

University of New Orleans

ScholarWorks@UNO

University of New Orleans Theses and
Dissertations

Dissertations and Theses

Spring 5-31-2021

Victim Impact: The Manson Murders and the Rise of The Victims'

Rights Movement

View this work at: <https://scholarworks.uno.edu/td>



Part of the American Politics Commons, American Popular Culture Commons, Civil Law Commons, Merrill W. Steeg
Civil Procedure Commons, Communication Technology and New Media Commons, Constitutional Law
University of New Orleans; MWsteeg@uno.edu

Commons, Courts Commons, Criminal Law Commons, Criminal Procedure Commons, Criminology
Commons, Criminology and Criminal Justice Commons, Cultural History Commons, Ethics and Political
Philosophy Commons, Folklore Commons, Law and Economics Commons, Law and Philosophy
Commons, Law and Politics Commons, Law and Psychology Commons, Law and Race Commons, Law
and Society Commons, Law Enforcement and Corrections Commons, Legal Ethics and Professional
Responsibility Commons, Legal History Commons, Legal Theory Commons, Legal Writing and Research
Commons, Legislation Commons, Liberal Studies Commons, Nonfiction Commons, Oral History
Commons, Other Feminist, Gender, and Sexuality Studies Commons, Other Legal Studies Commons, Other
Philosophy Commons, Policy Design, Analysis, and Evaluation Commons, Policy History, Theory, and
Methods Commons, Political History Commons, Politics and Social Change Commons, Prison Education
and Reentry Commons, Social Control, Law, Crime, and Deviance Commons, Social History Commons,
Social Justice Commons, Social Policy Commons, Social Psychology Commons, State and Local
Government Law Commons, Theory and Criticism Commons, and the United States History Commons

Recommended Citation

Steeg, Merrill W., "Victim Impact: The Manson Murders and the Rise of The Victims' Rights Movement"
(2021). *University of New Orleans Theses and Dissertations*. 2879.

<https://scholarworks.uno.edu/td/2879>

This Thesis is protected by copyright and/or related rights. It has been brought to you by ScholarWorks@UNO with permission from the rights-holder(s). You are free to use this Thesis in any way that is permitted by the copyright and related rights legislation that applies to your use. For other uses you need to obtain permission from the rights-holder(s) directly, unless additional rights are indicated by a Creative Commons license in the record and/or on the work itself.

This Thesis has been accepted for inclusion in University of New Orleans Theses and Dissertations by an authorized administrator of ScholarWorks@UNO. For more information, please contact scholarworks@uno.edu.

Victim Impact: The Manson Murders and the Rise of The Victims' Rights Movement

A Thesis

Submitted to the Graduate Faculty of the
University of New Orleans
in partial fulfillment of the
requirements for the degree of

Master of Arts
in
History

By

Merrill Steeg

B.A. California College of the Arts, 2016

May 2021

This thesis is dedicated to the memory of Joseph Vindel (1991-2021)

Acknowledgments

I cannot overstate my gratitude to those who have contributed to this project. Without the involvement of Stephen Kay and Bruce Davis, two men who are rarely thanked in the same sentence, this study would not have been possible. Thank you, Mr. Kay, for your thoroughness and kindness and for making me realize that no interview is beyond the realm of possibility. Special thanks to Tom O’Neil, author of *CHAOS: Charles Manson, the CIA, and the Secret History of the Sixties*, for being so generous to a budding historian. To Bruce Davis, thank you for your continued openness in our correspondence and for providing this study with your perspective, especially in light of the topic’s delicateness. Thank you, Bo, of the *Cielo Drive* online archive for your detailed record-keeping and public access. I am also grateful to the Los Angeles District Attorney’s office for providing me with the Manson case files electronically. I am especially appreciative of my parents for their encouragement and support. And thank you to Dr. Landry for your masterful edits and guidance throughout this process. Before March 7, 2021, murder had not touched my life. The senseless killing of a friend on that day has further informed my understanding of the shock and sorrow which violent crime wreaks.

Table of Contents

List of Illustrations	v
Abstract	vi
Introduction.....	1
Historiography/ literature review	3
Methodology	11
The Rise of “Law and Order” in the United States.....	13
The Manson Murders	15
The Victims’ Rights Movement.....	23
The Victims’ Rights Movement and Manson Family Parole	29
The Ethics, Gender, and Racial Aspects of the Victims’ Rights Movement	36
Conclusion	49
Primary Sources	56
Secondary Sources	56
Vita.....	59

List of Illustrations

Victims of the Manson Family	17
Pregnant Sharon Tate before her murder in 1969	41
Pregnant Laci Peterson before her disappearance in 2002	41
Stephen Kay in 1980 pictured with victims of the Toolbox Killers	47

Abstract

The powder keg of the late 1960s exploded with Charles Manson and the murders committed by his cult in 1969, igniting a landslide of change in the American justice system that is still felt today. In the wake of the murders, Doris Tate, mother of the Manson family's most famous murder victim, Sharon Tate, spearheaded the Victims' Rights Movement, a lobbying force that sought increased victim representation in courtrooms and parole hearings. The contribution of the Victims' Rights Movement to the American criminal justice system is underexplored in academia. This study will probe how and why the Victims' Rights Movement was so successful and the vital importance of sensationalism to its trajectory. Information about Doris Tate, the Victims' Rights Movement, and the Manson murders have been gleaned from biographies, autobiographies, popular literature, newspapers, interviews, and talk-show appearances. Most consequential to this study are the independent testimonies of Stephen Kay and Bruce Davis. Kay, a former Los Angeles District Attorney and Manson family prosecutor, tried and convicted Bruce Davis for the crimes he committed as a Manson family member. The conclusions of both men highlight this study's emphasis on the centrality of individual experience to notions about morality and crime and punishment.

Keywords: the Victims' Rights Movement, victim impact statement, law and order, crime and punishment, the Manson murders, the Manson Family, 1960s, 1969, Doris Tate, Sharon Tate.

Introduction

In 2018, former American gymnastics national team doctor Larry Nassar was sentenced to life in prison for sexually molesting underage female gymnasts in his care.¹ The abuse spanned decades, scarring the lives of women across generations. During the sentencing phase of Nassar's trial, 204 victim impact statements were read aloud. Over the course of nine days, Larry Nassar sat stonily as a succession of young women forced him to confront how he had affected their lives.²

The victim impact statement is an oral or written statement presented during the sentencing phase of the criminal judicial process, which allows victims, or, in the case of murder, the families of victims, to speak at the sentencing of their attackers and any subsequent parole hearings. As early as 1920, some California counties, like Fresno, allowed victim allocution at the sentencing phase of trials before it became an official stipulation of California's penal code.³ Elsewhere, victims were largely excluded from participating in criminal proceedings beyond testifying. In the 1970s, some victims of violent crimes and families of victims argued that criminal defendants were afforded more rights than they and sought to correct this perceived imbalance. These early demands of Californians for victim participation in criminal proceedings marked the beginning of what came to be known as the Victims' Rights Movement. California would remain in the foreground of the burgeoning Victims' Rights Movement and its implementation into the criminal justice system. This paper will argue that California's infamous

1. Sarah Rahal and Kim Kozlowski, "204 Impact Statements, 9 Days, 2 Counties, a Life Sentence for Larry Nassar," *The Detroit News*, February 8, 2018, <https://www.detroitnews.com/story/news/local/michigan/2018/02/08/204-impact-statements-9-days-2-counties-life-sentence-larry-nassar/1066335001/>

2. Ibid.

3. Hader Aviram, *Yesterday's Monsters: The Manson Family Cases and the Illusion of Parole* (Oakland, California: University of California Press, 2020), 49.

Manson murders directly contributed to the state's installation of Victims' Rights laws and marked a fundamental shift in the United States judicial system.

On August 9, 1969, Sharon Tate and four others were found slain at her hilltop home in Los Angeles. To some Americans, having endured a decade of assassinations, riots, and international warfare, the bizarreness and brutality of the Tate murders strengthened the belief that America was entirely out of control. The public unveiling of the long-haired Manson Family as the crime's perpetrators further compounded this sentiment. To conservative-minded Americans, the Manson gang represented everything that was wrong with the Sixties and America's course. Worry about the nation's moral direction continued well into the 1970s, a decade noted particularly for its vicious sex crimes, with serial killers like Ted Bundy, Richard Ramirez, and the Hillside Stranglers. Lingering fear from the Manson murders and the violence of the 1970s helped to form an unlikely allyship between conservative Americans, concerned with restoring law and order, and women's rights supporters, advocating for harsher sentencing in rape and domestic abuse cases. The ascent of the Victims' Rights Movement, chaired by Doris Tate following her daughter's murder in 1969 and strengthened by the feminist movement of the 1970s, became exceptionally influential in the 1980s, as public investment in law and order became more pronounced during Ronald Reagan's presidency.

The Victims' Rights Movement's contribution to the configuration of the American criminal and judicial system is greatly undervalued. Charles Manson and his followers got under America's skin, inspiring wide-reaching criminal reforms in California and across the nation. The layers of intrigue within the Manson saga often shroud its most potent legacy: establishing the victim impact statement in all fifty states. Not only does this paper endeavor to shed light on

the historical context which birthed the Victims' Rights Movement, but it also intends to illuminate the long-term effects of the Manson murders on issues of law and order in America.

The body of this work is composed of six sections. America's cultural environment in the years preceding 1969 is explored in the section entitled "The Rise of "Law and Order" in the United States," and is key to understanding why the Manson murders were so impactful. A close examination of the Manson murders as they really happened follows, carefully tailored to expound only those details of the crimes that relate to this thesis's focuses. The political ascendancy of the Victims' Rights Movement is charted in the component which bears the Movement's name. The influence of Doris Tate and the Victims' Rights Movement is then measured through the parole journeys of former Manson family inmates, namely Bruce Davis. The following chapter considers the criticisms of the Victims' Rights Movement and its policies, much of which is centered around perceived deference to middle-class white women. Lastly, this thesis concludes with a reflection on recent shifts away from tenets of the Victims' Rights Movement in Los Angeles. The conclusion also advocates for further scholarly consideration of the effects of the Manson murders and the Victims' Rights Movement on America's criminal justice system.

Historiography/ literature review

In both high-minded and popular portrayals of the 1960s, Charles Manson and the Manson murders often appear as an endnote to the decade. Different iterations of "the man who killed the Sixties" are assigned to Manson and his Family's crimes. In both popular history and academia, the Manson murders are charged with perverting the flower-wielding innocence of the peace and love hippie movement of the late 1960s. In her 1979 essay collection *The White*

Album, Joan Didion proclaimed, “Many people I know in Los Angeles believe that the Sixties ended abruptly on August 9, 1969.”⁴ Didion also remembered that no one was surprised.

To date, the Manson murders and their consequences have attracted more attention from popular writers than academics. The Manson murders' sensational dimensions make it an attractive topic for popular historians, particularly within the true crime genre. Those with a certain proximity or connection to the event have penned the most commanding and well-known pieces. Vincent Bugliosi's *Helter Skelter*, the definitive work on the subject, informs nearly all writings concerning the Manson murders. Bugliosi acted as lead prosecutor in the Manson trials, and his book remains the foremost authority on the murders.⁵ Bugliosi's *Helter Skelter* is heralded as one of the best-selling true-crime books of all time, and for good reason. One of the first of its kind, *Helter Skelter* captures the processes of criminal investigation, arrest, and trial as they pertain to the Manson Family. Bugliosi outlines the official narrative and motivation for the Manson Family's crimes, which centers around the group's conception of an imminent apocalyptic race-war, inspired by The Beatles' *White Album*. In the world of Manson literature, Bugliosi emerges as a controversial figure. The official motivation for the Manson Family crimes, the prosecution's narrative, and even Bugliosi's personal life are subjected to scrutiny by popular writers invested in the Manson cases.

Biographies and autobiographies constitute a large portion of Manson-related literature. Former Manson Family inmates, like Charles “Tex” Watson and Susan Atkins, were both eager to share their sides of the story after becoming born-again Christians in prison. Both Atkins' *Child of Satan, Child of God*, and Watson's *Will You Die for Me?* heap blame onto Manson and

4. Joan Didion, *The White Album* (New York: Simon & Schuster: 1979), 42.

5. Vincent Bugliosi with Curt Gentry, *Helter Skelter: The True Story of The Manson Murders* (New York: W.W. Norton & Company, Inc, 1974).

drug usage for their participation in the murders.⁶ In his book, Charles “Tex” Watson, Manson’s chief executioner and the perpetrator of seven known murders, also identifies the Victims’ Rights Movement and its direct impact on his prison tenure.⁷ Other notable memoirs from former Manson Family members include Dianne Lake’s 2017 *Member of the Family: My Story of Charles Manson, Life Inside His Cult, and the Darkness That Ended the Sixties*⁸, and Paul Watkins’ 1979 recollection, *My Life with Charles Manson*.⁹ Neither Watkins nor Lake were implicated in the Family’s crimes. Additional biographies have also been produced on behalf of Manson inmate Patricia Krenwinkel and steadfast Manson devotee and attempted assassin Lynette “Squeaky” Fromme.

