PLAIN DRESS IN THE DOCKET: LILLIAN RISSER, THE PENNSYLVANIA GARB LAW, AND THE FREE EXERCISE OF ANABAPTIST RELIGION, 1908–1910

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ABSTRACT: In 1895 Pennsylvania passed the so-called "Garb Law" prohibiting public school teachers from wearing religiously distinctive clothing. Although aimed at Catholic nuns in western Pennsylvania, the law was first enforced in Lancaster County against plain-dressed Mennonite and Brethren school teachers. The 1908 prosecution of Mennonite Lillian Risser and the school board that hired her was the first case to test the law. Although the district court ruled in Risser's favor, the Superior and Supreme Courts reversed that judgement and upheld the Garb Law, drawing on the precedents provided by John Banister Gibson, a prominent antebellum Pennsylvania Supreme Court justice whose legal legacy had produced a remarkably narrow view of religious free exercise. Risser's legal challenge remains an important episode in the ongoing debate over the boundaries of religious liberty in Pennsylvania. It also recalls an early example of legal engagement on the part of Pennsylvania's plain people.
KEYWORDS: First Amendment, religious liberty, clothing, Mennonites, Church of the Brethren

In spring 2021 the Pennsylvania Historical and Museum Commission erected a state historical marker in Cambria County to recognize the 1894 court case *Hysong v. Gallitzin School District*, considered to be a significant religious liberty ruling. The *Hysong* judgment held that public schools could not dismiss teachers, in this case, members of the Sisters of Saint Joseph, on the basis of religion. Employed to teach the standard public school curriculum in the

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borough of Gallitzin, the sisters could not be fired just because their presence offended some Protestant parents. Stories about the new marker acknowledged that the legal victory in 1894 had been short-lived. The following year the state legislature passed the so-called Garb Law, which forbade public school teachers from wearing religiously specific clothing at school, thereby prompting the sisters to withdraw from Commonwealth classrooms. Several stories also mentioned that the Garb Law sparked a wave of imitation, as nearly two dozen states from coast to coast later enacted policies patterned on Pennsylvania's.[1]

Although a product of nineteenth- and early twentieth-century Nativism and anti-Catholicism, which were endemic across the nation, the Garb Law was also a distinctively Pennsylvania phenomenon in its deployment and longevity. Despite being aimed initially at Catholic nuns in the western part of the state, the law was first enforced against plain-dressing Mennonite and Brethren teachers in Lancaster County.[2] These Anabaptist communities, in turn, despite their traditional reticence to engage political and judicial systems, defended Lillian Risser, a Mennonite teacher who wore her plain dress and head covering in the classroom. Given that Pennsylvania had the largest concentration of Anabaptists in the United States (a distinction it still holds), the fact that the Garb Law was first tested in this sort of community is perhaps not entirely surprising.[3] But the litigation does demonstrate the seriousness with which civic leaders took the crusade against religious clothing, expanding the law's scope beyond nuns. The legal rationale that the Commonwealth's Superior Court then used in upholding the law was equally distinctive and drew on the exceptional precedents provided by John Bannister Gibson, a member of the Pennsylvania Supreme Court from 1816 to 1853, and the chief justice for twenty-four of those years. Gibson's philosophy and legal legacy produced a remarkably narrow view of religious free exercise in Pennsylvania that legitimated the Garb Law.

The Pennsylvania Garb Law is still on the books (2022) and figured not long ago in the termination proceedings against a Muslim teacher whose religiously informed clothing ran against her public school district's dress code.[4] The story of Lillian Risser's legal challenge to the law in 1908–10 thus remains an important episode in the ongoing and unsettled debate over the boundaries of religious liberty and whether such liberty extends beyond abstract beliefs and liturgical practices to religion as expressed in embodied ways of life. It also recalls an early and often forgotten case of political and legal engagement on the part of Pennsylvania's plain people.

ORIGINS AND IMPLICATIONS OF THE PENNSYLVANIA GARB LAW

Efforts to restrict religiously distinctive dress in Pennsylvania public schools initially grew out of anti-immigrant and anti-Catholic sentiment. Given the historic role of common school education in creating and fostering a broadly Protestant civic identity, public education was often a site of conflict between the cultural custodians of American identity and newer arrivals, such as Roman Catholics, Jews, and sectarian Protestants uncomfortable with the public promotion of a generic religiosity.[5]

Rather than simply pushing back against the power of the public schools, some immigrant community leaders tried to harness and work with the system. Such was the situation in Gallitzin, Pennsylvania, where Catholic parents on the local school board hired six Sisters of Saint Joseph, a Roman Catholic religious order, as teachers.[6] The sisters had lived in their convent near Ebensburg, Cambria's county seat, since 1869, following their immigration from France. By the early 1890s nativist agitation resulted in a local lawsuit in which two Protestant families sought to have the sisters removed as teachers.[7] In 1894, on appeal, the Pennsylvania Supreme Court ruled in favor of the nuns, noting that it would be unconstitutional to bar someone from public employment simply because the teacher "holds a particular religious belief" since no "religious test as a qualification for office" was allowed under the state or national constitutions.[8] Moreover, there were no laws barring students from addressing teachers with the honorific title "Sister," or stopping teachers from wearing their religious habits. This ruling is the one honored with the recent state historical marker.

Unhappy with the high court's decision, the Republican caucus within the state legislature responded the following year by crafting a law to exclude the sisters indirectly. If the state disallowed religious garb in the classroom, it would create conditions under which the nuns would find teaching so unpalatable they would quit. By not naming Catholics specifically, the legislation could appear neutral on the surface, yet still achieve its purpose. Thus, the bill introduced by House member Robert Smith stipulated that "no teacher in any public school of this Commonwealth shall wear in said school or whilst engaged in the performance of his or her duty as such teacher any dress, mark, emblem, or insignia indicating the fact that such teacher is a member or adherent of any religious order, sect, or denomination."[9]

Whether all of the bill's supporters understood that their legislation would have an impact beyond the Catholic sisters is unclear. At one point,

a person lobbying for the bill promised it would not affect Protestants such as Brethren or Mennonites because their distinctive dress was merely "a custom" and not a practice imbued with religious significance.[10] The state's Anabaptists, however, saw things quite differently. For them, plainness in dress and demeanor was a matter of corporate church discipline and personal piety, inseparable from the "nonconformed, nonresistant faith" embraced by various branches of these churches.[11] Members of these churches had participated in the Pennsylvania public school system as pupils, teachers, and school-board members since its inception in the 1830s and had done so while maintaining their sartorial simplicity.[12]

