
Feminist Social Thought:

A Reader

Edited by
Diana Tietjens Meyers

Routledge
New York and London

Published in 1997 by
Routledge
29 West 35th Street
New York, NY 10018

Published in Great Britain by
Routledge
11 New Fetter Lane
London EC4P 4EE

Copyright © 1997 by Routledge

Routledge, Inc. respects international copyright laws. Any omissions or oversights in the
acknowledgments section of this volume are purely unintentional.

Printed in the United States of America on acid-free paper.

All rights reserved. No part of this book may be printed or reproduced or utilized in any
form or by any electronic, mechanical, or other means, now known or hereafter invented,
including photocopying and recording or in any information storage or retrieval system,
without permission in writing from the publishers.

Permissions acknowledgments appear on pages 771–772, and on this page by reference.

Library in Congress Cataloging-in-Publication Data

Feminist social thought : a reader / edited by Dana
Lietzjen Meyers

p. cm.

Includes bibliographical references and index.

ISBN 0-415-91536-8 (hbk) -- ISBN 0-415-91537-6 (pb)

1. Feminist theory. 2. Feminist ethics. 3. Women—Social

conditions. I. Meyers, Dana T.

HQ1190.L454 : 1997

305.42'01—dc20

96-41669

CIP

Fajr Eza Befer Khatay

Chapter 13

Kimberlé Williams Crenshaw

Beyond Racism and Misogyny:
Black Feminism and 2 Live Crew

Violence against women is a central issue in the feminist movement. As part of an overall strategy to change patterns of individual and institutional behavior to better women's lives, academics and activists have challenged the ways violence against women—primarily battering and rape—is perpetuated and condoned within our culture.

Much of this challenge has occurred within legal discourse because it is within the law that cultural attitudes are legitimized through organized state power. Feminists have struggled with some success to end the representation of battering and rape as a "private family matter" or as "errant sexuality" and make clear these are specific sites of gender subordination. These battles have taken place over issues such as mandatory arrest for batterers, the admissibility of a victim's sexual history in sexual assault cases, and the admissibility of psychological evidence, such as the battered women's syndrome in cases involving women who kill their batterers and rape trauma syndrome in sexual assault cases.

If recent events are indicative, the process may continue to bear some political fruit. The governors of Ohio and Maryland have committed sentences of women convicted of murdering abusive husbands, and other states are considering similar actions. Moreover, legislation is pending before Congress that would make violence "motivated by gender" a civil rights violation.¹

The emphasis on gender, however, tends to downplay the interaction of gender subordination with race and class. The attitude is largely consistent with doctrinal and political practices that construct racism and sexism as mutually exclusive. Given the assumption that all women stand to benefit from efforts to politicize violence against women, concerns about

race may initially seem unnecessarily divisive. Indeed, it seems that what women have in common—the fact that they are primary targets of rape and battering—not only outweighs the differences among them but may render bizarre the argument that race should play a significant role in the analysis of these issues.

Although racial issues are not explicitly part of the politicization of gender, public controversies show that racial politics are often linked to gender violence in the way that the violence is experienced, how the interventions are shaped, or the manner in which the consequences are politicized and represented. The controversies over the Central Park jogger case, the 2 Live Crew case, the Sr. John's rape trial, and the perhaps lesser known issue of Shahrazad Ali's *The Blackman's Guide to the Blackwoman*,² all present issues of gender violence in which racial politics are deeply implicated but in ways that seem impossible to capture fully within existing frameworks that separate racial politics from gender politics. These separations are linked to the overall problem of the way racism and sexism are understood and how these understandings inform organizing around antiracism and feminism.

Reformist efforts to politicize these issues exclusively around gender are thus problematic both for women of color and for those engaged in feminist and antiracist politics generally. Discursive and political practices that separate race from gender and gender from race create complex problems of exclusion and distortion for women of color. Because monoracial frameworks are unlikely to provide a ready means for addressing the interplay of gender and race in cultural and political discourse on violence, it is necessary to reenter inquiries relating to violence against women from the vantage point of women of color. On the simplest level, an intersectional framework uncovers how the dual positioning of women of color as women and as members of a subordinated racial group bears upon violence committed against us. This dual positioning, or as some scholars have labeled it, double jeopardy, renders women of color vulnerable to the structural, political and representational dynamics of both race and gender subordination. A framework attuned to the various ways that these dynamics intersect is a necessary prerequisite to exploring how this double vulnerability influences the way that violence against women of color is experienced and best addressed.

Second, an intersectional framework suggests ways in which political and representational practices connected to race and gender interrelate. This is relevant because the separate rhetorical strategies that characterize antiracist and feminist politics frequently intersect in ways that create new dilemmas for women of color. For example, political imperatives are frequently constructed from the perspectives of those who are dominant within either the race or gender categories in which women of color are situated, namely white women or men of color. These priorities are grounded in efforts to address only racism or sexism—as those issues are understood by the dominant voices within these communities. Political strategies that challenge only certain subordinating practices while maintaining existing hierarchies not only marginalize those who are subject to multiple systems of subordination but also often result in oppositionalizing race and gender discourses. An intersectional critique is thus important in uncovering the ways in which the reformist politics of one discourse reinforce subordinating aspects of another.

The observations that follow are meant to explore the ways in which intersections of race and gender bear upon depictions of violence against women, particularly women of color. My observations are also meant to explore the bearing of these intersections on the broader efforts to politicize violence against all women. I explicitly adopt a Black feminist

stance in my attempt to survey violence against women of color. This this with cognizance of several tensions that this perspective entails. The significant one relates to the way in which feminism has been subject to the dual criticism of speaking *for* women of color through its invocation of the term "woman" even as it fails to examine differences and the problem of *excluding* women of color through grounding feminism in the experiences and interests of white women. I think it is important to name the perspective from which my own analysis is constructed, and that is as a Black feminist. I also think it is important to acknowledge that the materials upon which my analysis is based relate primarily to Black women. At the same time, I see my own work as part of a broader effort among feminist women of color to broaden feminism to include, among other factors, an analysis of race. Thus, I attempt to reach across racial differences to share my thinking and tentatively suggest ways in which the theory may apply to other women of color.

This chapter focuses on the problem of representational intersectionality. After a brief introduction to the theory of intersectionality, I will consider the ways in which media representations of women of color reinforce race and gender stereotypes. These stereotyped representations encourage and incite violence against us. But they do much more than that. They create a dominant narrative that forces actual women of color to the margins of the discourse and renders our own accounts of such victimization less credible. These media images define the spaces that women of color may occupy in dominant institutions and problematize our efforts to construct a political practice and cultural critique that address the physical and material violence we experience.

