The Fight for Written Works:
Case Study of The Minnesota Coalition Against Censorship in 1970-1980

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Abstract

1970 through the 1980s was a time in the United States when the question of how schools should address written literature was up for debate. In Minnesota, there was a Coalition that had formed to help the fight against censorship in the state. Historians have not looked at the question of school censorship until recent years. The topic of censorship in schools is one that people in the education field explore. By looking at the Minnesota Coalition Against Censorship, a collection at the Minnesota Historical Society, there is much to learn about how this Coalition combatted the ideas of censorship. Looking at the Coalition's correspondence, cases they were asked to help with, and newspaper clippings that talked about cases they were helping with or watching the results help explain how the Coalition worked. Examining a specific location during a change can help better understand why the changes happened in a small area. Then able to see if this case study would also apply to what was happening nationally. The topic is essential as this is a little explored topic in the study of history, and the paper will help fill some of the gaps. At the same time, censorship is constantly an evolving topic that never has an end. Finally, the paper looks to highlight different solutions that have been used in the past to help the current society.
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Introduction

The years 1970 through the 1980s saw changes that affected the lives of the people that lived in America. The 1950s and 1960 were the times that saw the civil rights movements that opened the rights for many people to live the life they deserved. During the civil rights movement, many people tried to create change using words such as people like Martin Luther King chose to use the medium of the word to be able to express the goal that he was trying to create for the people of his race. The style he chose then became a way of being able to voice opinions that others could utilize when trying to make a point about what they believe. While this then started to create a different way that people could make a statement about the things they believe. As the events created an area where people were able to do different acts that were simple actions that did not harm the people around them. One example is three students wearing black armbands in Des Moines, Iowa, in 1969. They did this to display their protest against the Vietnam War, which caused a massive battle over the rights of students in schools. Tinker vs. Des Moines is one of the cornerstones of what students can do in school, making it so that the school could not stop students from showing their opinions unless they were disrupting the school day.\footnote{Henry Reichman, \textit{Censorship and Selection: Issues and Answers for School.} (Chicago: ALA Edition, 1993), 148.}

Public schools are areas where citizens have a piece of what should happen to them. As the schools are funded by the people who live in the area, there is a sense of control they believe they should have. Their power causes many different voices to speak out and try to influence the materials in school, as the main groups that put their voices into the issues are the parents, staff, and administrators. However, beyond these three groups, some influences are from the
government on both the state and the national level, as the government is the leading player in what the school can do because they are the ones that can control the money. Having these multiple different voices is a hard place for any decisions to be made on policies that inform how public schools should run. While the effect of Tinker is one of the things that was put into effect, not all the individual parties agreed on the policy. Tinker was an event before the Minnesota Coalition Against Censorship (MCAC) formed as a group.

The Minnesota Coalition Against Censorship started in early 1970. In their mission, they help create policies that can help schools and other public institutions with censorship events. Starting then, there were many questions about censorship in the state, and they wanted to help. To accomplish their goal, they acted by providing information to different organizations in the state and providing sets of procedures to be used when a question was brought forward and providing analysis of the event with the understanding of the laws of the time. This paper will look at the sources put into schools that students do not control and the student's written work. The materials the students have no control over our sources include books in the school library and textbooks that the teacher assigns where the question of who is being questioned for why the media was used is not a student. In comparison, the second one that is looked at is the student's words being questioned, as the school is the one that is questioning the freedom of speech that the student has and is the one that is being looked at on the legal scale. By using these different parts, the paper will look to find the events that the Minnesota Coalition Against Censorship affected in the ways that different cases ended through different procedures they had created.
Literature Review

When looking at all the information written on school censorship in literature, the literature has been created by people in the educational field. Given the fact that the information that they are looking at is a review of what was happening in the schools at the time of their research. Because people are writing from this viewpoint, there is a lack of deep investigation into why the situation is happening in schools. The authors took the methods by looking at the information from different surveys. Using these sources, there is a firsthand look at the materials the teachers faced as they do not look far back into history, with a mixture of the different fields starting to take part in finding the reason for different moments of censorship that have happened in the United States. Making this trend of research happen is the addition of the accuse available for students with the internet. They were causing another rise in questions about materials in school and more people trying to understand why the events happened.

