Dear Chicago Public Law and Legal Theory Workshop Participants:

This is an early first draft of my contribution to “Hip-Hop, Law, and Policy,” an anthology to be published by Cambridge University Press in 2021. Each author in the anthology selects one hip-hop work to write about. I chose N.W.A.’s *Fuck tha Police*.

Black Lives Matter,

Paul Butler
Defund the Police: A Polemic, with Elements of Pragmatism and Accommodation, Hopefully Not Fatal, as Black People Hope about Encounters with the Police

Fuck tha police. Defund the police. I appreciate the imperfect symmetry. Before, I might have thought that “imperfect symmetry” is an oxymoron. The Republican party in 2020 declined an actual platform; it reverted instead to “what Trump said” in 2016. But then, in the summer of the murder of George Floyd, the Trump/Pence campaign issued a series of “core priorities,” appropriately in the form of bullet points, one of which was “defend the police.” Defend the police. Defund the police. There is perfect asymmetry.

What the police do is kill Black people. We are more than twice as likely as white people to be subject to deadly force. According to a study published by the National Academy of Science, one in 1000 Black men and boys will be killed by US law enforcement. Also, the police beat us up. Arrest us in situations in which they do not arrest white people. Treat us as less than, other than, beneath them, as having no rights the police officer is bound to respect – all, frequently, as policy. I know that the police do other things too. And that we call them, I myself have called the police. But if killing, assaulting and dehumanizing African Americans is part of what they do, why would you want to fund them? Anybody who does not get that must not believe in Black people, innovation, hip-hop, the promise of America, the internet, Toni Morrison, the Movement for Black Lives, Kimberle Crenshaw, Lebron James, and James Baldwin. Anybody who does not understand defund the police is a low expectation having, violence against Black bodies accommodating, history denying, evidence ignoring, un-American romantic luddite. Or, what editors like to call, my main audience.

This Chapter, Dear Reader, makes the case for symmetry. “Fuck tha Police” is the theory. “Defund the police” is the contested and evolving set of practices. I want to make clear about the latter what is obvious about the former: defund the police is rooted in disillusionment and righteous anger, born of the lived experiences of Black communities. If We Shall Overcome was the soundtrack for the civil rights movement that sought to end the old Jim Crow, Fuck tha Police is an anthem for the movement to abolish the new Jim Crow.

Everything Old School is New Again

N.W.A. was an iconic US hip hop group, active between 1987-1991, who popularized the genre known as “gangsta rap.” N.W.A. is an abbreviation for “Niggaz Wit Attitudes” and the group’s

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2 https://www.donaldjtrump.com/media/trump-campaign-announces-president-trumps-2nd-term-agenda-fighting-for-you
4 https://www.pnas.org/content/116/34/16793
profane and poetic lyrics frequently exalted violence and unregulated free enterprise, including selling illegal drugs. N.W.A.’s work was explicitly political, and contained strong critiques of the criminal legal process, especially the police. N.W.A. has sold over ten million units, and was inducted in the Rock and Roll Hall of Fame in 2016.

_Fuck tha Police_ was released on August 9, 1988, on N.W.A.’s first studio album _Straight Outta Compton_. The song is a courtroom parody and revenge fantasy in which MC’s Ice Cube, Ren, and Eazy-E prosecute a police department that has engaged in racial profiling and other acts of anti-Blackness. Ice Cube tells the jury that “the police think they have the authority to kill a minority” and that cops would rather see him in prison than driving an expensive car. MC Ren relates being the victim of a race-based traffic stop, and getting arrested for being a “smart ass.” Eazy-E observes that “my identify by itself causes violence.” Consistent with the ethos of gangsta rap, the MCs’ characters are anti-heroes, and unreliable arbiters of morality; they spend as much time boasting about their own criminal exploits, and the kind of violence they would subject cops to if there could be a fair fight, as they do criticizing the police. In the final verse, the judge, played by the album’s producer Dr. Dre, announces that the jury has convicted a police officer of being a “redneck, white bread, chicken shit motherfucker.” In 2004, _Rolling Stone_ magazine ranked _Fuck da Police_ at 425 on its list of the “500 Greatest Songs of All Time.”

