

Teaching Themes from the Revolutionary Era with Documents on the Stevens Family

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Abstract: This article explores the use of primary documents related to the Stevens family to teach key themes from the Revolutionary era in American history. The Stevens family, who founded Stevens Institute of Technology, provide a compelling case study of how prominent colonial families navigated complex issues like choosing sides in the Revolution, participating in the transatlantic slave trade, and responding to gradual emancipation laws. By examining documents such as John Stevens's 1699 indenture contract, ledgers showing involvement in slave trading, Honorable John Stevens's 1776 letter resigning from the colonial government, and Elizabeth Stevens's will requesting the freeing of enslaved people, students can engage with nuanced historical questions. The article discusses how these primary sources allow students to grapple with the family's complicity in slavery while also considering their contributions. It concludes by sharing student reflections on how studying the Stevens family's history provides insight into broader themes of race, slavery, and historical memory in American society. This approach demonstrates how institutional histories can be leveraged to teach critical thinking about the Revolutionary period.

The land where the town of Hoboken, New Jersey, and the campus of Stevens Institute of Technology sits is prime real estate on the Hudson River. Its proximity to Manhattan is probably the biggest selling point today. However, as I remind my students, this land was attractive to European settlers all the way back in the eighteenth century when it was covered with abundant orchards and trees. Access to the river, the relative security of the cliff (now called Castle Point) overlooking the river, and the fertile ground were selling points to past generations. During the era of the Revolution, those grounds were raided by hungry Patriots, especially after the owner of the land, William Bayard, had shifted from supporting the revolutionaries to maintaining that the Crown would win the war.¹ When his ill-fated prediction failed to come to pass, the land was confiscated and put up for auction, paving the way for a nice land deal for the more firmly Patriot Stevens family. Had the decisions of the family been different during that pivotal time, the town and the university probably would not exist today. When sharing this story, the ears of the students in the room tend to perk up and more faces than usual are lifted from the screens of ubiquitous devices. Those are the moments educators crave: when a fairly obscure historical theme (the fate of Loyalists and their land) becomes momentarily real for students because they see how the history is relevant to their present circumstances (fulfilling a humanities credit at the eponymous university).

Teaching about an institution's namesake family presents unique challenges as well as opportunities. On the one hand, there is often a tendency toward hagiography and sometimes critical discussions are difficult to achieve or are lacking altogether. On the other, examining the

¹ The author would like to thank Steve Tettamanti and James Amemasor at the New Jersey Historical Society and Linda Beninghove, Leah Loscutoff, and Ted Houghtaling at the Samuel C. Williams Library for visiting classes and hosting class visits the past few years. Thanks also to Holly Metz whose book on Peter Lee has helped support discussions in numerous classes. Bayard's land is discussed in Archibald Douglas Turnbull, *John Stevens: An American Record* (New York: The Century Co., 1928), 82–83. See also: Holly Metz, *The Untold Life of Peter Lee* (Hoboken, NJ: Hoboken Historical Museum, 2019), 32–34.

complexities of an historically prominent family, like the Stevens, can open the door to in-depth reflections on complicated themes like choosing a side during the Revolution or participating in the transatlantic slave trade to build capital. In developing course material on the Stevens family over the past five or so years, I have hoped to bring historical conversations a little closer to home for students in my history classes. Because there is space for more to be published on the Stevens family, looking at what we do know within the context of the history in which they lived gives students an authentic experience of piecing together a narrative and asking meaningful questions that we may or may not be able to fully answer now.² It is this grappling that enables students to see how historians work and perhaps understand a little better how we all touch and are touched by history. One of my students once summed up this process when he wrote, “The past cannot be changed but how the past is portrayed can certainly change the future.”³

Even if one is not teaching at Stevens Institute, documents on the Stevens family can help complicate narratives that are too-often over-simplified such as confiscation of lands after the Revolutionary war and the rollout of gradual emancipation in the wake of the revolution. This article will discuss using documents to help illustrate and complicate key historical moments