English college professor from the Midwest Lee Burress wrote a book titled The Battle of the Book, which talks about the titles of books that were getting banned from 1950-1985. The book heavily influenced the area near Minnesota as he focused on one case study in Wisconsin. Looking at the Midwest is essential to understand the background information needed to formulate the context of the time in the paper. While Burress's book focuses on 1950-1985, which starts twenty years before the paper's timeline, this time is essential to help set the scene for the period the paper examines. Burress did create a timeline of the political movements that happened during the years he is examining in his book. While he is not a historian, he takes the time to think like a historian and set the historical context of the events he covers. Burress is working with the National Education Association to look at nationally collected information on
books that were getting banned. While Burress could not publish the information, he had researched during a trip. As the National Education Association did not want to share the context due to fear of more cases of censorship happening and proving a view of a historian to back up his arguments of why censorship is happening in schools and how to combat censorship in schools. The addition of this book Appendix B helps develop the context of the Midwest. In this part of the book, there is an extensive list of books being challenged and details about each case. He helped the knowledge of censorship in the form of books and provided a great foundation of cases of censorship before the paper's period. While this style of writing is a hybrid of content areas, it is essential to remember that the book's goal is not to give a reason but to provide solutions. Showing one area in the previous literature of why it happens and how it can be handled in multiple areas.

Henry Reichman creates timelines of twentieth-century censorship in schools in his book *Censorship and Selection: Issues and Answers for School*. While the timeline may be a list of books and reasons, there are also examples of timelines of ligations based on students' rights in schools. A standard document referred to in many secondary sources after the 1980s is the Library Bill of Rights. The Library Bill of Rights is a document that the American Library Association uses was created in 1982 and was amended in 1990.² This document was created for librarians to be able to use to defend the rights that they must be able to choose to have different books in their libraries, which leads to the second group of people that tend to write about this topic, which is the librarians. Then it aligns with the educators' reasons for writing about book censorship. Henry Reichman's book was created to help provide a background of information on

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all the different parts that happened to each of the cases to happen in its appendixes. As most of the book addresses the way that librarians and teachers can talk about the issues of censorship effectively. The book has been adapted three times, and with each edition, the topics have become more diverse. However, for the paper, the 1993 edition is the most helpful as it gives time to process the events that had just happened, trying to get a method closer to one of a historian. This book shows ways to help stop censorship was happening, yet it was being presented to the school staff before community members to help combat it.

When looking at the types of people that look at the topic of censorship in the education field tend to be the ones that are involved with the issues that come up during school challenges. The gap causes the literature that looks at the topic from a historical lens and examines the broader scope of why it was happening and what effective ways to combat the challenges. The other gap is that most secondary literature looks at the topic through a lens covering the United States, not one region or state. As many of these sources mention ways that people were trying to combat censorship, they tended to look at the national organizations and how they tried to help. However, it is hard to connect to the documents they were using, as they only mention the documents. Not examining the whole document but looking at the area that helps explain and help school staff members. Most of this gap was created in 1970 till about 2010, as few historians have looked at this issue and tried to analyze these things happening.

In an article written by Ryan Schroeder, he talks about how schools have started to adapt and find ways to remove books from schools in recent years. People argue that they can remove books since they claim it is "educational suitability." When making this claim, they are putting aside some of the rights the students have gained through different court cases in the United States. The removal of books, according to Schroeder, can limit the rights to students' freedom of
speech, which is a massive argument in both cases regarding how the paper defines forms of censorship in schools. As this article was only written in 2021, the issues drawn upon are that the freedom of students' rights has changed and many different court cases along the way as it is written through the lens of the law review. It shows that censorship is continually changing and has holes addressed. Helping the paper has the backing of the legal side of students' rights in school.

Since the 2010s, a different approach has been happening in literature around the ideas of censorship. After this time, a few more historians started looking at school censorship. While there is still not much written in the time period that the paper is looking at, there is more to look at on the topic. Many of the papers that have been written still look at the topic as a timeline of events that have happened in the United States. Many of these start with the idea of what has been censored in all aspects of society since the country's founding. The idea of censorship is still a new type of censorship. It tends to be some of the last things discussed on paper in historians' eyes. When they talk about many events of censorship, they tend to rely on the litigation that has happened and how it relates to the laws of The United States. The different cases are the places that have the most information available. While they have not investigated how different organizations have tried to reduce or understand the points of censorship in schools. Making the view of the historian a gap in knowledge of the events that happened around censorship, but when looking at one state or region. Understanding one spot's response can show how things have changed and affected other parts of the United States.

Types of materials that get censored

Books

In schools, students take in many mediums during the year, which are self-produced or given by the teachers. Several issues can be taken with the materials depending on the media. The first material that is most put into question is books. Books are the type of material that, during 1970-80, was being looked at and are mostly questioned because of the teacher's choice of material. In this paper, the style of written work that is a published piece of work that is not written by any of the students will be categorized as books. There are two ways the students access this type of media through the teacher assigning or reading the text. In many cases, the Minnesota Coalition Against Censorship would examine disputes on books not chosen by the student. While the other way that the student could access books was by their own choice, but in the confines of the school, such as the library or the school's classroom libraries. While these are the source of the disputes, the claims were an essential part of the process that the Coalition viewed.