This project is not oppositional to the overall effort to recode violence against women; rather, it is an attempt to broaden and strengthen the strategies available by exploring sites where race and gender converge to create the cultural and political grounding for gender violence. It is important also to ensure that these reform efforts do not reinforce racist sensibilities within the larger culture or ignore the need to challenge patriarchy within subcultures.

AN EXAMINATION OF INTERSECTIONALITY

Intersectionality is a core concept both provisional and illustrative. Although the primary intersections that I explore here are between race and gender, the concept can and should be expanded by factoring in issues such as class, sexual orientation, age, and color. I conceive of intersectionality as a provisional concept that links contemporary politics with postmodern theory. In examining the intersections of race and gender, I engage the dominant assumptions that these are essentially separate by tracing the categories to their interconnections. I hope to suggest a methodology that will ultimately disrupt the tendencies to see race and gender as exclusive or separable categories. Intersectionality is thus in my view a transitional concept that links current concepts with their political consequences, and real world politics with postmodern insights. It can be replaced, and our understanding of each category becomes more multidimensional. The basic function of intersectionality is to frame the following inquiry: How does the fact that women of color are simultaneously situated within at least two groups that are subjected to broad societal subordination (race upon problems traditionally viewed as monocausal—that is, gender discrimination or race discrimination)? I believe three aspects of subordination are important: the structural dimensions of domination (structural intersectionality), the politics engendered by a political system of domination (political intersectionality), and the representations of the dominated (representational

intersectionality). These intersectionalities serve as metaphors for different ways in which women of color are situated between categories of race and gender when the two are regarded as mutually exclusive. I hope that a framework of intersection will facilitate a merging of race and gender discourses to uncover what lies hidden between them and to construct a better means of conceptualizing and politicizing violence against women of color. It is important to note that although I use these concepts in fairly specific ways, as metaphors their boundaries are neither finite nor rigid. Indeed, representational intersectionality is not only implicated in the political interactions of race and gender discourses, it also can be inclusive of these intersections. Moreover, political and representational intersectionality can also be included as aspects of structural intersectionality.

Structural Intersectionality

I use the term structural intersectionality to refer to the way in which women of color are situated within overlapping structures of subordination. Any particular disadvantage or disability is sometimes compounded by yet another disadvantage emanating from or reflecting the dynamics of a separate system of subordination. An analysis sensitive to structural intersectionality explores the lives of those at the bottom of multiple hierarchies to determine how the dynamics of each hierarchy exacerbates and compounds the consequences of another. The material consequences of the intersection of these multiple hierarchies in the lives of women of color is what I call structural intersectionality. Illustrations of structural intersectionality suggest that violence toward women usually occurs within a specific context that may vary considerably depending on the woman's race, class, and other social characteristics. These constraints can be better understood and addressed through a framework that links them to broader structures of subordination that intersect in fairly predictable ways.

One illustration of structural intersectionality is the way in which the burdens of illiteracy, responsibility of child care, poverty, lack of job skills, and passive discrimination weigh down many battered women of color who are trying to escape the cycle of abuse. That is, gender subordination—manifested in this case by battering—intersects with race and class disadvantage to shape and limit the opportunities for effective intervention.

Another illustration of structural intersectionality is the way in which battered immigrant women's vulnerabilities were particularly exploited by the Immigration Marriage Fraud Amendments of 1986,³ which imposed a two-year wait for permanent-resident status on women who moved to this country to marry U.S. citizens or permanent residents, and which required that both spouses file the application for the wife's permanent-resident status. When faced with what they saw as a choice between securing protection from their batterers and securing protection from deportation, many women, not surprisingly, chose the latter. Even now that these provisions have been amended—primarily at the urging of immigration activists, not feminists, which is perhaps another testament to immigrant women's isolation under intersecting structures of subordination—immigrant women are still at risk. The amendment waives the two-year wait only for battered women who produce evidence of battering from authorities (such as police officers, psychologists, and school officials) to which immigrant women may have little access, and immigrant women may still lack the English language skills, the privacy on the telephone, and the courage to transgress cultural barriers to ask for help. Further, women married to undocumented workers may suffer in silence for fear that the security of their entire family will be jeopardized should they seek help.

A final illustration of structural intersectionality is the way in which rape crisis centers in poor minority or immigrant communities must address rape survivors' homelessness, unemployment, poverty, hunger, distrust of law-enforcement officers, and perhaps their lack of English-language skills as well, often hindered by funding agency policies premised on the needs of middle-class white rape survivors.

Political Intersectionality

I use the term political intersectionality to refer to the different ways in which political and discursive practices relating to race and gender interrelate, often erasing women of color. On some issues, the frameworks highlighting race and those highlighting gender are oppositional and potentially contradictory. These discourses are sometimes presented as either/or propositions with the validity of each necessarily precluding the validity of the other. Manifestations of this oppositionality are found in antiracist and feminist rhetorical postures that implicitly or explicitly legitimize the dynamics of either racial or gender subordination. An extreme example is Shulamith Albi's controversial book, *The Blackman's Guide to the Blackwoman* (1987), which blames the deteriorating conditions within the Black community on the failure of the Black men to control their women. Albi recommends, among other practices, that Black men "discipline" disrespectful Black women by slapping them in the mouth—the mouth "because it is from that hole, in the lower part of her face, that all her rebellion culminates into words. Her unbridled tongue is a main reason she cannot get along with the Blackman."⁸ More commonly, the need to protect the political or cultural integrity of the community is interpreted as precluding any public discussion of domestic violence. But suppressing information about domestic violence in the name of antiracism leaves unrevealed, and thus unaddressed in public discourse within our communities, the real terror in which many women of color live.

In other instances, women of color are erased when race and gender politics proceed on grounds that exclude or overlook the existence of women of color. Such an erasure took place in the rhetorical approach made by sponsors of the Violence Against Women Act (1994).⁹ White male senators eloquently urged passage of the bill because violence against women occurs everywhere, not just in the inner cities. That is, the senators attempted to persuade other whites that domestic violence is a problem because "these are our women being victimized." White women thus came into focus, and any authentic, sensitive attention to our images and our experience, which would have probably jeopardized the bill, faded into darkness.

But an erasure need not take place for us to be silenced. Tolerant, objectifying, voyeuristic inclusion is at least as damaging as exclusion. We are as silenced when we appear in the margins as we are when we fail to appear at all.

Political intersectionality as it relates to violence against women of color reveals the ways in which politics centered around exclusive notions of race and gender leave women of color without a political framework that will adequately conceptualize the violence that occurs in our lives.