Given the large number of plain Anabaptists in Pennsylvania, the garb bill's impact would be significant, as Mennonite and Brethren leaders even outside the Keystone State understood. "From the standpoint of religious liberty, it smacks pretty strongly of old-time Puritanic intoleration," opined John F. Funk, a Mennonite minister who published *Herald of Truth* in Elkhart, Indiana, when he heard about the proposal. He was especially concerned that female teachers would need to remove the "prayer head covering so as to conform to the law."[13] Henry B. Brumbaugh, a Pennsylvania-based writer for the Brethren *Gospel Messenger*, which was issued in Mount Morris, Illinois, shared Funk's concerns. "Will the [Pennsylvania] lawmakers . . . say that no one who dresses in harmony with the teachings of the Bible be allowed to teach in our public schools?" Brumbaugh asked. "Shall the latest styles and fashions of the world be exalted in preference above the plain and modest apparel taught in . . . Scripture?"[14]

Meeting in Lancaster County in the spring of 1895 as the bill worked its way through legislative committee, Mennonite bishops from several Susquehanna Valley counties prepared a "protest" against the proposed legislation since it would "place many teachers in an unpleasant circumstance of being unable for conscience sake to obey such a law."[15] Having drafted a memorial to state legislators, nearly 100 plain-dressed Mennonites and Brethren then took the train to Harrisburg to carry their remonstrance to the capitol. Augustus G. Seyfert, a member of the House of Representatives from Lancaster County, proved sympathetic to his constituents' concerns. Ordinarily, as a member of the Republican majority that dominated the state's government for most of the decades after the Civil War, Seyfert would have been a productive ally. On this issue, however, he was unable to drum up support from fellow caucus members since Nativism and "anti-Romanism" were central tenets of the state's GOP at the time, and the Garb Law resonated with the party's

constituency.[16] In the Senate the only Republicans to vote against the bill were Seyfert's two Lancaster County colleagues, likely also swayed by the trainload of plain people who had descended on Harrisburg.[17] With its future never seriously in doubt, the bill easily cleared the General Assembly and Republican governor Daniel Hastings signed it into law on June 27. The Sisters of Saint Joseph then withdrew from their Gallitzin classrooms. Thereafter, a number of them moved west and started a parochial school in Beaver County, Pennsylvania.[18]

Like the Sisters of Saint Joseph, plain Anabaptist teachers, and especially women, now faced a choice between their jobs and their understandings of what their faith required of them. As Stephanie Grossnickle-Batterton has shown, the law's pretense to religious neutrality was matched by its pretense to gender neutrality.[19] Although it applied to all teachers, it was Catholic women religious who had been in the legislature's sights. Indeed, women were the vast majority of teachers across the state, including in the communities populated by plain Anabaptists, and the law's impact seems to have been fairly direct on them. An 1896 *Lancaster Inquirer* piece listing the whereabouts of teachers from the previous school year included a host of typical Mennonite and Brethren surnames among those no longer in the classroom. For example, readers learned that Elizabeth Esbenshade of East Lampeter Township had "quit teaching on account of the enactment of the garb law."[20] Other former teachers were listed simply as now "at home."

At the same time, the highly localized nature of school administration and school boards' close relationships with their rural townships apparently injected some inconsistency into the law's implementation, as the experience of Elizabeth Myer suggests. Born in Upper Leacock Township, Lancaster County, to Brethren parents, Myer converted in 1886 at age twenty-three, joining the Bareville (Conestoga) Brethren church, and began dressing plainly. A schoolteacher, Myer was also taking classes at Millersville Normal School and graduated in 1887, apparently the first female Brethren church member to do so.[21] Myer seems to have continued teaching after 1895, despite the Garb Law, suggesting that in the absence of objection she and her school board were ignoring it.[22] Still, the uncertainty the new law cast over her occupational future may have factored into her choice to leave the public schools when a committee of Brethren churchmen invited her to become the first full-time faculty member at a new private academy they were chartering in 1899 as Elizabethtown College in northwest Lancaster County.

Some details surrounding the college's founding, including debates over exactly how it would be construed as a Brethren school, are obscured by incomplete minutes and behind-the-scenes conversations. But clearly, the group that ended up launching the college included advocates of traditional Anabaptist nonconformity and Elizabeth Myer's plainness, coupled with her academic skills, matched the board's ideals.[23] For Myer, a private Brethren school would allow her to teach without worrying about being turned out of the classroom by the Garb Law.[24]

THE CASE OF LILLIAN RISSER

Like many late-nineteenth-century educational facilities, Elizabethtown College was a modest enterprise with a small number of local students enrolled in two-year Bible, commercial, "English-scientific," or music courses of study. One of the students in the English-scientific (i.e., liberal arts) program was Lillian H. Risser, a Mennonite from Bellaire in southwestern Lebanon County. Risser was also a teacher in Mount Joy Township, Lancaster County, not far from Elizabethtown. At the time, rural school boards typically filled teaching positions by inviting young women who had excelled in school to take the county school superintendent's teaching examination. Candidates who passed that test could be hired without further training, although some of them simultaneously took classes at a state normal school or a private academy. Described by peers as "a modest, unobtrusive young lady," Risser had been teaching at least as early as 1906 while also enrolled at Elizabethtown College, which offered a congenial environment for a plain woman student, given Elizabeth Myer's influential presence on campus. Risser graduated from Elizabethtown in June 1908.[25]

Shortly before graduation, however, Risser's teaching career became entangled in legal controversy and she found herself in the middle of the first court case to test the state's Garb Law. Remarkably, despite being on the books for a dozen years, the Pennsylvania Garb Law had not, until then, met a school board or teacher determined enough to provoke a test case.[26]

In February 1908 Risser was teaching at Wheatland School, a brick, one-room schoolhouse three miles northeast of Elizabethtown, when a local taxpayer, Ananias W. Garman, brought a complaint to the local magistrate, John H. Eppler.[27] Risser was in violation of the state's Garb Law, the

complaint contended. As a Mennonite, she wore, as a newspaper put it, "the distinctive garb prescribed for members of that faith."[28] It is unclear whether Risser, then twenty years old, had recently been baptized and adopted plain dress, or whether she had been dressing plainly for some time and the complainant had only become aware of her practice.

