

6. *Matter of Farley*, 469 N.W.2d 295 (Mich. 1991). The published opinion is by Justice Levin, dissenting from the order denying Sharon Benn the opportunity to go forward with a late appeal.
7. Professor Robert Rosen uses this term, quoting Grand Master Marshall Farkas of Dade County, Florida.
8. See, e.g., Sally Quinn, "Who Killed Feminism? Hypocritical Movement Leaders Betrayed Their Own Cause," *Washington Post*, January 19, 1992, p. C1.
9. Statistics on the commonality of domestic violence vary widely. The question is obviously highly charged, and there are obvious difficulties with gathering reliable data. Lenore Walker and others have used an estimate that violence occurs in fifty percent of relationships, which has seemed reasonable to myself and other scholars (Walker 1979, 1984; Littleton 1989; Mahoney 1991).
No-fault divorce tends to hide domestic violence. Two separate studies done in legal services offices found extremely high rates of domestic violence among women seeking divorces. In Brooklyn, out of six hundred female clients seen at legal services during a fifteen-month period, sixty percent admitted having been beaten during their marriage (Bowker 1983, p. 3). In Baltimore, out of fifty women seeking divorces over the course of five days, twenty had been battered sufficiently to be described as battered wives and thirteen more had experienced violence in their relationships at least once, making a total of sixty six percent who had encountered violence in their marriages (Mahoney 1992, p. 1288). Violence may be more likely to have occurred among couples who are now separating; violence can either reflect or cause a desire to end the relationship, or it may occur in retaliation for separation. Many women underreport their experiences of violence even when questioned directly (for example, calling threats made with loaded guns "emotional abuse" and failing to count marital rape as a form of "violence").
10. *McMillan v. State Mutual Life Assurance Co. of Am.*, 922 F.2d 1073 (3d Cir. 1990).
11. Lee Bowker's study in Milwaukee revealed that the cessation of violence did not guarantee success for the relationship, and many women went on to end the relationships later for reasons other than their partner's violence (Bowker 1983, p. 29).
12. Martha Irvine, "Battered Women File Civil Suits," *Minnesota Free Press* October 21–November 3, 1992).

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From *Martha R. Mahoney's* *From Margins to Center: The Discovery of Domestic Abuse*

Mapping the Margins: Intersectionality, Identity Politics, and Violence Against Women of Color

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Introduction

Over the last two decades, women have organized against the almost routine violence that shapes their lives. Drawing from the strength of shared experience, women have recognized that the political demands of millions speak more powerfully than the pleas of a few isolated voices. This politicization in turn has transformed the way we understand violence against women. For example, battering and rape, once seen as private (family matters) and aberrational (errant sexual aggression), are now largely recognized as part of a broad-scale system of domination that affects women as a class. This process of recognizing as social and systemic what was formerly perceived as isolated and individual has also characterized the identity politics of people of color and gays and lesbians, among others. For all these groups, identity-based politics has been a source of strength, community, and intellectual development.

The embrace of identity politics, however, has been in tension with dominant conceptions of social justice. Race, gender, and other identity categories are most often treated in mainstream liberal discourse as vestiges of bias or domination—that is, as intrinsically negative frameworks in which social power works to exclude or marginalize those who are different. According to this understanding, our liberatory objective should be to empty such categories of any social significance. Yet implicit in certain strands of feminist and racial liberation movements, for example, is the view that the social power in delineating difference need not be the power of domination; it can instead be the source of political empowerment and social reconstruction.

The problem with identity politics is not that it fails to transcend difference, as some critics charge, but rather the opposite—that it frequently conflates or ignores intragroup differences. In the context of

violence against women, this elision of difference is problematic, fundamentally because the violence that many women experience is often shaped by other dimensions of their identities, such as race and class. Moreover, ignoring differences *within* groups frequently contributes to tension *among* groups, another problem of identity politics that frustrates efforts to politicize violence against women. Feminist efforts to politicize experiences of women and antiracist efforts to politicize experiences of people of color have frequently proceeded as though the issues and experiences they each detail occur on mutually exclusive terrains. Although racism and sexism readily intersect in the lives of real people, they seldom do in feminist and antiracist practices. And so, when the practices expound identity as “woman” or “person of color” as an either/or proposition, they relegate the identity of women of color to a location that resists telling.

My objective here is to advance the telling of that location by exploring the race and gender dimensions of violence against women of color. Contemporary feminist and antiracist discourses have failed to consider the intersections of racism and patriarchy. Focusing on two dimensions of male violence against women—battering and rape—I consider how the experiences of women of color are frequently the product of intersecting patterns of racism and sexism, and how these experiences tend not to be represented within the discourse of either feminism or antiracism. Because of their intersectional identity as both women *and* people of color within discourses that are shaped to respond to one *or* the other, the interests and experiences of women of color are frequently marginalized within both.

In an earlier article, I used the concept of intersectionality to denote the various ways in which race and gender interact to shape the multiple dimensions of Black¹ women’s employment experiences (Crenshaw 1989, p. 139). My objective there was to illustrate that many of the experiences Black women face are not subsumed within the traditional boundaries of race or gender discrimination as these boundaries are currently understood, and that the intersection of racism and sexism factors into Black women’s lives in ways that cannot be captured wholly by looking at the race or gender dimensions of those experiences separately. I build on those observations here by exploring the various ways in which race and gender intersect in shaping structural and political aspects of violence against women of color.²

I should say at the outset that intersectionality is not being offered here as some new, totalizing theory of identity. Nor do I mean to suggest that violence against women of color can be explained only through the specific frameworks of race and gender considered here. Indeed, factors I address only in part or not at all, such as class or sexuality, are often

as critical in shaping the experiences of women of color. My focus on the intersections of race and gender only highlights the need to account for multiple grounds of identity when considering how the social world is constructed.