In June 2020, another _Rolling Stone_ article observed, “Over the last week, N.W.A.’s fierce indictment of racial injustice, _Fuck tha Police_, has become the anthem of a revolution, as thousands all over the world have taken to the streets in outrage over the wrongful killing of George Floyd at the hands of Minneapolis police.” That summer I frequently heard the song at protests, the first time on a beautiful Sunday afternoon in D.C.’s newly christened “Black Lives Matter Plaza,” across Lafayette Park from the White House. The plaza, full of people of all ages, colors, and genders, and mainly Black vendors, had a joyous vibe. Part of the festiveness was no doubt inspired by people just being glad to be out of the house, after a long Spring of sheltering in place because of the coronavirus pandemic. Most everybody wore masks, which, adorned with slogans and images of the victims of police violence, were one of the hottest selling wares of the vendors.

For the first weeks of the summer, before the police kicked out the vendors, the Plaza was more a site for shopping and hanging out than marching but there was plenty of chanting. “Black lives matter,” obviously, plus “Black trans lives matter,” and “No justice, no peace.” There was call and response, often with someone reciting, one by one, Black victims of police violence and the crowd responding “Say His Name” or “Say Her Name.” Some chants were directed at the man who lived in the closest residence: “Throw Him Out” and “Dump Trump” and others were about the police: “If you stood there and watched, you’re a dirty ass cop,” and “Hey hey, ho, ho racists cops have got to go.”

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5  https://www.rollingstone.com/music/music-lists/500-greatest-songs-of-all-time-151127/
Later the New York Times would describe the summer’s protests as probably the largest social justice movement in the country’s history.\(^8\) In the way that, in a democracy, dissent is an act of faith, I felt, if not proud to be an American, that we all were right where we were supposed to be, even in the middle of a pandemic (it was virtually impossible to practice social distancing because of the size of the crowd). We had emerged from months of isolation and rediscovered community. I felt, unusual for me, like a citizen.

For this reason, “Who’s streets? Our streets” was my favorite chant. It was an insistent rebuke to the police but it was not personal. DC was certainly not exempt from the heavy handed and violent police response to protestors all over the country; most infamously, law-abiding protestors at Lafayette Park were gassed and shot with rubber bullets so that the president could make his way to a church, to hold up a Bible for a photo op. But at Black Lives Matter Plaza, the cops mainly laid low, and, probably not coincidentally, the Metropolitan Police Department officers deployed to the scene were almost all Black and Latinx. They stayed on the outskirts, and they seemed relaxed. Without their uniforms and guns, they would have fit right in the crowd. I would call it good policing, except that we didn’t need any policing, at least not from people with guns. It was, though, unusually chill policing, and it seemed effective at directing the crowds’ rage to institutions and systems, rather than towards those officers.

Sometimes, at the protests, I heard “Fuck Donald Trump,” but, as a chant, I never heard “Fuck tha Police.”\(^9\) But where Black people gather outdoors in summer, there will be boom boxes. By July hip-hop and pop artists had contributed dozens of new protest songs to the canon, but early on the soundtrack of the movement was familiar.\(^10\) Portable music players blasted Kendrick Lamar’s *Alright*, McFadden and Whitehead’s *Ain’t No Stoppin’ Us Now*, and N.W.A.’s *Fuck tha Police*.

*Fuck da Police* is, in some ways, unlikely music for a demonstration. It’s an unanthemic anthem. You can’t sing along, because there’s no melodic bridge, and it’s even hard to rap along, because the flow of the four MC’s on the track varies so much, plus, rare for a hip-hop classic, I don’t know anyone who knows all the words. The hook – “fuck tha police” – is unrhythmic; it’s scratched and staccato sounding. Still, at the summer protests the song had the impact of a club banger. More than 30 years after it dropped, *Fuck tha Police* still sounds rude and rambunctious.\(^11\) It makes you feel like agitating.

Another chant you heard all the time that summer was “Defund the Police.”

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“Defund the Police” is a Slogan

Asking what “defund the police means” is like asking what “Black Power” or “Occupy Wall Street” or “Me Too” means. It depends on who you’re asking.

The Liberal Version

To some, defunding the police means reducing the budgets awarded to police and reallocating those resources towards directly supporting under-resourced communities, including violence interruption programs, education, public health, housing, health care and youth services. In this vein, the call to “defund the police” functions in tandem with the call to “invest in communities.” What, then, do we do with the police? A moderate stance includes recruiting professionals that will work alongside officers to supplement police work by filling any gaps in knowledge, skills, and training. For mainstream progressive organizations like the ACLU, defunding the police translates into discernible policy changes that include decriminalizing minor offenses, removing police from schools, and eliminating aggressive police tactics like broken windows policing.