Technically, the complaint was against the township school board, which had "permitted a woman to teach in their schools who, by her dress . . . gives evidence of her religious belief."[29] But in practical terms, the complaint centered on Risser and her appearance. Still, the role of the school board in the ensuing case was far from immaterial. The board was comprised of six men, at least three, and perhaps five, of whom were members of local Mennonite and Brethren churches.[30] Moreover, Risser's uncle, Amos R. Herr, was the board president. He and the other Mennonite board members worshipped at the so-called Risser's Meetinghouse, one of three that formed a circuit of meeting places for Mennonites in the area.[31] The location of the Risser Meetinghouse, a stone's-throw from the Wheatland schoolhouse where Lillian Risser taught, suggests the multibonded nature of the Mount Joy Township Anabaptist community. Although it is highly unlikely the board set out to test the law—that kind of legal strategy was not in the mindset of plain Anabaptists at the time—it is perhaps not surprising that the board, in this community, chose to mount a defense when challenged. Unlike the teachers in 1895 who had stepped down in the wake of the Garb Law's passage, Lillian Risser did not resign.

In April a grand jury endorsed the charges and sent the case to the Lancaster County Court of Quarter Sessions. The local district and assistant district attorneys argued for the state and the Garb Law. In their corner, Risser and the Mount Joy Township school board had an unusual resource in Lancaster attorney Isaac R. Herr—another of Lillian Risser's uncles—who was almost certainly the first Mennonite lawyer in Pennsylvania, if not the nation.[32] Although Herr did not directly provide his niece's defense, he seems to have arranged representation from his friend, former state attorney general William U. Hensel.[33] In addition to being Herr's colleague, Hensel was one of Lancaster's few prominent Democrats and may have also had an interest in taking down the GOP's Garb Law.

On June 16, 1908, the two sides squared off before District Judge Charles I. Landis, a man who seemingly took pride in his Mennonite ancestry but was a member of the fashionable St. James Episcopal Church in Lancaster

City.[34] The state took a matter-of-fact approach, calling for enforcement of a law that the defendants had clearly broken, and insisting that "every semblance of sectarianism must be removed from the school system." Hensel, in contrast, sought to "quash the indictment" with "an elaborate argument to prove the unconstitutionality" of the law, a law Hensel called "ill-considered, unnecessary, and mischievous." He grounded his argument historically, contending that the Garb Law was "at variance with the spirit of tolerance and religious freedom in which this state [of Pennsylvania] was founded." He was delighted, he told Judge Landis, that the first test of the Garb Law had surfaced in Lancaster County "where of all sections of the state this spirit of religious liberty and tolerance has been vividly illustrated" by denominational diversity. Hensel combined this appeal to local pride with a dramatic reading of the state Bill of Rights (article 1, section 3) in which "no human authority can in any case whatever control or interfere with the rights of conscience."[35] The defendants had done nothing illegal, he asserted, because the law under which they were charged was wholly illegitimate.

Two months later, on August 15, Judge Landis issued his verdict, accepting Hensel's argument and declaring the Garb Law unconstitutional. Since "under the [state] constitution, no person is disqualified on account of his or her religious sentiments from holding any place of trust or profit under the Commonwealth, the legislature had no power to abridge this constitutional right," Landis wrote, "and it follows that the act of Assembly . . . is nugatory and void." The legislature might have the power to prescribe a dress code for teachers, Landis averred, provided it also respected conscience. Instead, Landis pointed out, the General Assembly had done the opposite: prescribing nothing and proscribing only religious garb. The result was necessarily unconstitutional. "A teacher may cover himself with partisan political badges or herself with the white ribbons of crusading Prohibitionists," Landis wrote. He or she "may dress as a fop or flirt or masquerade as a clown" or "display badges of Free Masonry . . . or Knights Pythias" and in doing so is said to be exercising the right of free association. But "if they don the plain skirt and the straight bonnet of the Mennonites or wear the straight coat and shaven upper lip of the Dunker, or the buttonless garb of the Amish, they are banished into outer professional darkness and stripped of their office and their rights."[36]

Crucially, with this line of reasoning Landis had accepted Anabaptist dress as a legitimate component of religious expression, behavior so intertwined

with belief that it could not be separated from the "sentiments" protected by the Constitution, even if others saw them as incidental. Here he seemed to anticipate what legal historian Michael McConnell describes as an interpretation of the free exercise clause, uncommon until the 1960s, that saw the clause guarding minority religious practices from "majoritarian presuppositions, ignorance, and indifference."[37]

Cheered by the courtroom victory, the Mount Joy Township school board sent Risser back into the classroom for the upcoming school year. Yet matters were not as settled as they appeared. Judge Landis's ruling had attracted attention both locally and further afield. The judgment made the front page of the *New York Times*, for example.[38] Closer to home, debate over the Garb Law spilled across the pages of Lancaster's *Daily New Era*. Defending plain dress was Elder George Bucher of the Mechanic Grove Church of the Brethren near the Lancaster County town of Quarryville. Championing the law and challenging the claim that dress was a meaningful measure of spirituality was Rohrerstown pastor Francis W. McGuire of the Church of God (Winebrenner).[39] The most significant reaction to the case, however, came from the Junior Order of American Mechanics, a national patriotic organization with a nativist agenda.

In mid-September 1908, a month after Judge Landis's ruling, the Pennsylvania state chapter of the Mechanics gathered in Lancaster City for its annual parade, members' meeting, and evening ball. Following a keynote address on the need to ban immigration from Japan because of "the bad character of the people of that race," the Mechanics "decided to do all in their power" to overturn Judge Landis's ruling. Without the Garb Law, the state's schools were open to pernicious influences, from Catholic nuns to Anabaptist pacifists; the Mechanics appropriated $1,000 for an appeal to the state's Superior and Supreme courts.[40]

In response, Elizabeth Myer, the plain-dressed professor at Elizabethtown College, swung into action, soliciting funds for Risser's defense from "the many friends of Elizabethtown College, as well as the citizens of our Commonwealth who believe in religious freedom." Myer set out "to raise a fund of no less than $500 to pay the costs of testing this case in the [state Superior Court]," directing college alumni and Brethren church members to "send your contribution to H. K. Ober," a well-known Church of the Brethren minister who was also the treasurer of the college.[41] The battle over the Garb Law was far from concluded.

THE LIMITS OF FREE EXERCISE IN PENNSYLVANIA

On November 13, 1908, the Superior Court of Pennsylvania, sitting in Philadelphia, heard the appeal of the case. William Hensel again represented the township school board and Risser, while the Junior Order of American Mechanics' lawyer, Alexander DeHaven, challenged Judge Landis's decision. The state Superior Court was still a relatively young entity, having been created during the administration of Daniel Hastings, the governor who had signed the Garb Law, and most members of the Superior Court bench were still Hastings's appointees, including Charles E. Rice, who presided at the appeal.