Many different positions exist within the Manson saga: there are the perpetrators, the former cult members who did not participate in the crimes, the prosecutors, and the victims’ family members. Each side feels that the event’s “true story” has been stifled by misinformed media speculation and rumors. Naturally, the “true story” is the teller’s truth and is subject to interpretation. In Manson-based literature, this inherent aspect of storytelling is often coupled with the teller’s specific aim, whether it be to garner sympathy, to seek vindication, to advocate for parole, or to oppose it. Many authors form relationships with former Manson Family inmates and blindly campaign for their parole. The reputed charm of Manson Family inmate Leslie Van Houten and her feasible candidacy for parole has earned her special notice in this area of literature. Two works that center around the author’s friendships and advocacy for Van Houten’s

6. Susan Atkins, *Child of Satan, Child of God* (San Juan Capistrano, CA: Menelorelin Dorenay's Publishing, 2005).

7. Tex Watson, as told to Chaplain Ray, *Will You Die for Me?* (Atlanta, GA: Cross Roads Publications, 1978).

8. Dianne Lake and Deborah Herman, *Member of the Family: My Story of Charles Manson, Life Inside His Cult, and the Darkness That Ended the Sixties* (New York: William Morrow, 2017).

9. Paul Watkins and Guillermo Soledad, *My Life with Charles Manson* (New York: Bantam Books, 1979).

freedom are Nikki Meredith's *The Manson Women and Me: Monsters, Morality, and Murder*¹⁰ and Karlene Faith's *The Long Prison Journey of Leslie Van Houten*.¹¹ Conversely, those who form relationships with the victims' families tend to demonize the Manson Family criminals as evil, sub-human cretins who should have been executed long ago. The two opposing camps that define Manson literature in popular histories and biographies also appear in academic works, which will be explored later.

The victims of the Manson murders will forever be overshadowed by the wildness of the Manson Family saga. Greg King, the author of *Sharon Tate and The Manson Murders*, provides an admirably raw and unaffected look at Sharon Tate's life before her murder by the Manson Family. Sharon Tate is inarguably the most famous of the Manson murder victims. After Sharon's murder, her mother, Doris Tate, championed California's Victims' Rights Movement. By developing a trusting relationship with Doris Tate, King claims insight into Tate's inner thought processes, following her trajectory into a life defined by victim advocacy work.¹² Notably, of the Manson murder victims, only Sharon Tate has been the subject of numerous biographies. In King's account, other victims' families' reluctance to put themselves back in the public eye is a noted source of frustration to Doris Tate when seeking representation at parole hearings. Media-shyness certainly factors into the absence of biographies on victims of the Manson murders other than Sharon Tate. However, Sharon Tate's glamour, her Hollywood career, and her advanced pregnancy at the time of her murder are also important to consider.

10. Nikki Meredith, *The Manson Women and Me: Monsters, Morality, and Murder* (New York: Citadel publishing, 2018).

11. Karlene Faith, *The Long Prison Journey of Leslie Van Houten: Life beyond the Cult* (Boston: Northeastern University Press, 2001).

12. Vincent Bugliosi with Curt Gentry, *Helter Skelter: The True Story of The Manson Murders* (New York: W.W. Norton & Company, Inc, 1974).

Like many serial killers, Charles Manson has been the subject of numerous biographical inquiries. Notable among them is *Manson: The Life and Times of Charles Manson*¹³ by Jeff Guinn and *Manson: In His Own Words*, as told to Nuel Emmons.¹⁴ The most reputable and advanced Manson chronicle, however, is Ed Sanders' 1971 *The Family*. Through his interactions with the Family, Sanders tackles Manson's origins, life within the Family, the Family's legacy, and the mysteries that remain.¹⁵ As a once avid participant in the hippie movement, Sanders evaluates the dark underbelly of the late Sixties and the rise of the occult, sometimes deferring to the shock value of crude and unsubstantiated rumors.

Restless Souls: The Sharon Tate Family Account of Stardom, the Manson Murders, and a Crusade for Justice by Alisa Statman and Brie Tate is based on memoirs left behind by Sharon Tate's mother, Doris, and her father, Colonel P.J. Tate. The collection also includes the voice of Patti Tate, Sharon's youngest sister, who continued her mother's efforts after her death. The book is attuned to the pain of the Tate family.¹⁶ However, *Restless Souls* is steeped in controversy. Notably, the volume omits mention of the Tate family's middle child, another daughter, named Debra. The extent of the trouble between Statman and Debra Tate is explored in Rachel Monroe's *Savage Appetites: Four True Stories of Women, Crime, and Obsession*.¹⁷ Monroe's work stands out for its attempt at even-handedness, as she reports from interviews with both Debra Tate and Alisa Statman. Monroe agrees that the content of *Restless Souls* is remarkable in its access to the Tate narrative, saying, "the story is told in an amalgam of voices,

13. Jeff Guinn, *Manson: The Life and Times of Charles Manson* (New York: Simon & Schuster Paperbacks, 2012).

14. Charles Manson, *Manson in His Own Words*, as told to Nuel Emmons (New York: Grove Press, 1986).

15. Ed Sanders, *The Family: The Story of Charles Manson's Dune Buggy Attack Battalion* (New York: Thunder's Mouth Press, 2002), 45.

16. Alisa Statman, with Brie Tate, *Restless Souls: The Sharon Tate Family Account of Stardom, the Manson Murders, and a Crusade for Justice* (New York: Harpers Collins: 2012).

17. Rachel Monroe, *Savage Appetites: Four True Stories of Women, Crime, and Obsession* (New York: Scriber, 2019).

cobbled together from Doris, Patti, and P.J.'s stalled-out memoir drafts, family correspondence, and parole-hearing transcripts.¹⁸ However, Statman's methods for obtaining such material, and her intrusion into the Tate family, are questionable. Although immensely interesting, this thesis will not delve into the sordid tale of Alisa Statman and her involvement with the Tate family. However, the instance does provide an example of the public's rabid fascination with the Manson murders and evidences the varied treatment of a subject according to the author's interest. Monroe notes that in *Restless Souls*, Statman dedicates eleven pages to a graphic play by play of Sharon's murder. In contrast, Debra Tate's *Sharon Tate: Recollection*¹⁹, a photo book containing complimentary quotes about Sharon Tate and a clear rebuttal to *Restless Souls*, only mentions her sister's death in passing.²⁰

The most recent addition to Manson literature is Tom O'Neil's prevalent *CHAOS: Charles Manson, the CIA, and the Secret History of the Sixties*, published in June of 2020. The book's title refers to the CIA's covert operation CHAOS, which O'Neil charges with involvement in the Manson murders. O'Neil explores alternative motives for the Manson murders, challenging the narrative outlined by prosecutor Vincent Bugliosi in *Helter Skelter*. After twenty years of research, O'Neil secures information from highly prized sources, with access to rare documents like Colonel P.J. Tate's "Five Down on Cielo Drive," an unreleased manuscript by Sharon Tate's father about the search for his daughter's killer.²¹ In a phone interview with O'Neil, while discussing Alisa Statman of *Restless Souls* and other notorious Manson murder fanatic Bill Nelson, O'Neil quipped, "Hopefully, you don't think I am one of

18. Monroe, *Savage Appetites*, 106.

19. Debra Tate, *Sharon Tate: Recollection* (Philadelphia: Running Press Adult, 2014).

20. Monroe, *Savage Appetites*, 108.

21. Tom O'Neil and Dan Piepenbring, *CHAOS: Charles Manson, the CIA, and the Secret History of the Sixties* (New York: Little, Brown and Company, 2019)

them,”²² as if to say: “I know my book’s theory is out there, but I am not one of the crazies.”

Aside from his theory's radicalness, O’Neil is far from being “one of them;” the author is both gracious and generous. Additionally, *CHAOS* initiated a new lens with which to view the Manson murders with, one which is particularly appropriate in the age of modern conspiracy.

Although Manson-directed literature lends naturally to popular histories, there are a handful of academic works on the subject. Social-psychological studies make up a large portion of these academic inquests, with focus on cult formation and the psychology behind serial killers. One such example is Donald A. Nielson’s article for *Sociological Analysis*, entitled, “Charles Manson’s Family of Love: A Case Study of Anomism, Puerilism, and Transmoral Consciousness in Civilizational Perspective.”²³ Manson also appears in academic studies of American media. Ian Cooper’s extensive *The Manson Family on Film and Television* documents the plethora of Manson-inspired filmography, the production of which has been unceasing since the crime’s occurrence. Along with the movies and shows that explicitly portray the *Helter Skelter* narrative, Cooper also notes a consistent influence that the Manson murders have had on details like set design, costume, and even character names. Cooper suggests that the fifty-plus-year stranglehold that the Manson saga has held on American pop culture consciously and subconsciously affects the direction of film and television.²⁴

Academic journals and books explore the massive impact of the Victims’ Rights Movement on the Californian and American judicial systems. However, mention of Doris Tate’s influence in the movement’s rise is not always plainly stated. *The Other Directed Memoir: Victim Impact* by Bunty Avieson, Fiona Giles, and Sue Joseph does not single out the Tate

22. Tom O’Neil, interview with the author, March 13, 2020.

23. Donald A. Nielsen, "Charles Manson's Family of Love: A Case Study of Anomism, Puerilism and Transmoral Consciousness in Civilizational Perspective," *Sociological Analysis* 45, no. 4 (1984): 315-37.

24. Ian Cooper, *The Manson Family on Film and Television* (Jefferson, NC: McFarland, 2018).

family's role in the perceived shortcomings of the Victims' Rights Movement and instead focuses on lawmakers and the disadvantages that the victim impact statement, the most far-reaching of the Victims' Movement's measures, presents to low-income minority groups.²⁵ In "In Whose Name? Crime Victim Policy and the Punishing Power of Protection" Jennifer K. Wood also challenges the inequity of the Victims' Rights Movement. Wood specifically criticizes laws made for white murder victims of the middle and upper class. These laws, Wood argues, represent the disparity in response to violence committed against low-income minorities and disproportionately punish people of color.²⁶

A recent addition to scholarly literature on Manson is *Yesterday's Monsters: The Manson Family Cases and the Illusion of Parole* by Hadar Aviram. An oft-cited source in this study, Aviram is one of few to tackle the issue of parole for the Manson Family and its implications for the American judicial system. Whereas the previously mentioned journal articles criticized the Victims' Rights Movement while only vaguely mentioning the Tate family, Aviram directly condemns Doris Tate and the Tate family's central role in the passage of tougher sentencing laws in California. Aviram's work is remarkable for its straying from the most sensationalistic aspects of the murders; however, the author's objective is not transparent. In her preface, Aviram states, "This book takes no position on the question of release for the inmates, and I invite you, gentle reader, to draw your own conclusions."²⁷ The dialogue which follows - a quote from Buddha about the nature of forgiveness and Aviram's philosophical musings about the pain of the victims' families and the inmates all flowing through "the same river" immediately muddies her anti-bias claim.²⁸ Aviram utilizes the

25. Bunty Avieson, Fiona Giles and Sue Joseph. "The Other Directed Memoir: Victim Impact." In *Mediating Memory: Tracing the Limits of Memoir* (New York: Routledge Taylor & Francis Group, 2018).

26. Jennifer K. Wood, "In Whose Name? Crime Victim Policy and the Punishing Power of Protection," *NWSA Journal* 17, no. 3 (2005): 1-17, <http://www.jstor.org/stable/4317155>.

27. Hader Aviram, *Yesterday's Monsters: The Manson Family Cases and the Illusion of Parole* (Oakland, California: University of California Press, 2020), preface.

28. *Ibid.*

parole hearings for former Manson Family inmates to measure the effects of the Victims' Rights Movement on California's parole system. Aviram's findings are also informed by her correspondence with former Manson Family inmate Robert Beausoleil and the attorneys for other Manson inmates like Patricia Krenwinkel. The basic assertion behind Aviram's study is at the core of my own: that the Manson cases shaped California's sentencing and parole processes. However, the dual perspectives that define my rendering will provide a genuine opportunity for readers to arrive at their own conclusions.

Methodology

In matters of crime and punishment, opinions are often formed in stark shades of black and white. In simply relating my thesis topic to others, I have found varying personal beliefs regarding the heightened presence of victim narratives within the judicial system to be, like most things in life, entirely informed by a person's own set of experiences. For instance, an individual whose brother was convicted of murder lamented the tearful accounts from the victim's multiple young children during the sentencing phase of her brother's trial. She believes that the intrusion of emotion from the victim's children negated the testimony which characterized the deceased as a troublemaker and obstructed the court from rendering a just decision. Conversely, another participant in the discussion opposed the first woman's stance, arguing that if the roles were reversed and her brother had been slain, that she would likely support the victim impact statement. As shown, many works concerning this area of study are targeted toward a specific aim. This thesis hopes to reflect the points of validity within the cause of criminal justice reform and victims' rights advocacy. There is no 'right' answer here but rather an abundance of room for considering another's perspective.