Many politicians, both Democrat and Republican, have responded to the movement to defund the police with disapproval and even alarm. President Trump has labeled the movement to defund police a “fad,” undermining decades of discourse on prison abolition. He has suggested that proponents of the movement are on an “anti-cop crusade,” a stance that reflects or rewards the political support he has garnered from police unions. Trump is far from alone in his admonition. Some Republican lawmakers have labeled the movement as “pure insanity,” “radical,” “dangerous,” “outlandish,” and an “abomination.”

Many Democrats have also been loath to support the movement to defund police, although they have supported broad based reforms like those contained in the George Floyd Justice in

14 Jon Schuppe, What Would it Mean to ‘Defund the Police’? These Cities Offer Ideas, NBC NEWS (June 10, 2020, 5:46PM), https://www.nbcnews.com/news/us-news/what-would-it-mean-defund-police-these-cities-offer-ideas-n1229266 (discussing a pilot program to reduce the incarceration of the mentally ill by placing an officer, a paramedic and a social worker in every vehicle responding to mental health emergencies).
Policing Act of 2020, including banning no-knock warrants and chokeholds, eliminating qualified immunity, providing improved training, and creating a nationwide police misconduct registry. While some progressive Democrats have explicitly supported the movement to defund police, other moderate-leaning Democrats have characterized it as a potential distraction and a poorly worded slogan, as indicated by Congressional Black Caucus Chair and Representative Karen Bass; or an unrealistic goal, as expressed by House Majority Whip and Representative Jim Clyburn. Supporting the movement to defund the police was leveraged as an accusation against Democratic nominee for the 2020 Presidential Election Joe Biden, who was quick to rebut the allegation.

Some local governments have taken steps to implement their own, limited versions of defunding. In Minneapolis, the City Council unanimously approved a proposal to alter the city’s charter, which would pave the way for disbanding the police. This act is only the first step in the process of formally replacing the Minneapolis Police Department with a Department of Community Safety and Violence Prevention which prioritizes restorative justice. Effectuating this change will require the support of voters on the November ballot.

New York City took a less drastic step towards defunding in the form of a $1-billion-dollar reduction in New York City’s $6-billion-dollar NYPD budget which will be reallocated to Education and Social Services. This reduction paled in comparison to protesters’ demands to disband the NYPD, who pointed out that the budget for school “safety agents” was merely shifted from the NYPD to the Department of Education. In Los Angeles, the Unified School District voted to cut its school police budget by a third, and the City Council voted to reduce the police’s $3.14 billion-dollar budget by $150 million dollars.

The Crit Version

23 Amy Forliti & Steve Karkowski, Minneapolis City Council Unanimously Approves Proposal to Disband Police, TIME (June 26, 2020, 12:02PM), https://time.com/5860172/minneapolis-city-council-eliminate-police-george-floyd/ (discussing bureaucratic challenges that the City Council faces in effectuating the disbanding of the police).
24 See Jennifer Peltz and Michael R. Sisak, New York City Shifts $1 Billion From NYPD to Education and Social Services in New Budget, TIME (July 1, 2020, 1:04AM), https://time.com/5862109/nypd-funding-new-york-city-council/.
26 See Associated Press, LAPD Funding Has Been Slashed by $150 Million, Reducing the Number of Officers, TIME (July 2, 2020, 2:55AM), https://time.com/5862499/lapd-funding-cut/.
For many Black-led grassroots movements, prominent activists and critical race scholars, including Angela Davis, Mariame Kaba and Ruth Wilson Gilmore, the former approaches are insufficient.\footnote{John Toussaint-Strauss, et al., *What Does it Mean to Defund the Police? – Video*, THE GUARDIAN (June 22, 2020, 1:12AM), https://www.theguardian.com/us-news/video/2020/jun/22/what-does-it-mean-to-defund-the-police-video (discussing the range of meanings associated with defunding the police and noting prominent proponents of abolition).} For this camp, defund the police calls for more radical actions than re-allocating money away from criminal law enforcement, if that still allows for the continued existence and active functioning of police in the daily lives of citizens. The violent and white supremacist origin and track record of US policing is fatal to any proposed reform. Simply put, defunding the police department culminates in abolishing it.

