Crusader or Criminal? An Educated Look at Real Life Vigilantism

James Byng

First Colonial High School

Legal Studies Academy

Abstract

The beginning of the paper will focus on the introduction and statement of the thesis that I have for this paper. Then it moves onto the definition of what vigilantism is itself and if vigilantism itself is a crime at all. Next the paper will look at the history of vigilantism within the United States of America and how it exists within the modern day. After that it moves onto vigilantism within other nations in different continents and is followed by different court cases within the United States regarding vigilantism. Finally we look at the few state sponsored vigilantism examples and the conclusion.

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We’ve all seen it at one point or another. A corporation that is destroying the environment while the government remains passive towards their actions, a police officer who killed an unarmed man and is acquitted or never put on trial, a corrupt politician taking bribes from any number of sources, or it could be a city where crime grows out of control. What do all of these things have in common? Injustice growing and the forces that are supposed to ensure and protect citizens rights either can’t or won’t act.

Some citizens, however, are not willing to be complicit with injustice growing. These citizens may act as a group defending others on subway systems, they may act individually killing someone they believed had wronged them and the community, or they could be people who go out and look for trouble and draw out criminals. Whether they create a positive or negative force can be seen as inconsequential, because if a trend of citizens being able to enforce law and justice in lack of the law enforcement doing so, where does the line get drawn for what can be done?

Vigilantism throughout the United States threatens to undermine the power of the justice system in the United States by allowing the foundation of law enforcement itself to be questioned.

**Definition of Vigilantism**

To examine vigilantism in the first place, one must first have a firm grasp of what vigilantism actually is. This is where one comes to the first problem regarding vigilantism: there is not one unified definition. William Tucker (1985) puts it as, “A vigilante is someone who tries to enforce the law by breaking the law” (p. 27). While this definition works for some, not all agree with William Tucker's definition, Kelly Hine (1998) cites Professor William E Burrows who defines it as,

Classic vigilantes (1) are members of an organized committee; (2) are established members of the community; (3) proceed for a finite time and with definite goals; (4) claim to act as a last resort because of failure of the established law enforcement system; and (5) claim to work for the preservation and betterment of the existing system. (p. 1224)

In Encyclopedia of Crime and Justice Vol 2 it comments, “Vigilantism has been a label placed on so many different situations over the centuries that no precise definition can capture all its elements” (Dressler, 2002). Without a uniform definition, authors have come to their own conclusions as to what vigilantism is, and with everyone having their own conclusions on what vigilantism is it leads to difficulty studying the issue as a whole. For the purpose of this paper, vigilantism will be defined as any person or group that takes legal measures into their own hands administering what they view as justice (D. Evins, Personal communication, November 30, 2016).

With all of that laid out, one question remains about vigilantism: is it a crime? The answer remains in a legal limbo, while the act of vigilantism itself is not illegal through any federal or state legislation to do vigilantism requires the breaking of the law. Assault and Battery, false imprisonment, arson, and ultimately murder as well as manslaughter are all characteristics of vigilantism. Even legal protections for crimes such as murder are not easily covered under vigilante action.

According to the Virginia Good Samaritan Law, “Persons rendering emergency care, obstetrical services exempt from liability” meaning if you have good intentions doing something to help someone, you won’t be held liable of something goes wrong (Virginia Good Samaritan Law 2000). While this law allows for someone to not be held liable for numerous possibilities such as assisting someone giving birth or helping emergency services upon request, it does not help vigilantes who harm others in the name of justice (Virginia Good Samaritan Law 2000).

**History of Vigilantism**

The United States of America and vigilantism have coexisted together since the nation's inception all the way to modern times. While the methods, groups, and victims of vigilantism have all changed of the course of history the act stays strong no matter the time period.

**Vigilantism throughout the United States History**

**Colonial America.** One of the earliest accounts of vigilantism goes back to Colonel Lynch in Virginia. The Colonel had vigilance committees set up that would publically whip those that they viewed as a threat whether it was a substantial claim or not. A dichotomy existed with the members of the vigilance committees almost always being made up of males in the upper class and the victims were almost always those in the lower class. While whippings were what Colonel Lynch's groups mostly consisted of, as time moved forward the groups would take more extreme measures and began to hang those they thought as criminals, coining the term lynch mob (Dressler, 2002).

