

We'll Build A Land: The Invention of Race as a Tool of Empire

Michael Tino – Ohio River Group 2014

The Rev. Danielle DiBona is brought to a place of deep, existential pain when her fellow Unitarian Universalists sing the hymn “We’ll Build a Land” in worship. Meant as a call to social justice by peace activist Barbara Zanotti, the hymn draws on texts from the ancient Hebrew prophets of Isaiah to exhort people to “build a land, where sisters and brothers, anointed by God may then create peace.” (Zanotti)

But this hymn, to DiBona and others (including the Rev. Dawn Cooley) “has the ring of empire building.” (Cooley) To DiBona, a member of the Wampanoag nation, the indigenous inhabitants of the area we now call eastern Massachusetts, the hymn echoes the theological justification used by Europeans to build a new nation on the land of her people, a conquest of empire that resulted in genocide. (DiBona, personal conversations) As she has said in workshops at General Assembly, singing these words in a worship surrounded by “hundreds of mostly white faces” brings back the pain of that conquest to her. (Haber)

Indeed, the era of European empire-building, which includes the slaughter of countless indigenous peoples, the enslavement of Africans and the subjugation of peoples all around the world, was begun with a theological doctrine, now known as the “Doctrine of Discovery,” developed over centuries by the Roman Catholic Church and finally codified in a series of papal decrees (bulls) released by Popes Nicholas V and Alexander VI in the mid-to-late 15th century.

The beginnings of the Doctrine of Discovery can be traced to the fifth century CE, when Catholic popes first took on a responsibility “to work for a universal Christian commonwealth,” including waging “justified holy war” against non-Christians in order to “enforce the Church’s vision of truth on all peoples.” (Miller, 9) This view led directly to the Crusades, and, as they neared an end, to their theological justification by Pope Innocent IV. The mid-thirteenth century writings of Innocent IV established that the Church was mandated by God to care for the world,

and thus had a moral obligation to “intervene in the secular affairs of infidels when they violated natural law,” defined, of course, by the Church itself. (Miller, 9)

Several centuries of theological debate ensued in which various European conquests—notably of Lithuania by Poland and of the Canary Islands by Portugal—were subject to challenges based on the rights (or lack thereof) of the non-Christian inhabitants of those lands. In 1434, Pope Eugenius IV declared, in a series of bulls, that “the Church had the authority to deprive pagans of their property and sovereignty if they failed to admit Christian missionaries or if they violated European defined natural law.” (Miller, 11) Throughout this period of the refinement of the Doctrine of Discovery, however, the emphasis was on the conversion of the indigenous populations of conquered lands to Christianity.

That changed significantly in 1452, when Pope Nicholas V began a new era of empire building. It should be noted that neither empire nor enslavement were new concepts to either the church or the kingdoms of Europe. Beginning with the papal bull *Dum Diversas*, however, King Alfonso V and his son, Henry, were, in the eyes of the Christian church, not only anointed by God to build European societies on lands inhabited by non-Christians but also to enslave said inhabitants in the service of their mission if they felt that conversion was not possible. No longer was the Christian imperative mere conversion for the sake of salvation—the humanity of non-Christians was judged to be so inferior as to make their personhood subject to the will of Christian monarchs.

In *Dum Diversas*, Pope Nicholas V charged King Alfonso V of Portugal and his heirs with the following mission:

“to invade, search out, capture, vanquish, and subdue all Saracens and pagans whatsoever, and other enemies of Christ wheresoever placed, and the kingdoms, ...possessions, and all movable and immovable goods whatsoever held and possessed by them *and to reduce their persons to perpetual slavery*, and to apply and appropriate to himself and his successors the kingdoms, ...possessions, and goods, and to

convert them to his and their use and profit ...” (Nicholas V-1452, emphasis mine)