I have divided the issues presented in this chapter into two categories. In the first part, I discuss structural intersectionality, the ways in which the location of women of color at the intersection of race and gender makes our actual experience of domestic violence, rape, and remedial reform qualitatively different from that of white women. I shift the focus in the second part to political intersectionality, where I analyze how both feminist and antiracist politics have functioned in tandem to marginalize the issue of violence against women of color. Finally, I address the implications of the intersectional approach within the broader scope of contemporary identity politics.

Structural Intersectionality

Structural Intersectionality and Battering

I observed the dynamics of structural intersectionality during a brief field study of battered women’s shelters located in minority communities in Los Angeles.³ In most cases, the physical assault that leads women to these shelters is merely the most immediate manifestation of the subordination they experience. Many women who seek protection are unemployed or underemployed, and a good number of them are poor. Shelters serving these women cannot afford to address only the violence inflicted by the batterer; they must also confront the other multilayered and routinized forms of domination that often converge in these women’s lives, hindering their ability to create alternatives to the abusive relationships that brought them to shelters in the first place. Many women of color, for example, are burdened by poverty, child-care responsibilities, and the lack of job skills. These burdens, largely the consequence of gender and class oppression, are then compounded by the racially discriminatory employment and housing practices women of color often face.⁴ Women of color are burdened as well by the disproportionately high unemployment among people of color that make battered women of color less able to depend on the support of friends and relatives for temporary shelter.

These observations reveal how intersectionality shapes the experiences of many women of color. Economic considerations—access to employment, housing, and wealth—confirm that class structures play an important part in defining the experience of women of color *vis-à-vis* battering. But it would be a mistake to conclude from these observations that it is

simply the fact of poverty that is at issue here. Rather, their experiences reveal how diverse structures intersect, since even the class dimension is not independent from race and gender.

At the simplest level, race, gender, and class are implicated together because the fact of being a woman of color correlates strongly with poverty. Moreover, the disparate access to housing and jobs—that is, the phenomenon of discrimination—is reproduced through their race and gender identity. Race and gender are two of the primary sites for the particular distribution of social resources that ends up with observable class differences. And finally, once in a lower economic class, race and gender structures continue to shape the particular ways that women of color experience poverty, relative to other groups.

These converging systems structure the experiences of battered women of color in ways that require intervention strategies to be responsive to these intersections. Strategies based solely on the experiences of women who do not share the same class or race backgrounds will be of limited utility for those whose lives are shaped by a different set of obstacles. For example, shelter policies are often shaped by an image that locates women's subordination primarily in the psychological effects of male domination, and thus overlooks the socioeconomic factors that often disempower women of color.⁵ Because the disempowerment of many battered women of color is arguably less a function of what is in their minds and more a reflection of the obstacles that exist in their lives, these interventions are likely to reproduce rather than effectively challenge their domination.

While the intersection of race, gender, and class constitute the primary structural elements of the experience of many Black and Latina women in battering shelters, it is important to understand that there are other sites where structures of power intersect. For immigrant women, for example, their status as immigrants can render them vulnerable in ways that are similarly coercive, yet not easily reducible to economic class. For example, take the Marriage Fraud Amendments to the 1986 Immigration Act. Under the marriage fraud provisions of the Act, a person who immigrated to the United States to marry a United States citizen or permanent resident had to remain "properly" married for two years before applying for permanent resident status,⁶ at which time applications for the immigrant's permanent status were required by both spouses.⁷ Predictably, under these circumstances, many immigrant women were reluctant to leave even the most abusive of partners for fear of being deported. When faced with the choice between protection from their batterers and protection against deportation, many immigrant women chose the latter (Walt 1990, p. 8). Reports of the tragic consequences of this double subordination put pressure on Congress to include

in the Immigration Act of 1990 a provision amending the marriage fraud rules to allow for an explicit waiver for hardship caused by domestic violence.⁸

Yet many immigrant women, particularly women of color, have remained vulnerable to battering because they are unable to meet the conditions established for a waiver. The evidence required to support a waiver "can include, but is not limited to, reports and affidavits from police, medical personnel, psychologists, school officials, and social service agencies."⁹ For many immigrant women, limited access to these resources can make it difficult for them to obtain the evidence needed for a waiver. Often cultural barriers further discourage immigrant women from reporting or escaping battering situations. Tina Shum, a family counselor at a social service agency, points out that "[h]is law sounds so easy to apply, but there are cultural complications in the Asian community that make even these requirements difficult. . . . [Just to find the opportunity and courage to call us is an accomplishment for many." (Hodgin 1991, p. E1). The typical immigrant spouse, she suggests, may live "[i]n an extended family where several generations live together, there may be no privacy on the telephone, no opportunity to leave the house and no understanding of public phones." As a consequence, many immigrant women may be wholly dependent on their husbands as their link to the world outside their homes.¹⁰

Immigrant women may also be vulnerable to spousal violence because many of them depend on their husbands for information regarding their legal status. More than likely, many women who are now permanent residents continue to suffer abuse under threats of deportation by their husbands. Even if the threats are unfounded, women who have no independent access to information will still be intimidated by such threats. And even though the domestic violence waiver focuses on immigrant women whose husbands are United States citizens or permanent residents, there are countless women married to undocumented workers (or who are themselves undocumented) who suffer in silence for fear that the security of their entire families will be jeopardized should they seek help or otherwise call attention to themselves.