The objective of this work is multifaceted. This study intends to make the direct correlation between the victim impact statement and the Manson murders more pronounced. Whereas most of the Victims' Rights Movement's initiatives are specific to California, the victim impact statement is utilized in every American state. Most Americans know what the victim impact statement is, but few know that it began with Doris Tate after her daughter's murder by the Manson gang. Doris Tate's contribution to the criminal justice system remains underappreciated, particularly in academia. This critical linkage is lost to the Manson saga's flashier aspects - its extreme violence, glamorous victims, and cult phenomena. Beneath the blood and sensationalism is the more important legacy of the Manson murders: the Victims' Rights Movement.

This work utilizes many of the sources cited in the literature review. Newspaper articles, taped interviews, talk-show appearances preserved via *Youtube*, and parole hearing records also constitute a large amount of source material. Most important, however, are the perspectives of two opposing forces: Bruce Davis and Stephen Kay. The contribution of both men to this study cannot be overstated. Stephen Kay, a prosecutor in the Manson Family trials, became a close ally to Doris Tate and an advocate for the Victims' Rights Movement. Kay has been open to multiple telephone interviews. Bruce Davis, a former Manson Family member and inmate at San Quentin State Prison, has received numerous favorable parole recommendations from California's parole board, all of which have been subsequently denied by California's governor. The reversals were made possible by the passage of the Victims' Rights Movement's California Proposition 89 in 1988. Correspondences with Bruce Davis have occurred via written letters over the course of a year. Stephen Kay prosecuted Davis's crimes and fought for his continued incarceration. Though these two individuals' objectives are irreconcilable, their contrary experiences ultimately support

the same conclusion: the Victims' Rights Movement irrevocably changed the landscape of California's court and parole systems.

The Rise of "Law and Order in the United States"

At the Republican National Convention in July 1964, Arizona Senator Barry Goldwater's acceptance speech introduced the term 'law and order' into America's political lexicon.

Historian Michael Flamm writes that "at that moment, law and order became an important part of national political discourse."²⁹ In *Law and Order: Street Crime, Civil Unrest, and the Crisis of Liberalism in the 1960s*, Flamm explores the political and social conceptualizations of law and order, its roots in the 1960s, and its potency in conservatism. To grasp the eventual impact that the Manson murders would have on the issue of law and order in America, it is vital to first contextualize the nation's cultural climate amidst the issue's growing implications.

During and after the Second World War, America experienced a jump in juvenile crime and delinquency, mirrored by Hollywood with 1950s films like *Rebel Without a Cause*. This pattern was largely chalked up to the absence of parental figures amid war. Later in the 1950s, juvenile delinquency was met with two other developments: black migration and urban de-industrialization. Flamm identifies these three happenings as providing the fertile soil for law and order sentiment to bud before fully blossoming during the civil chaos of 1968.³⁰

The appeal of law and order in the 1960s was multi-pronged. Understandably, many Americans, both liberal and conservative, were concerned about a perceived rise in violent crime. Underscoring this concern was anxiety about civil rights, antiwar protests, riots, morality,

29. Michael Flamm, *Law and Order: Street Crime, Civil Unrest, and the Crisis of Liberalism in the 1960s* (*Columbia Studies in Contemporary American History*), (New York: Columbia University Press, 2007), 31.

30. *Ibid*, 31.

and drug use. Law and order's "amorphous quality," and its ability to voice the unease of different people facing different situations, is what made it so powerful.³¹

For many Californians, the raucous environment at Berkeley, with its frequent protests and embrace of counterculture, represented the nation's moral decline and demonstrated the need for renewed authority. The U.S. Government's policies in Southeast Asia, combined with loosening attitudes toward sex and drug usage, widened the gap between the youth and older generations or individuals belonging to the "establishment." The growing anti-war feeling among some college students and other rebellious kids grew into a generalized anti-establishment sentiment; its members deemed "squares," "straights," and even "pigs." The initiation of affluent white kids into pot-smoking, not seen before the 1960s, struck fear into the hearts of upper and middle-class Californians.³² After Goldwater's infamous 1964 law and order speech, Flamm records a booming grassroots conservatism in Southern California's Orange County.³³ Flamm found that particularly among women, an anxiety and emptiness developed concerning "the consequences of modernity... (which) motivated them to seek to reassert control over their lives and the community through conservative political activism."³⁴

The 1960s saw the assassinations of three liberal icons: President John F. Kennedy and his brother, Robert Kennedy, and Martin Luther King Jr. Robert Kennedy's murder initiated a public debate on law and order issues, compounding conservative doubt regarding a liberal government's ability to squelch lawlessness.³⁵ The democratic response to Robert Kennedy's assassination began a modern staple of liberalism with calls for gun control.³⁶

31. Ibid, 2.

32. Ibid, 126.

33. Ibid, 68.

34. Ibid, 69.

35. Ibid, 146.

36. Ibid, 143.

In the 1966 mid-term elections, Ronald Reagan picked up the baton set down by Barry Goldwater in 1964. Reagan became California's Governor on a law and order platform which directly chastised the anti-war protests at Berkeley. Later, in 1968, the year of King and Robert Kennedy's assassinations, presidential nominee Richard Nixon would carry the same baton into the White House before returning it to Reagan in the mid 1980s.

The year 1968, "amid a pervasive sense that American society was coming apart at the seams," is the crucial moment that pushed law and order to the front line of American political debate - only to be intensified in 1969 by the Manson murders.³⁷

The Manson Murders

On July 20, 1969, Sharon Tate, like so many Americans, huddled around a television set with family and friends to watch astronaut Neil Armstrong become the first man on the moon, hearing the immortal utterance, "That's one small step for man, one giant leap for mankind." That was the last time Sharon Tate's family saw her alive. In just a few short weeks, Tate would be killed by members of the Manson Family, her life and name becoming forever linked with Charles Manson.

Historians and popular writers alike have chronicled the life and times of the rock-star wannabe, Rasputin-eyed Svengali, Charles Manson. Most know of the infamous cult leader, his harem, and the crimes committed at his bidding. Those who have been incarcerated for murdering for Manson in 1969 include Robert "Bobby" Beausoleil, Susan Atkins, Patricia Krenwinkel, Steven "Clem" Grogan, Bruce Davis, Charles "Tex" Watson, and Leslie Van

37. Ibid, 167.

Houten. Understanding the crimes for which these Manson Family members were incarcerated can help explain the motivation of the Victims' Rights Movement to keep them imprisoned.

In the late Sixties, the Manson Family cast a murderous shadow over the city of Los Angeles. The Manson gang left numerous victims in their wake, all of whom died grisly deaths. Prosecutor Vincent Bugliosi suggested that the Manson Family was likely responsible for up to thirty homicides during their reign.³⁸ Violent occurrences at the hands of Manson devotees continued long after their leader's conviction. Due to the Manson Family's tangled and rambling web of crimes, this study will focus on three Manson-directed homicides in particular: the murders of Sharon Tate, Gary Hinman, and Donald "Shorty" Shea. The murder of Sharon Tate was the impetus for Doris Tate's crusade for victims' rights and the passage of victim-centric judiciary laws in California. These laws, which include the California governor's ability to veto parole recommendations, have arguably affected the potential paroling of ex-Manson Family member Bruce Davis more than any of the Family's other incarcerated former members. With six parole recommendations from California's Prison Board of Terms and six subsequent reversals from California's acting governor, Bruce Davis is the Manson Family member who has incurred the most parole speculation besides Leslie Van Houten. Thus, the crimes for which Davis was committed - the murders of Gary Hinman and Donald Shea, will be explained. Consideration will also be given to Leslie Van Houten's offense.

38. Vincent Bugliosi with Curt Gentry, *Helter Skelter: The True Story of The Manson Murders* (New York: W.W. Norton & Company, Inc, 1974), 616.



Victims of the Manson Family, from the top left: Gary Hinman, Steven Parent, Jay Sebring, Abigail Folger, Sharon Tate, Voytek Frykowski, Leno Labianca, Rosemary Labianca and Donald “Shorty” Shea.

<https://themanfamily-mts.medium.com/the-bug-the-man-who-brought-the-manson-family-to-justice-97b33cce03ff>

In early August 1969, two consecutive nights of murder in Los Angeles shocked the world. These murders came to be known as the “Tate-Labianca murders” in reference to the victims’ surnames. However, killings by the Manson Family preceded the infamous Tate-Labianca slayings and would continue thereafter. In 1969, Charles Manson’s madness grew after his musical aspirations were crushed at the hands of Terry Melcher, the music producer to The Beach Boys and The Byrds, and the son of actress Doris Day. Long before Manson’s ultimate rejection by Melcher in 1969, Manson and his following had consistently listened to the Beatles’ *White Album*, released on November 22, 1968. Manson touted the album as prophetic and claimed it spoke to the Family’s existence with songs like “Sexy Sadie,” which he identified

as a clear reference to family member Susan “Sadie” Atkins.³⁹ Manson also enshrined the Family’s destiny in songs like “Piggies,” “Helter Skelter,” and “Blackbird.”⁴⁰ The Family’s destiny was Charlie’s version of “Helter Skelter,” an apocalyptic race war that culminated with the black defeat of the white race. In Manson’s mythology, the Bible’s bottomless pit referred to the Family’s place of refuge in Death Valley during this hypothetical race war. Manson’s preaching of the Bible’s Book of Revelations before the album’s release stoked the Family’s fiery reception and interpretation of The Beatles’ *White Album*.⁴¹ Chapter 9 of the Book of Revelations was central to Manson’s convincing his followers of the prophecy within The Beatles’ *White Album*. Verse 1 of Chapter 9 of the Book of Revelations states: “And the fifth angel sounded, and I saw a star from heaven fallen unto the earth: and there was given to him the key of the pit of the abyss.”⁴² Unsurprisingly, Manson anointed himself the fifth angel, taxed with shepherding his young flock to the pit of the abyss, otherwise known as the bottomless pit. The chapter’s third verse speaks of the power given to “locusts upon the earth.” Manson thus identified these locusts as beetles - The Beatles. To the Manson Family, the apocalyptic dimensions of chapter 9 of the Book of Revelations were affirmed in the album’s rambling, avant-garde track, “Revolution 9.” Amidst the cacophony of sound in “Revolution 9,” John Lennon screams, “Right!” However, the Manson Family heard “Rise!”- a call to revolution and a phrase later found at the Labianca murder scene, written in the victims’ blood.⁴³

After Manson’s “Helter Skelter” race-war, the Family would emerge from the bottomless pit and take authority from the victorious African Americans, who, Manson wagered, with his

39. *Helter Skelter*, 289.

40. The Beatles, “Blackbird,” “Helter Skelter,” “Piggies,” “Sexy Sadie,” by John Lennon and Paul McCartney, recorded 1968 on The White Album, Sony/ATV Music Publishing.

41. *Helter Skelter*, 324.

42. Rev, 9:1.

43. *Helter Skelter*, *ibid*.

racist ideology, could not govern themselves. Vengeful, bitter, and craving violent chaos in the wake of his musical rejection, Manson decided “Helter Skelter” was coming down fast - just not fast enough.⁴⁴

Ex-followers of Charles Manson know now what they could not see then. Bruce Davis, writing about “Helter Skelter,” says, “Manson didn’t believe in the story he told. As soon as he was in prison, he became a radical ‘green’ environmentalist, which was another show.”⁴⁵ However, in the summer of 1969, “Helter Skelter” was still Manson’s “show,” and he wanted to make it big. In his bloodlust and desperation for notoriety, Manson told his followers that the time had come to light the match that would spark the revolution. To the acid-addled minds of these lost children of the Baby Boom generation under Manson’s directive, the idea made sense: the sooner the war came, the sooner the Family would rule the land. To inspire the race war and obtain money when possible, Manson suggested committing crimes against white elites and members of the white establishment, known to the Family as “pigs,” and then framing the Black Panthers to incite white vengeance.⁴⁶

Two weeks before the Tate-Labianca murders, in a car driven by Davis, members of the Manson Family descended on the Topanga Canyon home of Gary Hinman. The 34-year old Hinman was a musician and follower of Buddhism. Hinman maintained a doomed friendship with some members of the Manson Family, who believed him to have money due to his ownership of two cars. On July 27, 1969, Bobby Beausoleil, Susan Atkins, and other members of the Manson Family held Hinman hostage and tortured him for two days in the hopes of gaining access to money that Hinman, in actuality, did not possess. The Family members in Hinman’s

44. The Beatles, “Blackbird,” “Helter Skelter,” “Piggies,” “Sexy Sadie,” by John Lennon and Paul McCartney, recorded 1968 on The White Album, Sony/ATV Music Publishing.