This mandate was further clarified over the years by theologians and popes, most notably in the bulls *Romanus Pontifex*, issued by Nicholas V in 1454, and *Inter Caetera*, issued by Alexander VI in 1493. In those succeeding documents, the powers granted to King Alfonso were expanded and justified. *Romanus Pontifex* declared that the Pope’s highest calling was to “bring the sheep entrusted to him by God into the single divine fold, ...acquire for them the reward of eternal felicity, and obtain pardon for their souls.” (Nicholas V-1454) The conversion and salvation of pagans and Saracens (Muslims), it continued, would be easiest to achieve “if we bestow suitable favors and special graces on those Catholic kings and princes, who...not only restrain the savage excesses of the Saracens and of other infidels...but also for the defense and increase of the faith vanquish them and their kingdoms and habitations....” (Nicholas V-1454)

Inter Caetera, issued to bless and thank the Spanish monarchs Ferdinand and Isabella for their patronage of Christopher Columbus and his beginning of the conquest of the Americas, provided theological limitations on this empire-building. In this bull, Pope Alexander VI makes it abundantly clear that the purpose of these grants of power was ultimately that “the Catholic faith and the Christian religion be exalted and be everywhere increased and spread, that the health of souls be cared for and that barbarous nations be overthrown and brought to the faith itself.” (Alexander VI) As part of this, Alexander declared, lands inhabited by Christians were not to be conquered or seized. Further, this bull clarified that lands inhabited by non-Christians (Saracens, pagans and infidels) were considered to have been “discovered” when Christian explorers arrived at them.

The theology behind this doctrine was derived from the stories of the Hebrew Scriptures, in which God commands Joshua to lead his people into Canaan after the death of Moses. (UUA 2013) In this story, God says to Joshua, “Now proceed to cross the Jordan, you and all this people, into the land that I am giving to them, to

the Israelites. Every place that the sole of your foot will tread upon I have given to you, as I promised to Moses.” (Joshua 1:2-3, NRSV) Anointed by God, the Israelites claimed a new land, convinced it was theirs despite the presence of the Canaanites in it. Embracing this theology, the Catholic Church and the Christian monarchs of Europe did the same with much of the world.

In order for this theology to work, the people they encountered—those Saracens, pagans and infidels—had to be somehow put in a different theological category of humanity from Christian Europeans. Their lands needed to be *terra nullius*—no man’s land—that could be claimed in the name of God. And the easiest justification for this was that non-Christians could be discounted as sub-human. The weakness of that justification, however, became immediately apparent as missionary priests began converting indigenous peoples—in Africa, Asia and the Americas—to Christianity. A new reasoning was required to continue the conquest, genocide and enslavement.

Prince Henry of Portugal brought with him Gomes Eanes de Azurara (known as Zurara), “a Christian intellectual at the dawn of the age of European colonialism,” to act as royal chronicler of the first expeditions of the African slave trade. (Jennings, 16) Theologian Willie James Jennings sees in Zurara’s documentation of the purchase of slaves in West Africa a new concept:

“the simple articulation of racial difference: ‘And these, placed all together in that field, were a marvelous sight for amongst them were some white enough, fair to look upon, and well proportioned; others were less white like mulattoes; others were as black as Ethiops, and so ugly, both in features and in body, as to almost appear...the images of a lower hemisphere.’” (Jennings, 23)

Jennings traces to this account the ordering of humanity along a spectrum from white to black, a spectrum that coincides with beauty and inherent worth, with

refinement and culture, and, most tellingly, with fitness for conversion to Christianity.

Over the course of the 16th century, this categorization of humanity became refined and developed, making “white” and “black” signifiers of worth and not of skin color. “As all the European empires draw on the flexibility of the racial scale,” Jennings writes, “they pull themselves into this boundary-less reality [of whiteness].” Jennings concludes, “this is nothing less than a theological operation.” (Jennings, 31)

This new way of seeing the world is reflected in the late 16th century writings of the Jesuit Alessandro Valignano, who traveled the world as a missionary and extensively documented his encounters with various peoples. Valignano was charged by the Vatican with evaluating whether people from different cultures were capable of “authentic Christian existence—” that is, whether their salvation was truly possible. (Jennings, 32) In 1580, he contrasts Japanese and Indian societies, concluding that because Indians “are blacks, and of small sense, they are subsequently very difficult to improve and turn into good Christians” while Japanese are “white and of good understanding and behavior...and when they are instructed they become very good Christians.” (Jennings, 32)