Language barriers present another structural problem that often limits opportunities of non-English-speaking women to take advantage of existing support services (Banales 1990, p. E5). Such barriers not only limit access to information about shelters, but also limit access to the security shelters provide. Some shelters turn non-English-speaking women away for lack of bilingual personnel and resources.¹¹

These examples illustrate how patterns of subordination intersect in women's experience of domestic violence. Intersectional subordination need not be intentionally produced; in fact, it is frequently the conse-

quence of the imposition of one burden that interacts with preexisting vulnerabilities to create yet another dimension of disempowerment. In the case of the marriage fraud provisions of the Immigration and Nationality Act, the imposition of a policy specifically designed to burden one class—immigrant spouses seeking permanent resident status—exacerbated the disempowerment of those already subordinated by other structures of domination. By failing to take into account the vulnerability of immigrant spouses to domestic violence, Congress positioned these women to absorb the simultaneous impact of its anti-immigration policy and their spouses' abuse.

The enactment of the domestic violence waiver of the marriage fraud provisions similarly illustrates how modest attempts to respond to certain problems can be ineffective when the intersectional location of women of color is not considered in fashioning the remedy. Cultural identity and class affect the likelihood that a battered spouse could take advantage of the waiver. Although the waiver is formally available to all women, the terms of the waiver make it inaccessible to some. Immigrant women who are socially, culturally, or economically privileged are more likely to be able to marshal the resources needed to satisfy the waiver requirements. Those immigrant women least able to take advantage of the waiver—women who are socially or economically the most marginal—are the ones most likely to be women of color.

Structural Intersectionality and Rape

Women of color are differently situated in the economic, social, and political worlds. When reform efforts undertaken on behalf of women neglect this fact, women of color are less likely to have their needs met than women who are racially privileged. For example, counselors who provide rape crisis services to women of color report that a significant proportion of the resources allocated to them must be spent handling problems other than rape itself. Meeting these needs often places these counselors at odds with their funding agencies, which allocate funds according to standards of need that are largely white and middle-class.¹² These uniform standards of support ignore the fact that different needs often demand different priorities in terms of resource allocation, and consequently, these standards hinder the ability of counselors to address the needs of nonwhite and poor women.

As noted earlier, counselors in minority communities report spending hours locating resources and contacts to meet the housing and other immediate needs of women who have been assaulted. Yet this work is only considered "information and referral" by funding agencies and as such, is typically underfunded, notwithstanding the magnitude of need

for these services in minority communities (Mathews 1989, pp. 287–88). The problem is compounded by expectations that rape crisis centers will use a significant portion of resources allocated to them on counselors to accompany victims to court,¹³ even though there is some evidence to suggest that women of color are less likely to have their cases pursued in the criminal justice system (Collins 1990; Field & Bienen 1980). The resources expected to be set aside for court services are misdirected in these communities.

The fact that minority women suffer from the effects of multiple subordination, coupled with institutional expectations based on inappropriate nonintersectional contexts, shapes and ultimately limits the opportunities for meaningful intervention on their behalf. Understanding the intersectional dynamics of crisis intervention may go far toward explaining the high levels of frustration and burnout experienced by counselors who attempt to meet the needs of minority women victims.

Political Intersectionality

The concept of political intersectionality highlights the fact that women of color are situated within at least two subordinated groups that frequently pursue conflicting political agendas. The need to split one's political energies between two sometimes opposing political agendas is a dimension of intersectional disempowerment that men of color and white women seldom confront. Indeed, their specific raced *and* gendered experiences, although intersectional, often define as well as confine the interests of the entire group. For example, racism as experienced by people of color who are of a particular gender—male—tends to determine the parameters of antiracist strategies, just as sexism as experienced by women who are of a particular race—white—tends to ground the women's movement. The problem is not simply that both discourses fail women of color by not acknowledging the "additional" burden of patriarchy or of racism, but that the discourses are often inadequate even to the discrete tasks of articulating the full dimensions of racism and sexism. Because women of color experience racism in ways not always the same as those experienced by men of color, and sexism in ways not always parallel to experiences of white women, dominant conceptions of antiracism and feminism are limited, even on their own terms.

Among the most troubling political consequences of the failure of antiracist and feminist discourses to address the intersections of racism and patriarchy is the fact that, to the extent they forward the interest of "people of color" and "women," respectively, one analysis often implicitly denies the validity of the other. The failure of feminism to interrogate race means that the resistance strategies of feminism will often replicate

and reinforce the subordination of people of color, and the failure of antiracism to interrogate patriarchy means that antiracism will frequently reproduce the subordination of women. These mutual elisions present a particularly difficult political dilemma for women of color. Adopting either analysis constitutes a denial of a fundamental dimension of our subordination and works to preclude the development of a political discourse that more fully empowers women of color.