45. Davis, letter to author, May 29, 2020.

46. *Helter Skelter*, 415.

home, unsure of what to do next and unmoved by Hinman's pleas, summoned Manson's help. Davis, after driving Manson to Hinman's house, held a gun on the man as Manson slashed the victim's face "from ear to chin."⁴⁷ After Davis's and Manson's departure, a frenzy of stab wounds was rained upon the body of Gary Hinman, to his heart, head, and chest. Before fleeing, the killers dipped into the blood spilling from Hinman's open wounds and scrawled the words "Political Piggy" on his apartment's wall. The words were accompanied by a dripping paw print meant to implicate the Black Panther Party.⁴⁸

Two weeks later, members of the Manson gang invaded the hillside residence of actress Sharon Tate while her film-director husband Roman Polanski was away. The house on Cielo Drive, located in Los Angeles's Benedict Canyon, was known to Charles Manson and his muscleman, Charles "Tex" Watson. The sprawling, crimson-colored farmhouse was formerly inhabited by Terry Melcher, the music producer Manson felt jilted by. The maniacal Manson knew Melcher had vacated the premises and that some Hollywood types had moved in. To the Family, targeting the rich Sherman Oaks set seemed the perfect catalyst for "Helter Skelter," but to Manson, it was more personal. At Sharon Tate's house on the night of August 8, 1969, five people perished, including Sharon Tate and her full-term unborn son, Paul. The horrific duration of violence enacted upon each of these victims need not be unduly exploited in this text. However, the unmerciful and cruel demise of Sharon Tate is key to understanding her mother Doris Tate's conviction regarding the Victims' Rights movement and the laws that the movement would enact. The aforementioned Charles "Tex" Watson is described as nearly emotionless while recounting the slaying of Sharon Tate to a reporter in 1978, he said:

47. Edmund G. Brown Jr, "Intermediate Sentence Parole Release Review," Penal Code Section 3041, August 8, 2014.

48. Ibid.

She was the only one left that was alive, the Tate girl. She was pleading to me and pleading to me and pleading to me, but I didn't even have any moment of hesitation. I took a knife and just slit a big slit right across her face. It was all just lighting up to me, just like a big acid trip, just all these colors, and everything. And I just kept cutting her and carving on her and started stabbing her in the chest from here up.⁴⁹

It is important to note here that Watson's colorful account of the violence is symptomatic of his time on Manson's trippy commune and not of his being high at the time of the murders.

Before leaving the Cielo Drive residence, murderer Susan Atkins remembers putting her ear to Tate's chest as she lay dying. Atkins then says she dipped a towel in the woman's blood, smeared the word "PIG" on the home's front door, then slipped back into the hot night with her co-conspirators.⁵⁰

The next evening, in the Los Feliz section of Los Angeles, a well-to-do grocer and his wife, Leno and Rosemary Labianca, were killed in a similarly gruesome manner with the words "Rise," "Death To Pigs," and the misspelled "Healter Skelter," streaked on the walls of their home in blood. Rosemary Labianca's autopsy revealed that six to eight of the forty-one stab wounds she sustained were fatal, suggesting that many were received post-mortem. Leslie Van Houten held down Rosemary Labianca while others stabbed her, penetrating the victim with her own knife when ring-leader Charles "Tex" Watson insisted she participate per Manson's instructions. Van Houten has maintained that Rosemary Labianca was already dead when she plunged her knife sixteen times into the woman's lower back and buttocks. The case's prosecutors have challenged this sequence of events. Despite the discrepancy, Van Houten's supporters often point to this scenario as indicative of Van Houten's separateness from her bloodthirsty, life-taking cohorts. In contrast, prosecutor Stephen Kay insists that Van Houten was

49. John Hurst, "Tex Watson felt no remorse until he found God," *Longview Daily News*, June 19, 1978, <https://www.newspapers.com/image/576940223/>

50. Susan Atkins with Bob Slosser, *Child of Satan, Child of God*, (San Juan Capistrano, CA: Menelorelin Dorenay's Publishing, 2005), 143.

“a very active participant in the Labianca murders, holding down Mrs. Labianca as Patricia Krenwinkel stabbed her to death.”⁵¹

The Tate-Labianca murders of 1969 generated a media storm not seen in the United States since the Lindbergh kidnapping case of 1932. While some members of the Family bragged about their murderous exploits, others became paranoid. Manson’s paranoia about police informants landed on the unfortunate head of ranch-hand Donald “Shorty” Shea, who found it exhausting to co-exist with the Family in their shared environment of Spahn Ranch.⁵² Seventeen days after the Tate-Labianca murders, Bruce Davis, Charles Manson, Charles “Tex” Watson, and Steven “Clem” Grogan surrounded Shea and took turns stabbing him to death. In a 2014 letter declaring his rejection of Davis’s parole recommendation, former California governor Edmund Brown claimed that Davis did not fully admit his participation in Shea’s death until 2012, when he copped to slicing Shea’s skin from armpit to collarbone while the others continued stabbing the victim.⁵³ In 1977, Steven “Clem” Grogan, an involved participant in Donald Shea’s murder, drew a map to the location of Shea’s body. As a result of Grogan’s cooperation, members of the prosecution team and Los Angeles Sheriff’s Homicide wrote a letter to the parole board requesting Grogan’s release.⁵⁴ Grogan was officially and quietly released from prison in 1985 and today lives as a free man. The passage of California’s Proposition Number 89, which allows the governor to overturn parole recommendations, was not passed until 1988. This factor, coupled with the absence of modern media coverage of high-profile parole hearings and thus, public scrutiny, has allowed Grogan to be the only Manson Family member ever paroled.

51. Kay, interview.

52. *Helter Skelter*, 153.

53. Edmund G. Brown Jr.

54. Kay, interview.

The Victims' Rights Movement

A combination of liberal and conservative tenets led to the blossoming of the Victims' Rights Movement in early 1970s California. True crime author and historian Rachel Monroe identifies the movement's "strategic alliance between those who had been the victims of violent crime and people who had not been victimized but still lived in a state of heightened anxiety."⁵⁵ A 1968 Gallup poll found that 81 percent of Americans agreed that "law and order has broken down in this country," with the most commonly identified culprits being "Negroes who start riots and Communists."⁵⁶ To conservative Californians, bewildered by the hippie movement and rising crime rates, the semblance of law and order within the Victims' Rights Movement was appealing. As Monroe puts it, "Who knew whose daughter might be murdered by the next sex-crazed hippie cult?"⁵⁷ Across the political spectrum, activists of radical 1970s-era feminism also mobilized behind the movement on behalf of rape and domestic violence victims, demanding more defined roles for victims in legal proceedings. In this way, the Victims' Rights Movement emerged as a conservative offshoot of feminism in the 1970s.

The choir of voices that initiated the start of the Victims' Rights Movement met its ultimate hero in Sharon Tate's mother, Doris Tate. Doris Tate once told Manson Family prosecutor Stephen Kay that should he ever believe that any of the killers would win release from prison and there was anything she could do to help, he should telephone her.⁵⁸ When murderer Leslie Van Houten began petitioning the California Board of Prison Terms with

55. Rachel Monroe, "The War on Murder: Sharon Tate and the Victims' Rights Movement Los Angeles Review of Books," *Los Angeles Review of Books*, (March 2013): <https://lareviewofbooks.org/article/the-war-on-murder-sharon-tate-and-the-victims-rights-movement/#:~:text=The%20early%20years%20of%20the,might%20someday%20become%20a%20victim>

56. Ibid.

57. Ibid.

58. Greg King, *Sharon Tate and The Manson Murders*, (New York: Barricade Books, 2000), 267.

hundreds of signatures supporting her release, Kay did just that. From then on, Tate worked tirelessly to see the passage of laws pertaining to the Victims' Rights Movement. In 1982, President Ronald Reagan, who had built a political career in part on issues of "law and order," released the official findings of his *Task Force on Victims of Crime*, which endorsed the use of victim impact statements and declared that judges should "provide for hearing and considering the victims' perspective at sentencing and at any early release proceedings."⁵⁹ The culmination of these efforts was the passage of California Proposition 8, the Victims' Rights Bill of 1982, which officially sanctioned the victim impact statement's usage in California courtrooms. In 1991, the Supreme Court of the United States held that a victim impact statement in the form of testimony was allowed during the sentencing phase of a trial in *Payne v. Tennessee* 501 U.S. 808. The court also found that the victim impact statement's usage did not violate the United States Constitution and could be ruled as admissible in death penalty cases.⁶⁰ All 50 states now allow victims to speak either written or orally at certain phases of the legal process, typically at sentencing and parole hearings.

The passage of California Proposition 8, the Victims' Rights Bill of 1982, allowed for allocution on behalf of victims at parole hearings for prisoners with life sentences. By 1983, Stephen Kay recalls that "California's Boards of Prison Terms approved family members of victims to attend lifer parole hearings. "Lifers" being people who are sentenced to life in prison. Doris [Tate] was the first family member allowed to attend a lifer hearing."⁶¹

59. Bunty Avieson, Fiona Giles and Sue Joseph. "The Other Directed Memoir: Victim Impact." In *Mediating Memory: Tracing the Limits of Memoir* (New York: Routledge Taylor & Francis Group, 2018).

60. Ibid.

61. Kay, interview.

At Charles “Tex” Watson’s 1983 parole hearing, Doris Tate became the first Californian to utilize this new policy. While Watson preached about clemency, Doris Tate, merely feet away from her daughter’s killer, responded sternly, asking the inmate, “What mercy, sir, did you show my daughter when she was begging for her life? What mercy did you show my daughter when she said, ‘Give me two weeks to have my baby, and then you can kill me?’ What mercy did you show her?”⁶² Later, Tate expressed frustration at the inmate’s inability to look her straight in the eyes.⁶³

In California, just a few years prior, Kay had set up a program that allowed prosecutors to attend parole hearings for life prisoners. Kay remembers:

The first lifer parole hearing in California was for Patricia Krenwinkel [of the Manson Family] on July 8, 1978. I started going to the hearings and helped set up a program at the LA county D.A.’s office where we would send deputy D.A.’s to hearings for all life prisoners. I saw how important it was because the parole board was only getting their information from the probation reports, and some probation reports were pretty thin.⁶⁴

The grassroots mobilization of victims’ rights supporters in the 1970s had become, by all accounts, a larger, more unified lobbying machine by the year 1982. Ex- Manson Family disciple Bruce Davis notes that when convicted California murderer and rapist Archie Fain was granted parole in 1983, “the public outcry grew.”⁶⁵ That public outcry would not be enough to overturn the California Supreme Court’s official ruling in 1983 to grant Fain a release date, citing the governor’s lack of authority to keep Fain in prison when the state board had recommended his release.⁶⁶ In 1972, when California’s death penalty was overturned, Archie Fain had his original

62. “Tex Watson Meets... Doris Tate.” *Helter Skelter Forum*, April 17, 2010, <https://www.youtube.com/watch?v=gr-MUJsROKQ>.

63. “Doris Tate on ‘People Are Talking’ 1984 Part 2.” *YouTube*, August 5, 2006, <https://www.youtube.com/watch?v=ne3BgvKq-Gg&t=4s>.

64. Kay, interview.

65. Bruce Davis, letter to author, May 29, 2020.

66. Jeff Jardine, “No One Told Family Notorious Killer Died.” *Modesto Bee*, January 2009, <https://www.modbee.com/news/local/news-columns-blogs/jeff-jardine/article3117354.html>

death sentence commuted to life in prison, as did most of the Manson Family inmates. Manson Family prosecutor and former LA district attorney, Stephen Kay, recounts:

In 1972, when the death penalty was overturned, there were 115 inmates on death row at that time, including Manson, [and Manson Family members] Watson, Van Houten, Atkins, Krenwinkel...they were all reduced to life sentences instead of the death penalty, which meant you were eligible for parole in seven years.⁶⁷

Some felt that Fain had used his recently adopted born-again Christianity to con the parole board into releasing him.⁶⁸ The role of religious conversion would prove to be an equally contentious issue regarding the parole of Manson Family members.

While the installation of the victim impact statement became a new staple of the American criminal justice system, other laws pushed by Tate and Kay were more concerned with keeping the Manson Family imprisoned, and as a result, exist primarily within California's criminal justice system. In 1983, after Archie Fain was released from prison due to the inability of the governor to veto parole decisions, Tate and Kay worked for the passage of California Proposition 89.