On behalf of the Church, Valignano developed a thorough analysis of the relative ability of people from different cultures, ethnicities and origins to embrace Christianity. At the very bottom of his scale are converts to Christianity from Islam and Judaism—the *conversos* and *moriscos*. In this category, labeled “black,” also fall all of the people of Africa. “They are a very untalented race,” he writes, “incapable of grasping our holy religion above the level of the senses...; they lack any culture and are given to savage ways and vices, and as a consequence they live like brute beasts....” (Jennings, 34) With this report, Valignano condemns all of the cultures of Africa, as well as Muslims and Jews, to the status of reprobates—incapable of salvation through Christ and fundamentally despised by God.

It is no surprise that the other end of Valignano’s spectrum is labeled “white.” At the pinnacle of whiteness are purebred Europeans born in Europe, followed by Europeans born outside of Europe, and then people of half-European descent (mixed-race people) such as *mestizos*. Chinese and Japanese people were also judged to be white and thus not only “intelligent and affable” but also worthy of attention by missionaries seeking to save souls. (Jennings, 34-35)

Somewhere in the middle—neither fully “black” and reprobate nor fully “white” and certain to be saved if Christian—were Indians (of the Asian subcontinent) and the indigenous peoples of North and South America. Significantly, Christian theologians struggled with the proper category for indigenous North and South American peoples, whose skin was often light and whose hair was often straight, and whose knowledge of the land was necessary for the survival of European colonists. Ultimately, the realities of colonization and conquest were once again rationalized by theologians. Historian Philip Deloria writes of this struggle as settlers in the American colonies applied it centuries later: “Americans wanted to feel a natural affinity with the continent, and it was Indians who could teach them such aboriginal closeness. Yet, in order to *control the landscape* they had to destroy the original inhabitants.” (as quoted in Jennings, 41)

While social or theological “otherness” was not a new concept in the history of humanity (witness the othering of the Canaanites in the story of Joshua, for one example of many available), the power given to the category of “race,” as defined along a black-white spectrum, was. Before this power “would yield the ‘idea of race,’ the ‘scientific concept of race,’ the ‘social principle of race,’ or even a fully formed ‘racial optic’ in the world,” Jennings writes, “it was a theological form—an inverted, distorted vision of creation that reduced theological anthropology to commodified bodies. In this inversion, whiteness replaced the earth as the signifier of identities.” (Jennings, 58) Prior to the ordering of humanity by *theological color* (which had something, but not everything, to do with skin color), the primary signifier of

otherness had been geography (the Canaanites were “other” because they lived in Canaan). Now, it became race.

“European Christians, from the Iberians through the British, saw themselves as agents of positive, if not divine, change.... They saw themselves as those ordained to enact a providential transition.” (Jennings, 60) Anointed by God, Europeans set forth to build their lands around the world, and in order to do so, they needed justification for the genocide and enslavement of the peoples already there. The new theology of race provided them with one.

With this, we come in history to the colonization of America by the British, and the peculiar ways in which British monarchs applied the Doctrine of Discovery, especially in the American colonies. “After developing a taste for foreign empire in Ireland, England became a strong advocate for the Doctrine of Discovery and began using that international law to claim the rights and powers of first discovery, conquest, and title in North America.” (Miller, 17)

In 1496, King Henry VII gave a patent to John Cabot “to find, discover and investigate whatsoever islands, countries, regions or provinces of heathens and infidels, in whatsoever part of the world placed, which before this time were unknown to all Christians.” (Henry VII) Cabot’s exploration of the Atlantic coast of North America, ranging from modern-day Newfoundland to Virginia, led the English monarch to claim the entire land as his, despite the papal declaration of 1493 infamously dividing the Americas between Spain and Portugal and giving Spain claim to much of North America following Columbus’ explorations. These claims would be challenged, over the centuries, by France, Spain and the Netherlands, but ultimately, England’s might prevailed.

