker, along with Charles Gonzales, declaring their efforts while just students “allowed millions of young people to participate actively in the democratic process.”²⁰⁷

To be sure, as was the case at the Senate Judicial Committee hearing in 1970, the NAACP was mentioned in passing as one of the groups with

201. *Id.* at 12–13.

202. *Id.* at 13.

203. *Id.* at 14–15 (remarking on the “unprecedented speed” with which the states approved the Twenty-sixth Amendment).

204. See, e.g., *Nixon Hails Youth as 26th Amendment Is Certified at the White House*, N.Y. TIMES, July 6, 1971, at 1.

205. Cindy Long, *Fourth of July Celebration Marks the 40th Anniversary of Student Voting Rights*, NEA (July 4, 2011), <http://www.nea.org/grants/46086.htm> [<https://perma.cc/6M4M-LAC7>].

206. *Id.*

207. Charles Gonzales appears to have later joined the NEA's youth suffrage efforts. *Id.*

whom the NEA's representatives had teamed up to advocate to reduce the national voting age.²⁰⁸ But it does not appear that Quilloin, Queen, or any of the other young Black female intersectional advocates discussed in this article were part of the celebration. And in the end its conveners definitively declared, "NEA made this happen."²⁰⁹

As we pause to reflect on the 100th Anniversary of the Nineteenth Amendment, this is a good time to begin to make historical amends to the Black women and girls who are usually left out of that telling. It also provides for an opportunity to expand the nation's suffrage story to embrace the history of the Twenty-sixth Amendment and first wave youth suffrage movement.²¹⁰

Almost no one is taught or knows the complex history relating to how, in 1971, our nation remarkably extended voting privileges to young people between ages eighteen and twenty. Accounts that do exist—in both scholarly circles and popular culture—overlook the powerful and strategic intersectional activism on the part of Black girls and women who helped to challenge childism and advance civil rights of youth in this country. This article serves as one small contribution towards beginning to recover these narratives—including those of Diane Nash, Carolyn Quilloin, and Philamena Queen—and an invitation for us to do better as teachers, learners, scholars, and citizens in the days ahead.²¹¹

208. *Id.*

209. *Id.*

210. See Quinn et al., *supra* note 14 (coining the term "first wave youth suffrage movement" and comparing the effort to the current "second wave youth suffrage movement," which seeks to further reduce the youth voting age in the United States).

211. As this Article heads to press, this author has learned about two history scholars working on full-length texts relating to the Twenty-sixth Amendment—Professors Jennifer Frost and Rebecca de Schweinitz. See Jennifer Frost & Eric S. Fish, *The Youth Vote Is Being Suppressed. The 26th Amendment Is the Solution*, WASH. POST (Aug. 14, 2020), <https://www.washingtonpost.com/outlook/2020/08/14/youth-vote-is-being-suppressed-26th-amendment-is-solution/> [https://perma.cc/9MQD-TULD] (mentioning Frost's forthcoming book); Manisha Claire, *How Young Activists Got 18-Year-Olds the Right to Vote in Record Time*, SMITHSONIAN MAG. (Nov. 11, 2020), <https://www.smithsonianmag.com/history/how-young-activists-got-18-year-olds-right-vote-record-time-180976261/> [https://perma.cc/BD68-Z2K3] (reporting on de Schweinitz's work in progress and this Article).