² A major published work on the Stevens family is Archibald Douglas Turnbull’s biography of Colonel John Stevens, which includes history going back to his grandfather who came to the colonies in 1699. While it is dated and largely hagiographic, the biography does include numerous photos and transcriptions of primary documents from the family’s papers. There is also a shorter version of Turnbull’s analysis in this article: Archibald Douglas Turnbull, “John Stevens” *The North American Review* 223 (Sept–Nov 1926), 440–455. There are short chapters on the history of the family and the town of Hoboken in Geoffrey W. Clark, *History of Stevens Institute of Technology: A Record of Broad-Based Curricula and Technogenesis* (Jersey City, NJ: Jensen/Daniels Publishers, 2000). Holly Metz’s more recent exploration of the life of Peter Lee, who was enslaved by the Stevens family, does a better job of asking important critical questions about the family and slavery although there are not (yet) answers to all the questions. The bulk of the unpublished family papers are in collections at the New Jersey Historical Society in Newark and the Archives and Special Collections at Samuel C. Williams Library at Stevens Institute. There are also some documents related to the family in the digital collections of the Hoboken Historical Museum: <https://www.hobokenmuseum.org/collection-items/>. The museum did an exhibit on the family in 2015, which can be viewed virtually here: <https://www.hobokenmuseum.org/exhibition/the-extraordinary-stevens-family-a-new-jersey-legacy-1776-1911/>.

³ All quotes from students are taken from writing assignments completed in the first half of the US History survey and African American history classes between 2020 and 2024 as well as a special summer course on Stevens History I taught in 2021.

including the arrival of the first John Stevens in the colonies in 1699, the transatlantic slave trading that helped build the primary wealth of the family, the pivotal decision to join the Patriots in the war when their family's political influence was burgeoning, and the complex questions about the extent to which they engaged with gradual emancipation after the Revolution as slavery started to be slowly eradicated in some states. It will close with student reflections on interacting with documents and drawing conclusions on the history that they help to illuminate.

John Stevens's Indenture

As the economies of the British North American colonies were growing in the 1600s, the need for labor was acute. When teaching about indentured servitude, I emphasize that one's experience would vary significantly depending on where one was working (tobacco farms in Virginia, for example) and for whom one was working. Some indentured servants did not live to see the end of their contracts due to harsh punishments or overwork, while others were able to eventually obtain some land as freedom dues and eke out a living for themselves. An historic letter from Richard Frethorne described the conflict and desperate hunger he experienced as an indentured servant in Virginia in the early 1600s.⁴ The 1699 indenture of John Stevens, who was around seventeen when he arrived in the colonies, showed a wholly different perspective on indentured servitude.⁵ Stevens worked for seven years as a clerk for a colonial official who was an attorney, registrar, and examiner in New York.⁶ Stevens's family must have already been plugged into important social networks in London to be able to secure what sounded essentially like a white collar apprenticeship. Students who see the indenture are often impressed by the age

⁴ Richard Frethorne to his parents, 1623. Available at: <https://historymatters.gmu.edu/d/6475>.

⁵ John Stevens's indenture is in the family collection in the Archives and Special Collections at Samuel C. Williams Library. It is also pictured in Turnbull, 17.

⁶ John Stevens's indenture and Turnbull 8–9.

of the document. They also tend to view John Stevens's indenture as an opportunity or, as one student described it, "essentially a story of the American dream."

That student's comparison to the American Dream was apt since it seemed that the indenture helped connect John Stevens with powerbrokers of the time, for he was soon involved in land deals and trading ventures that started building the family wealth. The land that would become New Jersey appeared promising to him in the early 1700s as speculators were using African labor to cut down timber to sell overseas. Stevens was also drawn to the possibility of investing in local copper mines. In 1714, Stevens made a favorable marriage to Ann Campbell whose father, John, was a justice in the Court of Common Rights and owned valuable land that would be inherited through Ann upon his death.⁷ Thus, John Stevens's indenture was foundational as his early success in the colonies began a family dynasty that enjoyed growing wealth and connections to power by the time of the Revolution. In fact, I remind students, there would be no Stevens Institute without John Stevens's indenture and his economic productivity that set the up-and-coming family on its way.

Records on Slave Trading

One of John Stevens's children, who was born in 1716 and became known as "Honorable John," continued to build the family's wealth and influence during the 1700s. Honorable John, like many people of his time, got involved in the lucrative commerce across the Atlantic. Sometimes he even directly engaged ship captains and got others to buy shares for profits to be made off the goods sold. Honorable John also forged valuable social and political connections, as his father had, especially one with the prominent lawyer and wealthy landowner James

⁷ Turnbull 10–12.