English monarchs also continued to refine the Doctrine of Discovery to meet the needs of their growing empire. No longer a theological document, the Doctrine became international law, and cases were made not by theologians but legal scholars. Queen Elizabeth I and her advisers in the 1580s “argued that the Doctrine

required that a European country had to actually occupy and possess non-Christian lands to perfect their...title to discovered lands.” (Miller, 18) Alongside France—also left out of the Spain-Portugal bull of 1493—England successfully changed the terms of the original doctrine. Other European powers agreed to these terms.

“England also developed another element of Discovery to justify its alleged right to the lands of Indigenous peoples.” (Miller, 21) This was a refinement of the concept of *terra nullius*, which stated that lands “that were actually occupied but were not being used in a manner that European legal systems approved” were considered to be empty upon “discovery.” (Miller, 21) Thus, in order to claim the lands, English settlers needed to make the case that the societies of the indigenous peoples of North America were, in fact, uncivilized.

This led to centuries of denigrating and dismissing the advanced civilizations that colonists would encounter in North America. Often, the ability of Europeans to efficiently kill large numbers of native peoples served as proof of the inferiority of their society. This is reflected in the 1634 writings of Governor John Winthrop of the Massachusetts Bay Colony, who declared, “But for the natives in these parts, God hath so pursued them, as for three hundred miles space the greatest part of them are swept away by smallpox which still continues among them. So as God hath thereby cleared our title to this place, those who remain in these parts, being in all not 50, have put themselves under our protection.” (As quoted in UUA) God’s will that the Europeans should own the land was proven by their ability to spread deadly smallpox to the native peoples.

Legal historian Walter Echo-Hawk writes:

“At bottom, however, the religious justification of the English, like that of the Spanish, was largely a pretext. The colonization of the Americas had little to do with Christianity, and as time went along the pretext was abandoned. As the ‘English settled more of North America, the religious justification for acquiring land virtually disappeared’... and

the supposed right of Christians to take non-Christian land is scarcely found after the seventeenth century.” (Echo-Hawk)

By this point in history, “the English colonists and their governments [had] established political and diplomatic relationships with the tribal governments and dealt with them as sovereign entities....” (Miller, 27) But this arrangement was short-lived, as the influx of Europeans to the American colonies, combined with the lust for more land—and the resources contained in that land—gave the colonies, and later the United States, more and more reason to revert to old theological constructs of racial inferiority.

Any remaining pretext to religious doctrine was shed by the new nation of the United States of America after its independence was won from Britain. Perhaps predictably, understanding the dynamics of power and empire, this theological doctrine of inferiority became a legal doctrine of inferiority when it was needed to persist in the United States, which promised its citizens a government free from the establishment of any religious doctrine as official.

“Plainly, a clear and very potent legal right was needed by the... [American settlers] to support their occupation of Indian territory and to obtain ownership of the land. Otherwise, their occupation must at its core be considered illegal and illegitimate.” (Echo-Hawk) That right was enshrined in law by the United States Supreme Court in their very first case to decide a significant Native American issue. In this 1823 case, *Johnson v M’Intosh*, “Chief Justice John Marshall ominously described the American judicial system as ‘the Courts of the conqueror.’” (Echo-Hawk) Despite the fact that no Native American person or nation was either a party to this case (it involved a land ownership dispute among White settlers, one of whom traced his ownership of the land to a purchase directly from Native Americans) or even allowed into the courtroom, this opinion set an extraordinary legal precedent that still stands today.

In the unanimous ruling of the court in *Johnson*, Marshall wrote that “Christian people” who had “discovered” the lands of “heathens” and “fierce savages” had assumed the right of “ultimate dominion to be in themselves” and that this presumption of “dominion” had “diminished” the Indians' rights to sovereignty as independent nations, and had resulted in the Indians having a mere right of occupancy to their lands. (Marshall) This sweeping ruling (possibly inspired by Chief Justice Marshall’s own extensive real estate holdings) was issued not even as pertaining to the merits of the case, but rather in an unusual extra section, called an *obiter dictum*. This “incidental” section stripped all “legal title to land away from American Indian tribes in North America,” effectively stealing their land for the United States. (Echo-Hawk)