Much of Doris Tate's influence was derived from her prominence in various California victims' coalitions and support groups. Tate first joined the Los Angeles chapter of a support group called Parents of Murdered Children. Stephen Kay recollects:

We would meet at her house in Rancho Palos Verdes, and the victims' family members would come. It was very emotional to go around the room, and everyone would tell how their child was murdered. Doris just devoted her life to that. She was available 24/7 to talk to these family members; they would call her at all hours of the day and night.⁶⁹

67. Stephen Kay, interview with author, May 6, 2020.

68. Jeff Jardine, "No One Told..."

69. Kay, interview with author, May 6, 2020.

As Doris Tate's position advanced within the Los Angeles chapter of Parents of Murdered Children, Stephen Kay became the group's legal counsel.⁷⁰ Doris Tate also founded COVER- the Coalition On Victims' Equal Rights. Additionally, Tate was an active member of the Victim Offender Reconciliation group, Justice for Homicide Victims, and later served as a victims' representative on the California State Advisory Committee for Correctional Services.⁷¹ On Doris's extensive activity in networks for victims' advocacy and support, Kay says that "people just really responded to her, she was a very good spokesperson, and people heard what she was saying, and they just flocked to her."⁷²

Doris Tate's personability and public championing of victims' rights helped gain public support for California Proposition 89, which passed in 1988 and allowed the state's governor to overturn parole decisions made by the California Board of Prison Terms. California is one of only four states that permits parole recommendations to be overturned by the state's governor.⁷³

In the 1980s, the wretchedness of the Manson murders was still etched into the minds of Los Angelenos and Californians. The continued fascination and media attention generated by the crimes was the most crucial aspect to garnering public support for the Victims' Rights Movement and its initiatives. Murder victims, especially in headline-making cases, are often defined by their deaths. In highly sensationalized crimes, post-mortem speculation by the media can often be so salacious that the victim's family feels that their loved one is being killed for a second time. The dismantling of a victim's reputation is a particularly painful desecration of the physically departed for surviving family members. In 1969, the victims of the Tate murders were spared no judgment. The epitaph "Live Freaky, Die Freaky" became emblematic of the murders

70. Ibid.

71. King, 67.

72. Kay, interview with author, May 6, 2020.

73. King, *Sharon Tate*, 269.

in the press and public, constituting the idea that the victims had brought their deaths on themselves by free-wheeling, drug-taking, and orgiastic practices.

Doris Tate found that she could use the media's sensationalizing of her daughter's murder to keep former Manson Family members behind bars. In 1982, after learning of Leslie Van Houten's bid for release, Doris Tate agreed to pen a story for the tabloid *National Enquirer* as long as they included a clip-out coupon that people could send to the California parole board opposing Van Houten's release.⁷⁴ Tate's bid in *National Enquirer* was successful; signatures against Van Houten's parole easily outnumbered those obtained for a petition supporting her release. In the 1980s and 1990s, Doris Tate also frequented the talk show circuit. After Tate's passing, daughter Patti and ally Stephen Kay made the rounds, with appearances scheduled around the parole hearing dates for ex-family members. The high profile of the Manson murders allowed Doris Tate a public forum to transform her grief into a channeled initiative. Network handling of the sensitive matter of Sharon Tate's murder was often clumsy, with interviewers reflexively reverting to sordid details of the case, perhaps momentarily forgetting their proximity to the deceased's parent. In a 1984 Baltimore talk-show called People Are Talking, Doris spoke about her incredulousness at the ability of Manson's killers to brutalize the victims at her daughter's residence without knowing or having any ill will towards them. As Tate speaks, the host interjects, saying, "Right, to just go in there, cut their throats, and stab them..."⁷⁵ Tate is thoroughly unfazed by the statement, but the implications are pronounced. The interaction speaks to the public appetite for knowledge about the unparalleled bloodiness of the Tate-Labianca murders, which often lends to gross exaggeration (since none of the victims at the Tate house had their throats slashed.) This instance also demonstrates Doris Tate's willingness to endure

74. King, 267.

75. "Doris Tate on 'People Are Talking....'"

painful recollections and misappropriations to spread her gospel. The increasing power of the Victims' Rights Movement under Doris Tate is a testament to Tate's galvanizing abilities and the savage notoriety of the Manson Family's crimes.

The Victims' Rights Movement and Manson Family Parole

In the 1980s, the Victims' Rights Movement's growing power coincided with a reimagining of the purpose of California's parole boards due to developments in the sentencing of Manson Family members and the new offenses committed by a paroled California inmate named Robert Massie.⁷⁶ The growing immediacy of news in the United States during this time also contributed to greater public input on parole procedures. Before the Victims' Rights Movement made headway, Stephen Kay noted that the California Board of Prison Terms was initially called "The Community Release Board" until public complaints began to roll in.⁷⁷ Many Californians were dismayed that the Manson gang members would be eligible for parole as early as 1978 following the California Supreme Court's overturning of the death penalty in 1972. In 1978 the granting of a third re-trial for Manson murderer Leslie Van Houten was also of concern. Ultimately, Van Houten received a sentence of seven years to life with the possibility of parole.⁷⁸

Public proponents of parole system reform felt vindicated by the case of Richard Massie. Massie, convicted of a 1965 murder, was granted parole in 1979. Later that year, he killed a liquor store attendant and wounded another during a robbery.⁷⁹ Like members of the Manson Family, Massie was only afforded the prospect of parole because of the 1972 death penalty reversal. Massie's re-offense helped reinforce the view that the 1972 reversal was an error and

76. Hader, 47.

77. Ibid.

78. Ibid.

79. Hader, 48.

that the Board of Prison Terms should act as a gatekeeper, responsible for keeping still dangerous offenders from re-entering society. The prospect that a paroled individual might reoffend put added political pressure on California's Prison Board of Terms and their decisions. In 1988, with the passage of California's Proposition 89, the ultimate responsibility for parole decisions became vested in California's governor.

By the 1990s, the Victims' Rights Movement became one of California's most powerful lobbying forces. The movement emerged as a coalition of crime victims and their families, prison officials, prosecutors, and politicians.⁸⁰ Stephen Kay estimates that around this time, Doris Tate was one of the most powerful women in California "because she was the one who controlled the victims' rights groups."⁸¹ Tate's mission within the Victims' Rights Movement, which was initially concerned with installing the victim impact statement during sentencing at trials, came to also encompass parole with the potential release of Van Houten and others of the former Manson clan.

The changes brought on by Doris Tate's Victims' Rights crusade to parole procedures and outcomes in California were felt amongst her intended targets. Sharon Tate's primary executioner, Charles "Tex" Watson, noted that:

In the 1970s, things looked different; we were on rehabilitation instead of punishment. When I would come before the board, there wouldn't be these television cameras; there wouldn't be the district attorney, and the victims' families weren't there. It looked like in the 1970s that everyone was getting a date. Then the tide started to turn in 1982. Things looked completely different.⁸²

On June 8, 1982, California voters enacted the Victims' Rights Bill and Proposition 8, which allowed for the victims of any crimes, the victim's next of kin and/or the victim's attorney to

80. Monroe, 103.

81. Kay, interview.

82. Alisa Statman, with Brie Tate, *Restless Souls: The Sharon Tate Family Account of Stardom, the Manson Murders, and a Crusade for Justice*, (New York: HarperCollins, 2012), 266.

make statements during sentencing and parole hearings. In 1983, Doris Tate was the first to utilize that ability at Charles “Tex” Watson’s parole hearing. During that time, Tate reminded the parole board that if not for the death penalty reversal of 1972, Watson would be on California’s death row with other infamous serial killers like Richard Ramirez and Randy Kraft.⁸³

The ability of prosecutors and family members to attend parole hearings made a notable difference in the behavior of Manson Family inmates. Watson’s recorded 1983 parole hearing captures a showdown between two Texas natives, Watson and Doris Tate, which forced the inmate to confront the physical manifestation of his crime’s lingering sorrow.⁸⁴ Thus, the Board of Prison Terms might be influenced in their judgment not solely based on the original offense but also on the degree of remorse displayed by an inmate whilst recounting his or her crimes and in relation to family members present at the hearing.

Similar to the presence of family members at parole hearings is the function of the district attorney at hearings for “lifers.” Former D.A. and Manson Family prosecutor Stephen Kay believes his attendance forced defendants to “face the music.”⁸⁵ Before his involvement in the parole hearings, Kay says that “the defendant wasn’t even sworn in to tell the truth, it was just like a nice conversation with the board members.”⁸⁶ Kay uses an encounter with Patricia Krenwinkel, who participated in both the Tate and Labianca murders, as an example:

She [Patricia Krenwinkel] said, “Oh, it was terrible what happened, and I was there, and I was just in shock,” saying, “Watson did this and Atkins did that. But

83. “Tex Watson....”

84. Ibid.

85. Kay, interview

86. Ibid.

you know, I certainly didn't do any of it." And then I pointed out exactly what she did, and of course, she was mad as a hornet.⁸⁷

Since 1988, Manson Family crime participants Bruce Davis and Leslie Van Houten, who were physically implicated to lesser degrees than Watson or Krenwinkel, have been recommended for parole numerous times, decisions consistently overturned by California's governors. Bruce Davis speculated that in 1985, although "the governor at the time was not wild about having added political pressure given to him," prisoners like himself became subject to a principle of "lock them up and throw away the key."⁸⁸

Due to the physical circumstances of the crimes, one might expect that Bruce Davis, who indirectly contributed to two murders, would be judged less harshly than Charles "Tex" Watson, who directly caused the deaths of multiple people. This was not the conclusion of the presiding judge nor the prosecutor of Bruce Davis's crimes. After the 1972 death penalty reversal, while sentencing Davis to life in prison with the possibility of parole, Superior Judge Raymond Choate said, "Davis is older than all the youngsters who were led by Manson and closer to Manson than most of them. He is more intelligent and educated, and capable of independent reasoning. For reasons known only to him, he did not exercise this capability."⁸⁹ Stephen Kay echoes Judge Choate's conclusion and contends that Davis's close bond with Manson suggests a greater culpability level than the others, placing Davis as Manson's "right-hand man."⁹⁰

The prison lives of former Manson Family members, who are among the longest-serving inmates in California's history, reflect a desire for self-enlightenment and religious fulfillment, the authenticity of which is called into question during parole hearings by the victims' family

87. Ibid.

88. Davis, letter to author, May 29, 2020.

89. "The MansonFamilyToday.info Files: The Bruce Davis Biography," *Manson Blog*, May 25, 2015, <https://www.mansonblog.com/2015/05/the-mansonfamilytodayinfo-files-bruce.html>

90. Kay, interview

members and the prosecution team. As of 2020, Bruce Davis's stance is clear: "I want my freedom. I haven't gone to the parole board 32 times for nothing."⁹¹

In 1974, Bruce Davis became a born-again Christian and denounced the Manson Family. However, he is not embittered with his former mentor, saying, "I have it on good authority that Charlie came to faith in Jesus before he died. It made my day when I heard it."⁹² Davis later obtained a PhD in divinity studies and became an ordained minister in 1983.⁹³ Doris Tate, like Stephen Kay, insists that "faith has nothing to do with release."⁹⁴ At a 1978 parole hearing for Charles "Tex" Watson, Kay declared it unsurprising that a former Manson Family member should turn to religion for they were never turned off of it.⁹⁵ Regarding former family members finding faith, both Tate and Kay suggested a proclivity among former members to devote themselves to worship in the place of self-determination, which is what got them entangled with Manson in the first place.

The installation of the victim impact statement and other directives of the Victims' Rights Movement was met with minimal pushback, at least not enough to stop its progress. In 1988, any opponents to California's Proposition 89, which allowed the state's governor to overturn parole decisions, were overridden by the state's majority voters, concerned with reoffending parolees and rising crime rates. Modern outlooks and increased concern about the American prison system have given way to criticism regarding policies instituted during eras noted for tougher sentencing laws. The passage of time since the Manson murders occurred has also contributed to a divide in public opinion regarding the release of formerly reviled and feared individuals. As

91. Bruce Davis, letter to author, August 4, 2020.

92. Ibid.

93. "The MansonFamilyToday..."

94. "Tex Watson meets..."

95. State of California Community Release Board, "In The Matter of The Life Term Parole Consideration of: Charles Watson", October 22, 1978.

previously mentioned, a seven-count killer like Manson henchmen Charles “Tex” Watson will likely never be found suitable by a parole board and garners no legitimate sympathy from the public. However, former Manson followers like Bruce Davis and Leslie Van Houten, who arguably participated in more limited capacities, are viable candidates for parole. Every few years, the American public is reminded of the Manson Family when Van Houten and Davis resurface in the news after being recommended for release by The California Board of Prison Terms. Reactions to the rulings, which are invariably denied by California’s governor, spring up on social media sites like *Twitter*. Some commentators who were alive during the Manson murders recall the fear that the group inspired and demand that the prisoners resign to their life sentences, as their victims were forced to do. Conversely, some members of the generation, looking at accompanying pictures of the aging Davis and Van Houten, who are both in their 70s, argue that the greying ex-Manson Family members pose no real danger to society now.