Representational Intersectionality

A final variant on the intersectional theme is representational intersectionality, referring to the way that race and gender images, readily available in our culture, converge to create unique and specific narratives deemed appropriate for women of color. Not surprisingly, the clearest

convergences are those involving sexuality. Perhaps because it is through sexuality that images of minorities and women are most sharply focused. Representational intersectionality is significant in exploring violence against women of color because it provides cues to the ways in which our experiences are weighed against counternarratives that cast doubt upon the validity and harm of such violence. I will analyze examples of representational intersectionality in images of violence against women—images that wound—in the next section.

REPRESENTATIONAL INTERSECTIONALITY AND IMAGES THAT WOUND

Representational intersectionality is manifest in the familiar images of women of color within popular culture. Here I examine the cultural images widely disseminated in the mainstream movies *Angel Heart*, *Colors*, *Year of the Dragon*, and *Tales From the Darkside: The Movie*. Next, I will discuss a video game called *General Curtis' Revenge*. Finally, I will consider in more detail the debate surrounding the obscenity prosecution of 2 Live Crew's album *As Nasty as They Wanna Be*.

Media images provide cues to understanding the ways in which women of color are imagined in our society. The images of Latina, African-American, Asian-American, and Native American women are constructed through combinations of readily available race and gender stereotypes. Because the stereotypes depicted in these prescriptions are quite familiar, collectively they form images of women of color that are specific and categorically unique.

Consider first the film *Colors*. *Colors* was a controversial film, but unfortunately, none of the criticism addressed its portrayal of women. Yet the film was rife with familiar stereotypes. The obligatory sexual relationship in that movie occurred between a husky-headed white cop played by Sean Penn and a young Latina played by Maria Conchita Alonso, whom he encountered working at a fast-food stand. Their relationship and her characterization progressed as follows: In Scene 1, he flirts, she blushes. In Scene 2, she accompanies him to a family sitting at his father's house. In Scene 3, the crucial scene, he drops her off at her home. She almost maintains the "good girl" image that had been carefully constructed from the onset, but when she reaches her door, she reconsiders and turns back to invite him in for a night of sex. In subsequent scenes this nice, hardworking ethnic girl increasingly turns into a promiscuous schizophonic Latina. In her final appearance, the transformation is complete. The scene begins with the young cop arriving to investigate a noisy house party. She is seen putting on her clothes in a bedroom from which a black man has departed. She wears a low-cut, loud dress and six-inch heels. She is very loud and brash now, laughingly tormenting the distraught and disappointed Sean Penn who, upon seeing her, attempts to escape. She follows him and with her hands on her hips, demanding more in a very heavy and exaggerated accent: "Look at me. This is part of me too!"

The image of the good ethnic fiery Latina is contrasted with an image of Black sexuality also constructed in *Colors*. In another scene, the police converge on a house to serve a warrant on a suspect named Rock-it. As they approach the house, the viewer hears a rhythmic speaking and loud screams. The camera takes several seconds to track through the ramshackle house. There is little in the house except a stereo apparently playing the loud, pulsating music accompanying the sound track. The camera turns a corner and finds a Black man and a Black woman on a bed, atop a single white sheet, so earnestly and fanatically copulating that they are wholly oblivious to the several police officers surrounding them with guns

drawn. When they finally become aware of the officers' presence, the man makes a sudden move and is shot several times in the back. As his lover screams hysterically, he gasps that he was simply reaching for his clothes.

In *Angel Heart*, the descent of an African-American woman into her own uncontrolled sexuality ends in tragic horror. Epiphany Proudfoot, played by Cosby-kid Lisa Bonet, is introduced washing her hair at a well. She appears at first the model of youth, resistent and cool. Yet she is slightly fallen: she has a child whose father is unknown. Later we see her as a voodoo priestess dancing a blood-curling ritual and collapsing in an uncontrolled sexual frenzy. The movie culminates in a vicious postnuptial scene between Epiphany and Harry Angel (played by Mickey Rourke) that gives new meaning to the phrase "sex and violence." Sex—initiated by Epiphany—soon becomes gruesome as dripping water turns to blood, intercut with rivers of blood, deep throating, and screams of agony and horror. The visual narrative splits after this scene: Epiphany appears normal, singing a lovely lullaby and wistfully twisting her hair as she lathers, but later we discover that Epiphany is in fact dead. Her body spreads across the bed, her legs spread open. A deep pool of blood surrounds her pelvic area. The movie's final scene plays out across her dead body. We discover the cause of her death when the southern sheriff questioning Angel draws, "Is that your gun up her stretch?" The horror is not yet complete, for we have still to discover that not only has Harry Angel killed his lover, but that his lover is actually his daughter. So this Cosby-kid hits big time, being multiply victimized by incest, rape and murder.

Perhaps it is happenstance that Lisa Bonet played Epiphany and that the imagery in this big-budget Hollywood film is so violent. Yet I wonder whether a Michelle Pfeiffer, a Kim Basinger, or even a Madonna would be asked to play such a role? I don't think so. The film, by relying on race-sex exoticism, works differently from the way it would with a white female. In fact, the presence of a woman of color often "makes" the story, as it still more clearly shown in an episode from *Tales from the Dark Side: The Movie*. The life of a young white artist is spared by a sixteen-foot talking gargoyle upon the artist's promise that he will never tell anyone that he has ever seen this gargoyle. Later that night he meets a Black woman, played here by Rae Dawn Chong, whom he later marries and with whom he has two lovely children. With the support of his wife he becomes enormously successful, and they live a happy, fulfilled life. On their tenth anniversary, he decides to tell his wife this secret as part of his expression of affection to her. Presenting her with a full-sized sculpture of the monster, he tells her how his life was spared upon making a vow never to reveal that the monster exists. After he tells her the story, she becomes hysterical and, at "last" would have it, begins to turn into the sixteen-foot gargoyle. Their two children emerge from the adjoining room as baby gargoyles. The wife disregards the artist's frantic efforts to profess his love for her, stating that she "loved him too but when the vow was broken their fate was sealed." She mountously tears out his throat, gathers up the "children," and swoops through the ceiling. Here the drop-of-blood rule really works: The children, although half-human, are little monsters too. Can anyone doubt the message?—white male miscegenators, beware! Exoticia and danger go hand in hand.

Mickey Rourke, apparently bidding to be every body's favorite racist/sadomasochist rapist/murderer, turns up again in *Heat of the Day*. There he plays Captain Stanley Whitem, a New York cop who pursues a brash and independent Asian-American TV newscaster. He encounters her on the street, addresses her as a prostitute, taunts her with racist epithets (apparently learned from his days in Vietnam). After she invites him up to her apartment, he

continues to assault her verbally, before physically doing so. He tells her that he hates everything about her, and then taking down his pants, he queries, "So why do I want to fuck you so badly?" The worst is yet to come: As our heroine rallies enough courage to ask him to leave, he calls her a slant-eyed cunt. She slaps him once, pauses, and slaps again. He then grabs her, throws her down, rips off her clothes, and has forcible sex with her.