Significantly, this ruling was at odds with accepted international law by the time it was written, which generally gave property rights to conquered peoples (despite the centuries-old papal bulls establishing the Doctrine of Discovery to begin with). Marshall, faced with legitimizing his reliance on the Doctrine of Discovery to abrogate those rights, “asserted that the ‘character and religion’ of the Indians ‘afforded an apology for considering them as a people over whom the superior genius of Europe might claim an ascendancy.’” (Echo-Hawk) Marshall continued, arguing that “to leave [Native Americans] in possession of their country, was to leave the country a wilderness” because Indians were “fierce savages, whose occupation was war.” (Marshall) In short, Marshall relied on overt racism and gross mischaracterization of the indigenous peoples of North America to justify applying a centuries-old theological doctrine to the rapidly expanding United States. And it stuck.

Johnson reduced Native Americans to tenants on land owned by the United States, a legal standing that persists to this day. As one clear example, the Bureau of Indian Affairs is an agency within the United States Department of the Interior (Bureau of Indian Affairs), whose chief charge is to “...manage and sustain America’s lands, water, wildlife, and energy resources....” (Department of the Interior)

Subsequent to *Johnson*, only the Federal government of the United States can buy and sell land that Native Americans are granted permission to occupy.

Unlike many regrettable decisions in the history of the U.S. Supreme Court, *Johnson* has never been overturned. In fact, it is cited frequently as the basis for ongoing decisions regarding land use and the rights of indigenous Americans. *Tee-Hit-Ton v United States*, decided by the court in 1955, expanded the scope of *Johnson*, allowing “the government to confiscate aboriginal land interests with impunity.” (Echo-Hawk) In it, Justice Stanley Forman Reed wrote for the majority of the Warren Court:

“Every American schoolboy knows that the savage tribes of this continent were deprived of their ancestral ranges by force and that, even when the Indians ceded millions of acres by treaty in return for blankets, food and trinkets, it was not a sale but the conqueror’s will that deprived them of their land.” (Reed)

Lest one think that new and expanding applications of *Johnson* have stopped (or even slowed) in recent years, the Doctrine of Discovery itself was cited in the 2005 decision in *City Of Sherrill v Oneida Indian Nation Of New York*, in which the court decided that native nations could not claim sovereignty if they bought the lands promised to them in treaties *on the open real-estate market*. Justice Ruth Bader Ginsburg wrote for the court:

“Under the ‘doctrine of discovery,’... ‘fee title to the lands occupied by Indians when the colonists arrived became vested in the sovereign— first the discovering European nation and later the original States and the United States’....” (Ginsburg)

The Doctrine of Discovery was used to subjugate, enslave, and slaughter non-Europeans all over the globe in the name of Christianity, claiming the authority of God for monarchs hungry for empires to mine and exploit. The legacy of this Doctrine in the United States includes not only the lingering effects of centuries of

slavery and the theft of a continent from Native Americans who became subject to campaigns of mass murder. The Doctrine of Discovery also became the legal justification for European monarchs—and their sovereign heirs in the United States, Canadian and Mexican governments—to draw borders by mutual agreement through the lands of indigenous peoples, and to enforce immigration restrictions on peoples who for thousands of years had freely roamed across those borders. Significantly, the legacy of the Doctrine of Discovery also includes our modern-day conception of race, and the racism that comes when that conception is given institutional power in our society.

The stubborn persistence of the category of race in our society, despite the absence of any scientific or biological rationale for it, has everything to do with the lasting power of the original, *theological*, concept of race—and the power inherent in defining people as inferior in the eyes of God.

It is obvious to many the lasting effects of the enslavement of Africans as the labor that built European colonies in North and South America and the Caribbean. One only need look to recent events in the news to see this in stark and appalling clarity. “A path can be traced from slavery to the killing of Michael Brown,” asserts Sharifa Rhodes-Pitts in a recent *New York Times Magazine* article. (Rhodes-Pitts) “Racialized slavery was only the first in a series of ‘peculiar institutions’ (as went the 19th-century euphemism gilding the nation’s founding contradiction) to enforce caste and class in the United States. The most recent is the ‘hyperghetto’ and ‘hyperincarceration’ that presides today, wherein there’s little hope of mobility and uniformly dire possibilities [for Black men].” (Rhodes-Pitts) Black men, she argues, are disposable “surplus labor” in modern American society, valued much the same as the slaves brought to America because of their supposed inherent inferiority.