The Politicization of Domestic Violence

That the political interests of women of color are obscured and sometimes jeopardized by political strategies that ignore or suppress inter-sectional issues is illustrated by my experiences in gathering information for this essay. I attempted to review Los Angeles Police Department statistics reflecting the rate of domestic violence interventions by district, because such statistics can provide a rough picture of arrests by racial group, given the degree of racial segregation in Los Angeles.¹⁴ The L.A.P.D., however, would not release the information. A representative explained that one reason the information was not released was that domestic violence activists, both within and outside the department, feared that statistics reflecting the extent of domestic violence in minority communities might be selectively interpreted and publicized so as to undermine long-term efforts to force the department to address domestic violence as a serious problem. Apparently activists were worried that the statistics might permit opponents to dismiss domestic violence as a minority problem and, therefore, not deserving of aggressive action.

The informant also claimed that representatives from various minority communities opposed the release of these statistics. They were concerned, apparently, that the data would unfairly represent African-American and Latino communities as unusually violent, potentially reinforcing stereotypes that might be used to justify oppressive police tactics and other discriminatory practices. These misgivings are based on the familiar and not unfounded premise that certain minorities—particularly Black men—have already been stereotyped as pathologically violent. Some worry that attempts to make domestic violence an object of political action may only serve to confirm such stereotypes and undermine efforts to combat negative beliefs about the African-American community.

Concerns about the misuse of statistics are, of course, well-founded; however, suppressing the information appears to be an easy answer to the problem only so long as the interests of women of color subject to domestic violence are not directly assessed. The effects of this political “gag order” are particularly disturbing in light of the feminist imperative to “break the silence,” a value grounded in the recognition that knowl-

edge about the extent and nature of domestic violence is an important precondition to successful efforts to mobilize against it. This suppression is also troubling given the improbability that women of color would benefit significantly from the trickle-down effects of either the feminist mobilization against domestic violence or the more community-based mobilizations against intraracial crime in general. Thus, the mutual suppression of critical information rendered the possibility of a broad mobilization against domestic violence within communities of color less likely.

This story, although anecdotal, serves as a useful illustration to frame the more conventional ways that women of color have been sometimes erased within the political contestations between antiracism and racial hierarchy, and between feminism and patriarchy. As the discussion below suggests, these erasures are not always the direct or intended consequences of antiracism or feminism, but frequently the product of rhetorical and political strategies that fail to challenge race and gender hierarchies simultaneously.

Domestic Violence and Antiracist Politics

Within communities of color, efforts to stem the politicization of domestic violence are often grounded in attempts to maintain the integrity of the community. The articulation of this perspective takes different forms. Some critics allege that feminism has no place within communities of color, that gender issues are internally divisive, and that raising such issues within nonwhite communities represents the migration of white women's concerns into a context in which they are not only irrelevant but also harmful. At their most extreme, critics who seek to defend their communities against this feminist assault deny that gender violence is a problem in their community, and characterize any effort to politicize gender subordination as itself a community problem. This is the position taken by Shabrazad Ali in her controversial book, *The Blackman's Guide to Understanding the Blackwoman*. In this stridently antifeminist tract, Ali draws a positive correlation between domestic violence and the liberation of African-Americans. Ali blames the deteriorating conditions within the African-American community on the insubordination of Black women and on the failure of Black men to control them (Ali 1989, pp. viii, 76). Ali goes so far as to advise Black men to physically chastise Black women when they are “disrespectful” (p. 169). While she cautions that Black men must use moderation in disciplining “their” women, she argues that Black men must sometimes resort to physical force to reestablish the authority over Black women that racism has disrupted (pp. 174, 172).

Ali's premise is that patriarchy is beneficial for the African-American community (p. 67), and that it must be strengthened through coercive

means if necessary.¹⁵ Yet the violence that accompanies this will-to-control is devastating, not only for the Black women who are victimized, but also for the entire African-American community. The recourse to violence to resolve conflicts establishes a dangerous pattern for children raised in such environments, and contributes to other pressing problems. For example, it has been estimated that nearly forty percent of all homeless women and children have fled violence in their homes, and an estimated sixty-three percent of young men between the ages of eleven and twenty who are imprisoned for homicide have killed their mothers' batterers (Women and Violence Hearings, 1991, pt 2, p. 142). And yet, while gang violence, homicide, and other forms of Black-on-Black crime have increasingly been discussed within African-American politics, patriarchal ideas about gender and power preclude the recognition of domestic violence as yet another compelling incidence of Black-on-Black crime. Efforts such as Ali's to justify violence against women in the name of Black liberation are indeed extreme. The more common problem is that the political or cultural interests of the community are interpreted in a way that precludes full public recognition of the problem of domestic violence. While it would be misleading to suggest that white Americans have been any more successful in coming to terms with the degree of violence in their own homes, it is nonetheless the case that race adds yet another dimension to why the problem of domestic violence is suppressed within nonwhite communities. People of color often must weigh their interests in avoiding issues that might reinforce distorted public perceptions of their communities against the need to acknowledge and address intracommunity problems. Yet the cost of suppression is seldom recognized, in part because the failure to discuss the issue mishapes perceptions of how serious the problem is in the first place.