Rice's decision did not come down until the following July, and when it did it took Landis's 1908 ruling apart piece by piece, relying on the distinctive interpretative history and precedent around free exercise that prevailed in Pennsylvania. As legal historian Michael McConnell has shown in his study of American understanding of free exercise of religion, Pennsylvania's judicial precedents in this realm were unique and shaped by antebellum Chief Justice John Bannister Gibson.[42] Gibson had championed legislative supremacy, rejected the concept of judicial review, and followed Thomas Jefferson's narrow definition of religion that had profound implications for understanding the Constitution's free exercise clause.

Both the national and Pennsylvania bills of rights limited government's ability to establish religion and to interfere with individuals' free exercise of religion.[43] Just how religion might be exercised, and thus protected, however, hinged on the definition of religion. One view, drawing on the notions of John Locke and Thomas Jefferson, held that the state could not limit the exercise of religion because true religion consisted of private beliefs and thus was beyond the state's ability to evaluate, much less control. In contrast, a position articulated by James Madison recognized a public dimension of religion via the behaviors that flowed from beliefs. For Madison, religion was exercised not just in the mind but through one's conduct, and the constitutional protection of free exercise stemmed from the state's inability to predetermine what faith might entail for the believer.[44]

Although neither Hensel nor Landis cited Madison, their argument and judgment reflected Madisonian assumptions, assumptions shared by the communities caught up in the garb case. As Brethren Elder Henry Brumbaugh had put it in 1895, since plain Anabaptists placed a premium on lived religion, they "exemplify their religion in their garb as [much as] in their

actions, dealings, conversation, or any other way."[45] Judge Landis had agreed, accepting that dress was a constituent aspect of Risser's daily devotion. Thus, even if the state had an interest in establishing a dress code for teachers, it needed to grant an exception for religious dress. Since it had not done so, the entire Garb Law, which focused only on religious dress, was indefensible.

Superior Court Judge Rice, however, drawing on John Bannister Gibson's jurisprudence, accepted none of those assumptions or arguments.[46] Rice framed the decision to uphold the Garb Law within the Gibsonian tradition of extreme judicial restraint and began by chiding Judge Landis for thinking that he could find a law unconstitutional when he should, instead, recoil from judicial review.[47] Rice then invoked Gibson (and Jefferson) directly, defining religion in entirely private, cerebral terms as "a right to worship the Supreme Being according to the dictates of the heart, to adopt any creed or hold any opinion whatever on the subject of religion." Since the Garb Law was "directed against acts, not beliefs," it contravened no protected right of religious freedom, Rice insisted.[48]

Rice supported this interpretation with a number of antebellum Pennsylvania Supreme Court decisions that laid out a distinctly narrow understanding of religion and its minimal sphere of exercise. Among these were Gibson rulings that discounted a prospective juror's religious objection to capital punishment and a judgment that required Jews to appear in court on Saturdays. The latter case expressed Gibson's position that while belief *about* the Sabbath was protected, the *practice* of Sabbath was not, and Rice applied the same distinction to the Garb Law. Simply put, actions or refusal to take an action "for conscience sake" was not a right of free exercise, but a matter of privilege in the hands of the legislature, which alone could determine what is and is not "prejudicial to the common weal." It followed, then, that "the right to wear a particular garb is not absolute and free from legislative control" because dress did not fall under his definition of religion. Plain garb "may be dictated by the religious sentiments of the teacher," Rice granted, but it was only those sentiments that were protected, not action flowing from them. The Garb Law was an unassailable expression of the legislature's will. The school board could not flout it, and Lillian Risser had no claim of protected conscience when she wore a plain bonnet.[49]

Back in Lancaster, the *Intelligencer Journal* (editorially aligned with attorney Hensel), could not hide its astonishment at the ruling, adding its expectation that "many Mennonites and Dunkards employed in our country schools" would now lose their jobs.[50] For its part, the rival *New Era*, which

supported the law but had plain Anabaptist readers, tried to thread the needle, admitting it was ironic that, were plain-clothed William Penn alive, he would find himself unwelcome in Pennsylvania schools, but quickly circled around to the importance of order and obedience: "The law as it is interpreted must be obeyed" and "we should all conform to the law."[51] Indeed, there seemed to be little recourse for Risser and the school board. The state Supreme Court reviewed Superior Court decisions, but in a largely perfunctory manner, as Hensel seemed to recognize. Invited to address a large Brethren gathering at Elizabethtown College, Hensel praised "the 'sect' people in Lancaster county" for standing up for the rights of conscience, and he slammed the "unjust discrimination of the so-called Garb Law." But he did not seem to hold much hope that Rice would be reversed.[52]

Indeed, in mid-May 1910, the Pennsylvania Supreme Court sustained Judge Rice's opinion with little elaboration.[53] Again, the *Intelligencer* groaned that the ruling "hits the 'plain people' . . . the Mennonites, the Dunkards, the Amish and others."[54] To prove its point, the paper shared the story of a Mennonite teacher, Lydia Miller, of Franklin County, who had resigned because of the Superior Court ruling. The school board accepted her departure only "reluctantly," the paper reported, "regarding Miss Miller as one of the most efficient teachers in its service."[55]

The legal denouement played out quickly and undramatically. That summer, Lillian Risser's name was not listed among the Mount Joy Township schoolteachers hired for the fall 1910 term.[56] In November the township school-board members traveled to Lancaster City to "place themselves upon the mercy of the court." They received suspended sentences and Risser's teaching license was revoked, as stipulated by the law. "This means an end of this prosecution," the *Intelligencer Journal* announced, "but the result will be that no school board in the county can employ . . . plain people."[57]

LEGACIES OF CHANGE AND CONTINUITY

The staying power and legacies of the Garb Law were more varied than the *Intelligencer* imagined. Anecdotal evidence suggests that, while there was something of a withdrawal (again) of plain Anabaptist women from public school teaching, in some places they returned to the classroom by midcentury, apparently under the same sort of localized accommodation that had allowed Elizabeth Myer to teach for a few years after 1895 or Lillian