One of the earliest organizations in the United States that practiced vigilante justice has its roots in 1767 South Carolina. Gangs and other criminals caused constant problems for the locals; in response, the locals formed the Regulators and started a fight to restore order that would take two years to complete. While the Regulators were successful in their mission, their actions also prompted another group called the Moderators to rise up in effort to control the Regulators. The trend of a group starting for the cause of self-protection and escalating beyond continues throughout the history of the United States (Dressler, 2002).

**Old West.** The prospect of going westward as the people of the United States moved into the west, their beliefs went out west with them which included their vigilante spirit. Vigilance Committees were set up in areas where the arm of the law simply did not extend over. In San Francisco during the gold rush, a problem of crime erupted throughout the city. The locals responded with one the largest vigilance committees consisting of at least eight thousand members. It should be noted however that the vigilance committee had goals that expanded beyond simply stopping criminals and included oppressing Irish Catholics. Almost ten years later in Montana, thirty people were killed under the banner of vigilante justice ranging from outlaws to a corrupt sheriff compared to the four in San Francisco (Dressler, 2002).

San Francisco was only the third wave of such vigilante justice, which had been sweeping west going all the way back to 1830. As Jared Keller explains it,

The first wave was from 1830 to 1835, taking place mainly in Southern states like Alabama and Mississippi and dealing with horse-theft and counterfeiting. The second wave included vigilante activity in Iowa, east Texas, Illinois, and the Missouri Ozark during the early 1840s, addressing the shift in outlaw elements from the lower Mississippi River to the upper Mississippi and trans-Mississippi southwest after the 1830s campaign. The third wave – catalyzed by the famous San Francisco vigilante movement in the early 1850s – ran from 1857 to 1859, addressing violence on the advancing lawless frontier and including new vigilante movements in Iowa, northern Indiana Regulators, the San Antonio and New Orleans vigilantes, and the Comites de Vigilance of southwest Louisiana. (p. 87)

The fourth wave of vigilantism has its roots across the entire nation as opposed to more concretely in the west.

**Southern** **Reconstruction.** Just as the San Francisco vigilance committee, vigilante groups can have a motivation that extends beyond simple prosecution of wrongdoers in the groups eyes (Dressler, 2002). This fourth wave of vigilantism has one of the best example of this attributed to the Ku Klux Klan, who in fearing the loss of traditional American values from emancipation of black slaves in the south responded with violence against anyone who did not support them (Keller 2009 p 128). The power of the Klu Klux Klan expanded greatly in a short amount of time existing in states from Indiana to Colorado and 550,000 members in its prime (Keller 2009 p 128).

**Crime Wave of the 70’s-90’s.** The period of history ultimately led to two of the most important events in modern vigilante history, the emergence of possibly the most important vigilante groups in the modern day as well as a citizen receiving support for his vigilante action in a crime stricken area. The group the Guardian Angels formed with citizens not feeling safe on the subway and people making sure that it was safe. The organization formed after an increase of crime emerged during the late 60’s was starting to be known and the effects were becoming more apparent in cities from Kansas to New York. Ultimately the Guardian Angels would only react to crime, but a subset of the organization calling itself the Suicide Squad would actively seek out crime and become incredibly confrontational with others (Kenny 1987).

The other major event was the case of Bernhard Goetz, which will be covered later during the cases section of this paper.

**Vigilantism in the Modern Day United States**

As technology moved forward across the world, vigilantism moved forward as well and adapted to it. Just like contemporary vigilantism, cyber-vigilantism has a broad scope of definitions attributed to it so this paper will only cover a one of the examples of cyber-vigilantism.

**Hacktivism.** The advent of anonymity on the internet has led to some groups using hacking as a way to fight criminals on the internet. This can be done through releasing personal information such as names or IP addresses, having websites redirect web traffic to sources the group creates, and crashing websites entirely making it so that no one can access the sites. One of the most prominent groups responsible for hacktivism is the group Anonymous that has orchestrated hacking attacks on individuals and governments alike. The group has hacked websites such as the United States Sentencing Commission website in response to a man’s suicide, redirecting web traffic to a YouTube video. While this was conducted under what they called Anonymous Operation Last Resort, there were many more attacks Anonymous committed on both governments and individuals (Smallridge, Wagner, and Crowl 2016 p. 57-70).

Anonymous did not settle for attacking criminals in the government; however, they also directed their efforts towards criminals who were using the service TOR. Having a high level of anonymity, users of TOR could access a range of illegal products ranging from drugs to child pornography. It was the latter that had garnered action from Anonymous, in what was called Operation Darknet. This included committing actions such as removing links to pornography websites from other websites, committing distributed denial of service attacks on websites linking to child pornography, and ultimately releasing both the names and IP addresses of those who had access to child pornography. Even though the group does not have the same structure as a traditional vigilante group, by using their resources to make sure criminals face justice for their actions they show how the future of vigilantism could be conducted (Smallridge, Wagner, and Crowl 2016 p. 57-70).