The controversy over Alice Walker's novel, *The Color Purple*, can be understood as an intracommunity debate about the political costs of exposing gender violence within the Black community. Some critics chastised Walker for portraying Black men as violent brutes (Early 1988, p. 9; Pinckney 1987, p. 17). Others lambasted Walker for the portrayal of Celie, the emotionally and physically abused protagonist who triumphs in the end. Walker, one critic contended, had created in Celie a Black woman whom the critic could not imagine existing in any Black community she knew or could conceive of (Harris 1984, p. 155).

The claim that Celie was somehow an unauthentic character might be read as a consequence of silencing discussion of intracommunity violence. Celie may be unlike any Black woman we know because the real terror experienced daily by minority women is routinely concealed in a misguided (though perhaps understandable) attempt to forestall racial stereotyping. Of course, it is true that representations of Black violence—

whether statistical or fictional—are often written into a larger script that consistently portrays the African-American community as pathologically violent. The problem, however, is not so much the portrayal of violence itself as it is the absence of other narratives and images portraying a fuller range of Black experience. Suppression of some of these issues in the name of antiracism imposes real costs. Where information about violence in minority communities is not available, domestic violence is unlikely to be addressed as a serious issue.

The political imperatives of a narrowly focused antiracist strategy support other practices that isolate women of color. For example, activists who have attempted to provide support services to Asian- and African-American women occasionally report intense resistance from some of the leaders and institutions within those communities.¹⁶ At other times, cultural and social factors contribute to suppression. Nilda Rimonte, director of Everywoman's Shelter in Los Angeles, contends that in the Asian community, saving the honor of the family from shame is a priority (Rimonte 1991; Rimonte 1989, p. 327). Unfortunately, this priority tends to be more readily interpreted as obliging women not to scream rather than obliging men not to hit.

Race and culture contribute to the suppression of domestic violence in other ways as well. Women of color are often reluctant to call the police, a hesitancy likely due to a general unwillingness among people of color to subject their private lives to the scrutiny and control of a police force that is frequently hostile. There is also a more generalized community ethic against public intervention, the product of a desire to create a private world free from the diverse assaults on the public lives of racially subordinated people. In this sense the home is not simply a man's castle in patriarchal terms, but it is also a safe haven from the indignities of life in a racist society. In many cases, the desire to protect the home as a safe haven against assaults outside the home may make it more difficult for women of color to seek protection against assaults from within the home.

There is also a general tendency within antiracist discourse to regard the problem of violence against women of color as just another manifestation of racism. In this sense, gender domination within the community is reconfigured as a consequence of racial discrimination against men. Of course, it is probably true that racism contributes to the cycle of violence, given the stress that men of color experience in dominant society. It is therefore more than reasonable to explore the links between racism and domestic violence. But the chain of violence is more complex and extends beyond this single link. Moreover, arguments that characterize domestic violence in communities of color as the acting out of frustrations over denial of male power in other spheres tend to be tied to claims

that eradicating the power differentials between men of color and white men will solve the problem. Yet, as a solution to violence, this approach seems counterproductive, first, because men of power and prestige also abuse women, but most importantly, because it buys into dominant images of male power that are socially damaging. A more productive approach—one more likely to benefit women and children as well as other men—is to resist the seductive images of male power that rely on the ultimate threat of violence as a legitimate measure of male agency. The legitimacy of such power expectations can be challenged by exposing their dysfunctional and debilitating effects on families and communities of color. Moreover, while understanding links between racism and domestic violence is an important component of any effective intervention strategy, it is also clear that women of color need not await the ultimate triumph over racism before they can expect to live violence-free lives.

Race and the Domestic Violence Lobby

Not only do race-based priorities function to obscure the problem of violence suffered by women of color; certain rhetorical strategies directed at politicizing violence against women may also reproduce the political marginalization of women of color. Strategies for increasing awareness of domestic violence tend to begin by citing the commonly shared assumption that battering is a problem located in the family of the "other"—namely, poor and/or minority families. The strategy then focuses on demolishing the straw man, stressing that spousal abuse also occurs in white elite communities. Some authorities are explicit in renouncing the "stereotypical myths about battered women" (Women and Violence Hearings, 1991, pt. 2, p. 139). A few commentators have even transformed the message that battering is not *exclusively* a problem of the poor or minority communities into a claim that it *equally* affects all races and classes (Borgmann 1990). That battering occurs in families of all races and all classes seems to be an ever-present theme of antibuse campaigns. (Women and Violence Hearings, 1991 pt. 1, p. 101; pt. 2, pp. 89, 139). First-person anecdotes and studies, for example, consistently assert that battering cuts across racial, ethnic, economic, education, and religious lines. (Walker 1989, pp. 101–2; Straus, Gelles and Steinmetz 1980, p. 31; Clark 1987, p. 182 n. 74). Countless first-person stories begin with a statement like, "I was not supposed to be a battered wife." The inference, of course, is that there is a more likely vision of a battered spouse, one whose race or class background contrasts with the identity of the speaker to produce the irony. Playing on the contrast between myths about and realities of violence functions effectively to challenge beliefs about the occurrence of domestic violence in American society.