The next image comes not from a movie but from a video game, *General Custer's Revenge*. A Native American woman is tied to a pole. The player, General Custer, must traverse an obstacle course to get to the woman before getting shot. His saberlike penis leads him forward. The player wins when General Custer reaches the Native American woman and pounces on her. She "kicks up her legs in dubious delight" as he commits "what opponents call a rape and the manufacturer claims is a willing sex act." (A spokesman for the manufacturer commented, "There is a facsimile of intercourse. The woman is smiling.") Every stroke is a point. The motto: "When you score, you score."⁶

These four representations confirm both the feminist claim that women are legitimate targets for violence and the more specific observation that these targets are often represented with distinct racialized images. The Latina is two-sided: she is both a sweet, hardworking ethnic and a loud, unscrupulous, racialized "other." The Black woman is wild and animal-like. In *Tales from the Dark Side: The Movie*, she is an animal, or, worse yet, a monster. The Asian-American woman is passive. She is verbally abused and physically assaulted, yet she still stands ready to please. The Native American woman is a savage. She has no honor and no integrity. She doesn't fight rape: in fact, being tied up and ravished makes her smile. She enjoys it.

In each of these cases the specific image is created within the intersection of race and gender. Although some claim that these images reflect certain attitudes that make women of color targets of sexual violence, the actual effect of images on behavior is still hotly contested. Whatever the relationship between imagery and actions is, it seems clear that these images do function to create counternarratives to the experiences of women of color that discredit our claims and render the violence that we experience unimportant. These images not only represent the devaluation of women of color, they may also reproduce it by providing viewers with both conscious and unconscious cues for interpreting the experiences of "others." Because both the actual experience of violence and the representations of those experiences constitute the "problem" of gender violence, feminists of color must address how race and gender intersect in popular discourse as well as in feminist and antiracist politics.

ADDRESSING THE INTERSECTIONALITIES IN THE 2 LIVE CREW CONTROVERSY

The different intersectionalities discussed above converge in my thinking on the controversy surrounding the obscenity prosecution of 2 Live Crew. The entire problem spurred by the prosecution of 2 Live Crew—the question of how to construct a Black feminist approach to the virulent misogyny in some rap music—has vexed me for some time, and as I suggested at the outset, prompted my attempt to construct a Black feminist understanding of gender violence.

The prosecution of 2 Live Crew began several months after the release of their *As Nasty As They Wanna Be* album. In the midst of the Mapplethorpe controversy and Tipper Gore's campaign to label offensive rock music, the Broward County sheriff, Nick Navarro, began

investigating 2 Live Crew's *Nasty* recording at the behest of Jack Thompson, a fundamentalist attorney in Miami, Florida. The sheriff obtained an ex parte order declaring the recording obscene and presented copies of the order to local store owners, threatening them with arrest if they continued to sell the recording. 2 Live Crew filed a civil rights suit, and Sheriff Nasama sought a judicial determination labeling 2 Live Crew's *Nasty* recording obscene.⁷ A federal court ruled that *Nasty* was obscene but granted 2 Live Crew permanent injunctive relief because the sheriff's action had subjected the recording to unconstitutional prior restraint. Two days after the judge declared the recording obscene, 2 Live Crew members were charged with giving an obscene performance at a club in Hollywood, Florida. Additionally, deputy sheriffs arrested a merchant who was selling copies of the *Nasty* recording. These events received national attention and the controversy quickly polarized into two camps. Writing in *Newsweek*, political columnist George Will took a case for the prosecution. He argued that *Nasty* was misogynistic filth. Will characterized the performance as a profoundly repugnant "combination of extreme infantilism and racism" that objectified Black women and represented them as suitable targets for sexual violence.⁸

The most prominent defense of 2 Live Crew was advanced by Professor Henry Louis Gates, Jr., an expert on African-American literature. In a *New York Times* op-ed piece and in testimony at the criminal trial, Gates contended that 2 Live Crew were literary geniuses operating within and inadvertently elaborating distinctively African-American forms of cultural expression.⁹ Furthermore, the characteristic exaggeration featured in their lyrics served a political end: to explode popular racist stereotypes in a comically extreme form. Where Will saw a misogynistic assault on Black women by social degenerates, Gates found a form of "sexual carnivalesque" with the promise to free us from the pathologies of racism.

As a Black feminist, I felt the pull of each of these poles but not the compelling attractions of either. My immediate response to the criminal charges against 2 Live Crew was a feeling of being torn between standing with the brothers against a racist attack and standing against a frightening explosion of violent imagery directed to women like me. This reaction, I have come to believe, is a consequence of the location of Black women at the intersections of racial and sexual subordination. My experience of sharp internal division—if dissatisfaction with the idea that the "real issue" is race or gender is inertly juxtaposed—is characteristic of that location. Black feminism offers an intellectual and political response to this experience. Bringing together the different aspects of an otherwise divided sensibility, Black feminism argues that racial and sexual subordination are mutually reinforcing, that Black women are marginalized by a politics of race and gender, and that a political response to each form of subordination must at the same time be a political response to both. When the controversy over 2 Live Crew is approached in light of such Black feminist sensibilities, an alternative to the dominant poles of the public debate emerges.

At the legal bazaar line I agree with the supporters of 2 Live Crew that the obscenity prosecution was wrongheaded. But the reasons for my conclusion are not the same as the reasons generally offered in support of 2 Live Crew. I will come to those reasons shortly, but first I must emphasize that after listening to 2 Live Crew's lyrics along with those of other rap artists, my defense of 2 Live Crew, however careful, did not come easily.

On first hearing 2 Live Crew I was shocked; unlike Gates I did not "burst out laughing." One trivializes the issue by describing the images of women in *As Nasty As They Wanna Be* as simply "sexually explicit." We hear about cunts being fucked until backbones are cracked, asses being busted, dicks rammed down throats, and semen splattered across faces

Black women are cunts, bitches, and all-purpose "hos." Images of women in some of the other rap acts are even more horrifying: battering, rape, and rape-murder are often graphically detailed. Occasionally, we do hear Black women's voices, and these voices are sometimes oppositional. But the response to opposition typically returns to the central refrain: "Shut up, bitch. Suck my dick."

This is no mere braggadocio. Those of us who are concerned about the high rates of gender violence in our communities must be troubled by the possible connections between such images and violence against women. Children and teenagers are listening to this music, and I am concerned that the range of acceptable behavior is broadened by the constant propagation of antiwomen imagery. I'm concerned, too, about young Black women who together with men are learning that their value lies between their legs. Unlike that of men, however, women's sexual value is portrayed as a depletable commodity. By expending it, boys become men and girls become whores.