The intellectual history of the radical version of defunding the police includes W.E.B. DuBois’s seminal work *Black Reconstruction*, published in 1935. He used the phrase “abolition democracy” to make the case that African Americans would not be fully emancipated until the institutions that maintained their subordination were abolished, in the way that the 13\textsuperscript{th} amendment abolished the law that authorized slavery. DuBois used prisons and convict leasing as the main examples from the criminal legal system, but he noted “white” police officers (at the time he wrote, essentially all police officers were white) participated in black “domination.”

DuBois was right, then and now. If police work includes selecting out some law breakers, from a virtually limitless pool, for investigation and detention it is impossible for that work to be accomplished in the United States in a way that is not infected with white supremacy. If the police are authorized to use violence, including killing people, on those they deem to be dangerous, it is impossible for them to exercise this license absent race and class bias. This is not conjecture; it is evidenced by virtually every objective analysis of American police departments, including those done by the US Justice Department as “pattern or practice” investigations.

Some polls have indicated that African Americans prefer to either maintain the level of policing that currently exists in their communities, or to have more police. For example, a Gallup Panel survey conducted during the summer of 2020 found that 61\% of Blacks wanted the police to spend the same amount of time in their neighborhoods, 20\% wanted them to spend more time, and 19\% wanted them to spend less time.\footnote{https://news.gallup.com/poll/316571/black-americans-police-retain-local-presence.aspx}

I discount the significance of this data for two reasons. First, as James Forman as demonstrated, Black politics that appears to support criminal law enforcement is often part of a set of demands that include non-criminal based responses as well, but their yield is much of the former and little of the latter.\footnote{Cite James Forman, Locking Up Our Own.} If the survey question was “Would you prefer to have more police in your community or more social services to residents that are proven to reduce crime better than the police?” the results might be quite different. For example, an ABC/Ipsos Poll.
conducted around the same time as the Gallup survey found that 57% of African Americans support “the movement to ‘defund the police,’” and 64% favored putting the money towards other community programs (64%).

The second reason that polling data is not dispositive is that, Blacks, like other Americans, can suffer from a false consciousness that police work is more beneficial to them than it actually is. Later I explain why there is reason to be skeptical of any supposed benefits of policing, especially crime preventing or solving. Other data from the above referenced Gallup survey supports this point. For example, 61% of Blacks were somewhat or very confident that police would treat them with courtesy and respect, compared with 91% of whites. Significantly, 75% of Blacks who were “not too confident that the police would treat them with courtesy and respect still preferred that police either maintain the same presence in their community or increase their presence.

**The Power of Rhetoric**

Of course people in both the liberal and critic camps understand that the slogan “defund the police” is provocative. For the “defund means defund” crew the slogan is an accurate description of their mission, but liberals might have embraced a less inflammatory label. For example, “justice reinvestment” is a familiar concept to criminal justice reformers, and has much in common with the liberal idea of re-allocating some resources from the criminal legal system to social services. But both camps have seemed to embrace the extreme sounding framing. Congresswoman Alexandria Ocasio-Cortez tweeted that “It’s been an excellent choice for the organizers who have been trying to prompt a national convo for years about multibillion-dollar police depts. “Refund” or “reallocate” didn’t do that. “Defund” did.”

After *Fuck da Police*, the next most famous hip-hop song that addresses racial profiling might be Jay-Z’s *99 Problems*. Jay Z’s intervention depicts a person pulled over by the cops because he’s “young” and “black” and his “hat is real low.” Jay Z’s character refuses to step out of the car, and also declines consent for a search, citing his constitutional rights. The stop ends ominously, with the officer warning “we’ll see how smart you are when the K-9 comes.” Still Jay Z has assured the listener that he’s “got a few dollars” so he can “fight the case.”

I love the song, and have used it in my criminal procedure class. I’ve never heard it at a protest rally, although it is in most respects catchier than *Fuck da Police*. But one reading is that the verse is about a business mogul whose class status might buy him some level of protection from the most abusive policing. It’s “respectability politics” adjacent in a way that *Fuck da Police* is not. Ice Cube, MC Ren, and Eazy-E were 19 and 20 years old when they recorded that track. They sound way angrier than Jay-Z, and their passion is in turn more potent and more inspiring.