Yet this tactic is tricky business, one that may simultaneously reify and erase "othered" women as victims of domestic abuse. It is clear, on one hand, that attacking the stereotypes underlying dominant conceptions of domestic violence is both a feminist and antiracist strategy. By pointing out that violence is a universal problem, elites are deprived of their false security, while nonelite families are given reason not to be unduly defensive. Moreover, all battered women may well benefit from knowing that they are far from alone. But there is, nonetheless, a thin line between debunking the stereotypical beliefs that only poor or minority women are battered, and pushing them aside to focus on victims for whom mainstream politicians and media are more likely to express concern. While it is unlikely that advocates intend to play into such sensibilities—and it is even less clear whether favorable responses reflect these sensibilities—the rhetoric about and representations of battered women produced by power elites provide some grounds for concern.

An illustration of this troubling possibility is found in the remarks of Senator David Cohen in support of the Violence Against Women Act of 1991.¹⁷ Senator Cohen stated:

[Rapes and domestic assault] are not limited to the streets of our inner cities or to those few highly publicized cases that we read about in the newspapers or see on the evening news. . . . It is *our* mothers, wives, daughters, sisters, friends, neighbors, and coworkers who are being victimized.¹⁸

Senator Cohen and his colleagues who support the Act no doubt believe that they are directing attention and resources to all women victimized by domestic violence. Despite their universalizing rhetoric of "all" women, they were able to empathize with female victims of domestic violence only by looking past the plight of "other" women, and by recognizing the familiar faces of their own. The strength of the appeal to protect "our" mothers, wives, daughters, and sisters must, on some level, be its race and class specificity. After all, it has always been someone's mother, wife, daughter, or sister who has been abused, even when the victim was imagined to be Black, Latina or poor. The point here is not that the Violence Against Women Act is particularistic on its own terms, but that, unless the senators and other policymakers consciously examine why violence remained insignificant as long as it was understood as a minority problem, it is unlikely that women of color will share equally in the distribution of resources and concern. It is even more unlikely, however, that those in power will be forced to confront this issue. As long as attempts to politicize domestic violence focus on convincing elites that this is not a "minority" problem but *their* problem, any authentic and

sensitive attention to the experiences of minority women will probably continue to be regarded as jeopardizing the movement.

While Senator Cohen's statement reflects a self-consciously political presentation of domestic violence, an episode of the CBS News program *48 Hours*¹⁹ shows how similar patterns of "othering" nonwhite women are also apparent in journalistic accounts of domestic violence. The program presented seven women who were victims of abuse. Six were interviewed at some length, along with their family members, friends, supporters, and even detractors. The viewer got to know something about these women as each was humanized through the telling of their stories. Yet the seventh woman, the only nonwhite one, never came into focus. She remained literally unrecognizable throughout the segment, first introduced by photographs showing her face badly beaten, and later shown with her face electronically altered in the videotape of a hearing at which she was forced to testify. Other images associated with this woman included shots of a bloodstained room and blood-soaked pillows. Her boyfriend was pictured handcuffed, while the camera zoomed in for a close-up of his bloodied sneakers. Of all the presentations in the episode, hers was the most graphic and impersonal. The overall point of the segment "featuring" this woman was that battering might not escalate into homicide if battered women would only cooperate with prosecutors. In focusing on its own agenda and failing to explore why this woman did not cooperate with prosecutors, the program diminished this woman, communicating, however subtly, that she was responsible for her own victimization.

Unlike the other women, all of whom, again, were white, this Black woman had no name, no family, no context. The viewer sees her only as victimized and uncooperative. She cries when shown pictures. She pleads not to be forced to view the bloodstained room and her disfigured face. The program does not help the viewer to understand her predicament. The possible reasons she did not want to testify—fear, love, or possibly both—are never suggested. Most unfortunately, she, unlike the other six women, is given no epilogue. While the fates of the other women are revealed at the end of the episode, we discover nothing about the Black woman. She, like the "others" she represents, is simply left to herself and soon forgotten. This episode presents the classic view of the pathological "other": the viewers peer through the dimly lit window into her life; they see the violence she experiences, but they cannot and do not understand why she stays. Communication—indeed, rationality itself—seems virtually impossible. The life of the "other" continues along as a predictably unfathomable script and thus serves as the symbolic backdrop against which more accessible and familiar voices speak.

I offer this description to suggest that tokenistic, objectifying, voyeuristic

inclusion of women of color is at least as disempowering as complete exclusion. The effort to politicize violence against women will do little to address Black and other minority women if their images are retained simply to magnify the problem rather than to humanize their experiences. Similarly, the antiracist agenda will not be advanced significantly by forcibly suppressing the reality of battering in minority communities. As the *48 Hours* episode makes clear, the images and stereotypes we fear are readily available and are frequently deployed in ways that do not generate sensitive understanding of the nature of domestic violence in minority communities.

Race and Domestic Violence Support Services

Women working in the field of domestic violence have sometimes reproduced the subordination and marginalization of women of color by adopting policies, priorities, or strategies of empowerment that either elide or wholly disregard the particular intersectional needs of women of color. While gender, race, and class intersect to create the particular context in which women of color experience violence, certain choices made by "allies" can reproduce intersectional subordination within the very resistance strategies designed to respond to the problem.

Feminists, of course, cannot be held solely responsible for the various ways in which their political efforts are received. Usually, much more is demanded of power than is given. Nonetheless there are sites in which feminist interventions can be directly criticized as marginalizing women of color.