In 1952, Martinican psychiatrist Frantz Fanon examined the lasting psychological effects of the centuries of European colonization, justified by theological doctrines of racial inferiority. “Any ontology,” he writes, “is made impossible in a colonized and acculturated society.” (Fanon, 89) This, he explains, is

due to centuries of internalized inferiority. “Ontology does not allow us to understand the being of the black man, since it ignores the lived experience. For not only must the black man be black; he must be black in relation to the white man.” (Fanon, 90) Colonized peoples, he writes, have had their very being defined in opposition to the concept of whiteness.

In order to work to reverse the damage wrought by centuries of misguided theology, it is necessary to decolonize our theology. And so I believe we, as religious people, must make this our work. The UUA Board, in 2012, issued a report on the Doctrine of Discovery as a prelude to asking the delegates to General Assembly that year to formally repudiate it (which they did). As the co-author of that report with the Rev. Dr. Clyde Grubbs (though neither of us is formally named in the report except as the person who moved and seconded it before the Board), I will take the liberty of quoting it at some length. The report states, in part:

“There is a profound brokenness deeply embedded in our national identity that calls to us for healing and reconciliation. The Doctrine of Discovery is central to many painful legacies of American history, including the legacies of slavery, the forcible relocation and genocide of Native American peoples and the colonial partitioning of the continent. It is also central to the painful relationship that European-Americans have with their history. Healing is needed.” (UUA Board)

But where do we begin with that healing? Where do we—especially those of us who are white—begin in seeking right relationship and reconciliation with people of color, given the theological roots of racist oppression? How do we open up centuries of colonized and damaged theology and begin to repair it? The challenge begins with truth-telling, and with true listening. Frantz Fanon writes, “The black man is not. No more than the white man. Both have to move away from the inhuman voices of their respective ancestors so that a genuine communication can be born. Before embarking on a positive voice, freedom needs to make an effort at disalienation.” (Fanon, 206)

Theologian James Cone makes plain the challenge before any modern American theological thinker, especially ones of European descent in a religion tied historically to Christianity. “One must suppose,” he writes, “that in order to feel comfortable in the Christian faith, whites needed theologians to interpret the gospel in a way that would not require them to acknowledge white supremacy as America’s great sin.” (Cone, 159) In order to find right relationship with people of color, white people must understand that “the terror of the lynching tree,” like the legacy of conquest, genocide and slavery, “is buried deep in the living memory and psychology of the black experience in America.” (Cone, 159-160) Healing and reconciliation necessarily start with truth-telling. “If America has the courage to confront the great sin and ongoing legacy of white supremacy with repentance and reparation,” Cone concludes, “there is hope ‘beyond tragedy.’” (Cone, 166)

Along with the UUA Board, as expressed in its 2012 report on the Doctrine of Discovery, I have come to a similar conclusion:

“A theology of mutuality and equality rather than of privilege and dominance means challenging ourselves to understand this history. The indigenous people of this land were conquered by vicious force and the land was taken from them. These actions were rationalized with the arrogant notion that the natives were savages and the invaders were civilizing Christians. The first people of this land have contributed much to our national culture, our food, our music, and most notably to our impatience with hierarchy and patriarchy. Benjamin Franklin credited the Haudenosaunee Confederacy for the idea that a federal union could be created out of self-governing states. Yet these contributions are forgotten and even denied and it offends the presumption of white privilege to admit how much the nation has been influenced by People of Color.” (UUA Board)

European ancestors, believing that they were anointed by God to conquer the world and convert it to Christianity, left us a dangerous legacy of racism, colonialism

and conquest. When we claim that theology again—even with good intentions—we unwittingly re-open centuries-old wounds that have never been allowed to heal, for it is the core of a theology of dominance, a celebration of *power-over*. Instead, let us claim that theology of mutuality wherever we can, let us claim *power-with*, which, as we know, asks those of us with power to give some up. We begin this long process of decolonizing our theology by telling the truth, by understanding our history, and by opening ourselves up to really hearing the experiences of others—and then we use what we have learned to deconstruct the systems that were built over centuries, one piece at a time.