Risser before 1908.[58] Mennonite and Brethren young men had an easier time since their weekday clothing (as opposed to their plain suits worn only on Sundays) differed little from that of their non-Anabaptist male peers. Indeed, in fall 1910 when the Garb Law excluded Risser from teaching, one of the new teachers Mount Joy Township hired (for its high school) was Mennonite Henry F. Garber.[59]

For a couple of reasons, the Garb Law became less of a practical concern for Pennsylvania's Anabaptists by the mid-twentieth century. Beginning in the 1930s, the rise of parochial schools, first in Lancaster County and among Mennonites and Amish, rendered the Garb Law irrelevant, since private schools operated beyond its bounds.[60] Those parochial schools appealed to the more conservative wings of the Anabaptist community. For other Brethren and Mennonites, the Garb Law became less problematic because they themselves gradually began to shed distinctive dress, a complex development that curiously was also illustrated in the life of Lillian Risser. Following the premature conclusion of her teaching career, Risser took a job at the Hager Department Store in Lancaster City, working in and eventually managing its "plain goods" department. Although Hager aimed for middle-class consumer taste, on one of its upper floors it catered to a plain clientele, selling men's coats without lapels, as well as women's bonnets, serviceable black shoes and stockings, and so forth. Risser filled that role until she retired in 1962 at age seventy-five.[61] By that time, she had become involved in another conflict involving plain dress. This time it was not with state authorities prohibiting her garb, but with the bishops of her church whom she believed were insisting on ever more specific clothing details that discouraged potential church members. Although personally devoted to plainness, she "experienced an increasing hassle with the dress code as applied to nonethnic converts" at the Mennonite mission on Vine Street, where she related to young women from Lancaster City's south side who felt they could not live up to the bishops' expectations.[62] In response, during the 1940s Lillian and her husband, Jonas Ebersole, were instrumental in organizing Monterey (later known as Forest Hills) Mennonite Church, in which dress requirements would be less rigid. She remained a member until she died, in May 1988, approaching age 101.[63]

The most striking legacy of the 1910 Pennsylvania Superior Court ruling upholding the Commonwealth's Garb Law, however, has been the persistence of the law itself. The statute lived on and was copied by other states, though all of those jurisdictions later repealed their legislation (the last three to do so were North Dakota in 1998, Oregon in 2010, and Nebraska in 2017). In

contrast, the Pennsylvania General Assembly incorporated the law into Act No. 14, the Public School Code of 1949, where it still exists as section 1112. Nor did it retire into unenforced oblivion. As recently as 1990, Alima D. Reardon, a Muslim teacher who wore a head covering and long, flowing dress when in public, lost her legal challenge to the Pennsylvania Garb Law.[64]

On the larger legal issues of free exercise, Pennsylvania's practice is now less distinctive than it once was—the persistence of the Garb Law notwithstanding—given the incorporation doctrine by which the federal Bill of Rights is applied to all states. The narrow interpretation of free exercise crafted by John Bannister Gibson had to yield, after 1940, to the US Supreme Court's recognition of religiously motivated conduct within the sphere of the free exercise clause.[65] The highwater mark of such expansion, according to Michael McConnell, was the decade 1963 to 1972.[66] Although the Amish school case, *Wisconsin v. Yoder* (1972), was one of several rulings that redefined the boundaries of religious freedom in the United States, the free exercise of Anabaptist religion had, by the turn of the twenty-first century, largely come to rely on legislative exemptions rather than constitutional rights. Distinctive practices tied to contemporary plain churches that have been sources of legal conflict—rejection of Social Security, driving steel-wheel tractors on public roads, and allowing minors to work in family businesses, among other flash points—have more often found resolution through negotiation with state and federal legislators than through the courts.[67]

News stories accompanying the recent historical marker recognizing the 1894 *Hysong v. Gallitzin School District* case often suggested that ordinary Pennsylvanians were incredulous upon learning that a religious Garb Law was still on the books. Nevertheless, repeal has been oddly elusive.[68] During the 2010s, Representative Will F. Tallman (R–Adams/Cumberland counties) regularly sponsored legislation to repeal Act 14's section 1112, but the bills always stalled in committee or otherwise never made it to a vote by the full chamber or by the state Senate.[69] Since Tallman's retirement at the end of 2018, the effort to repeal the Garb Law has been led by Representative David S. Hickernell (R–Lancaster/Dauphin Counties), whose legislative district includes a portion of the school district where Lillian Risser once taught.[70] Time will tell, but Risser and Judge Landis may yet have the last word.

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NOTES

1. E.g., Mark Pesto, "Gallitzin Historical Marker to Commemorate 1894 Court Case," *Johnstown (PA) Tribune-Democrat*, March 10, 2020, https://www.tribdem.com/news/gallitzin-historical-marker-to-commemorate-1894-court-case/article_51b94188-6345-11ea-9d3f-bb59b09a9c4d.html. On laws subsequently passed in other states, see Kathleen A. Holscher, "Contesting the Veil in America: Catholic Habits and the Controversy over Clothing in the United States," *Journal of Church and State* 54 (December 2012): 57–81; and Joan M. Blauwkamp, "Free Exercise and the Fashion Police: Nebraska's Ban on Religious Dress," *Great Plains Research* 27 (Spring 2017): 43–58. In his study of current education policy, Nathan C. Walker found that by 1946 "twenty-two states prohibited public school teachers from wearing religious garb, either through state statutes, a public referendum, or administrative policies"; see Walker, *The First Amendment and State Bans on Teachers' Religious Garb: Analyzing Historic Origins of Contemporary Legal Challenges in the United States* (New York: Routledge, 2020), 50.
2. The principal Mennonite characters in this story were members of the so-called (Old) Mennonite Church and specifically the Lancaster Conference of that body. Before 1908 the Brethren were formally known as the German Baptist Brethren; that year the denomination's annual conference adopted the name Church of the Brethren. Before and after 1908, the Brethren were nicknamed "Dunkers" or "Dunkards" because of their practice of immersion baptism. For

more on these groups, see John L. Ruth, *The Earth Is the Lord's: A Narrative History of the Lancaster Mennonite Conference* (Scottdale, PA: Herald Press, 2001) and Donald F. Durnbaugh, *Fruit of the Vine: A History of the Brethren, 1708–1995* (Elgin, IL: Brethren Press, 1997).