Nasty is misogynist, and a Black feminist response to the case against 2 Live Crew should not depart from a full acknowledgment of that misogyny. But such a response must also consider whether an exclusive focus on issues of gender risk overlooking aspects of the prosecution of 2 Live Crew that raise serious questions of racism. And here is where the roots of my opposition to the obscenity prosecution lie.

An initial problem concerning the prosecution was its apparent selectivity. Even the most superficial comparison between 2 Live Crew and other mass-marketed sexual representations suggest the likelihood that race played some role in distinguishing 2 Live Crew as the first group ever to be prosecuted for obscenity in connection with a musical recording, and one of only a handful of recording groups or artists to be prosecuted for a live performance. Recent controversies about sexism, racism, and violence in popular culture point to a vast range of expression that might have provided targets for censorship, but that were left untouched. Madonna has acted out masturbation, portrayed the seduction of a priest, and simulated group sex on stage. But she has never been prosecuted for obscenity. Whereas 2 Live Crew was performing in an adults-only club in Hollywood, Florida, Andrew Dice Clay was performing nationwide on HBO. Well known for his racist "humor," Clay is also comparable to 2 Live Crew in sexual explicitness and misogyny. In his show, for example, Clay offers: "Feny, meeny, miney, mo, suck my [expletive] and swallow slow," or "Love the bra bitch." Moreover, graphic sexual images—many of them violent—were widely available in Broward County where 2 Live Crew's performance and trial took place. According to the trial testimony of a vice detective named McCloud, "Nude dance shows and adult bookstores are scattered throughout the county where 2 Live Crew performed."¹⁰ But again, no obscenity charges were leveled against the performers or producers of these representations.

In response to this charge of selectivity, it might be argued that the successful prosecution of 2 Live Crew demonstrates that its lyrics were uniquely obscene. In a sense, this argument runs, the proof is in the prosecution—if they were not uniquely obscene, they would have been acquitted. However the elements of 2 Live Crew's performance that contributed initially to their selective arrest continued to play out as the court applied the obscenity standard to the recording. To clarify this argument, we need to consider the technical use of "obscenity" as a legal term of art. For the purposes of legal argument, the Supreme Court in the 1973 case of *Miller v. California* held that a work is obscene if and only if it meets each of three conditions: (1) "the average person, applying community standards, would find that the work, taken as a whole, appeals to the prurient interest"; (2) "the work

depicts or describes, in a patently offensive way, sexual conduct specifically defined by the applicable state law"; and (3) "The work, taken as a whole, lacks serious literary, artistic, political, or scientific value."¹¹ The Court held that it is consistent with first amendment guarantees of freedom of expression for states to subject work that meets each of the three prongs of the *Miller* test to very restrictive regulations.

Focusing first on the prurient interest prong of the *Miller* test, we might wonder how 2 Live Crew could have been seen as uniquely obscene by the lights of the "community standards" of Broward County. After all, as Detective McCloud put it, "Patrons [of clubs in Broward] can see women dancing with at least their breasts exposed" and bookstore patrons can "view and purchase films and magazines that depict vaginal, oral and anal sex, homosexual sex and group sex."¹² In arriving at this finding of obscenity, the court placed little weight on the available range of films, magazines, and live shows as evidence of the community's sensibilities. Instead the court apparently accepted the sheriff's testimony that the decision to single out *Nasty* was based on the number of complaints against 2 Live Crew "communicated by telephone calls, anonymous messages, or letters to the police."¹³

Evidence of this popular outcry was never substantiated. But even if it were, the case for selectivity would remain. The history of social repression of Black male sexuality is long, often violent, and all too familiar. Negative reactions against the sexual conduct of Black males have traditionally had racist overtones, especially where the conduct threatens to "cross over" into the mainstream community. So even if the decision to prosecute did reflect a widespread community perception of the purely prurient character of 2 Live Crew's music, that perception itself might reflect an established pattern of vigilante attitudes directed toward the sexual expression of Black males. In short, the appeal to community standards does not undercut a concern about racism; rather, it underscores that concern.

A second troubling dimension of the case against 2 Live Crew was the court's apparent disregard for the culturally rooted aspects of 2 Live Crew's music. Such disregard was essential to a finding of obscenity given the third prong of the *Miller* test, requiring that obscene material lack literary, artistic, or political value. 2 Live Crew argued that this test was not met because the recording exemplified such African-American cultural modes as "playing the dozens," "call and response," and "signifying." As a storehouse of such cultural modes, it could not be said that *Nasty* could be described as completely devoid of literary or artistic value. In each case the court denied the groups' claim of cultural specificity by recharacterizing these modes claimed to be African-American in more generic terms. For example, the court reasoned that "playing the dozens is commonly seen in adolescents, especially boys, of all ages."¹⁴ "Boasting," the court observed, appears to be "part of the universal human condition."¹⁵ And the court noted that the cultural origins of one song featuring call and response—a song about flirtations which competing groups chanted "less filling" and "tastes great"—were to be found in a Miller beer commercial, not in African-American cultural tradition. The possibility that the Miller beer commercial may have itself evolved from an African-American cultural tradition was lost on the court.

In disregarding this testimony the court denied the artistic value in the form and style of *Nasty* and, by implication, rap music more generally. This disturbing dismissal of the cultural attributes of rap and the effort to universalize African-American modes of expression flattens cultural differences. The court's analysis here manifests in the law a frequently encountered strategy of cultural appropriation: African-American contributions accepted by the mainstream culture are considered simply "American" or found to be the "universal."

Other modes associated with African-American culture that resist absorption and remain distinctive are neglected or dismissed as "deviant."

An additional concern has as much to do with the obscenity doctrine itself as with the court's application of it in this case. The case illustrates the ways in which obscenity doctrine asks the wrong questions with respect to sexual violence and facilitates wrong conclusions with respect to racially selective enforcement. As I mentioned earlier, obscenity requires a determination that the material be intended to appeal to prurient interest. In making this determination, the court rejected the relevance of 2 Live Crew's admitted motives—both their larger motive of making money and their secondary motive of doing so through the marketing of outrageous sexual humor. Although the prurient interest requirement eludes precise definition—recall Potter Stewart's infamous declaration that "I know it when I see it"—it seems clear that it must appeal in some immediate way to sexual desire. It would be difficult to say definitively what does or does not constitute an appeal to this prurient interest, but one can surmise that the twenty-five cent peep shows that are standard fare in Broward County rank considerably higher on his scale than the sexual talk talks sold by 2 Live Crew.