One conflict brought to the Minnesota Coalition Against Censorship (MCAC) was the Battle Lake school district in 1980, an example of censorship that questions the students' religious backgrounds. The town is about sixty-six miles east of the North Dakota Border. Battle Lake is not a large town, as it had less than seven hundred people in the 1990s census report.\(^4\) While the paper is not the period the paper is looking at, the lack of census reports from 1980 led to the use of the latter year. The population that is in the latter year still paints the picture of the size of the town that the paper is examining. The issue in Battle Lake was about the book Person

to Person by a parent of a ninth-grade student who did not agree with the book's content in 1980. As the book in the mother views Mrs. Budke, "it frightened her." The part of the book that was causing the mother's issues was that they were talking about sex in school and not just telling students not to have sex. Person to Person brought into question sexual content and birth control which were complex topics for this area of the country. The book's goal was to help teach students how to deal with different social pressures in a safe place. As this conversation would be happening in the Midwest, it would not have been one parent of students who would have been used to hearing. As Minnesota is a permanently Christian state, the idea of safe sex is one; they would not be talked about as they would teach abstinence. One of the other mothers in the community, Fay Hess, said, "it is time we Christians spoke up." The statement she is quoted on is a decisive view of what should be taught in schools. Bring the parents' ties in making decisions that impact the way school teaches, where the parents are looking at the impact of the subjects that the students are learning based on the religious belief of the household.

As this was the scene happening from the parent's point of view, there was also the view of the school staff members on the issues of censorship. In this case, the central Person in the school being questioned was Mrs. Dietz, as she was the teacher that decided to use the book in her classroom. When picking out Person to Person to be used in the classroom, Mrs. Dietz went through the steps of getting the book approved by the school board, which set the staff member as the first line of defense when it came to censorship situations. Having the board members

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6 "Sex book stirs angry parents in Battle Lake," Dispatch, March 5, 1980, box 2, folder MCAC 1987, Minnesota Coalition Against Censorship (Saint Paul, Minn.), Minnesota Coalition Against Censorship Records, Minnesota Historical Society.
know what will be taught in the classroom and have previous knowledge of the book source gives them background information on the curriculum used in the classrooms. While reading this book, Mrs. Dietz used, it also spoke to other teachers at the school who found that the topics were necessary for students to learn. The head of the home economics department, Audrey Grote, took the time to make statements on the events. "We have a moral obligation not to protect them from society but to educate and prepare them."7 Highlighting the importance these teachers feel about the Person to Person and why it should be used in the classroom in the view of the teachers, showing the contrasts with what the parents said about the book, as they saw that the information should not be used in schools. The teacher's point in this dispute is the question of church and state within the school. Developing a new line as the society around them was also changing about these ideas of what should be in schools.

Looking at the school board's views in this dispute, they were the leading players in the solution to the case over Person to Person. As stated above, the school board approved the book being used in the school. However, in January 1980, Mrs. Budke and her husband went to the school board with their complaints about the book Person to Person. Once hearing this complaint, the board acted and took charge of the complaint. To accomplish this, they put together a seven-member committee to approach the complaint by the Budke's" At the time of the reports, the outcome of this committee did not happen till three months later, in March of 1980. In the final vote, the school board chose to keep the book in the classroom with a vote of

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7 “Sex book stirs angry parents in Battle Lake,” Dispatch, March 5, 1980, box 2, folder MCAC 1987, Minnesota Coalition Against Censorship (Saint Paul, Minn.), Minnesota Coalition Against Censorship Records, Minnesota Historical Society.
While this is not a simple ending, the article from Dispatch makes the resolution sound. The day after the decision, the press released an article stating that the parents were still unsatisfied with this conclusion. Titled "Parents to appeal decision Book wins in school battle," Mrs. Budke comes out again saying that she was not pleased with the outcome. She was making statements that she would challenge the decision. She believed the review board knew its decision before the sides were presented to the members. While Dale Kvale, who chaired the committee, states that he did not decide until he could hear all sides of the dispute. While the Minnesota Coalition Against Censorship collected does not talk about how they were involved in this case, the types of systems they were trying to put forward were followed. Bringing about the first type of system, the Coalition was trying to create the process of hearing the case with a mixture of people to make the final decision on what should be done in the case.

In a case in Stillwater Minnesota elementary school, a book is seen as inappropriate for the minor children as there is not a good role model in the book in 1980. The town of Stillwater is in the Southeast of the state, right along the border with Wisconsin. The population during 1980 was about 12,290 people that lived in the town. Putting this in a larger town would have more people seeing the question the parents were bringing forth. The book that Mrs. Myrtis Peck did not think should be in the school's library is Father Christmas in 1980. In this book, Father

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8“Sex book stirs angry parents in Battle Lake,” Dispatch, March 5, 1980, box 2, folder MCAC 1987, Minnesota Coalition Against Censorship (Saint Paul, Minn.), Minnesota Coalition Against Censorship Records, Minnesota Historical Society.