3. According to the 1890 US Census, 29 percent of all Brethren, Mennonites, and Amish in the nation lived in Pennsylvania (33,930 of 118,763 members of all branches); see *Report on Statistics of Churches in the United States at the Eleventh Census: 1890* (Washington, DC: Government Printing Office, 1894), 215, 357–58, 486.
4. Christine Rienstra Kiracofe, "Can Teachers Really Wear That to School? Religious Garb in Public Classrooms," *Clearing House* 83, no. 3 (2010): 80–83. For more information about the teacher, Alima Reardon, and her case, see n. 64 below.
5. The relevant literature is vast, from classics such as John Higham, *Strangers in the Land: Patterns of American Nativism, 1860–1925* (New Brunswick, NJ: Rutgers University Press, 1955), to newer works such as John T. McGreevy, *Catholicism and American Freedom: A History* (New York: W. W. Norton, 2003).
6. The village of Gallitzin was named for Father Demetrius Gallitzin (1770–1840), an immigrant priest and early Catholic leader in western Pennsylvania; see *Salute to the Pioneers: The Early History of the Sisters of St. Joseph of Baden, Pennsylvania* (Baden, PA: Sisters of St. Joseph, 1952), 3–13, accessed via Catholic Historical Research Center Digital Collections, https://omeka.chrc-phila.org/items/show/8039.
7. Ibid., 30–32.
8. *Hysong v. Gallitzin Borough School Dist.*, 30 A. 482 (Pa. 1894), 295. Chapter 2 of Stephanie A. Grossnickle-Batterton, "'Ye Shall Know Them by Their Clothes': Women and the Rhetoric of Religious Dress in the United States, 1865–1920" (PhD diss., University of Iowa, 2019), provides insightful gender analysis of the case, developing the dissertation's larger argument.
9. *Laws of the General Assembly of the Commonwealth of Pennsylvania . . . 1895* ([Harrisburg, PA]: Clarence M. Busch, 1895), 395. The penalties outlined in section 2 of the statute stipulated that an offending teacher would be suspended for one year upon the first offense and permanently barred from teaching after a second offense; school board members hiring an offending teacher would be fined $100 each upon the first offense, and upon a second offense would be fined $100, removed from office, and disqualified from serving on any school board for five years (395–96). Robert Smith was from Philadelphia and part of the highly organized Republican "machine" that dominated state politics. See Peter McCaffery, *When Bosses Ruled Philadelphia: The Emergence of the Republican Machine, 1867–1933* (University Park: Pennsylvania State University Press, 1993).

10. Rev. Marcellus D. Lichliter, *History of the Junior Order, United American Mechanics of the United States of North America* (Philadelphia: Lippincott, 1909), 270, reproduces a lobbying speech by William H. Painter, a Harrisburg, Pennsylvania, dentist and American Mechanics leader who included the brief reference to Brethren and Mennonites in his much longer anti-Catholic diatribe.
11. Among the primary and secondary sources on Anabaptist plain dress, see Daniel Kauffman, *One Thousand Questions and Answers on Points of Christian Doctrine* (Scottdale, PA: Mennonite Publishing House, [1908]), 87–95, and Esther F. Rupel, *Brethren Dress, a Testimony to Faith* (Philadelphia: Brethren Encyclopedia, 1994). The details of Anabaptist plain dress varied somewhat across time and by locale, but often included the following elements: For men, a dark suitcoat without lapels and a brimmed hat with no dents or creases in its crown. For women, an ankle-length dress with a cape (i.e., an extra layer of cloth over the bodice) an apron, and a white head covering ("prayer covering"), which in turn was often covered by a black bonnet when outdoors, especially in the winter. Men do not wear neckties and neither men nor women wear jewelry of any kind, including wedding rings.
12. For broader context see William W. Donner, "Education," in *Pennsylvania Germans: An Interpretive Encyclopedia*, ed. Simon J. Bronner and Joshua R. Brown (Baltimore: Johns Hopkins University Press, 2017), 390–410.
13. Untitled news and commentary, *Herald of Truth*, May 1, 1895, 130.
14. [Henry B. Brumbaugh], "The Religious Garb," *Gospel Messenger*, April 16, 1895, 250.
15. "Memorial Against the Religious Garb Bill," *Herald of Truth*, May 1, 1895, 135. One later memory held that Mennonite preacher Jacob Herr of Cumberland County led the petitioning because his daughter, Mary Herr, was a teacher (Ira D. Landis, "Bishop Isaac Eby, Revered Churchman," *Mennonite Research Journal* [October 1963]: 46). While it is possible that Herr was a principal figure in crafting the memorial, he was far from alone in his objections and almost certainly not the only Mennonite or Brethren minister to have a close relative who was a teacher.
16. Seyfert's lonely opposition is reported in "Religious Garb in Public Schools," *New York Times*, March 7, 1895, 1. A year later, the Lancaster press reported that Seyfert's bid for another term in the House was opposed by "members of patriotic organizations . . . for his opposition to the garb bill," so he was relying on support from Mennonite, Brethren, and Amish voters to secure reelection. "The Republican Factions Are Having a Nip and Tuck Tussle," *Lancaster Intelligencer* (PA), March 14, 1896, 2.
17. The two Republican senators were John H. Landis and Christian C. Kauffman. See "No Religious Garb in School," *New York Times*, May 29, 1895. In 1908 *Our College Times*, the campus newspaper of Lancaster County's Elizabethtown

College, reprinted Senator Kauffman's speech opposing the garb bill and recalled the approximately 100 Brethren and Mennonite men and women descending on the capital thirteen years earlier. See "The Religious Garb Bill," *Our College Times*, December 1908, 10–11.