Alexander. Stevens went on to marry Alexander's daughter, Elizabeth, and participated in business ventures, including transatlantic trading, with Elizabeth's brother William.

The trading in which Stevens was involved included goods such as wine, which tended to be profitable, as well as enslaved people from Africa, who were often even more lucrative for traders. In his biography of Honorable John's son written in the 1920s, Archibald Douglas Turnbull transcribed a 1751 letter to Honorable John from a ship captain in Antigua who encouraged Stevens to keep him in mind if he should decide to get further involved in slave trading. The captain observed, "... I think if you had a small Vessel in that trade it would suit you ... And you would find it much more profitable ..."⁸ Interestingly, Turnbull then stated that Honorable John did not become a "blackbirder," or slave trader, as "more legitimate trading ... appears to have sufficed to keep him fully and ... profitably occupied."⁹ However, Holly Metz concluded from her more recent research on the Stevens family that in 1749 alone, Honorable John's ledgers showed that he had made 3,993 pounds from slave trading, which would be over a million dollars in 2024 currency.¹⁰ Indeed, Stevens and his wife owned substantial landholdings in New Jersey and purchased a new townhouse in 1760 on the fashionable side of Broadway in New York City, indicating their standing both socially and financially in the mid-1700s.

Regardless of Turnbull's analysis, Honorable John Stevens's eighteenth century ledgers at the New Jersey Historical Society clearly demonstrate his involvement in slave trading as well as his enslaving of numerous people. Having students read Turnbull's account next to Metz's

⁸ Turnbull 31.

⁹ Ibid. Turnbull seems to use the term "blackbirder" here as a general euphemism for slave trading. The label, however, is primarily associated with the kidnapping and enslavement of indigenous Pacific Islanders, especially in Australia, in the 1800s and not the transatlantic trading in the 1700s with which Stevens was involved.

¹⁰ Metz 8.

narrative and view original ledgers can be an instructive historical exercise. Was Turnbull trying to downplay the family's involvement in slave trading when he was writing in the 1920s? And, if so, why would he do that? Turnbull did quote from Stevens's letters mentioning enslaved people from Africa on shipments he was tracking, making it clear that Stevens did engage in slave trading.¹¹ Did Turnbull consider those people to be merely a sideline to Honorable John's more legitimate trading and, thus, overlook their humanity as Stevens did? These are substantive questions for students to consider and write about. Ultimately, as Metz's book and the ledgers at NJHS make clear, slave trading accounted for a share, perhaps a considerable portion, of the Stevens's wealth that was accumulated in the eighteenth century. Metz also pointed out that Honorable John listed owning thirteen people from the mid to late 1700s.¹² Thus, both slave trading and slave labor were key to the family's economic development. It is also important to note that Honorable John was the grandfather of Edwin Augustus Stevens who left the money in his will that was used to start Stevens Institute in 1870.¹³ This further connects the family capital built, in part, on slave trading and slave labor to the university itself.

It is vital for students to ponder the extent to which it is significant that part of the family wealth used to found their university was gained through slave trading and the use of slave labor. Viewing the original ledgers at the New Jersey Historical Society can be difficult even though they offer important lessons. After a visit to NJHS, one student reflected, "The Stevens family's documents revealed their participation in the slave trade, which is a disturbing fact to learn." And they went on to conclude, "Our country allowed these injustices like slavery to create a nation

¹¹ For example, Turnbull 28.

¹² Metz 16.

¹³ Colonel John and Rachel Cox Stevens were Edwin's parents. It was the three executors of Edwin's will, including his wife Martha Bayard Stevens, who employed money he left to create an institution of higher education and started Stevens Institute.

that would thrive on these injustices.” Another student was moved by seeing the ledgers “because it specifically illustrated both how organized his daybooks were, but also how little he actually cared about the slaves that he owned and sold.” They concluded, “While it was slightly uncomfortable to learn about, I felt that it was important to learn as it gave me a stronger grasp of the relationships between the 17th century white elite and their slaves.”