2 Live Crew is thus one of the lesser candidates in the prurient interest sweepstakes mandated by the obscenity standard, and it is also a lesser contender by another measure that lies explicitly outside the obscenity doctrine: violence. Compared to groups such as N.W.A., Too Short, Ice Cube, and the Geto Boys, 2 Live Crew's misogynistic, hyperbolic sounds minor league. Sometimes called gangsta rap, the lyrics offered by these other groups celebrate violent assault, rape, rape-murder, and mutilation. Had these other groups been targeted rather than the comparatively less offensive 2 Live Crew, they may have been more successful in defeating the prosecution. The graphic violence in their representations militates against a finding of obscenity by suggesting an intent to appeal not to prurient interests but instead to the fantasy of the social outlaw. Indeed, these appeals might even be read as political. Against the historical backdrop against which the image of the Black male as the social outlaw is a prominent theme, gangsta rap might be read as an expression of a counterforce aimed at undermining fear through reassurance in favor of a more subversive form of opposition that attempts to challenge the rules precisely by becoming the very social outlaw that society has proscribed. Thus, so long as obscenity remains preoccupied with finding prurient interests and violent imagery is seen as distinct from sexuality, obscenity doctrine is ineffectual against more violent rappers.

Yet even this somewhat formal dichotomy between sex, which obscenity is concerned about, and violence, which lies beyond its purview, may provide little solace to the entire spectrum of rappers ranging from the Geto Boys to 2 Live Crew. Given the historical linkages between Black male sexuality and violence, the two are likely to be directly linked in the prurient interest inquiry, even if subconsciously. In fact, it may have been the background images of Black male sexual violence that rendered 2 Live Crew an acceptable target for obscenity in a lineup that included many stronger contenders.

My point here is not to suggest that the distinction between sex and violence should be maintained in obscenity, nor more specifically, that the more violent rappers ought to be protected. To the contrary, these groups trouble me much more than 2 Live Crew. My point instead is to suggest that obscenity doctrine does nothing to protect the interests of those who are most directly implicated in such rap—Black women. On a formal level, obscenity separates out sexuality and violence, thus shielding the more violently misogynistic groups

from prosecution. Yet the historical linkages between images of Black male sexuality and violence simultaneously single out lightweight rappers for prosecution among all other purveyors of explicit sexual imagery. Neither course furthers Black women's simultaneous interests in opposing racism and misogyny.

Although Black women's interests were quite obviously irrelevant in this obscenity judgment, their bodies figured prominently in the public case supporting the prosecution. George Will's *New Yorker* essay provides a striking example of how Black women's bodies were appropriated and deployed in the broader attack against 2 Live Crew. In "America's Slide into the Sewers," Will told us, "America today is capable of terrific intolerance about smoking, or toxic waste that threatens trout. But only a deeply confused society is more concerned about protecting lungs than minds, trout than Black women. We legislate against smoking in restaurants, singing 'Me So Horny' is a constitutional right. Secondary smoke is carcinogenic; celebration of torn vaginas is 'mere words.'" 14

Notwithstanding these expressions of concern about Black women, Will's real worry is suggested by his repeated references to the Central Park jogger. He writes, "Her face was so disfigured a friend took 15 minutes to identify her. 'I recognized her ring.' Do you recognize the relevance of 2 Live Crew?" Although the connection between the threat of 2 Live Crew and the image of the Black male rapist was suggested subtly in the public debate, it is manifest throughout Will's discussion and in fact bids to be its central theme. "Fact: Some members of a particular age and societal cohort—the one making 2 Live Crew rich—stomped and raped the jogger to the razor edge of death, for the fun of it." Will directly indicts 2 Live Crew in the Central Park jogger rape through a fictional dialogue between himself and the defendants. Responding to one defendant's alleged confession that the rape was fun, Will asks: "Where can you get the idea that sexual violence against women is fun? From a music store, through Walkman earphones, from boom boxes blaring forth the rap lyrics of 2 Live Crew? Because the rapists were young Black males and *Nasty* presents Black men celebrating sexual violence, surely 2 Live Crew was responsible. Apparently, the vast American industry that markets misogynistic representation in every conceivable way is irrelevant to understanding this particular incident of sexual violence."

Will invokes Black women—twice—as victims of this music. But if he were really concerned with the threat to Black women, why does the Central Park jogger figure so prominently in his argument? Why not the Black woman from Brooklyn who, within weeks of the Central Park assault, was gang-raped and then thrown down an air shaft? What about the twenty-eight other women—mostly women of color—who were raped in New York City the same week the Central Park jogger was raped? Rather than being centered in Will's display of concern, Black women appear to function as stand-ins for white women. The focus on sexual violence played out on Black women's bodies seems to reflect concerns about the threat to Black male violence against the strategy of the prosecutor in Richard Wright's novel *Nativ Son*.¹⁵ Bigger Thomas, the Black male protagonist, is on trial for killing Mary Dalton, a white woman. Because Bigger burned her body, however, it cannot be established whether Mary was raped. So the prosecution brings in the body of Bessie, a Black woman raped by Bigger and left to die, to establish that Bigger has raped Mary.

Further evidence that Will's concern about sexual imagery and rape is grounded in familiar narratives of Black sexual violence and white victimhood is suggested by his nearly apologetic reaction to similar attempts to regulate racist speech. In his assault on 2 Live Crew, Will decries liberal tolerance for lyrics that "desensitize" our society and that will cer-

tainly have "behavioral consequences." Proponents of campus speech regulations have made arguments that racist speech facilitates racial violence in much the same way that Will links rap to sexual violence. Yet Will has excoriated such proponents.

Despite his anguish that sexual lyrics "coarsen" our society and facilitate a "slide into the sewer," in Will's view,¹⁶ racist speech is situated on a much higher plane. Apparently, the "social cohort" that is most likely to engage in racial violence—young white men—has sense enough to distinguish ideas from action whereas the "social cohort" that identifies with 2 Live Crew is made up of mindless brutes who will take rap as literal encouragement to rape. Will's position on racist speech not only indicates how readily manipulable the link between expression and action is, but suggests further reasons why Will is so outraged about attacks on Black women's vaginal walls and feet concerned about attacks on our skin.

These concerns about selectivity in prosecution, about the denial of cultural specificity, and about the manipulation of Black women's bodies convince me that race played a significant if not determining role in the shaping of the case against 2 Live Crew. While using antiracist rhetoric to suggest a concern for women, the attack simultaneously endorsed traditional readings of Black male sexuality. The fact that most sexual violence involves interracial assault fades to the background as the Black male is represented as the agent of sexual violence and the white community is represented as his victim. The subtext of the 2 Live Crew prosecution thus becomes a rereading of the sexualized racial politics of the past.