It is not just the United States that has suffered from hacktivist attacks however; the Republic of India suffered an attack all the way back in the 1990s. Attacks upon the Indian Bhabha Atomic Research center resulted with information being lost by either being downloaded or deleted outright. The attacks were shortly after the nations of India and Pakistan declared themselves nuclear powers and in response the group Milw0rm conducted the hacks. While the example from Milw0rm is not a cohesive example of vigilantism as Anonymous has done, it still shows people ultimately going against governments which hurts the legitimacy of acts the government (Smallridge, Wagner, and Crowl 2016 p. 57-70).

**Vigilantism in Other Nations**

While the United States and its laws are the focus of this paper, it is important to not only understand vigilantism in other countries, but to also observe the similarities and differences between the United States and other nations.

**Africa**

Within the country of Niger, the ability for the state itself to enforce the law comes upon multiple obstructions as many factions try and gain power. Due to this vigilante groups have formed in efforts of both keeping stability and enforcing order. However, the motivations go deeper as the weapons the these groups are using come from many different sources such as oil companies and the government itself using vigilantes almost as an extension of their own power. Due to this many vigilante groups have become saturated with the amount of weapons they have, which leads to other problems. All of the weapons spread out cause the problem of difficulty in assessing which areas of Niger are in combat and which are not making peace efforts harder. These groups also having such a large number of weapons leads to the problems of increased militarization amongst groups leading to the opposite effect the groups wanted in the first place which was stability and order (Nyiayaana 2015).

**Asia**

Unlike many other examples of vigilantism, the people in the Philippines are instead of going against the government are attempting to aid them. Combating those who the people and police view as criminals, almost 2000 people have been killed in the name of cracking down on crime. The cause of this is thought heavily to rely on the new president of the Philippines Rodrigo Duterte who openly exclaimed his desire for the death of criminals. Regardless of the actuality of the people being killed being criminals, the death toll has showed little signs of slowing down or stopping (Taub 2016).

**Europe**

Fear has increased throughout Europe since the influx of Muslim migrants and refugees have arrived from the Middle East. Not wanting any crime to occur, the Slovakian political group Peoples Party-Our Slovakia has committed to making sure citizens of the eastern European nation is protected from any violent migrants. Deciding that the police themselves are not enough to deter the potential threat in their eyes, people are clearly showing the distaste they have with foreigners entering their land regardless of the number of them actually entering Slovakia compared to the rest of Europe. The plan includes having volunteer citizens “patrolling passenger trains to keep the ‘decent citizens’ of Slovakia safe from criminals and minorities” (Germanova, Dzhambazova and Bienvenu 2016).

**Latin/South America**

William Tucker (1985) comments on the reason vigilantes form as, “outbreaks of vigilantism have occurred when people were suspicious of corruption of generally disillusioned with law enforcement” (p. 28). This logic definitely holds true in the Mexican town of Nueva Italia where the authorities had lost their power from a vigilante group (Cantor 2014). Believing that the authorities had been corrupted by a drug cartel called the Knights Templar, the vigilante group disarmed the police using the town as a mere stepping stone to get to the cartels headquarters (Cantor 2014). Both the vigilante group and the Knights Templar cartel eventually came into open conflict within the town yet government forces did not intervene (Associated Press 2014).

**Court Cases**

Despite not being a crime in it of itself, many people have gone to court over committing an illegal act in the name of vigilantism. Through observing these cases, patterns and trends can be seen throughout acts of vigilantism.

**Bernhard Goetz**

A vigilante that emerged from a crime spike in the 1980’s, Bernhard Goetz shot men trying to mug him on his way home (Tucker 1985). Eventually turning himself in, Goetz was supported massively by citizens writing to him saying he did the right thing (Tucker 1985). While Goetz was eventually found not guilty for murder, he was arrested for a lesser charge possessing an unregistered firearm and this shows us ultimately how the future of vigilantism will shape the United States down the road (Chung 2011).

**George Zimmerman**

One of the most recent examples of vigilante justice that divided the nation was the case of George Zimmerman who was arrested after shooting a young African American male named Trayvon Martin that was beating on Zimmerman. As Zimmerman was a member of the neighborhood watch, killing a youth in the area was met with outrage from the community and the country at large. In his trial Zimmerman was eventually found to be not guilty despite the upset his actions caused across the United States (Rubin 2013).