Letter of Resignation

By the time rebellion against the British was gaining steam in the colonies, Honorable John Stevens was in the autumn of his life but enjoyed land, wealth, and status. His children also forged favorable familial connections such as when his daughter, Mary, married into the powerful Livingston family and when his son, John, who became known as Colonel John from his service in the Revolution, married Rachel of the prominent Cox family. In the 1760s and 1770s colonists pushed against taxation from Britain and, in response, the Mother Country attempted to assert her authority over the rebellious North American colonies. The specter of violence grew north of New Jersey with the Boston Massacre in March 1770 and the fights at Lexington and Concord five years later. Thomas Paine’s famous argument in *Common Sense* was published early in 1776 and made a strong case for breaking away from the British empire. As these events transpired, colonists had to decide which side to support. The Stevens family could have easily stayed loyal to the Crown since they had much to lose in terms of land and investments should a commitment to the fledgling colonial movement fail. While students tend to take for granted that people joined the Patriot movement, supporting the rebels was an arduous decision as Honorable John’s letter to the colonial governor resigning his seat on the Council Board in June 1776 demonstrated.¹⁴ In it, Stevens labeled the conflict between the colonies and

¹⁴ Letter from John Stevens to Governor Franklin, June 1776. Transcribed in Turnbull 56 and also available at <https://www.njstatelib.org/wp->

Britain as “alarming.” He emphasized that he had hoped for “Accommodation of our Unhappy Controversy” and had wanted to stay in a position of political service while that hope remained. However, the “large Armament of Foreign Troops” left him no doubt that “an entire submission of These Colonies with a view to Internal Taxation is their ultimate object.” He concluded that he preferred “the duty I owe to my Native Country . . .” Indeed, shortly after this letter was dispatched, Stevens was elected as a representative to the state council that governed New Jersey through the war. His son, Colonel John, also served the American cause in the Army and as state treasurer.¹⁵

Students reading this letter within the context of a study of the Revolution often point out that Stevens sounded somewhat reluctant to resign his post. Like many in the colonies, Stevens seemed to favor a nonviolent solution to the dispute with Britain. But the continued presence of British troops in the colonies became a sign that he could not ignore. I always ask students to consider the timing of Stevens’s letter as well. It came after Paine’s *Common Sense* and just one month before the Declaration of Independence in July 1776. Thus, as one student wrote, the letter’s date “is of significance because it shows how long it took him to come out publicly and take his stance.” It was also interesting that several times in the letter Stevens referred to the colonies and Britain as different countries and referenced America as “my Country” and “my Native Country.” While many people in the colonies still held fast to British cultural identity while the colonies were still in the empire, Stevens’s letter showed that people born in the

content/uploads/slic_files/imported/NJ_Information/Digital_Collections/NJInTheAmericanRevolution1763-1783/7.1.pdf.

¹⁵ Rachel Cox Stevens was also involved in the Revolutionary efforts of women in Trenton. See: Catherine Hudak, “The Ladies of Trenton: Women’s Political Activism in Revolutionary New Jersey” *New Jersey Studies* 1 (Summer 2015): 39–78.

colonies were already conceptualizing themselves as being from a wholly detached place even before the Declaration.

Elizabeth Stevens's Will

Following victory in the American Revolution, Colonel John Stevens purchased 564 acres of attractive land on the Hudson River where he constructed a villa for his family, which would soon be growing after his 1782 marriage to Rachel Cox. The land not only had unobscured views of the river but was situated nicely between New York City and Stevens family properties that were further south in New Jersey. While Colonel John was building his family and his family home, there was increasing dialogue about the issue of slavery in the former colonies. The rhetoric of liberty had touched more than a few hearts during the long struggle with Britain and the use of slave labor no longer seemed like a foregone conclusion for everyone in the new United States. A few slave owners, such as Robert Carter III of Virginia, decided individually to emancipate the people they owned. Continued participation in the transatlantic slave trade was hotly contested during the debates on the Constitution and it was finally decided that Congress could not pass a law regulating the slave trade until 1808 (which it did).¹⁶ Individual states also began to curb the expansion of slavery by passing gradual emancipation laws during and just after the Revolution. Beginning with Vermont in 1777 and ending with New Jersey in 1804, states north of Maryland began the slow process of eradicating slavery with the gradual emancipation movement.