This problem is starkly illustrated by the inaccessibility of domestic violence support services to many non-English-speaking women. In a letter written to the Deputy Commissioner of the New York State Department of Social Services, Diana Campos, Director of Human Services for Programas de Ocupaciones y Desarrollo Economico Real, Inc. (PODER), detailed the case of a Latina in crisis who was repeatedly denied accommodation at a shelter because she could not prove that she was English-proficient. The woman had fled her home with her teenage son, believing her husband's threats to kill them both. She called the domestic violence hotline administered by PODER, seeking shelter for herself and her son. Because most shelters would not accommodate the woman with her son, they were forced to live on the streets for two days. The hotline counselor was finally able to find an agency that would take both the mother and the son, but when the counselor told the intake coordinator at the shelter that the woman spoke limited English, the coordinator told her that they could not take anyone who was not English-proficient. When the woman in crisis called back and was told of the shelter's "rule," she replied

that she could understand English if spoken to her slowly. As Campos explains:

Mildred, the hotline counselor, told Wendy, the intake coordinator, that the woman said that she could communicate a little in English. Wendy told Mildred that they could not provide services to this woman because they have house rules that the woman must agree to follow. Mildred asked her, "What if the woman agrees to follow your rules? Will you still not take her?" Wendy responded that all of the women at the shelter are required to attend [a] support group and they would not be able to have her in the group if she could not communicate. Mildred mentioned the severity of this woman's case. She told Wendy that the woman had been wandering the streets at night while her husband is home, and she had been mugged twice. She also reiterated the fact that this woman was in danger of being killed by either her husband or a mugger. Mildred expressed that the woman's safety was a priority at this point, and that once in a safe place, receiving counseling in a support group could be dealt with.³⁰

The intake coordinator restated the shelter's policy of taking only English-speaking women, and stated further that the woman would have to call the shelter herself for screening. If the woman could communicate with them in English, she might be accepted. When the woman called the PODER hotline later that day, she was in such a state of fear that the hotline counselor who had been working with her had difficulty understanding her in Spanish. Campos directly intervened at this point, calling the executive director of the shelter. A counselor called back from the shelter. As Campos reports,

Marie [the counselor] told me that they did not want to take the woman in the shelter because they felt that the woman would feel isolated. I explained that the son agreed to translate for his mother during the intake process. Furthermore, that we would assist them in locating a Spanish-speaking battered women's advocate to assist in counseling her. Marie stated that utilizing the son was not an acceptable means of communication for them, since it further victimized the victim. In addition, she stated that they had similar experiences with women who were non-English-speaking, and that the women eventually just left because they were not able to communicate with anyone. I expressed my extreme concern for her safety and reiterated that we would assist them in providing her with the necessary services until we could get her placed someplace where they had bilingual staff.

After several more calls, the shelter finally agreed to take the woman. The woman called once more during the negotiation; however, after a

plan was in place, the woman never called back. Said Campos, "After so many calls, we are now left to wonder if she is alive and well, and if she will ever have enough faith in our ability to help her to call us again the next time she is in crisis."

Despite this woman's desperate need, she was unable to receive the protection afforded English-speaking women, due to the shelter's rigid commitment to exclusionary policies. Perhaps even more troubling than the shelter's lack of bilingual resources was its refusal to allow a friend or relative to translate for the woman. This story illustrates the absurdity of a feminist approach that would make the ability to attend a support group without a translator a more significant consideration in the distribution of resources than the risk of physical harm on the street. The point is not that the shelter's image of empowerment is empty, but rather that it was imposed without regard to the disempowering consequences for women who did not match the kind of client the shelter's administrators imagined. And thus they failed to accomplish the basic priority of the shelter movement—to get the woman out of danger.

Here the woman in crisis was made to bear the burden of the shelter's refusal to anticipate and provide for the needs of non-English-speaking women. Said Campos, "It is unfair to impose more stress on victims by placing them in the position of having to demonstrate their proficiency in English in order to receive services that are readily available to other battered women." The problem is not easily dismissed as one of well-intentioned ignorance. The specific issue of monolingualism and the monistic view of women's experience that set the stage for this tragedy were not new issues in New York. Indeed, several women of color reported that they had repeatedly struggled with the New York State Coalition Against Domestic Violence over language exclusion and other practices that marginalized the interests of women of color.³¹ Yet despite repeated lobbying, the coalition did not act to incorporate the specific needs of nonwhite women into their central organizing vision.

Some critics have linked the coalition's failure to address these issues to the narrow vision of coalition that animated its interaction with women of color in the first place. Efforts to include women of color came, it seems, as something of an afterthought. Many were invited to participate only after the coalition was awarded a grant by the state to recruit women of color. However, as one "recruit" said, "they were not really prepared to deal with us or our issues. They thought that they could simply incorporate us into their organization without rethinking any of their beliefs or priorities and that we would be happy." Even the most formal gestures of inclusion were not to be taken for granted. On one occasion when several women of color attended a meeting to discuss a special task force

on women of color, the group debated all day over including the issue on the agenda.

The relationship between the white women and the women of color on the board was a rocky one from beginning to end. Other conflicts developed over differing definitions of feminism. For example, the board decided to hire a Latina staffperson to manage outreach programs to the Latino community, but the white members of the hiring committee rejected candidates who did not have recognized feminist credentials even though they were favored by Latina committee members. As Campos pointed out, by measuring Latinas against their own biographies, the white members of the board failed to recognize the different circumstances under which feminist consciousness develops and manifests itself within minority communities. Many of the women who interviewed for the position were established activists and leaders within their own community, a fact that suggests that these women were probably familiar with the specific gender dynamics in their communities, and were accordingly better qualified to handle outreach than other candidates with more conventional feminist credentials.