18. *Salute to the Pioneers*, 34–35.
19. Grossnickle-Batterton, "Ye Shall Know Them by Their Clothes." Although gender is not the focus of analysis in this article, one can see that some Anabaptist commentators, such as John F. Funk (n. 13 above), were especially concerned about the dress of women members.
20. "The Vacant Chair," *Lancaster Inquirer*, November 7, 1896 [10], second page of "Supplement" section.
21. A biography of Myer appears in *History of the Church of the Brethren: Eastern Pennsylvania, 1915–1965* (Lancaster, PA: Eastern District of Pennsylvania, 1965), 320–24, and emphasizes her commitment to plain dress.
22. "Can Religious Garb Be Worn by a Teacher?" *Lancaster Examiner* (PA), June 20, 1908, 2, indicates that the Garb Law had sometimes been ignored.
23. George N. Falkenstein, "The Organization and the Early History of Elizabethtown College," 1937, 99-page manuscript, Hess Archives, Elizabethtown College. The college catalog published for the 1900–01 academic year stated, "All those who are members of the Brethren Church should bring their certificates of membership, and it is expected that all such conform to the order of the Church in all her doctrines, plainness of dress and daily Christian deportment" (13). The school also enrolled students of other faiths, with no expectation that they dress plainly.
24. Ralph W. Schlosser, *History of Elizabethtown College, 1899–1970* (Elizabethtown, PA: Elizabethtown College, 1971), 118–19; and as discussed in Jean-Paul Benowitz and Peter DePuydt, *Elizabethtown College* (Charleston, SC: Arcadia Publishing, 2014).
25. "The Past Year's Record," *Our College Times*, July 1908, 1. The October 1908 issue of *Our College Times* includes the description of Risser, adding that she "is a member of the Mennonite Church and a graduate of our college" (p. 4). Risser taught at Mount Joy Township's Mount Pleasant school during the 1906–1907 school year, and at Wheatland school from 1907 to 1910; see *Lancaster Examiner (PA)*, June 9, 1906, 7; *Lancaster Examiner*, June 8, 1907, 7; *Lancaster Examiner*, June 6, 1908, 6; *Lancaster Examiner*, June 12, 1909, 7.
26. "Can Religious Garb Be Worn by a Teacher?" *Lancaster Examiner*, June 20, 1908, 2, says the case of Lillian Risser in 1908 was "the first suit of its kind ever brought since the law was passed." Statements by lawyers and judges involved with the case make the same point.
27. Confusingly, some news accounts list Garman as the complainant and others list a John Stager; it is, of course, possible that two individuals brought the complaint to Eppler. The red-brick Wheatland schoolhouse where Risser

taught is still standing along Elizabethtown Road, opposite Milton Grove Road. It functioned as a public school until 1957 and later was converted into a private residence.

28. "Testing Anti-Garb Law," *Lancaster Intelligencer*, February 13, 1908, 5. An early news story mistakenly identified Risser as a "Dunkard" rather than a Mennonite (perhaps because of her connection with Elizabethtown College) but later stories corrected her ecclesial affiliation.
29. Ibid.
30. Amos R. Herr and Elmer W. Strickler were Mennonites, and Daniel E. Miller likely was Mennonite. David B. Eshleman was a Church of the Brethren member and David F. Greiner likely was Brethren. Board member Aaron Gephart does not seem to have been a plain church member.
31. The three meetinghouses in the circuit were known by surnames of neighboring Mennonite landowners: Good's Meetinghouse, Risser's Meetinghouse, and Stauffer's Meetinghouse. The first two were located in northwestern Lancaster County and the third was in southern Dauphin County. In 1914 Lillian Risser's father, Peter S. Risser, was ordained as the deacon for this Mennonite church-community.
32. Herr was admitted to the bar in 1895; see *Biographical Annals of Lancaster County, Pennsylvania* ([Chicago]: J. H. Beers, 1903), 1045, and H. M. J. Klein, *Lancaster County, Pennsylvania: A History* (New York: Lewis Publishing, 1924), 2:900. Raised in northwestern Lancaster County, Herr was a member of East Chestnut Street Mennonite Church after moving to Lancaster City to establish his law practice.
33. A substantial biography is J. Barry Girvin, "The Life of William Uhler Hensel," *Journal of the Lancaster County Historical Society* 70, no. 4 (1966), 185–248. Although Hensel apparently had many Anabaptist friends, his own church ties were German Reformed and Presbyterian.
34. *Biographical Annals of Lancaster County*, 183–84. Individuals profiled in the book provided their own biographical information and Landis's entry praises his Mennonite forebears.
35. "Declares that Garb Law Is Unconstitutional," *Lancaster Intelligencer*, June 17, 1908, 1.
36. "Unconstitutional," *Lancaster Intelligencer*, August 19, 1908, 5.
37. Michael W. McConnell, "The Origins and Historical Understanding of Free Exercise of Religion," *Harvard Law Review* 103 (May 1990): 1417, 1419. Protecting practices that the dominant group did not regard as religious, but that the minority group saw as salient, was not articulated until 1963 in *Sherbert v. Verner*, according to McConnell.
38. "Teacher's Dress Legal," *New York Times*, August 16, 1908, 1.
39. The debate was reprinted as a forty-one-page booklet by Bucher and marketed by the newspaper. See George Bucher and F. W. McGuire, *The Garb Law: An*

Argument on the Pennsylvania Garb Law in Relation to Public School Teachers (Quarryville, PA: [G. Bucher], 1908), copy in Hess Archives, Elizabethtown College.

40. "Mechanics for Garb Law," *Lancaster Intelligencer*, September 19, 1908, 1. In line with their anti-Catholic sentiment, the Mechanics also protested "against the movement to dispense with the reading of the Bible [in Protestant translation] in public schools." Grossnickle-Batterton, "Ye Shall Know Them by Their Clothes," 64–67, summarizes the Mechanics' role in having lobbied for the Garb Law in 1895.
41. "The Garb Law Under Test," *Our College Times*, December 1908, 13. Ober would later serve as president of the college beginning in 1918.
42. McConnell, "Origins and Historical Understanding," 1507–10.
43. Thomas J. Curry, *The First Freedoms: Church and State in America to the Passage of the First Amendment* (New York: Oxford University Press, 1987). For a number of reasons, the establishment side of that equation had received far more attention than the free exercise side.
44. McConnell, "Origins and Historical Understanding," 1443, 1451–55, 1511–16. According to Locke, "the government's perception of public need defines the boundaries of freedom of conscience" (1434).
45. [Henry B. Brumbaugh], "The Religious Garb," *Gospel Messenger*, April 16, 1895, 250.
46. "The Garb Law Decision. The Full Text of Opinion of Judge Rice," *Lancaster Daily New Era* (PA), July 17, 1909, 3.
47. This Gibsonian rejection of judicial review, unique to Pennsylvania, veered far from the overwhelming evidence that the federal Constitution's framers and ratifiers intended and expected courts to engage in constitutional judicial review. See David P. Curry, *The Constitution in the Supreme Court: The First Hundred Years, 1789–1888* (Chicago: University of Chicago Press, 1985), esp. 69–70.
48. "Garb Law Decision," 3.
49. Ibid. See also *Commonwealth v. Lesher*, 17 Serg. and Rawle 155 (1828); and *Simon's Executors v. Gratz,* 2 Pen. & W. 412 (1831). A number of authors, such as Marci A. Hamilton, "The Belief/Conduct Paradigm in the Supreme Court's Free Exercise Jurisprudence: A Theological Account of the Failure to Protect Religious Conduct," *Ohio State Law Journal* 54 (1993): 713–96, have argued that a sharp distinction between belief and conduct has been a persistent part of free exercise jurisprudence; however, McConnell, "Origins and Historical Understanding," 1506–10, demonstrates that more nuanced, Madisonian understandings have claimed attention and that the distinction in Pennsylvania was uniquely sharp. Although Rice also cited *Reynolds v. United States*, 98 U.S. 145 (1878), a ruling that upheld an antipolygamy law against Latter-day Saints' free exercise claims by saying that the demands of public order could override religious conscience, Rice oddly did not address the question of whether

Risser's dress disturbed public order. This omission is curious insofar as Landis's ruling had specifically noted the state's allowance for teachers to wear politically provocative pins and to wear otherwise unconventional clothing in the classroom.