Students often assume that enslavement was practiced primarily in the deep South in the antebellum years associated with cotton farming. Most students have little to no background in the ways that slavery was practiced throughout the colonies prior to the Revolution and the

¹⁶ Article 1, section 9 of the US Constitution.

complications of dismantling it in the more northerly states after the Revolution. New Jersey was an instructive example of the difficulties of ending enslavement as James Gigantino pointed out in *The Ragged Road to Abolition*. In 1790, about six percent of the population of New Jersey was enslaved. While gradual emancipation provided that children of enslaved mothers born after July 4, 1804, would be freed at age twenty-one or twenty-five, they still spent the first part of their lives enslaved. Additionally, as Gigantino made clear, slaveowners “continually resisted abolition in order to profit from their bound laborers.”¹⁷ Strategies such as ignoring or falsifying birth dates or referring to continued unpaid labor as an apprenticeship could keep enslaved people bound to their workplace. Some slaveowners cut their losses and simply sold enslaved people to southern states in order to make a tidy profit and avoid gradual emancipation. The obstinacy to both abiding by gradual emancipation and embracing rights for African Americans showed how “New Jerseyans never left slavery behind either in practice or in how it influenced their ideological identity.”¹⁸

The life of Peter Lee, a man who the Stevens family enslaved, illustrated the complexities and failures of efforts toward emancipation after the Revolution. An obituary in the *New York Times* placed Peter Lee’s birth in 1804, however, Holly Metz’s research on Lee was not able to substantiate that claim.¹⁹ While his birthdate might be unclear, Peter Lee did labor for the family until his death in 1902. However, the question arises: if he was born in 1804, why was he not freed according to the gradual emancipation law? Additionally, and perhaps even more troubling,

¹⁷ James Gigantino III, *The Ragged Road to Abolition: Slavery and Freedom in New Jersey, 1775–1865* (Philadelphia: University of Pennsylvania Press, 2015), 7. See also: Bruce A. Bendler, “‘Love to Justice, and a Wish to Support It:’ The Politics of Slavery in New Jersey 1770-1775,” *New Jersey Studies* 2 (Winter 2017): 23–47.

¹⁸ Gigantino 9.

¹⁹ “Old Peter Lee is Dead,” *New York Times*, January 30, 1902. Also, Metz 39. Metz additionally pointed to a plaque in Holy Innocents Church in Hoboken (founded by Martha Bayard Stevens) that memorialized Lee as having lived from 1804 to 1902 which might be why that year is generally accepted in family tradition (vii–viii).

Elizabeth Stevens, Honorable John's wife who died in 1800, requested in her will that her slaves be freed upon her death. This request included Nancy and Silvia who were Peter Lee's grandmother and mother. If they had been freed in 1800, then Peter would have been born free. A note in a Stevens family bible stated that Colonel John "supported" Nancy and Silvia for the rest of their lives, but Holly Metz could find no records of manumission filed for them.²⁰ Why, then, were Nancy and Silvia not emancipated as Elizabeth requested? Other questions that I ask students to ponder include: Was Elizabeth Stevens moved by the events of the Revolution to offer liberty to the people who the family had enslaved? Were there others in the family who were not similarly moved and wanted to continue enslaving as long as they could? One student was "curious to know if Peter Lee and other women in the Stevens family knew about Elizabeth's intentions to free her slaves," which is another excellent question. While there are no clear answers to many of these inquiries, it is clear that as questions over enslavement after the Revolution were being deliberated across the state of New Jersey, which had staunch supporters of the slave system as well as advocates of abolition, such debates were occurring in the Stevens family as well.

Conclusions

For conclusions, I turn to students who have considered these documents and their historical context. When I assign a written document analysis exercise, I ask students to examine the content of the document alongside the historical context and then connect the content with the context to draw one or more conclusions. When I have had archivists visit classes or have taken students to visit an archive or museum, I ask them to use a similar format to reflect on a document or artifact they encountered during the visit that stood out to them. Students who have

²⁰ Metz 24–29. Elizabeth Stevens's will is in the collections at the NJHS and the family bible is in the collections of Samuel C. Williams Library.

studied historical documents about the Stevens family have drawn a variety of thoughtful conclusions.

They are often most impacted by the documents on the Stevens family and slavery, which is a theme that recurs in their final assessments of family documents. For example, after a visit to the New Jersey Historical Society, one student pointed out, “Clearly, these historical records are invaluable because they force us to face the harsh realities that tarnish New Jersey’s early decades.” Another student thoughtfully observed that “the Stevens family is a microcosm for America’s greater issues regarding slavery and racism.” This student alluded to the tensions that can arise when studying aspects of US history that are difficult to reconcile. Students attuned to this tension respond in different ways. For some, practices like slavery do not negate other achievements of the Stevens. One student concluded, “Slavery was a terrible practice, but a common one at the time, and the families [sic] overwhelmingly positive contributions to the country should not be tossed aside because they participated in it.”