The latter group is correct in assuming that an inmate’s estimated threat to society is nominally the determining factor for release suitability. In California, parole boards consist of twelve members who are appointed by the governor and are subject to senate confirmation. The continually updated Barclays Official California Code of Regulations determines the conduct of California’s Parole Boards, defining procedures and parameters for parole consideration. Title 15 of California’s Code of Regulations determines that lifer parole hearings are attended by the inmate and his or her attorney, media representatives, victims or victims’ representatives, and representatives of the district attorney’s office responsible for prosecuting the committal offense.⁹⁶ The impact of the Victims’ Rights Movement is seen clearly within the representation

96. Determination of Suitability. 15 CA ADC § 2281 (2020), [https://govt.westlaw.com/calregs/Document/15E3918F0078211E3A8E0B021DF1F7DCE?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=\(sc.Default\)](https://govt.westlaw.com/calregs/Document/15E3918F0078211E3A8E0B021DF1F7DCE?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=(sc.Default))

allowed on the victim's behalf, including the presence of the original prosecutor and victims' representatives. The Parole Board's objective of determining whether an inmate poses a continued threat to society is measured by findings of suitability or unsuitability. Title 15 notes that particularly heinous crimes can alone warrant unsuitability. Examples of heinous crimes include the attack of multiple victims, offenses committed in dispassionate and calculated manners, abuse or defilement of a victim, callousness in carrying out the crime, or an inexplicable or trivial motive.⁹⁷ Conversely, factors that implicate suitability tend to be reflected in the presence of remorse in an offender, often shown by attempts to relieve the suffering of a victim or victim's family, a lack of criminal history, especially in relation to violent crime, and motivation for the offense, that the crime was committed under duress or victimization.⁹⁸ Following the board's recommendation to grant parole, the governor must approve, modify, or reverse within 120 days.

The Ethics, Gender, and Racial Aspects of Victims' Rights Movement.

When Doris Tate died of a brain tumor in 1992, her two other daughters, Patti and Debra, became the successive torchbearers for the Victims' Rights Movement. In 2000, Patti Tate died of cancer, and Debra assumed the mantle as the only remaining representative of the immediate Tate family. The voices of opinion which converge in the wake of Davis and Van Houten's parole recommendations orbit around Debra Tate.

One of the Tate family's biggest detractors, who fundamentally opposes the Victims' Rights Movements' initiatives, is author Hadar Aviram. Aviram is a native of Israel, receiving law and criminology degrees from The Hebrew University of Jerusalem and a PhD in

97. Ibid.

98. Ibid.

jurisprudence and social policy from The University of California, Berkeley. As a professor at UC Berkeley, Aviram's focus is criminal justice and civil rights from a socio-legal perspective. In 2020, Aviram penned *Yesterday's Monsters: The Manson Family Cases and the Illusion of Parole*, which serves as a modern indictment of California's parole system and criminal procedures introduced by the Doris Tate-led Victims' Rights Movement. Aviram's work serves as the fundamental basis for this paper's exploration into the forces opposed to changes brought on by the Victims' Rights Movement to California's paroling and sentencing procedures.

Aviram acknowledges that the Manson Family cases changed the landscape of California's criminal justice system. In *Yesterday's Monsters*, Aviram asserts that the main contribution of the Manson Family criminal saga and the Victims' Rights Movement's intervention is the furthering of extreme punishment. The criminologist makes her case through analysis of Manson Family parole hearings. Aviram asserts that the modern construction of California's parole hearings disproportionately favors victims' narratives.

As evidenced by Doris Tate's metamorphosis from grieving mother to victims' rights champion, the murder of a loved one can have a transformative effect on victims' families. In 1983, the murder of California college student Marsalee Nicholas inspired her family to follow in Doris Tate's footsteps by rallying for increased victim representation in parole hearings. By 2008, the Nicholas family helped to secure the passage of Marsy's Law in California. Marsy's Law allows for:

Victims, next of kin, members of the victim's families and two representatives to appear personally or by counsel to adequately express his, her, or their views concerning the criminal and the case... the effect of the enumerated crimes on the victims and the family of the victim, the person responsible for these enumerated crimes, and the suitability of the prisoner for parole.⁹⁹

99. Aviram, 119.

The clause of Marsy's Law which allows for the presence of two victim representatives at parole hearings is the basis for much of Aviram's critique. Whereas Doris Tate's Victims' Rights Movement advanced the attendance of a victim's next of kin at parole hearings, Marsy's law has expanded that circle. Debra Tate's incurrence of public annoyance, particularly from those who believe Manson Family members like Davis and Van Houten are overdue for release, centers around her utilization of Marsy's Law. In 2006, a parole hearing for Bruce Davis was attended by Debra Tate and prosecutor Patrick Sequeira, representing original prosecutor Stephen Kay. At the 2006 hearing, Sequeira recounted Davis's involvement in the murder of Gary Hinman, remembering how the defendant held a gun to Hinman as Manson sliced the victim's ear with a sword. Debra Tate spoke after the prosecutor, agreeing that Davis, like the rest of the Manson Family, should never be released. Tate went on to describe how the Manson Family had impacted her life, declaring that "Mr. Davis was one tentacle of a unified monster."¹⁰⁰

Aviram asserts that Marsy's Law's opening of parole hearings not just to victims' next-of-kin but to representatives and supporters of the victims like Debra Tate has allowed a sphere of influence that is too large. Despite neither inmate being involved in the murder of her sister, Debra Tate has attended every one of Leslie Van Houten's parole hearings since 2002 and regularly attends hearings for Bruce Davis, especially in recent years.¹⁰¹

Debra Tate's perceived over-involvement has garnered her more backlash than the women who stood before her. Both Doris and Patti Tate resigned to attending only the parole hearings for those present at Sharon's murder, though they did not have much of an option as Marsy's law was not enacted until 2008, long after both women had passed. However, it should

100. "Bruce Davis Denied Parole, Sept 6, 2007," *Youtube*, September 7, 2007, <https://www.youtube.com/watch?v=A1aT8684fDI>

101. Aviram, 120.

be noted that neither of the Tate women supported parole for any of Manson's affiliates. A degree of public admiration for Doris Tate is detected in commentary online. Many admire the strong-willed, straight-shooting Texan, who could look her daughter's killer straight in the eye without flinching. Even the staunchest supporters of paroling former Manson family members cannot help but respect Doris Tate. Commentary on videoed interviews and parole hearings featuring Debra Tate is less unilateral - some applaud Debra's continued investment in victims' rights, and others complain of Aviram's primary charge: the Tate family, under Debra's leadership, has become too overbearing. Stephen Kay admits that Debra can be outspoken.¹⁰² In 2017, Debra was particularly chastised for remarks about casting for Quentin Tarantino's *Once Upon a Time in Hollywood*, about which she stated that actress Jennifer Lawrence was not pretty enough to portray her sister Sharon.¹⁰³

Aviram also asserts that the layout of California's parole hearings, which allows for the input of representatives like Debra Tate, who is not the victim's next of kin, assigns blame for actions not committed by the defendant. One of the critical criterium for a defendant's parole suitability is the assumption of responsibility. In Aviram's estimation, efforts on behalf of Bruce Davis and Leslie Van Houten to differentiate their crimes from those of their fellow Manson Family members are: "thwarted by the ever-present Tate family as the leader of the monolithic victim chorus, reminding the Board of the Manson context and strengthening the Board's tendency to regard any effort to discuss the crimes separately as "minimization."¹⁰⁴

102. Kay, interview.

103. Amy De Klerk, "Debra Tate says Jennifer Lawrence is "not pretty enough" to play her sister Sharon: The actress is rumoured to be up for the part in Quentin Tarantino's new film about the Manson Family," *Harper's Bazaar*, (July 17, 2017), <https://www.harpersbazaar.com/uk/culture/culture-news/news/a42738/sharon-tate-jennifer-lawrence-not-pretty-enough/>

104. Aviram, 124.

Perhaps Aviram's harshest condemnation of the Tate family is her accusation of the clan's privilege and punitiveness in dealing with their grief. The Tate family does not possess untold financial wealth. However, as described, the global publicity elicited by the crime and the political backing needed to pass Doris Tate's Victims' Rights initiatives certainly garnered a measure of influence for the Tate's not afforded to other victim's families. However, neither the murder of Sharon Tate nor the public's reaction to the crime was typical.

Aviram declares that "voices of poor victims of color, who are less likely to espouse punitive views, are also less likely to voice their perspectives at [parole] hearings."¹⁰⁵ Aviram believes that the rural location of many California prisons makes commutation for lower-income citizens infeasible, leaving the Tate family and its allies to monopolize California's Victims' Rights circuit.¹⁰⁶ Aviram implies that more measures need to be taken to reflect the needs of poor victims of color in sentencing and paroling procedures. Aviram is not the first to accuse the Tate family of being vengeful. However, Aviram dismisses the unapparelled media attention and widespread interest still summoned by the Manson murders and its centrality to the success of the Tate family's Victims' Rights crusade to keep ex-Manson Family members in prison.

Public interest in the Manson murders has not waned since 1969. Along with prosecutor Vincent Bugliosi's original bestseller *Helter Skelter*, a myriad of Manson-related books, movies, and TV shows pop up consistently. In 2019, Quentin Tarantino's *Once Upon a Time... in Hollywood* depicted the lives of two fictional actors in 1969 who become entangled with Sharon Tate and the Manson Family. Annually, on August 9, the date of the Tate killings, television segments devote time to re-visiting the crimes, knowing that audiences will tune in. Original crime scene photographs are widely available on the internet, and scores of blogs are dedicated

105. Ibid, 126.

106. Ibid, 124.

to probing theories, inconsistencies, and questions that some still have about the Manson Family and its crimes. Public intrigue with Sharon Tate is more extensive than with other victims of the Manson Family. Heralded for her exquisite beauty and style, Tate's work as a fashion model provides troves of sentimental and haunting photographs for fans to pour over. Pictures of Steven Parent, Voytek Frykowski, Abigail Folger, and Jay Sebring, who died with Tate at her Cielo Drive residence in 1969, are not nearly as prominent or available. The domination of Sharon Tate's narrative in the Manson murders is multifaceted. For one, Tate's undeniable beauty, and her budding acting career, lend to an air of Hollywood glamor that captivates the American imagination. Beautiful and heavily pregnant at the time of her death, Tate also embodies the essence of tragic innocence that many associate with ideal victimhood.

Most regard the killing of a pregnant woman as a particularly egregious crime. However, some scholars criticize the role of murdered middle-class white women in securing tougher sentencing and paroling laws. Indiana law professor Lynne N. Henderson, an early critic of the Victims' Rights Movement, wrote in a 1985 paper called "The Wrongs of Victim's Rights," of the Movement's reliance on the "symbolism of blameless, female victimhood."¹⁰⁷ In a journal article entitled, "In Whose Name? Crime Victim Policy and the Punishing Power of Protection," Jennifer K. Wood comments on the ideal victimhood held by murdered, white pregnant women. Wood uses the 2002 murder of Laci Peterson and her unborn child as an example. Peterson, like Sharon Tate, was murdered in California while eight months pregnant with her first child. Both women would have given birth to baby boys. Laci Peterson, unlike Tate, whose death came down to being at the wrong place at the wrong time, was killed by her husband, Scott Peterson. Women are most likely to be

107. Lynne N. Henderson, "The Wrongs of Victim's Rights," *Stanford Law Review* 37, no. 4 (1985): 937-1021, doi:10.2307/1228587.

killed by an ex or current partner. Wood’s analysis of the symbolism behind Peterson’s widely distributed pregnancy photo at the time of her disappearance applies to Sharon Tate. Wood says:

The photograph of her [Peterson] standing sideways, holding her stomach in that classic happily pregnant pose conveys this ideal perfectly: white, suburban, middle class, married, not too young nor too old, pregnant at the right time and for the right reasons. . . . communicates volumes about whose pregnancies and whose murders and victimization justifies tough-on-crime measures.¹⁰⁸



Sharon Tate before her murder in 1969.
(Photo courtesy of Terry O’Neil, 1969.)



Laci Peterson before her disappearance in 2002.
(Photo courtesy of *The Modesto Bee/AP*, 2002.)

After Peterson’s 2002 murder, the Unborn Victims of Violence Act made headway. By 2015, it was enacted in California under the alternative name “Laci and Conner’s Law,” Conner being the intended name for Peterson’s son. The Unborn Victims of Violence Act made it a

108. Jennifer K. Wood, "In Whose Name? Crime Victim Policy and the Punishing Power of Protection," *NWSA Journal* 17, no. 3 (2005): 1-17, <http://www.jstor.org/stable/4317155>.

crime to harm a fetus during an assault on a pregnant woman. Peterson's mother, Sharon Rocha, spearheaded the campaign for Laci and Conner's Law.¹⁰⁹ Critics like Wood and Henderson find fault in the parent-driven crusades based on middle-class white children's deaths. The basis for this claim is the belief that crimes against lower-income women of color do not incur such responses.