The connections to vigilantism become more solidified when quotes from Zimmerman highlighting his reasoning for why he did the action. As stated by the Associated Press (2013) Zimmerman commented to a 911 dispatcher, “F------ punks. These a-------. They always get away." Anger and discontent at people getting away with crimes ultimately led to the death of a fellow citizen. Zimmerman was willing to take justice into his own hands for the greater good even if that meant killing someone (Associated Press 2013).

Not all people, however, view what he did as wrong and that Zimmerman was justified in killing Martin. Jennifer Rubin speaks about how Zimmerman’s charge of second degree murder simply would not be prosecutable here saying, “One has to prove beyond a reasonable doubt that Zimmerman was not simply a fool, a grandstander or even a racist” (Rubin 2013). Despite Zimmerman's act of vigilante justice, he was found not guilty as he qualified under the state of Florida’s self-defense definition (Alcindor 2013).

**San Jose Vigilante**

While Zimmerman’s case was divisive and garnered a publicized trial, Luis Ricardo Hernandez had a small response that would eventually end with a plea bargain never even going to trial (Fernandez and Preuitt 2013). Hernandez, who is known as the San Jose Vigilante, attempted to make a citizen's arrest upon a suspected serial burglar but the confrontation ended with the man, Chris Soriano, being killed (Trujillo 2013). Unlike the Zimmerman case, Hernandez never viewed what he died as the right thing, and this thought was shared with the family of the now dead Soriano, and thus he was charged with murder (Trujillo 2013). This should make the decision for Hernandez to not try and take this case into court and make a display by going to trial a logical alternative, instead deciding to take time in prison for four years if he would confess to the crime (Fernandez and Preuitt 2013).

**Jerome Ersland**

Perhaps being the direct contrast to the Zimmerman case, Jerome Ersland also attempted to use the self-defense excuse when he shot and killed one of two men who attempted to rob the store he worked at. When he shot the man, he chased the other out of the store, but then came back and made sure the man he already shot was dead. This provided a difficult dilemma as while Ersland was defending himself, the fact that he then shot the man again put it in a difficult situation. With self-defense claims there is a necessity for a danger upon Ersland’s life, ultimately leading to the interpretation of the jury. People ranging from members of the National Rifle Association to university professors weighed in on their opinions which went either in support of his conviction or support of an acquitting (Associated Press 2009).

The case has been compared to the Goetz case in the sense of the public’s support for the man who was in a difficult situation, and the sympathy for the victim who while did something wrong (Associated Press 2009). In the end Ersland was convicted for murder and eventually had contraband in prison. His case still stands as in important moment in the history of vigilantism and how the public feels about it.

**State Sponsored Vigilantism**

While there majority of vigilantism goes against the state or acts as an actor when the state does not have the power to enforce the laws, there are few cases in which the vigilante acts in unison with the state or the state is using the vigilantes. The two examples that were already covered were Niger vigilantes being armed by the government as well as multinational corporations that led to proliferation of weapons in the area and increased militaristic violence (Nyiayaana 2015). The other example goes back to the Philippines with President Duterte waging a war on crime not only with police but with individual citizens also participating in the mass killing of whom they perceive as criminals (Taub 2016). Both of these examples show how that even vigilante actions can be molded or influenced by the state.

However there are also examples of vigilantism closer to home in the state of Virginia. Within this state, we have things called special conservators of the peace which has the powers of the police with less training (Nakamura 2011). The ability of Special Conservators of the Peace include,

A special conservator of the peace shall have all the powers, functions, duties, responsibilities and authority of any other conservator of the peace within such geographical limitations as the court may deem appropriate within the confines of the county, city or town that makes application or within the county, city or town where the corporate applicant is located, limited to the judicial circuit wherein the application has been made, whenever such special conservator of the peace is engaged in the performance of his duties as such (Virginia State Police-Firearms-Conservator of the Peace).

Ultimately these Special Conservators of the Peace show the middle ground between vigilantism and the authorities. Just as there are complications with the legality of vigilantism, Special Conservators of the Peace have problems when dealing with interstate jurisdictions making it difficult to show what is legal and what is out of their powers. It also has complications arise as many of the Special Conservators of the Peace work directly for corporations making their judgment warped compared to those of normal police officers (Nakamura 2011).