Although concerns about racism fuel my opposition to the obscenity prosecution, I am also troubled by the uncritical support for and indeed celebration of 2 Live Crew by other opponents of that prosecution. If the rhetoric of antiracism provided an occasion for racism, in turn, the rhetoric of antiracism provided an occasion for defending the misogyny of Black male rappers.

The defense of 2 Live Crew took two forms, one political and one cultural, both of which were advanced most prominently by Henry Louis Gates, Jr. The political argument was that 2 Live Crew represents an attack against Black sexual stereotypes. The strategy of the attack is, in Gates's words, to "exaggerate [these] stereotypes" and thereby "to show how ridiculous the portrayals are."¹⁷ For the strategy to succeed, it must of course highlight the sexism, misogyny, and violence stereotypically associated with Black male sexuality. But far from embracing that popular methodology, the idea is to fight the racism of those who accept it. Thus, the argument goes, 2 Live Crew and other rap groups are simply pushing white society's buttons to ridicule its dominant sexual images.

I agree with Gates that the reactions by Will and others to 2 Live Crew confirm that the stereotypes still exist and will evoke basic fears. But even if I were to agree that 2 Live Crew intended to explode these mythic fears, I still would argue that this strategy is wholly misguided. These fears are too active and African Americans are too closely associated with them not to be burned when the myths are exploded. More fundamentally, however, I am deeply skeptical about the claim that the Crew was engaged—either in intent or effect—in a postmodern guerrilla war against racist stereotypes.

Gates argues that when one listens to 2 Live Crew, the ridiculous stories and the hyperbole make the listener "burst out laughing." Apparently, the fact that Gates and many other people react with laughter confirms and satisfies Crew's objective of ridiculing the stereotypes. The fact that the Crew is often successful in achieving laughter neither substantiates Gates's reading nor forecloses serious critique of its subordinating dimensions.

In disagreeing with Gates, I do not mean to suggest that 2 Live Crew's lyrics are to be taken literally. But rather than exploding stereotypes as Gates suggests, I believe that the group simply uses readily available sexual images in trying to be funny. Trading in racial stereotypes and sexual hyperbole are well-rehearsed strategies for achieving laughter; the most extreme representations often do more to reinforce and entrench the image than to explode it. 2 Live Crew departs from this tradition only in its attempt to up the ante through more outrageous boasts and more explicit manifestations of misogyny.

The acknowledgment, however, that the Crew was simply trying to be funny should not be interpreted as constituting a defense against its misogyny. Neither the intent to be funny nor Gates's loftier explanations negate the subordinating qualities of such humor. An examination of the parallel arguments in the context of racist humor suggests why neither claim functions as a persuasive defense for 2 Live Crew.

Gates's use of laughter as a defensive maneuver in the attack on 2 Live Crew recalls similar strategies in defense of racist humor. Racist humor has sometimes been defended as anti-racist—an effort to poke fun at or to show the ridiculousness of racism. More simply, racist humor has often been excused as just joking; even racially motivated assaults are often defended as simple pranks. Thus, the racism and sexism of Andrew Dice Clay could be defended either as an attempt to explode the stereotypes of white racists or more simply as simple humor not meant to be taken seriously. Implicit in these defenses is the assumption that racist representations are injurious only if they are devoid of any other objective or are meant to be taken literally. Although these arguments are familiar within the Black community, I think it is highly unlikely that they would be viewed as a persuasive defense of Andrew Dice Clay. Indeed, the historical and ongoing criticism of such humor suggests widespread rejection of such disclaimers. Operating instead under a premise that humor can be nonliteral, perhaps even well intended, but racist nonetheless, African Americans have protested such humor. This practice of opposition suggests a general recognition within the Black community that "mere humor" is not inconsistent with subordination. The question of what people find humorous is of course a complicated one that includes considerations of aggression, reinforcement of group boundaries, projection and other issues. The claim of intending only a joke may be true, but representations function as humor within a specific social context and frequently reinforce patterns of social power. Even though racial humor may sometimes be intended to ridicule racism, the close relationship between the stereotypes and the prevailing images of marginalized people as well as a presumed connection between the humorist and the dominant audience complicates this strategy. Clearly, racial humor does not always undermine the racism of the character speaking nor indict the wider society in which the jokes have meaning. The endearment of Archie Bunker seems to suggest at least this much.

Thus, in the context of racist humor, neither the fact that people actually laughed at racist humor nor the usual disclaimer of intent have functioned to preclude incisive and quite often angry criticism of such humor within the African-American community. Although a similar set of arguments could be offered in the context of sexist humor, images marketed by 2 Live Crew were not condemned but, as Gates illustrates, defended, often with great commitment and skill. Clearly, the fact that the Crew is Black, as are the women it objectifies, shaped this response. There is of course an ongoing issue of how one's positioning vis-à-vis a targeted group colors the way the group interprets a potentially derisive stereotype or gesture. Had 2 Live Crew been whites in blackface, for example, all of the defend-

ings would have been different. Although the question of whether one can defend the broader license given to Black comedians to market stereotypical images is an interesting one, it is not the issue here. 2 Live Crew cannot claim an in-group privilege to perpetuate misogynistic humor against Black women. Its members are not Black women, and more important, they enjoy a power relationship over them.

Sexual humor in which women are objectified as packages of bodily parts to serve whatever male-bonding/male-competition the speakers please subordinates women in much the same way that racist humor subordinates African Americans. That these are "just jokes" and are not taken as literal claims does little to blunt their demeaning quality—*not, for that matter, does it help that the jokes are told within a tradition of intragroup humor.*

Gates offered a second, cultural defense of 2 Live Crew: the idea that *dozens* and other forms of verbal boasting have been practiced within the Black community for some time. It is true as well that raucous jokes, innuendoes, and boasts of sexual prowess were not meant to be taken literally. Nor, however, were they meant to disrupt conventional myths about Black sexuality. They were meant simply to be laughed at and perhaps to gain respect for the speaker's word *wisdom*.

Ultimately, however, little turns on whether the "wordplay" performed by 2 Live Crew is a postmodern challenge to racist sexual mythology or simply an internal group practice that has crossed over to mainstream U.S. society. Both versions of the defense are problematic because both call on Black women to accept misogyny and its attendant disrespect in the service of some broader group objective. Whereas one version argues that accepting misogyny is necessary to antiracist politics, the other argues that it is necessary to maintain the cultural integrity of the community. Neither presents sufficient justification for requiring Black women to tolerate such misogyny. The message that these arguments embrace—that patriarchy can be made to serve antiracist ends—is a familiar one, with proponents ranging from Eldridge Cleaver in the 1960s to Shabazz Ali in the 1990s. In Gates's variant, the position of Black women is determined by the need to ward paganism penises in efforts to subvert racist images of Black male sexuality. Even though Black women may not be the intended targets, they are necessarily called to serve these gargantuan penises and are thus in the position of absorbing the impact. The common message of all such strategies is that Black women are expected to be vehicles for notions of "liberation" that function to preserve Black female subordination.