9 “Parents to appeal decision Book wins in school battle,” 3-6-80. Press, box 2, folder MCAC 1987, Minnesota Coalition Against Censorship (Saint Paul, Minn.), Minnesota Coalition Against Censorship Records, Minnesota Historical Society.

Christmas is not portrayed in the typical way the United States sees him. This book is written in Great Britain, which explains their personality differences. The book talks about Santa's life, not just on the night of Christmas. He is not always happy and jolly but grumpy and shows more diverse emotions. The case at Stillwater is one case the MCAC saw come through their system as a Censorship Case Documentation Form. The form is used for the MCAC members to understand the events happening in the case and the different parts that explain how the book was put up for question.

The two pictures below are the documents filled out for the case in Stillwater. It is important to note when they ask, "What were the objections?" This is the first thing that needs to be understood to look at any of these cases of censorship. As it plays a big role in the solutions that can be found in each case and to see if there is a type of pattern. In this case, there are only two things that are recorded for this case for the reason for objections. The two things being "illustrations w toilet & liquor (wine) bottle." While this was recorded for the records at MCAC, the news articles gave other reasons that Mrs. Peck was uncomfortable with the book being available in her child's library. Beyond the liquor, she found that the book did not portray Santa Claus well, implying swearing and a poor attitude. The swear words the article talks are not the official swear words but substitutions that share the same meaning. Adding this other source provides a fuller story of what Mrs. Peck thought about the book. In comparison, the news article adds a distinct perspective of the story that was trying to be told by the people that were not directly involved. The form MCAC started with the basic things that were put into

11 “Censorship case Documentation Form: Father Christmas,” Minnesota Coalition Against Censorship, Father Christmas Lakeside- Afton School Stillwater, Side 1, box 3, folder Father Christmas Lakeside- Afton School Stillwater, Minnesota Coalition Against Censorship (Saint Paul, Minn.), Minnesota Coalition Against Censorship Records, Minnesota Historical Society.

12 Ibid.
question for the book’s use in the school.

Figure 1. Censorship Case Documentation Form. Minnesota Coalition Against Censorship, Minnesota Historical Society, box 3, folder Father Christmas Lakeside- Afton School Stillwater. Minnesota Coalition Against Censorship (Saint Paul, Minn.). Minnesota Coalition
Figure 2. Censorship Case Documentation Form Back. Minnesota Coalition Against Censorship, Minnesota Historical Society, box 3, folder Father Christmas Lakeside-Afton School Stillwater. Minnesota Coalition Against Censorship (Saint Paul, Minn.). Minnesota Coalition Against Censorship Records, Minnesota Historical Society.
While the second thing that the Coalition was recording looks at the process of what was being done at the school level as the process for censorship events. In the case at Stillwater, which started when Mrs. Peck went to the school's principal Mr. Bunz to voice her opinion on the book, choice in the classroom. Making note that she did not go to the library staff as her first stop. The question of why her child could access the book was the main starting point for the complaint that Mrs. Peck made. The additional notes were taken on the backside of the document, mentioning that this book was not in the picture book section of the library but the older kid section. The next step that the school took was to have a meeting between the three people involved in the case, those being the principal, the mother, and the librarian. As there is no further information on what happened during this meeting, it can be inferred that an agreement could not be made at that time. Leading the school to decide to form a committee that would give a recommendation to the school board on what they deemed acceptable. The committee was made up of three members of the school staff and three members of the community that took part in the committee. They could come to a unanimous decision and what they believed should have been done with the book *Father Christmas*. In this decision,

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13 “Censorship case Documentation Form: Father Christmas,” Minnesota Coalition Against Censorship, Father Christmas Lakeside- Afton School Stillwater, Side 1, box 3, folder Father Christmas Lakeside- Afton School Stillwater, Minnesota Coalition Against Censorship (Saint Paul, Minn.), Minnesota Coalition Against Censorship Records, Minnesota Historical Society.

14 “Censorship case Documentation Form: Father Christmas,” Minnesota Coalition Against Censorship, Father Christmas Lakeside- Afton School Stillwater, Side 2, box 3, folder Father Christmas Lakeside- Afton School Stillwater, Minnesota Coalition Against Censorship (Saint Paul, Minn.), Minnesota Coalition Against Censorship Records, Minnesota Historical Society.

15 “Censorship case Documentation Form: Father Christmas,” Minnesota Coalition Against Censorship, Father Christmas Lakeside- Afton School Stillwater, Side 1, box 3, folder Father Christmas Lakeside- Afton School Stillwater, Minnesota Coalition Against Censorship (Saint Paul, Minn.), Minnesota Coalition Against Censorship Records, Minnesota Historical Society.

they decided the book should not be placed in areas for grades first through third. However, it was not able to be forbidden from students use. They left the book readily available for the fourth through sixth grades. In this solution, they developed a unique way to acknowledge the mother's concern about the book but could keep it in the school. At the end of the case, the school board took the committee's recommendations and implemented the solutions they developed.