On the other hand, students also believe it is still important to learn about histories even when they are uncomfortable to face. One student emphasized, “Although it was acceptable at the time it is still necessary to learn about the atrocities committed by the Stevens family who were such influential figures in American history.” Another student maintained, “The Stevens were slave traders and owners who treated their slaves as property, in line with the norms of the time.” They continued, “This truth brings context to the Stevens, although they were innovators and progressive when it came to technology, the Stevens still participated in the archaic enslavement of other human beings.” I thought it was especially interesting that one student applied their engineering training when they noted that “Mistakes are invaluable in the field of engineering.” And “if students were able to see how Stevens learned from his mistakes maybe

they can feel better about themselves in their studies.” Such a practical application to the study of the family’s history could be a useful approach for STEM students.

Student conclusions also illustrate divisions on the relationship between the university and the family. Some students would like to see more published about the family such as this student who wrote, “If the university would have had a more active role in publishing the family’s accomplishments, maybe more people would have known the Stevens name.” Other students want to see the university distance itself from the family especially since there is much about the early family history that is not entirely clear. This student noticed, “the Stevens family deserves a more critical look and possibly some separation from the University” because “The Stevens family has too much unknown and, in my belief, not enough legitimacy in their role in founding the school to validate the close ties our school holds with the family.” Other students would like to see the university publicly acknowledge the family’s involvement with slavery and slave trading as well as the narrative of Peter Lee who was enslaved on the very land where the university is located. One student summarized, “Stevens as a school is extremely behind other schools when it comes [sic] to examining their institution and connection to slavery” and both the family and the university “have mutually failed completely when it comes to being enlightened on issues of race.”²¹

Some students look more broadly at the impact studying history can have on society. One student reflected, “This is why learning history is necessary . . . when people actively learn about

²¹ For more on universities who are researching and finding ways to repair connections to slavery, see, for example, “Universities Studying Slavery (USS): The Birth of a Movement” at <https://slavery.virginia.edu/universities-studying-slavery-uss-the-birth-of-a-movement/>. And Craig Steven Wilder, *Ebony and Ivory: Race, Slavery and the Troubled History of America’s Universities* (New York: Bloomsbury Press, 2013). Brown University was one of the first to study their founding family’s ties to slavery: <https://slaveryandjustice.brown.edu/report>. In New Jersey, Princeton’s History Department has posted findings on their site: <https://slavery.princeton.edu/>. Rutgers produced an impressive multi-volume series of books: Marisa J. Fuentes and Deborah Gray White eds., *Scarlet and Black: Slavery and Dispossession in Rutgers History* vol. 1 (New Brunswick: Rutgers University Press, 2016). Subsequent volumes came out in 2020 and 2021. They also have a website: <https://scarletandblack.rutgers.edu/>.

the hardships and emotional turmoil African Americans experience, we can create a more inclusive society.” Another student suggested that “The study of these histories can lead to some answers about how embedded the issues of race are in the education system and even society today.” These are particularly important findings by students at a time when books and curricula on African American history are being banned and challenged across the US. Students understand that as a nation we must examine all our history in order to create a more equitable society going forward. In that spirit, one student found a trip to NJHS to be “empowering” because they were inspired to learn more about how the African American “community has refused to give into these efforts [to repress] and has instead fought to empower itself and others.”

Finally, one student who was grappling with the narrative of Peter Lee concluded on a personal note. They revealed, “Although slavery was a fact of life in that time, it is hard to comprehend that over a hundred years ago there was an enslaved man walking up and down the same Castle Point hill I take to class every day.” It is sometimes challenging to imagine the lives of Peter Lee and others who were enslaved in the very spaces where we live and work today. And yet, this is part of the job of history: to show us the unimaginable and nudge us to consider how to construct such narratives and how to repair the trauma they have caused. Maybe thinking about the people, named and unnamed, who built the cities and institutions where we now walk each day is a step toward repairing the debt we owe for their unpaid labor.

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