**Conclusion**

One of the research points I had when writing this paper was examining the connection between terrorism and vigilantism and if there is one. The conclusion reached through that really depends on the observer’s viewpoint of who is in the right and who is in the wrong. While some may feel that the Philippines vigilantes killing people in the name of stopping crime at random to be terroristic actions and in the wrong, but others may believe that things like Niger vigilantes’ militaristic actions to be justified in face of the violence in the region.

Throughout the research for this paper, the evidence points into an interesting direction in regards to the thesis of this paper. As the thesis states, Vigilantism throughout the United States threatens to undermine the power of the justice system in the United States by allowing the foundation of law enforcement itself to be questioned. The research has pointed towards this being true in most regards. In the United States history vigilante groups have risen to power when the government could not protect them, therefore investing the power of enforcing law within the citizens of the nation not the actual foundations of government. Other nations, however, has shown how vigilantism can be used as both an ally to the state by having the Philippines president encouraging violence against a group and possibly manipulated by the state through arming vigilantes in Niger. Even within our own country Special Conservators of the Peace show a gray line between what constitutes state power and what is citizens or companies exploiting the system for their own benefit.

In conclusion, the power being moved from a state actor to other non-state actors has empirically shown degradation in the states power unless the vigilantes are specifically controlled by the state.

References

Alcindor, Y. (2013, July 14). George Zimmerman found not Guilty. Retrieved from http://www.usatoday.com/story/news/nation/2013/07/13/george-zimmerman-found-not-guilty/2514163/

Andersen, M. E. (2015, November 15). How Vigilante Justice Threatens all Justice. Retrieved from http://www.dailykos.com/story/2015/11/15/1444140/-How-vigilante-justice-threatens-all-justice

Associated Press. (2009, May 29). Killing Stirs Furious Debate over Vigilante Justice. Retrieved from http://www.nbcnews.com/id/31003987/ns/us\_news-crime\_and\_courts/t/killing-stirs-furious-debate-over-vigilante-justice/#.WEg3POArLnB

Associated Press. (2014, January 13). Mexico Vigilantes in Turf War with Drug Cartel. Retrieved from https://www.theguardian.com/world/2014/jan/13/mexico-vigilantes-turf-war-drug-cartel-nueva-italia

Candy, G. (2012). Conceptualizing vigilantism. *Focaal,* *2012*(64), 129-132. Retrieved December 13, 2016, from ProQuest Central K-12.

Cantor, M. (2014, January 13). Vigilantes Take Mexico Town in Fight With Cartel. Retrieved from http://www.newser.com/story/180619/vigilantes-take-mexico-town-in-fight-with-cartel.html

Chung, J. (2011, December 24). Bernhard Goetz On Death Of Man He Shot: "Sounds Like He Was Depressed" Retrieved from http://gothamist.com/2011/12/24/bernard\_goetz\_weighs\_in\_suicide\_of.php

Clay, N. (2014, April 14). Convicted Murderer Jerome Ersland Pleads Guilty to Possession of Contraband. Retrieved from http://newsok.com/article/3955377

Dressler, J. (2002). Vigilantism. In *Encyclopedia of crime & justice* (2nd ed.). Retrieved November 15, 2016, from http://www.encyclopedia.com/social-sciences-and-law/law/law/vigilantism

Dumsday, T. (2009). On Cheering Charles Bronson: The Ethics of Vigilantism. *The Southern Journal of Philosophy,* *47*(1), 49-67. Retrieved December 13, 2016, from ProQuest Central K-12.

Evins, D. (2016, November 30). Professional Interview [Telephone interview].

Fernandez, L., & Preuitt, L. (2013, April 16). San Jose "Vigilante" Killing Case Ends in Plea Bargain. Retrieved from http://www.nbcbayarea.com/news/local/SJ-Vigilante-Killing-End-in-Plea-Bargain-203304271.html

Filan, S. (2006, October 20). Vigilante Justice: So, is it Murder? Retrieved from http://www.nbcnews.com/id/15348726/

Germanova, M., Dzhambazova, B., & Bienvenu, H. (2016, June 10). Vigilantes Patrol Parts of Europe Where Few Migrants Set Foot. Retrieved from http://www.nytimes.com/2016/06/11/world/europe/vigilante-patrols-in-parts-of-europe-where-few-migrants-set-foot.html

Haas, N. E. (2010). *Public support for Vigilantism* (Doctoral thesis, Leiden University, 2010) (pp. 1-196). Zutphen: Wöhrmann.