Finishing out the sheet that the MCAC has filled out with essential information that was needed to know about the school. Proving the timeline of when each Person was brought into the case. The initial complaint that Mrs. Peck made took place in May 1980, when the board did not bring up the issue until July 24, 1980. This timeline paints the picture that this was a well-thought-out decision, as every one of the steps took a significant amount of time to complete. Finally, an essential thing to the procedures that the MCAC was creating during this time; they asked if the school had procedures for these types of cases. According to the sheet, the school of Stillwater had these procedures in place for complaints and sections. The sheet filled out in the case of Father Christmas shows the steps MCAC was trying to create for the state. By using and helping schools based on the steps that they had in place before the instance happened.

In both examples, two cases of books that were being put up to question, a common trend had emerged. In the first case in Battle Creek, while there was less information about how the case was handled, they knew they needed to take it step by step. After the complaint was made,

17 “Censorship case Documentation Form: Father Christmas,” Minnesota Coalition Against Censorship, Father Christmas Lakeside- Afton School Stillwater, Side 2.

18 “Censorship case Documentation Form: Father Christmas,” Minnesota Coalition Against Censorship, Father Christmas Lakeside- Afton School Stillwater, Side 1.
there was no decision made right away. The school board took the time to investigate the matter and put together a committee of different people to make the final decision. While this goes along with what happened in the Stillwater case. As the steps were not rushed but given time to be thought about before a final decision was made. It showed that the process the Coalition was making was impacting how schools handled these issues.

**Student Freedom of Speech:**

While the books can be used in schools or placed in schools, there is the question of why the school allows them into the school. When thinking about censorship, there is a second way of looking at it through the idea of what the students can say. Taking the time to look at the topic in this way shows censorship through the light of the student's rights, which is a balancing act when looking at schools as schools are places where not all behaviors or language is welcomed as it is a place for all students. This type of issue can be fought on many distinct levels of organizations. As freedom of speech is one of the rights given in the constitution, this cannot be taken away. While there are many parts to freedom of speech, it is one place that has court rulings that lay out the things that can be done and those that are not.

One of the cases of freedom of speech that happened in Minnesota happened at Coon Rapids High School. Coon Rapids is a suburb of the Twin Cities, with a population during the 1980s census placed it at 35,826, making it a large town in the state. At the end of the school year of 1987, the school was holding an election for the student council. On June 2, 1987, a student running for the council handed out campaign literature to the students when one of the
assistant principals told him to go to the office. Once he was in the office, she told him he was not allowed to hand out any more of the literature for his campaign; otherwise, he would be suspended. She believed that the information he was handing out was "Not becoming of the honorary post of councilman." In this first part of the story, it would have been helpful if the Minnesota Coalition Against Censorship explained what the literature had said to help us understand the whole picture of the case. While that is not the mission of the Coalition to deal with the complaint, but to help when something is being censored by, helping apply procedures to the intuition with which they are working with. When it came to the election, the ballot did not have the student's name, yet he had received many written votes. As there were classmates of his that decided to stage a sit-down for the situation that he had been put in. In the end, he had not won the election for other reasons unrelated to the instance with the assistant principal.

The next day, June 3, 1987, he had put together a handout that criticized the assistant principal for taking the handout he was trying to use for the election. He was called back into the assistant principal's office and suspended for the handout he created that day. He was suspended for the rest of the day and the next day. Now, this is where the start of the question of the student's right to freedom of speech was being put into question. His second handout is a different type of speech that he had decided to take part in completing. As the sources do not speak of what he wrote in the handout, it hinted at he was targeting the assistant principal. While


the first handout is not told what it said, it was like a standard question of free speech as this handout does not seem to have any direct targeting of a person. At the end of his suspension, he wrote a letter to the school board about the incident and why he did not think the suspension should have been allowed. In hearing the letter, the school board decided on their response, as they had a set of policies aligned with the case. Based on the policies that they had in place, the situation was in favor of the assistant principal, as the handouts were derogatory about her. So, here finishes the role that the school had in this case as they had set procedures that explained the things that would be accepted.