In California, the occurrence of parent-enacted laws on behalf of a murdered child is not novel, as evidenced by Marsy's Law and Laci and Conner's Law. However, those involved in the passage of the Victims' Rights Movement's initiatives, and the ex-Manson Family members most affected by them, maintain that no other case could have solicited such change. As of 2020, ex-family member Bruce Davis has received six release recommendations by the California Prison Board of Terms, all of which have been reversed. Davis contends that "Manson was a trigger setting off a long, building issue of crime and punishment." Bruce Davis remains hopeful for an eventual release. However, the stigma and potential political repercussions for any California governor who lets a former Manson Family member walk free from prison have kept those hopes at bay.

In law and order issues, an individual's set of experiences orients them toward a particular stance. Aviram, a staunch supporter of prison reform, contextualizes her work, *Yesterday's Monsters: The Manson Family Cases and the Illusion of Parole*, through that lens. Aviram critiques the scope of influence afforded to families of the Tate-Labianca victims, contending that Debra Tate's speaking role at all Manson Family parole hearings, even if the defendant did not participate in the killing of Tate's sister, unfairly taints the perception of the parole board. In her work, Aviram also decries parole hearing participation of Tate victim

109. Ibid.

representatives like Anthony DiMaria, who was three years old when his uncle Jay Sebring was killed by the Manson Family. Widening the circle of participation at parole hearings, Aviram contends, opens the floor to a generation of relatives who were either very young or not yet born when their family member was murdered.¹¹⁰ Again, Aviram discounts the omnipresence of the Manson saga in American media and pop culture, thus undervaluing the cyclical nature of trauma and the generational effect that murder often inflicts on a family unit. Aviram's complaints about the modern construction of California's Parole Boards and its unfair application to former Manson Family members is contradicted by the fact that both Leslie Van Houten and Bruce Davis have received multiple parole recommendations, followed by subsequent reversals by California's governor. Critics who take issue with the continued incarceration of inmates deemed rehabilitated by California's Board of Prison Terms might focus on the governor's veto rather than the supposed over-influence of victims' families.

As stated, the subjects of this thesis have reflected the fundamental importance of personal circumstances in shaping beliefs about law and justice. The opinions of former Los Angeles District Attorney Stephen Kay are undoubtedly colored by his experiences. Kay is responsible for prosecuting some of Los Angeles's worst twentieth-century crimes. Remarkably, he is not a firm believer in the death penalty.¹¹¹ However, Kay does concede that some offenses are too abhorrent not to be prosecuted to the fullest extent of the law. One such case is that of Lawrence Bittaker, one half of a sadistic duo called "the ToolBox Killers," coined for their use of pliers, icepicks, and sledgehammers in the rape and torture deaths of five young girls in the Los Angeles area in 1979. Despite receiving the death sentence in 1981, Bittaker served life in San Quentin until his death in 2019. During his 1981 trial, Bittaker provided Prosecutor Kay

110. Aviram, 119.

111. Kay, interview.

with conclusive evidence of his guilt through audio recordings of his victims' sexual assault and torture, namely of 16-year old Shirley Lynette Ledford. NBC News coverage of Bittaker's 1981 trial captured streams of attendees staggering from the courtroom in tears after Ledford's recording was played for jurors. Some appeared to get sick. In a recess afterward, Kay attempted to speak to NBC reporters before breaking down. Weeping openly to media personnel gathered outside the courtroom, Kay managed to say through tears, "I just picture those girls ... how alone they were when they died."¹¹² Kay revealed in a 2017 interview with Long Beach's *Press-Telegram* that of all the crimes he had tried, only one case stuck in his mind more than the Manson Family crimes, and that was Lawrence Bittaker's offenses. Even decades later, Kay admits to being plagued by dreams and reoccurring flashbacks. The scenario is always the same: he hears the screams of Bittaker's victims but cannot save the young girls from their terrible fates. This incident points to Kay's continued personal investment in serving as a voice for victims and of the profound effect that victim suffering has on those closest to it.

Stephen Kay's experience provides insight into the mindset of those who support the Victims' Rights Movement - a group made up by victims and families of victims of violent crimes. Additionally, this scenario demonstrates how the observance of victim suffering through picture, video, or sound recording triggers visceral reactions in humans. Viewing gruesome evidence can be a persuasive method for convincing the public to support harsher penal and sentencing codes.

Along with the intense public and media interest inspired by the Manson murders, a significant factor in the persistent public condemnation of the Manson Family, particularly amongst generations far removed from the crime's occurrence, is the brutality and accessibility

112. Ibid.

of the Tate-Labianca murders. The American appetite for the sordid details of the Tate-Labianca murders was and continues to be exploited for profit. On the widespread circulation of post-mortem pictures in the Tate-Labianca slayings, Stephen Kay says, “I don’t know how they got the autopsy photographs, but we had two books of crime scene photographs stolen from the D.A.’s office... the person made some money off of them before they were recovered.”¹¹³

In 2021, the Tate-Labianca death pictures are still pedaled to the morbidly curious for a buck. In a place far removed from 1969 Los Angeles, modern-day New Orleans’ Museum of Death offers a crass assortment of true crime memorabilia with special emphasis on the Tate-Labianca crime scene and autopsy photographs.¹¹⁴ For a city as steeped in mystery and lore as New Orleans, the museum’s focus on Manson gore of 1969 is but one of many examples that illustrates the American public’s persistent interest in the unparalleled violence of these crimes. Stephen Kay does not believe that the Tate-Labianca death pictures have any bearing on parole decisions. Neither Kay nor his representatives have presented the photographs during the parole proceedings for former Manson Family members.¹¹⁵ Kay, incredulous that members of the public willingly view the pictures, said, “they [the parole board] probably do not want to see them. Unless on their off hours they go to the websites which have those photographs, then I doubt they’ve seen them.”¹¹⁶

In *Savage Appetites*, Rachel Monroe notes the startling prominence of the Tate-Labianca post-mortem photographs online, stating that “these days, it’s harder to avoid the images than to see them.”¹¹⁷ Naturally, the immediacy of the images was made more pronounced by the advent

113. Kay, interview with author, January 26, 2021.

114. *Museum of Death in New Orleans*, 2021.

115. *Ibid.*

116. *Ibid.*

117. Monroe, 72.

of the internet. That increased circulation of these photographs may have aided in the public's continued damnation of the Manson Family and its crimes is of little consequence to the victims' families, Kay says. He states, "the families are upset that they are out there. That's the last thing they would ever want to release."¹¹⁸ The sentiment is understandable. The Tate-Labianca victims are among the most publicly exploited and desecrated murder victims in the annals of American crime. However, as Doris Tate showed through her many talk-show appearances, enduring the public's hunger for lurid details can act as a vital stepping-stone to garnering their support. In *Sharon Tate and The Manson Murders*, author Greg King explains why he includes graphic photographs of the Tate-Labianca victims and deftly summarizes such evidence's capability to affect public opinion on parole. King writes:

No matter how many words might be spilled in describing the brutality of the murder which took Sharon's life, it seems to me that there is no better, mute testimony as to why none of the Manson Family members still incarcerated should ever be released than the vivid depiction of their own acts.¹¹⁹

118. Kay, interview with author, Jan. 21, 2021.

119. King, 451.



Stephen Kay in 1980 working from his office in the Torrance Courthouse. On his walls are the five victims of the Toolbox Murderers: Cindy Schafer, Shirley Ledford, Jackie Gillam, Leah Lamp, and Andrea Hall. Courtesy of San Pedro's *News-Pilot*, November 28, 1980.

Stephen Kay contends that no other case could have initiated the changes brought on by the Manson murders.¹²⁰ The victim impact statement is a modern staple of American courtrooms. Yet, the story of its origins with Doris Tate and the Victims' Rights Movement is seldom told. Kay states that "the victim's family members had no rights before, they couldn't attend parole hearings, they couldn't do victims impact statements... Doris Tate really changed everything."¹²¹ Doris Tate fundamentally changed the landscape of California's criminal justice system, and her efforts oversaw the eventual installation of the victim impact statement nationwide. Although Doris Tate endeavored to "transform Sharon's legacy from murder victim to a symbol for victim's rights," she was never fully able to deconstruct Sharon's legacy as the beautiful

120. Kay, interview

121. Ibid.

pregnant victim of the Manson Family.¹²² As of yet, mention of Sharon Tate does not often illicit discourse on the advent of the victim impact statement. An oddity, considering the victim impact statement is often prominently featured in modern crime reports. For decades, the Manson Family crimes' flashy and macabre elements have overshadowed the major influence of the Victims' Rights Movement. Ironically, the intrigue that directs the public toward the grotesque and accessible gore of the Manson murders is fundamental to Doris Tate's personal objective within the Victims' Rights Movement: to keep former Manson Family members behind bars.

Conclusion

Due to the influence of the Victims' Rights Movement, the Manson murders are one of the most law-influencing crimes in American history. Historical contextualization of 1960s America often marks the Manson murders of August 1969 as the unofficial end to that momentous and stormy decade. By 1970, the shattered hopeful, idealistic notions of bohemians and non-conformists led to cooperation between liberal feminists and conservative citizens, helping to launch the Victims' Rights Movement. In the 1980s, the continued cultural aftershock of the Manson murders merged with Ronald Reagan's 'tough on crime' presidency, creating a rich environment for the ascent of the Victims' Rights Movement. The unmatched media attention commanded by the Manson murders, with its glamorous victims and transfixed cult killers, allowed a degree of publicity and interest in the blossoming movement that is not often afforded to grassroots collectives. Doris Tate, the mother of the Manson family's most famous murder victim, Sharon Tate, deftly maneuvered through media channels, turning her private pain into public support for victim-centric criminal sentencing and paroling laws in California.

122. King, 272.

The enduring parole journey of former Manson family member Bruce Davis demonstrates the strength of the changes instituted by Doris Tate and the Victims' Rights Movement. On January 23, 2021, Bruce Davis was granted parole for the seventh time. Three different California governors overturned Davis's six previous parole recommendations; reversals made possible by three amendments to the criminal justice systems of California and the nation, noted foremost within this paper. Those stipulations were the aforementioned California Proposition 89; the victim impact statement, which was instituted in California with the passage of The Victims' Rights Bill in 1982 and is now utilized in nearly all fifty states; and a program in Los Angeles initiated by Stephen Kay, allowing for original prosecutors or representatives to attend parole hearings for inmates with life-sentences.

Before 2021, the seemingly impenetrable armor of the Victims' Rights Movement's policies remained untouched. Yet, recent policy revisions in California have marked a shift away from the stipulations instituted by the Victims' Rights Movement nearly forty years prior. This latest development in the Manson Family saga offers another opportunity to study justice's reflective equilibrium and the implication of individualized moral judgments in issues of law and order.

Either Stephen Kay or a representative from the Los Angeles District Attorney's office following Kay's retirement had been present for all of Davis's parole hearings until 2021. In the days following Davis's seventh parole recommendation in 2021, Kay relayed a recent development, saying, "there's a new D.A. in Los Angeles that's very much pro-defense, and he has forbidden D.A.'s from attending parole hearings. At Davis's last hearing, there were no deputy D.A.'s there."¹²³

123. Kay, interview.

Los Angeles's new District Attorney, George Gascón, had campaigned on a platform of social justice and criminal reform.¹²⁴ Los Angeles's new District Attorney won his seat by appealing to America's calls for racial justice and equality leveled by the Black Lives Matter Movement. During his campaign, Gascón pledged to tackle issues of mass incarceration and racial disparity in Los Angeles' justice system.¹²⁵ Within two weeks of taking office, Gascón introduced widespread initiatives that attempted to deliver on his campaign's promises. Jeremy B. White aptly summarizes Gascón's actions in a piece for *Politico* entitled, "California prosecutors revolt against Los Angeles DA's social justice changes." White reports:

(Gascón) instructed prosecutors to stop seeking the death penalty and trying juveniles as adults. He ordered a halt to most cash bail requests and banned prosecutors from appearing at parole hearings. Most controversially, he barred prosecutors from seeking various sentencing enhancements.

The public and internal backlash to Gascón's swift and sweeping changes were immediate. White identifies Gascón's sentencing enhancement mandate, which sought to reverse the long-standing practice among Los Angeles prosecutors to seek longer sentences for criminal defendants with prior convictions, as particularly controversial. On February 9, 2021, Judge James Chalfant blocked the measure after members of The Association of Deputy District Attorneys for Los Angeles sued their new boss, George Gascón.¹²⁶

The startling loss of official representation during parole proceedings left the families of Manson crime victims feeling abandoned.¹²⁷ Stephen Kay explained that the barring of D.A.