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30 https://abcnews.go.com/Politics/64-americans-oppose-defund-police-movement-key-goals/story?id=71202300
31 https://twitter.com/AOC/status/1270343169780178944
Pragmatics and Accommodations

Phil Pannell is a longtime community activist in Washington DC. At a forum on divesting from the police he said, “I’m going to be really honest, and it really hurts to say this. But as a black gay senior citizen who lives in a poorer part of town, I’m more afraid of being on the streets... and being confronted by a young man in a hoodie than someone in a police uniform.” Pannell added “I’ve been one of those folks who have been in the chorus of wanting more police ... because I’ve been victimized so many times. And right on the block where I live I’ve had three neighbors and friends who have been killed. And none of them were killed by police.”

Pannell’s concerns are vital, despite his allusion to the tired trope that there is tension between agitating against police brutality and desiring safe streets. The most important question advocates of divestment must address is whether defunding the police would make the streets less safe for people like Pannell. In this regard, it is worth noting that the District of Columbia has more police per capita than any other large US city. In 2018, DC police made arrests in about 66% of the 160 homicides that occurred that year. Also in DC, Blacks, who make up slightly less than half of the city’s population, were 83% of those stopped by police in a recent four year period. More than 80% of the people who the police use violence against are African American. Before the city legalized marijuana, 90% of weed related arrests were of Black people. Even if Pannell is correct that the police help keep him safe, their work exacts a terrible racial toll.

Myths about Police Work

But the reality is that there is scant evidence that the police are effective at protecting Pannell. Contrary to what many people think, they don’t mainly go around preventing and solving serious crimes. The New York Times looked at ten large police departments that make public their calls for service. It found that requests to respond to serious violent crime consisted of

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33 Id.
34 For a discussion of this issue, and its surprising currency among Black men, see Chokehold, Chapter 4, “Black Male Violence: The Chokehold Within.”
about 1% of the calls. Most of the tasks citizens ask police officers to do are things like responding to traffic accidents or burglar alarms. In New Orleans, which has a high homicide rate, only 0.7% of officer time is spent responding to shootings.

US police make a lot of arrests – roughly 10,000,000 a year – but 80% of those arrests are for low level offenses, like drug crime, or civil infractions, like failure to pay fines or child support. Only about 5% of arrests are for serious, violent offenses like the ones feared by Pannell.

**Opting Out by Victims**

According to the US Department of Justice, less than 45 percent of violent victimizations were reported to police from 2014 to 2018. This amounts to over 3 million unreported violent offenses.

In 2018, 42.6 percent of violent crime was reported, 24.9 percent of rape/sexual assault, 62.6 percent of robbery, and 43 percent of assault. The report cited primary reasons for not reporting as fear of reprisal or getting the offender in trouble, believing that police would not or could not do anything to help, and believing the crime to be a personal issue or too trivial to report. Violent crimes that occur at schools are also largely not reported to the police. About three of four victims of offenders at schools don’t report, mainly because the offense was addressed in some other way, like notifying school officials, or because the matter was considered “private.”

Some survivors explicitly identify as abolitionists. Like many educators, I learn as much from my students as I teach them. My understanding of abolition was significantly advanced during a discussion in my criminal law class. A student stated that she is an abolitionist and referred to our study of sexual assault, weeks before, when she had disclosed to the class that she is a survivor. The student referenced studies that purport that one in four women college students experience sexual assault, and other studies that find that most people are assaulted by someone they know. Just as our class of over 100 students contained many survivors, the student noted, it was also likely the class contained several rapists. The student looked around the class and said that she did not think that locking up the men in the room who were sexual assailters would be productive, for their victims or for the offenders. She said she certainly believed that an intervention was important, but if the only thing the government offered was punishment, she would opt out.

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41 U.S. Dept. of Justice, Office of Justice Programs, NCJ 253043, Criminal Victimization, 2018, at 8 (Sept. 2019), available at [https://www.bjs.gov/content/pub/pdf/cv18.pdf](https://www.bjs.gov/content/pub/pdf/cv18.pdf)
42 Id.
43 Id.
44 Cite.
Still, I am not suggesting that most victims who choose not to report are necessarily endorsing defunding. Rather I include this data to make two points: First that we must understand that, as a matter of practice, most crime victims do not prefer a punitive response, and second, as a result of this choice by victims, the great majority of people who hurt others experience no criminal sanction whatsoever. They live among us, as “free” people.