Haas, N. E., De Keijser, J. W., & Bruinsma, G. J. (2012, December). Public Support for Vigilantism: An Experimental Study. *Journal of Experimental Criminology,* *8*(4), 387-413. http://dx.doi.org/10.1007/s11292-012-9144-1

Hine, K. D. (1998). Vigilantism Revisited: An Economic Analysis of the Law of Extrajudicial Self-Help or why can't Dick Shoot Henry for Stealing Jane's Truck? *American University Law Review,* *47*(5), 1221-1254. Retrieved from http://www.aulawreview.org/pdfs/47/47-5/hine.pdf

Keller, J. (2009). *Pax Vigilanticus: Vigilantism, Order, and Law in the Nineteenth Century American West* (Unpublished master's thesis). Wesleyan University. Retrieved from http://wesscholar.wesleyan.edu/cgi/viewcontent.cgi?article=1241&context=etd\_hon\_theses

Kenney, D. J. (1987). *Crime, fear, and the New York City Subways: The role of citizen action*. New York: Praeger.

Kopel, D. B. (1992). *The Samurai, the Mountie, and the Cowboy: Should America Adopt the Gun Controls of Other Democracies?* Buffalo, NY: Prometheus Books.

Leslie Slape, & The Daily News. (2009, December 22). Police Warn Against Vigilantism in wake of Bow and Arrow Incident. Retrieved from http://tdn.com/news/police-warn-against-vigilantism-in-wake-of-bow-and-arrow/article\_9a825b10-ef66-11de-a34a-001cc4c002e0.html

Nakamura, D. (2011, June 26). Virginia 'Conservator of Peace' Program Flawed, Some Say. Retrieved from https://www.washingtonpost.com/local/dc-politics/virginia-conservators-have-police-powers-raise-questions-in-the-washington-area/2011/06/15/AGfA6XmH\_story.html?utm\_term=.ffeaf9c5566a

Neely, R. (1990). *Take Back Your Neighborhood: A Case for Modern-Day "Vigilantism"* New York: D.I. Fine.

Newby, B. (2012). Watchful Guardian or Dark Knight? The Vigilante as a Social Actor. *International Foundation for Protection Officers,* 1-12. Retrieved from http://www.ifpo.org/wp-content/uploads/2013/08/Newby\_Vigilante.pdf

Nyiayaana, K. (2015). Arming Community Vigilantes in the Niger Delta: Implications for Peacebuilding. In J. I. Lahai & T. Lyons (Authors), *African frontiers: Insurgency, governance and peacebuilding in postcolonial states* (pp. 131-141). Farnham, Surrey: Ashgate Publishing Limited.

Rubin, J. (2013, July 5). Zimmerman’s Prosecution: Vigilante Justice? Retrieved November 21, 2016, from https://www.washingtonpost.com/blogs/right-turn/wp/2013/07/05/zimmermans-prosecution-vigilante-justice/?utm\_term=.07b1ba653606

Salonga, R. (2013, January 3). San Jose: Vigilante who Shot Man Suspected of Burglaries Charged with Murder. Retrieved from http://www.mercurynews.com/2013/01/03/san-jose-vigilante-who-shot-man-suspected-of-burglaries-charged-with-murder/

Smallridge, J., Wagner, P., & Crowl, J. N. (2016). Understanding Cyber-Vigilantism: A Conceptual Framework. *Journal of Theoretical & Philosophical Criminology,* *8*(1), 57-70. Retrieved December 13, 2016, from ProQuest Central K-12.

Taub, A. (2016, September 11). How Countries Like the Philippines Fall Into Vigilante Violence. Retrieved from http://www.nytimes.com/2016/09/12/world/asia/the-philippines-rodrigo-duterte-vigilante-violence.html?\_r=0

Tucker, W. (1985). *Vigilante, the Backlash Against Crime in America*. New York: Stein and Day.

Virginia "Good Samaritan" Law, VA Code § 8.01-225 (2000).

Virginia State Police - Firearms - Conservator of the Peace. (n.d.). Retrieved from http://www.vsp.state.va.us/Firearms\_Conservator.shtm

Wadman, R. C., & Bailey, S. E. (1993). *Community Policing and Crime Prevention in America and England*. Chicago, IL: Office of International Criminal Justice, University of Illinois at Chicago.

The Washington Times. (2007, May 18). Vigilante Justice Fills Law-And-Order Vacuum. Retrieved from http://www.washingtontimes.com/news/2007/may/18/20070518-113952-8508r/

Wilson, J. Q. (1983). *Crime and Public Policy*. San Francisco, CA: ICS Press.