50. "Garb Law Declared Constitutional," *Lancaster Intelligencer*, July 15, 1909, 1, and "Garb Law Aimed at Acts, Not Beliefs," *Lancaster Intelligencer*, July 16, 1909, 1. Hensel was an investor in the *Lancaster Intelligencer*.
51. "The Garb Case," *Lancaster Daily New Era*, July 23, 1909, 4. The *New Era*'s approach did not satisfy all readers and drew an anonymous letter to the editor defending the county's plain people and calling on civic officials to be honest about what had transpired. See "To the Editor," *Lancaster Daily New Era*, August 9, 1909, 2.
52. "At Elizabethtown College," *Lancaster Daily New Era*, March 5, 1910, 2.
53. *Commonwealth v. Herr*, 78 A. 68 (Pa. 1910), 277.
54. "Before Supreme Court," *Lancaster Intelligencer*, May 9, 1910, 1; "Ten Cases Decided," *Lancaster Inquirer* (PA), July 9, 1910, 4.
55. "Woman Resigns," *Lancaster Intelligencer*, July 29, 1910, 5. Given her residence in Washington Township, Franklin County, Miller was likely a member of the Reformed Mennonite Church.
56. "School Boards Organize," *Lancaster Semi-Weekly New Era* (PA), June 11, 1910, 5.
57. "End of the Garb Case," *Lancaster Intelligencer*, November 21, 1910, 2.
58. Ruth, *The Earth Is the Lord's*, 712.
59. "School Boards Organize," 5. Garber was later a minister and noted Mennonite mission board leader. Again, the gender analysis of Grossnickle-Batterton, "Ye Shall Know Them by Their Clothes," is relevant.
60. The first Amish schools in Pennsylvania began in 1937 and the first Mennonite schools in the state opened in 1939 and 1940. These parochial schools grew out of concerns about rural school consolidation, which was just beginning; Amish objection to required high school attendance, which was at the heart of *Wisconsin v. Yoder* 406 U.S. 205 (1972), became a source of conflict with the state after World War II.
61. Stephanie Alexieff, "Lillian Ebersole, Active and Upbeat, Hits the Century Mark Tuesday," *Lancaster New Era*, October 12, 1987, 38, 26. Risser had later married Jonas W. Ebersole, a Mennonite man with ties to her home in northwestern Lancaster County; the couple had no children, which is one reason it is difficult today to locate reliable family memories, photos, or artifacts from her 1908–1910 legal tussle. Note that a number of biographical elements in this *New Era* newspaper piece are seemingly incorrect.
62. *Rooted in Faith and Growing in Love: Forest Hills Mennonite Church, 1946–1986* ([Leola, PA: Forest Hills Mennonite Church, 1986]), 8. For broader context, see Ruth, *The Earth Is the Lord's*, 971, 1049–52.

63. Lillian Ebersole obituary, *Lancaster New Era*, May 24, 1988, 3.
64. Dismissed in 1984, Reardon got her job back in 1985 through an Equal Employment Opportunity Commission process but lost her claim for back pay in 1990 when the courts held that her firing had been legitimate in light of the Pennsylvania Garb Law. See Kathleen Moore, "The *Hijab* and Religious Liberty: Anti-Discrimination Law and Muslim Women in the United States," in *Muslims on the Americanization Path?*, ed. Yvonne Yazbeck Haddad and John L. Esposito (New York: Oxford University Press, 1998), 110–14. The next year, a federal court held that Pennsylvania school counselor Cynthia Moore could not be dismissed under the state's Garb Law because her dress was not generally perceived by others as being religious (though it was to her) and thus did not fall under the definition of religious garb; thus, accommodating Moore did not invalidate the Garb Law; see *E.E.O.C. v. READS, Inc.*, 759 F. Supp. 1150 (E.D. Pa. 1991). Walker, *First Amendment and State Bans*, 55–57, 93, 176, provides additional discussion.
65. See *Cantwell v. Connecticut*, 310 U.S. 296, 303-04 (1940).
66. McConnell, "Origins and Historical Understanding," 1417–20, 1488. That decade, marked from *Sherbert v. Verner*, 374 U.S. 398 (1963) through *Wisconsin v. Yoder*, 406 U.S. 205 (1972), was followed by something of a paring back of the scope of free exercise, driven not by a narrow definition of religion, in the vein of Jefferson and Gibson, but by the judicial restraint of the Rehnquist court. *Employment Division v. Smith*, 494 U.S. 872 (1990) marked the turn away from further expansion.
67. Donald B. Kraybill, ed., *The Amish and the State*, 2nd ed. (Baltimore: Johns Hopkins University Press, 2003), although chapters 6 and 13 highlight cases of litigation of first amendment claims, of which there have been several other examples since 2003.
68. Some sentiments from 1894 still echo, though with different characters. Rather than fears of a conspiracy to sneak Catholic canon law into public schools, today's concerns may center on the notion that sharia law is being introduced by stealth. In a since-deleted Facebook post on December 3, 2020, a resident of the school district in which Lillian Risser once taught suggested that COVID-19 masking requirements were really more about students "looking Muslim than about health and safety." Alex Geli, "How a Mount Joy Twp. Couple who attended Trump's Jan. 6 'Stop the Steal' Rally Ended Up Running for E-town School Board," *Lancaster Online*, April 25, 2021, https://lancasteronline.com/news/local/how-a-mount-joy-twp-couple-who-attended-trumps-jan-6-stop-the-steal-rally/article_b0a16164-a46a-11eb-91ba-ef6dc2636894.html.
69. Sponsorship was sometimes bipartisan, with Eugene DePasquale (D-York County).
70. Hickernell, like Lillian Risser, is an alumnus of Elizabethtown College.