For the question of the students' rights at Coon Rapids, the Minnesota Coalition Against Censorship took a role in the issues as the results did not align with what the school decided upon. In many messages MCAC executive director Matthew Stark sent, he outlines the cases that had happened at the school. The students were not happy with the decision and with the help of the Minnesota Civil Liberties Union (MCLU) was trying to take legal action on this matter. The MCAC was recommended as a third party to look at the challenge. As this is an area that they look at in-depth through the mission that they are trying to make in the world of censorship. They were asked to look at the events that happened on June 2nd and 3rd 1987 at Coon Rapids High School. The Minnesota Civil Liberties Union asked the Coalition to look at the events as the Minnesota Civil Liberties Union was trying to act in favor of the student. Their argument for this stance is "…regarding students' rights to distribute literature unless it can be shown that such
distribution substantially disrupted school programs." As stated in the quote, the student did not do anything that disrupted the school day's flow. On September 5, 1987, the Minnesota Coalition Against Censorship took a vote which ended in eight votes in favor of helping by taking the non-bias stance. Making their stance on what their mission was from the start of the Coalition to help stop some of the moments of censorship. In this correspondence, the Coalition asks for any of its members to be part of the group that puts together the case information. Showing that the question of freedom of speech is not a simple answer, as many distinct aspects go into the decision. While in this case, it shows that the Coalition is sticking to its belief that there must be some type of consideration in making the decision to limit that speech of the student. While they also made their knowledge of the subject known by taking part in the case that went on to get reviewed.

**Litigation**

When looking at the Minnesota Coalition Against Censorship, their starting belief is shaped by the time they lived. During this time, there were two different cases that impacted the decisions they made. While this decision was not just made in Minnesota but was in two different states that made it to the supreme court. In 1969 *Tinker vs. Des Moines* took place in the highest court in The United States. The cause is students who participated in a silent protest in Vietnam by wearing black armbands to school. As this plan was being created, the school's principal heard what would happen on the day they chose. The principal told the students that they were deciding to do this protest and would be suspended if they were to participate. The day

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they planned to do the protest, only three students decided to participate in the demonstration. There was no disturbance to the school day as the three students wore black armbands. When they were asked to take off the armband, they did not and were told to leave school and were suspended. When they returned to school, they chose to wear a different armband color, as the school had made a policy that did not allow black armbands.25 During this time, their parents filed a suit against the school as they believed the student's rights had been diminished. Looking at their children's freedom of speech is a right that has been taken away. With continual losses on the part of the families, they finally filed appeals to the supreme court. In this level of the court, the student's families won the case. In February 1969, the supreme court made this statement, "neither student nor teachers 'shed their Constitutional rights to freedom of speech or expression at the schoolhouse gate"26 Tinker vs. Des Moines is the first case of its kind that set a precedent about the rights that the students have when they set foot into the school.

Being put into place at the start of the Minnesota Coalition Against Censorship as it was building the Coalition in 1970. Following the information put into place by the Supreme Court in using Tinker vs. Des Moines as a starting point of what students should be able to do. In the case of what happened in Coon Rapids, this is one of the things that the Coalition could be able to look upon to help guide the decision. While the documents were sent to the members, there was little information on the student's writing in either case. However, when comparing the two cases, there is a commonality in how the students reacted to the events. If MCAC looked at Tinker vs. Des Moines' case, they would see disturbances on a school day with the second

handout. While in Coon Rapids, there could have been a disruption as the students had decided to do a sit-down at the school. The event that the students participated in could have disrupted the school day. Nevertheless, the lack of information in the documents limits the analysis that can be done in the ways that the MCAC can use that precedent to apply it to Coons Rapids. However, it can be seen in the Coalition's purpose: to help the schools with procedures. It makes *Tinker vs. Des Moines* one of the influential cases to help the Coalition develop its core values and see them through.

One of the other main ways students can share their freedom of speech in schools is by using school newspapers. While there are few that the Minnesota Coalition Against Censorship case took place on this topic, it is still one important one that happens on the national level. In the case of *Hazelwood vs. Kuhlmerier* 1988, the question of students' rights to publish information in the paper even if it is not like the usual articles. The Hazelwood East High School in St. Louis, Missouri, had a school newspaper that they had wanted to release an article about teen pregnancy and divorce. As these topics were not discussed much at the time, this would have been a strange sight to have seen in the paper. When the principal looked over the paper before it was released, he deleted two pages of work the children had worked on. The children that had worked on this portion of the paper did not feel like they could get a fair deal as they could not make any changes. As this adds a new idea that was not looked at in Tinker, the student's rights when it comes to writing and being able to express their interests in that method. After this event at Hazelwood, the students felt their first amendment rights had been violated, so they took the case to the district court. At this level of the court, they ruled that the students did

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not have their rights violated by the school. After this, the students took it to the court of appeals; at this level, the court ruled that removing the pages had violated the students' rights. At the final level, the school brought the case to The Supreme Court, which won in favor of the school. The court ruled this way because they believed the articles went against the school's educational mission. In contrast, adding that the role of the student reporters was to learn the process. This task was supervised to ensure it was following the mission the school was trying to achieve.

As the case of Hazelwood happened after the incident at Coon Rapids, it still made the view of the Minnesota Coalition Against Censorship as it plays a role in how they function when addressing different cases. As the MCAC follows the library bill of rights, they follow many of the same policies, following and receiving information sent out to the libraries. In March 1988, they received the School Library Journal that explained what happened during the Hazelwood case. It starts with how the Supreme Court has been changing over the years. From the ideas put forth in Tinker's case, there was much more freedom to say what the students were able to do and say in the school. However, in the 1980s, there was a shift as more rules were being implemented for the students regarding what they could say. As Tinker was the case that formed the way the Coalition performed, these changes then had to be added to their techniques.