124. Jeremy B. White, "California prosecutors revolt against Los Angeles DA's social justice changes," *POLITICO*, January 25, 2021,

<https://www.politico.com/news/2021/01/25/george-gascon-california-social-justice-461667>

125. Ibid.

126. Diaz, Jaelyn, "Judge Blocks LA District Attorney's Reforms," *NPR*, February 9, 2021, <https://www.npr.org/2021/02/09/965673109/judge-blocks-la-district-attorneys-reforms>

127. Andrew Blankstein and Eric Leonard, "Relatives of Manson 'family' murder victims outraged by DA's new policy," *NBC News*, January 31, 2021, <https://www.nbcnews.com/news/us-news/relatives-manson-family-murder-victims-outraged-da-s-new-policy-n1256183>

representation at lifer parole hearings means that “it is up to the families to argue against the defendant being released on parole.”¹²⁸ Writing for *NBC*, journalists Andrew Blankstein and Eric Leonard reported that both Kay Martley, cousin of murder victim Gary Hinman, and Debra Tate, sister of Sharon Tate, were alarmed that the D.A.’s responsibilities would now be their own. Tate stated, “at the most horrible moment, when you have to relive the gruesome details of the loss of your loved ones, you are now also supposed to perform the job and act as the DA would.”¹²⁹ Martley echoed Tate’s statement, saying that it is unfair to only allow the defendant legal representation.¹³⁰

Alex Bastian, special advisor to Gascón, stated that his office would make the presence of victim’s advocates available to victims and victims’ families during parole hearings, should they want the support.¹³¹ The policy shift which accounted for the loss of prosecutive representation at lifer parole hearings is coupled with Gascón’s support for the paroling of prisoners who have served their mandatory minimum sentence, all in a bid to lessen mass incarceration in California. The prime argument for this venture has been long expounded by detractors of the Victims’ Rights Movement: the idea that parole board officials are more qualified than prosecutors in assessing an inmate’s potential for release and that the latter’s attendance conflates the purpose of the hearings.¹³²

The Victims’ Rights Movement blossomed under Reagan-era conservatism, as it instituted tough-on-crime measures that challenged the perceived lawlessness of the tumultuous 1960s and 1970s and sought to amplify victims’ voices within the criminal justice system. Like

128. Kay, interview.

129. Andrew Blankstein and Eric Leonard, “LA sheriff’s office to attend parole hearings after outrage over Manson ‘family’ case,” *NBC News*, February 3, 2021, <https://www.nbcnews.com/news/us-news/la-sheriff-s-office-attend-parole-hearings-after-outrage-over-n1256669>

130. Ibid.

131. Ibid.

132. Ibid.

the Victims' Rights Movement's direction, Gascón's initiatives reflect larger tensions within the country. In the wake of Gascón's reforms, Jeremy B. White of *Politico* wrote that "Los Angeles is now the hub of a struggle over the course of criminal justice."¹³³ The far-reaching effects of Doris Tate's Victims' Rights Movement, namely its introduction of the victim impact statement, suggest that Los Angeles's centrality to the country's criminal justice system has been notable for some time. Gascón's objectives continue that pattern but directly oppose the changes brought on by the Victims' Rights Movement.

The progressiveness of Los Angeles's new District Attorney is unlikely to profoundly affect Bruce Davis's parole decision, so long as California Proposition 89 remains intact. On the likelihood of California Governor Gavin Newsom reversing Davis's parole recommendation, Stephen Kay said:

I wouldn't think he (Governor Newsom) would grant Davis parole because I don't think Governor Newsom would want that on his legacy. There's a recall campaign against him because some people don't like the fact that he's shut down businesses because of Covid-19, and so they're trying to gang up against him and get rid of him.

Bruce Davis remains hopeful for his release but is resigned to whatever fate awaits him. Of Gascón's decision to bar prosecutors from attending parole hearings for lifers, Davis had this to say: "I think he (Gascón) knows the (parole) Board is very seldom if ever influenced by a DA's statement. Plus, it costs money."¹³⁴

This thesis's examination of the rise of the Victims' Rights Movement and its deep impact on California and America's justice systems coincides with the emergence of a faction that seeks to revoke much of the movement's implications. So far, Los Angeles District Attorney George Gascón has emerged as the cause's champion, vowing to reduce mass incarceration and

133. Ibid.

134. Bruce Davis, letter to author, February 5, 2021.

improve racial disparity within Los Angeles' justice system during his time in office. Stephen Kay is fundamentally opposed to the release of any Manson Family member and naturally takes issue with the banning of a program he fought to institute. However, as a former Los Angeles District Attorney who once made waves and refused to back down from his convictions, Kay seemingly respects a similar spark in Gascón, regardless of his own beliefs. Blankstein and Leonard, in their article for *NBC News*, quote Kay as stating that he “believes that Gascón, in trying to do the right thing, went too far by issuing a blanket policy.”¹³⁵

The difference in the two lawmen's attitudes, symbolic of the schism in American opinion on issues of crime and punishment, was shaped by two distinct sets of experiences. When Kay made the ranks as a young prosecutor, there was virtually no representation for victims or the families of in criminal sentencing and parole proceedings. His unparalleled exposure and deep sensitivity to victim suffering made his mission for increased representation a singular and obvious goal. Conversely, George Gascón, who emigrated to California from Cuba with his family in 1967, knew what it was to live in a police state.¹³⁶ In 2000, Gascón became commander of the Los Angeles Police Department training unit amidst the Rampart Scandal, one of the most widespread cases of documented police corruption in United States history. Gascón's career flourished from his dedication to lawful policing and a homegrown consideration for minority groups.¹³⁷

With further scrutiny, two approaches that initially appear adversarial are found to be united in the common goal of updating Los Angeles' and California's judicial systems to reflect

135. Andrew Blankstein and Eric Leonard, “Relatives of Manson ‘family’ murder victims outraged by DA’s new policy,” *NBC News*, January 31, 2021, <https://www.nbcnews.com/news/us-news/relatives-manson-family-murder-victims-outraged-da-s-new-policy-n1256183>

136. Joe Domanick, “George Gascon, 2002, Los Angeles Police Department Headquarters,” *Blue: The LAPD and the Battle to Redeem American Policing* (New York: Simon & Schuster, 2015), 258.

137. *Ibid.*

the social environments of that period. As time has shown, justice's swinging pendulum is moved by America's cultural climate. And if history is the best indicator of the future, then Los Angeles will remain a focal point for the nation's continued reckoning with issues of crime and punishment for generations to come.

The enormous contribution of the Manson murders and the Victims' Rights Movement to the modern configuration of America's criminal justice system has eluded scholarly studies for too long. In America, the sheer ability of victims or their families to have a voice in the criminal justice process is largely due to the efforts of Doris Tate. In California, the lasting influence of Doris Tate's actions is felt even more ardently. The popular legacy of the Manson murders eschews the tremendous and enduring footprint of the Victims' Rights Movement. When thinking of the Manson murders, the American public is saturated with images of a beautifully pregnant Sharon Tate, angelic in her tragic innocence, or footage of three young dark-haired women, gaily skipping to their murder trial, echoing in song, spouting love and togetherness. While the human psychology and intrigue of this case are undeniable, cementing unmovable images in American media and the nation's collective consciousness, this thesis hopes to chip away at the relegation of the Manson murders to pop culture fodder and tabooed morbidity, recognizing its historical importance and academic merit.

Primary Sources

Stephen Kay, interview with author, May 6, 2020, and January 26, 2021.

Bruce Davis, letters to the author, from 2020-2021.

“Bruce Davis Denied Parole, Sept 6, 2007.” *Youtube*. September 7, 2007.
<https://www.youtube.com/watch?v=A1aT8684fDI>

“Tex Watson Meets... Doris Tate.” YouTube Video. *YouTube*. April 17, 2010,
<https://www.youtube.com/watch?v=gr-MUJsROKQ>.

“Doris Tate on ‘People Are Talking’ 1984 Part 2.” YouTube Video. *YouTube*. August 5, 2006.

Determination of Suitability. 15 CA ADC § 2281 (2020).

Edmund G. Brown Jr, “Intermediate Sentence Parole Release Review,” Penal Code Section 3041, August 8, 2014.

State of California Community Release Board. “In The Matter of The Life Term Parole Consideration of: Charles Watson.” October 22, 1978,
<https://www.cielodrive.com/charles-tex-watson-parole-hearing-1978.php>

Secondary Sources

Atkins, Susan, with Bob Slosser. *Child of Satan, Child of God*. San Juan Capistrano, CA: Menelorelin Dorenay’s Publishing, 2005.

Aviram, Hader. *Yesterday's Monsters: The Manson Family Cases and the Illusion of Parole*. Oakland: University of California Press, 2020.

“The Bruce Davis Biography.” *Manson Blog*. May 25, 2015.
<https://www.mansonblog.com/2015/05/the-mansonfamilytodayinfo-files-bruce.html>

Bugliosi, Vincent and Curt Gentry. *Helter Skelter: The True Story of the Manson Murders*. New York: W.W. Norton, 1974.

Bunty Avieson, Fiona Giles, and Sue Joseph. “The Other Directed Memoir: Victim Impact.” In *Mediating Memory: Tracing the Limits of Memoir*. New York: Routledge Taylor & Francis Group, 2018.

Cooper, Ian. *The Manson Family on Film and Television*. Jefferson, NC: McFarland Publishing, 2018.

Didion, Joan. *The White Album*. New York: Simon & Schuster, 1979.

- Domanick, Joe. "George Gascon, 2002, Los Angeles Police Department Headquarters." In *Blue: The LAPD and the Battle to Redeem American Policing*, 256-259. New York: Simon & Schuster, 2015.
- Faith, Karlene. *The Long Prison Journey of Leslie Van Houten: Life beyond the Cult*. Boston: Northeastern University Press, 2001.
- Flamm, Michael. *Law and Order: Street Crime, Civil Unrest, and the Crisis of Liberalism in the 1960s (Columbia Studies in Contemporary American History.)* New York: Columbia University Press, 2007.
- Guinn, Jeff. *Manson: The Life and Times of Charles Manson*. New York: Simon & Schuster Paperbacks, 2012.
- Henderson, Lynne N. "The Wrongs of Victim's Rights." *Stanford Law Review* 37, no. 4 (1985): 937-1021. doi:10.2307/1228587.
- Hurst, John. "Tex Watson felt no remorse until he found God." *Longview Daily News*, June 19, 1978.
- King, Greg. *Sharon Tate and The Manson Murders*. New York: Barricade Books, 2000.
- Lake, Dianne, and Deborah Herman. *Member of the Family: My Story of Charles Manson, Life Inside His Cult, and the Darkness That Ended the Sixties*. New York: William Morrow, 2017.
- Manson, Charles, as told to Nuel Emmons. *Manson in His Own Words*. New York: Grove Press, 1986.
- Watkins, Paul, and Guillermo Soledad. *My Life with Charles Manson*. New York: Bantam Books, 1979.
- Meredith, Nikki. *The Manson Women and Me: Monsters, Morality, and Murder*. New York: Citadel Publishing, 2018.
- Monroe, Rachel. *Savage Appetites: Four True Stories of Women, Crime, and Obsession*. New York: Scriber, 2019.
- Monroe, Rachel. "The War on Murder: Sharon Tate and the Victims' Rights Movement - Los Angeles Review of Books," *Los Angeles Review of Books*, (March 2013).
- Nielsen, Donald A. "Charles Manson's Family of Love: A Case Study of Anomism, Puerilism and Transmoral Consciousness in Civilizational Perspective." *Sociological Analysis* 45, no. 4 (1984): 315-37.

- O'Neil, Tom, and Dan Piepenbring. *CHAOS: Charles Manson, the CIA, and the Secret History of the Sixties*. New York: Little, Brown and Company, 2019.
- Rahal, Sarah and Kim Kozlowski. "204 Impact Statements, 9 Days, 2 Counties, a Life Sentence for Larry Nassar." *The Detroit News*, February 2018.
<https://www.detroitnews.com/story/news/local/michigan/2018/02/08/204-impact-statements-9-days-2-counties-life-sentence-larry-nassar/1066335001/>
- Sanders, Ed. *The Family: The Story of Charles Manson's Dune Buggy Attack Battalion*. New York: Thunder's Mouth Press, 2002.
- Statman, Alisa, and Brie Tate. *Restless Souls: The Sharon Tate Family Account of Stardom, the Manson Murders, and a Crusade for Justice*. New York: Harper Collins, 2012.
- Tate, Debra. *Sharon Tate: Recollection*. Philadelphia: Running Press Adult, 2014.
- Watson, Tex, as told to Chaplain Ray, *Will You Die for Me?* Atlanta, GA: Cross Roads Publications, 1978.
- Wood, Jennifer K. "In Whose Name? Crime Victim Policy and the Punishing Power of Protection." *NWSA Journal* 17, no. 3 (2005): 1-17. <http://www.jstor.org/stable/4317155>.

Vita

Born in New Orleans, Louisiana, Merrill Steeg graduated from Louise S. Mcgehee High School in 2011. Merrill went on to earn a Bachelor of Fine Arts degree in Creative Writing and Literature at the California College of the Arts in Oakland, California. Informed by her life-long passion for history, Merrill's writing continues to be within the genre of historical non-fiction and historical fiction.