Clearance Rates

When crimes are reported, the police usually do not solve them. As the chart below details, police make arrests (or otherwise identify a culprit) in about 62% of murder and manslaughter cases. These crimes are the most serious and the most cleared. This means that almost 40% of people who kill intentionally and unlawfully literally get away with murder and voluntary manslaughter. For most other crimes, in most cases, the police fail to identify the perpetrator. Motor vehicle theft cases had the lowest crime clearance rate, at 13.8 percent.\textsuperscript{45}

\begin{figure}
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\caption{Crime clearance rate in the United States in 2018, by type}
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\end{figure}

One of the concerns about the lack of transparency in most of the 18,000 different police departments in the US is that citizens don’t have much information about how well or poorly their local departments are doing in solving crimes.

\textsuperscript{45} Id.
Many departments publish the clearance rate for homicide only, and even that is discretionary. From what’s available, we can see substantial variation in closure rates:

- Baltimore Police Department (2019): 32%46
- Philadelphia Police Department (2019): 46.6%47
- Chicago Police Department (2019): 53%48

In the few jurisdictions that release data about clearance rates in non-fatal shootings, the situation is even bleaker. According to a report by the University of Chicago, in 2016 Chicago police made arrests in fewer than 5% of those cases.49 In Baltimore and San Francisco, the clearance rate for non-deadly shootings is less than 20%.50

Most people realize that if they call the police and report their smartphone was stolen, the police are unlikely to find it. What they may not realize, however, is that often the cops do not even try to solve crimes – even for more serious offenses. In San Jose, California, for example, the police did not follow up on 60% of the crimes that were reported to them.51 The Trace is an independent news organization that focuses on gun violence. It found a startling lack of investigation of non-fatal shootings. In Anchorage, Alaska, 90% of reported felony assaults were not assigned to an investigator in 2010. In Oakland, California and Portland, Oregon, around 40% of serious assaults were not assigned a detective.52

In sum, the majority of people who experience anti-social conduct opt out of the criminal legal process. Even when victims opt in, the majority of those cases do not lead to anyone being arrested or prosecuted.

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CRIME PREVENTION

Even if police do not solve most of the crime that they learn of, there still might be a public safety benefit to policing and incarceration if they deter people from committing crime.

Daniel Nagin, in a frequently cited review of academic scholarship on deterrence, concludes

First, there is little evidence that increases in the length of already long prison sentences yield general deterrent effects that are sufficiently large to justify the social and economic costs. Second, there is little evidence of a specific deterrent effect arising from the experience of imprisonment compared with the experience of noncustodial sanctions such as probation. Third, there is substantial evidence that increasing the visibility of the police by hiring more officers and allocating existing officers in ways that materially heighten the perceived risk of apprehension can deter crime. Thus, evidence in support of the deterrent effect of various measures of the certainty of punishment is far more convincing than the severity of punishment.”

If the certainty of punishment is the most important variable for deterrence, the data in the previous section regarding the substantial unreporting of crime suggests that incarceration is probably not an effective sanction, since for the average criminal it likely that she will be punished.

Many defunders have have looked beyond allocation of police resources to the broader notion of “preventive justice.” The concept is that investing in communities would act as a better deterrent to crime by directly addressing societal problems like poverty, mental illness, and homelessness. Police do not do a good job of deterring crime, and reallocating funds to other resources, such as healthcare, housing, youth programs, and workforce development would be more effective deterents. Advocates argue that investing in communities and providing them with resources such as those above would reduce crime on its own. For example, a 2016

report from the Obama White House’s Council of Economic Advisers found that “a 10 percent increase in wages for non-college educated men results in approximately a 10 to 20 percent reduction in crime rates.”

[More to come, including using *Fuck da Police* to ruminate on how citizens should feel about cops in a democracy. Are they a positive good, as many white people might suggest, or a necessary evil, as some people of color might suggest, or an unnecessary evil, as suggested by the “defund the police” movement? I also will explore the meaning of the trial metaphor in the song – what would it mean for African Americans to put the police on trial? What would be the crime and the appropriate punishment?]