As one of the main ways that the collection highlights the ways the MCAC took part in any of the litigation is through Coon Rapids. While this is a clear example of this happening in the Coalition, as they have documentation that they were trying to find people who wanted to


participate in the committee. While seen in the questionnaire they have for varied censorship reasons, they are looking at the whole picture, not at one point in that story, as they wanted to know about the procedures that the schools had before the case happened. Through this point, it is seen that they are looking to help guide the schools or parties in the causes of any of the types of censorship; to the discussion as they were basing the information on the ideas that libraries take and allow that multitude of cases that happened during 1970-1980.

**National Response to Censorship**

During 1970-1980, there were many changes regarding the ideas around what should be allowed into schools through the two different types of written literature found in schools. As seen in the litigation discussion, part of the paper points out that the court system was actively acting in the debates. Not just happening on the higher levels of the court system; this was happening in many different states. At the same time, none of the cases were brought to court for any singular reason but for many different reasons. Just looking at the ligation in the Midwest, there were many cases.

First, it is essential to point out that the case of *Tinker vs. Des Moines* takes place in the Midwest and is one of the first cases that is brought up when thinking of censorship in the Midwest. In contrast, many different areas still had cases that did not just talk about the freedom of speech that the case of Tinker talked about, as these cases looked at different books that should be allowed in schools following similar lines of the book section of the paper. One of the cases on this topic took place in Michigan; in this case, a father did not agree with using the book *Slaughterhouse-Five or The Children's Crusade* in his children's class.\(^{30}\) In this case Todd versus

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Rochester Community Schools, the question of the book was all related to religion that was brought up in the book. The case went up to the Michigan Court of Appeals in 1972. It placed this at an earlier time frame than the different cases that the Minnesota Coalition Against Censorship was viewing regarding book censorship. This case speaks of a different way that censorship was being viewed in other states. While they are not on the same level as the case studies for Minnesota, it did not end up going to court, while the Todd versus Rochester Community Schools did end up going to court to make a ruling. It can be observed that the Minnesota Coalition can provide a structure to the state and how to deal with different issues of censorship in their state. Leading the cases does not have to fall to the courts but can be handled by these school boards through the different structures that the Coalition was putting together to help. Placing the Coalition activity in a time where different cases go to courts for different reasons shows that this was not a singular event in one state but an issue across the nation.

While the Coalition was trying to achieve the goal that they had created, there had to be an understanding that the systems they would create would not just stay in the state. The first way they were able to do this was by staying connected with the many different people doing things involving censorship. One of the first places that relationships could be created is in the types of news they were receiving. It was not through just one type of source. When the Coalition first heard of Hazelwood's case, there would have been media coverage of the case as it had become a national case. In this way, the members of the Coalition would have been hearing it in the way that all the citizens would have been hearing the information. The media would have looked at the case and given the information of the case in a concise way that would not go into much detail. Telling the readers or listener the information that is the main points, and how the case ended. The information in this media form would not be enough for the Coalition to act
on the information and use it to help the process that they had implemented. Furthermore, this is the case; they were part of different groups that handled censorship to be able to use it as a support system in the decisions that they were making.

When looking at the materials that were collected by the Coalition, it is seen that they were taking informants from many different states and organizations. One of these sources is a group called Student Press Law Center (SPLC), which had put out a packet about the Hazelwood case and what it entirely meant.31 As it breaks down the case and how it happens, it results in the verdict that the court finally reached. Right below the case name, it states, "What it says, what it means. Where student journalism goes from here."32 By looking at the fact that the packet is specifically looking at the ways that the SPLC is looking at the effects of the case on the schools and how they need to work forward on the topic. The pamphlets place this organization's location in Washington, DC. The fact that this information is being created in the nation's capital gives this group a solid position to have information on the topic of censorship of students as it is taking place in the laws that the nations are looking at trying to create. The fact that the Minnesota Coalition Against Censorship sent this information to them makes the point that they were looking for information from many sources. So, it is being able to get a complete picture of the events while also getting a plan of what would be able to be done in the future.

While one of the other resources that the Coalition received that showed how they were looking at going beyond the state was the document titled "Selective Chronology of American

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Public Library Censorship and Events that have Affected it with Special Emphasis on Minnesota." This was put together by a member of the Coalition named Mary L. Lawson; it still gives credit to many other groups that helped in this process. Many credited people were part of different levels of groups that dealt with libraries and the things that happen in them. Bring out the extensive network of people that the Coalition started with gaining resources from. Mary's list has a timeline from 19th century England but started most of its work in 1855 to 1978.\textsuperscript{33} Most of this information that is not related to the state would have been gained through the different library organizations they were working with. It shows first that censorship was not an issue during the 1970s to 1980s, but this is a topic that has a long past that is a continual issue that happens not only in the United States but also in England. The second thing that can be learned from this list is that they had a connection to these groups. This shows that the actions they took when they made censorship decisions were not based on one event. Instead, they were looking at the events that had happened in the past to better plan for what they were planning to do in the future.