Works Cited

All links active as of November 5, 2014

Alexander VI, Pope of the Roman Catholic Church, *Inter Caetera*, papal bull released May 4, 1493. Found on-line in translated form at <http://www.doctrineofdiscovery.org/inter%20caetera.htm>

Bureau of Indian Affairs of the United States of America.
<http://www.indianaffairs.gov>

Cooley, Dawn. "Reimagining Memorial Day," sermon delivered at the First Unitarian Church of Louisville, KY on May 25, 2014. Found on-line at her blog: <http://revdawn.wordpress.com/2014/05/25/reimagining-memorial-day/>

Cone, James H. *The Cross and the Lynching Tree*. Maryknoll, NY: Orbis Books, 2011.

Department of the Interior of the United States of America, "What We Do."
<http://www.doi.gov/whatwedo/index.cfm>

Personal conversations between the author and the Rev. Danielle DiBona, cited with permission.

Echo-Hawk, Walter R. *In the Courts of the Conqueror: The 10 Worst Indian Law Cases Ever Decided*. Golden, CO: Fulcrum Publishing, 2010.

Fanon, Frantz. *Black Skin, White Masks*. New York: Grove Press, 1952 (English translation by Richard Philcox, 2008).

Ginsburg, Justice Ruth Bader, "Opinion Of The Court: City Of Sherrill v Oneida Indian Nation Of N.Y." Supreme Court of the United States of America, 544 U.S. (2005) found online at <https://supreme.justia.com/cases/federal/us/544/03-855/opinion.html>

Haber, Toby, "Pirates, Boats, Adventures in Cross-Cultural Engagement," Report from UUA General Assembly 2009.
<http://www.uua.org/multiculturalism/ga/144281.shtml>

Henry VII, King of England. *Patent Granted to John Cabot and His Sons*. March, 1496. Found on-line at <http://www.heritage.nf.ca/exploration/1496patent.html>

Jennings, Willie James. *The Christian Imagination: Theology and the Origins of Race*. New Haven: Yale University Press, 2010.

Marshall, Chief Justice John. "Opinion of the Court: Johnson and Graham's Lessee v M'Intosh." Supreme Court of the United States of America. 21 U.S. 8 Wheat 543 (1823), found online at <https://supreme.justia.com/cases/federal/us/21/543/case.html>

Miller, Robert J., Jacinta Ruru, Larissa Behrendt and Tracy Lindberg. *Discovering Indigenous Lands: The Doctrine of Discovery in the English Colonies*. Oxford: Oxford University Press, 2010.

NRSV: *New Revised Standard Version of the Bible*. Nashville: Division of Christian Education of the National Council of Churches of Christ in the United States of America, 1989.

Nicholas V, Pope of the Roman Catholic Church, *Dum Diversas*, papal bull released June 18, 1452. Found on-line in translated form at <http://www.doctrineofdiscovery.org/dumdiversas.htm>

Nicholas V, Pope of the Roman Catholic Church, *Romanus Pontifex*, papal bull released January 8, 1455. Found on-line in translate form at <http://www.doctrineofdiscovery.org/pontifex.htm>

Reed, Justice Stanley Forman. "Opinion of the Court: Tee-Hit-Ton Indians v United States of America." Supreme Court of the United States of America. 348 U.S. 272 (1955). Found on-line at <https://supreme.justia.com/cases/federal/us/348/272/>

Rhodes-Pitts, Sharifa, "Extra Men: The Struggle To Assert Black Humanity," *The New York Times Magazine*, October 12, 2014, pp. 13-14.

Zanotti, Barbara, "We'll Build a Land," Hymn #121 in *Singing the Living Tradition*. Boston: Unitarian Universalist Association.

UUA. "The Doctrine of Discovery: The True Story of the Colonization of the United States of America," 2013. Video available on-line with script at <http://www.uua.org/multiculturalism/dod/199814.shtml>

UUA Board. *Report from the Board on the Doctrine of Discovery*. 2012. http://www.uua.org/documents/boardtrustees/rrmc/120109_motion.pdf