To be sure, Gates's claim about the cultural aspects of 2 Live Crew's lyrics do address the legal issue about the applicability of the obscenity standard. As I indicated earlier, the group's music does have artistic and potentially political value; I believe the court decided this issue incorrectly and Will was all too glib in his critique. But these criticisms do not settle the issue within the community. *Dozens* and other wordplays have long been within the Black oral tradition, but acknowledging this fact does not eliminate the need to interrogate either the sexism within that tradition or the objectives to which that tradition has been pressed. To say that playing the dozens, for example, is rooted in a Black cultural tradition or that themes represented by myths, folk heroes such as Stingee or Black does not settle the question of whether such practices are oppressive to women and others within the community. The same point can be made about the relentless homophobia in the work of Eddie Murphy and many other comedians and rappers. Whether or not the Black community has a pronounced tradition of homophobic humor is beside the point; the question instead is

how these subordinating aspects of tradition play out in the lives of people in the community, people who are otherwise called upon to share the benefits and the burdens of a common history, culture, and political agenda. Although it may be true that the Black community is more familiar with the cultural forms that have evolved into rap, that familiarity should not end the discussion of whether the misogyny within rap is acceptable.

Moreover, we need to consider the possible relationships between sexism in our cultural practices and violence against women. Violence against women of color is not centered as a critical issue in either the antiracist or antiviolenence discourses. The "different culture" defense may contribute to a disregard for women of color victimized by rape and violence that reinforces the tendency within the broader community not to take intraracial violence seriously. Numerous studies have suggested that Black victims of crime can count on less protection from the criminal justice system than whites receive. This is true for Black rape victims as well—their rapists are less likely to be convicted and on average serve less time when they are convicted. Could it be that perpetuating the belief that Blacks are different with respect to sexuality and violence contributes to the disregard of Black female rape victims like Bessie in *Native Son* or the woman thrown down an air shaft in Brooklyn?

Although there are times when Black feminists should fight for the integrity of Black culture, this does not mean that criticism must end when a practice or form of expression is traced to an aspect of culture. We must also determine whether the practices and forms of expression are consistent with other tenets that we must define. The legal question of obscenity may be settled by finding roots in the culture. But traditional obscenity is not our central issue. Performances and representations that do not appeal principally to "prurient interests" or that may reflect expressive patterns that are culturally specific may still encourage self-hatred, disrespect, subordination, and various other forms of manifestations of intragroup pathology. These problems require an internal group dialogue. Although we have no plenary authority to grapple with these issues, we do need to find ways of using group formation mechanisms and other social spaces to reflect upon and reformulate our cultural and political practices.

I said earlier that the political goals of Black feminism are to construct and empower a political sensibility that opposes misogyny and racism simultaneously. Merging this double vision in an analysis of the 2 Live Crew controversy makes clear that, despite the superficial defense of the prosecution as being in the interests of women, nothing about the anti-2 Live Crew movement is about Black women's lives. The political process involved in the legal prosecution of 2 Live Crew's representational subordination of Black women does not seek to empower Black women; indeed, the racism of that process is injurious to us.

The implication of this conclusion is not that Black feminists should stand in solidarity with the supporters of 2 Live Crew. The spirited defense of 2 Live Crew was no more about defending the Black community than the prosecution was about defending women. After all, Black women—whose assault is the very subject of the representation—are part of that community. Black women can hardly regard the right to be represented as rape-deserving bitches and whores as essential to their interests. Instead, the defense primarily functions to protect the cultural and political prerogative of male rappers to be as misogynistic as they want to be.

The debate over 2 Live Crew illustrates how the discursive structures of race and gender politics continue to marginalize Black women, rendering us virtually voiceless. Fitted with

a Black feminist sensibility, one uncovers other issues in which the unique situation of Black women renders a different formulation of the problem than the version that dominates in current debate. Ready examples include rape, domestic violence, and welfare dependency. A Black feminist sensibility might also provide a more direct link between the women's movement and traditional civil rights movements. Helping them both to shed conceptual blinders that limit the efficacy of their efforts. In the recent controversy over the conviction of Clarence Thomas to the U.S. Supreme Court, for example, organized groups in both camps—on particular women's groups—initially struggled to produce evidence showing Thomas's negative disposition toward their respective constituencies. Thomas's repeated derogatory references to his sister as the quintessential example of welfare dependency might have been profitably viewed from a Black framework as the embodiment of his views on race, gender, and class, permitting an earlier formulation of a more effective coalition.

The development of a Black feminist sensibility is no guarantee that Black women's interests will be taken seriously. For that sensibility to develop into empowerment, Black women will have to make it clear that patriarchy is a critical issue that negatively impacts the lives of not only African American women but men as well. Within the African American political community, this recognition might reshape traditional practices so that evidence of racism would not constitute sufficient justification for uncritical rallying around misogynistic politics and patriarchal values. Although collective opposition to racist practice has been and continues to be crucially important in protecting Black interests, an empowered Black feminist sensibility would require that the terms of unity no longer reflect priorities premised upon the continued marginalization of Black women.

NOTES

1. 137 Cong. Rec. 5597, S610 (1991) (S. 15, H.R. 1502).
2. S. Ali, *The Blackman's Guide to the Blackwoman* (1980).
3. Pub. L. 99-639 (Nov. 10, 1986); Pub. L. 100-525, § 7(a)-(c) (Oct. 24, 1988).
4. S. Ali, *supra* note 2, at 169.
5. H.R. 1502, S. 15 (102d Cong.).
6. Coddani, *Center May Be Shot Down Again in Battle of Sexes over X-Rated Video Game*, *People Magazine*, Nov. 15, 1982.
7. Santoro, *How 2K Nasty Rap Musician, 2 Live Crew, Arrested*, *The Nation*, July 2, 1990, at 4.
8. Will, *America's Slide into the Seven N*, *Newsweek*, July 30, 1990, at 64.
9. Gates, *2 Live Crew Decoded*, *N.Y. Times*, June 19, 1990, at A23.
10. *2 Live Crew*, 471 (Oct. 19, 1990).
11. 413 U.S. 15, 24 (1973).
12. *2 Live Crew*, 471 (Oct. 19, 1990).
13. 739 F. Supp. 578, 589 (S.D. Fla. 1990).
14. Will, *supra* note 8.
15. R. Wright, *Native Son* (1966).
16. Will, *supra* note 8.
17. *An Alimony Judgment Obscure: Rap, Slick, Violence, Nasty and Maybe Helpful*, *N.Y. Times*, June 17, 1990, at 1.