While there are a few different ways that the Minnesota Coalition Against Censorship was not alone in the actions they were trying to create for the schools. The information they were receiving was from groups looking for a specific spot of censorship in school and able to understand that part well. The packet from the Student Press Law Center shows how students' rights in the press changed and how that new system would look. Giving the Coalition a good starting spot that they could use for any cases they were to help on that dealt with this topic. In

\textsuperscript{33} Mary Lawson, “Selective Chronology of American Public Library Censorship and Events that have Affected it with Special Emphasis on Minnesota,” box 3, folder Miscellaneous censorship articles and reports, 1980s, Minnesota Coalition Against Censorship (Saint Paul, Minn.), Minnesota Coalition Against Censorship Records, Minnesota Historical Society.
contrast, the connections that the MCAC had with the variety of library organizations in the United States helped with the rights to be allowed in different types of organizations than schools. However, they can be applied as school libraries still follow the library organizations' goals. Finally, the variety of cases brought forward during the paper shows the variety of complaints. However, beyond that, the solutions for these cases are not a one size fits all type of situation, as each has a different way of solving the problem. Nevertheless, an important thing to understand about censorship from a national view is that the area where it takes place can make a difference in what is being questioned and the severity that it is taken.

**Conclusion**

After looking at the case study of the Minnesota Coalition Against Censorship, they tried to create a system that would be able to help events of contention of schools. As they took part in looking at many different parts of the different cases that were happening in the state. The first part that the paper focused on was the medium of books in schools that can be accessed. The MCAC looked at cases that did not go to a high level of severity. As the cases that were talked about in this paper, they were able to come to a solution by the school board where that event happened. Both cases discussed in the paper ended with the book allowed back into the schools. In the case at Stillwater, the solution that was created was a combination of what the parents were looking for while it could still be used in the school. Finally, in the case of the students' freedom of speech, the MCAC looked to be involved as a third-party group that was there to help give meaning to the laws of the time. Finally, being able to give a solid foundation for the case being presented to the court.

Each of the different cases that the Coalition looked at in this paper is how the law refers to the cases they look at as two different cases from the Supreme Court form the foundation of
the actions that the MCAC took. These two that stemmed from the Supreme court caused the rules to have to be followed by all states in the United States. Creating a guideline that the Coalition could follow, enforce in their state, and build a stable ground for the work that they were trying to create in Minnesota. Nevertheless, the vital thing to understand about this time was that the ligation that was happening at the time did not just lie in one state over another. Each area of the nation faced its type of struggle; they were trying to create their own rules and ideas. The ligation being looked at is only a tiny piece of the bigger picture of the 1970-1980s. It created the context that the Minnesota Coalition Against Censorship was not just one group working on its own. Instead, they were creating a network of people and other organizations to help build a system that people could refer to in cases of challenges. Finally, using newsletters and messages back and forth, they created a broader knowledge of censorship topics, as the team did not have a robust set of rules that anyone could follow.

Completing this study contributes to the knowledge that can be created about Minnesota and its systems around censorship. This paper aimed to see how the Minnesota Coalition Against Censorship handled cases of censorship and tried to gain knowledge of why cases end the way they do. In the end, the paper has shifted to see how censorship is a wide variety of things that do not always happen for the same reason. The Coalition noticed this hole and took the time to find a way to provide a simple way that can be applied many times for different reasons. Giving schools a starting point for each of the complaints they may receive and giving them steps they can take to build a better system for themselves. Creating a fairer system that they can create at the top of the processes gives the schools a better chance to solve the issues on their own. When looking at the previous literature on the topic of censorship, there is little that has been done on this topic. Instead, the paper can find an area that has not been looked at by scholars and give
meaning to the actions that the Coalition created during this time, placing it in a picture of
change happening and explaining why it started to change.

After creating this paper, much more can be done on the topic, as this is only one place
and once. One of the ways that further research would be able to be completed is by exploring
the other organizations that the Coalition interacted with and what their role was in the changes
being put into place. See if any other systems were being put into place to help schools regarding
censorship. In contrast, seeing if there are any similarities to how the Minnesota Coalition
Against Censorship sees it and if others were thinking the same way. Another way that further
research could be completed is by examining the collective ligation that happened in the courts.
Allowing a comparison of each area of the country and their responses and seeing if any trends
can be grouped into regions of the nation. Finally, giving a regional idea of censorship and being
able to see why cases of censorship are a diverse set of challenges.
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