The coalition ended a few months later when the women of color walked out. Many of these women returned to community-based organizations, preferring to struggle over women's issues within their communities rather than struggle over race and class issues with white, middle-class women. Yet as illustrated by the case of the Latina who could find no shelter, the dominance of a particular perspective and set of priorities within the shelter community continues to marginalize the needs of women of color.

The struggle over which differences matter and which do not is neither an abstract nor an insignificant debate among women. Indeed, these conflicts are about more than difference as such: they raise critical issues of power. The problem is not simply that women who dominate the anti-violence movement are different from women of color, but that they frequently have power to determine, either through material or rhetorical resources, whether the intersectional differences of women of color will be incorporated at all into the basic formulation of policy. Thus, the struggle over incorporating these differences is not a petty or superficial conflict about who gets to sit at the head of the table. In the context of violence, it is sometimes a deadly serious matter of who will survive—and who will not.

Conclusion

This article has presented intersectionality as a way of framing the various interactions of race and gender in the context of violence against

women of color. I have used intersectionality as a way to articulate the interaction of racism and patriarchy generally. I have also used intersectionality to describe the location of women of color both within overlapping systems of subordination and at the margins of feminism and anti-racism. The effort to politicize violence against women will do little to address the experiences of nonwhite women until the ramifications of racial stratification among women are acknowledged. At the same time, the antiracist agenda will not be furthered by suppressing the reality of intraracial violence against women of color. The effect of both these marginalizations is that women of color have no ready means to link their experiences with those of other women. This sense of isolation compounds efforts to politicize gender violence within communities of color, and permits the deadly silence surrounding these issues to continue.

I want to suggest that intersectionality offers a way of mediating the tension between assertions of multiple identity and the ongoing necessity of group politics. It is helpful in this regard to distinguish intersectionality from the closely related perspective of antiesentialism, from which women of color have critically engaged white feminism for the absence of color on the other. One rendition of this antiesentialist critique—that feminism essentializes the category “woman”—owes a great deal to the postmodernist idea that categories we consider natural or merely representational are actually socially constructed in a linguistic economy of difference.²² While the descriptive project of postmodernism of questioning the ways in which meaning is socially constructed is generally sound, this critique sometimes misreads the meaning of social construction and distorts its political relevance.

One version of antiesentialism, embodying what might be called the vulgarized social construction thesis, is that since all categories are socially constructed, there is no such thing as, say, “Blacks” or “women,” and thus it makes little sense to continue reproducing those categories by organizing around them.²³ Even the Supreme Court has gotten into this act. In *Melro Broadcasting, Inc. v. FCC*, (110 S. Ct. 2997 (1990)) the Court conservatives, in rhetoric that oozes vulgar constructionist smugness, proclaimed that any set-aside designed to increase the voices of minorities on the air waves was itself based on a racist assumption that skin color is in some way connected to the likely content of one's broadcast. The Court said:

The FCC's choice to employ a racial criterion embodies the related notions that a particular and distinct viewpoint inheres in certain racial groups and that a particular applicant, by virtue of race or ethnicity

alone, is more valued than other applicants because "likely to provide [that] distinct perspective." The policies directly equate race with belief and behavior, for they establish race as a necessary and sufficient condition of securing the preference. . . . The policies impermissibly value individuals because they presume that persons think in a manner associated with their race. (p. 3037, internal citations omitted)

But to say that a category such as race or gender is socially constructed is not to say that that category has no significance in our world. On the contrary, a large and continuing project for subordinated people—and indeed, one of the projects for which postmodern theories have been very helpful—is thinking about the way power has clustered around certain categories and is exercised against others. This project attempts to unveil the processes of subordination and the various ways those processes are experienced by people who are subordinated and people who are privileged. It is, then, a project that presumes that categories have meaning and consequences. This project's most pressing problem, in many if not most cases, is not the existence of the categories, but rather the particular values attached to them, and the way those values foster and create social hierarchies.

This is not to deny that the process of categorization is itself an exercise of power, but the story is much more complicated and nuanced than that. First, the process of categorizing—or, in identity terms, naming—is not unilateral. Subordinated people can and do participate, sometimes even subverting the naming process in empowering ways. One need only think about the historical subversion of the category "Black," or the current transformation of "queer," to understand that categorization is not a one-way street. Clearly, there is unequal power, but there is nonetheless some degree of agency that people can and do exert in the politics of naming. And it is important to note that identity continues to be a site of resistance for members of different subordinated groups. We all can recognize the distinction between the claims "I am Black" and the claim "I am a person who happens to be Black." "I am Black" takes the socially imposed identity and empowers it as an anchor of subjectivity. "I am Black" becomes not simply a statement of resistance, but also a positive discourse of self-identification, intimately linked to celebratory statements like the Black nationalist "Black is beautiful." "I am a person who happens to be Black," on the other hand, achieves self-identification by straining for a certain universality (in effect, "I am first a person") and for a concomitant dismissal of the imposed category ("Black") as contingent, circumstantial, nondeterminant. There is truth in both characterizations, of course, but they function quite differently depending on the political context. At this point in history, a strong case can be

made that the most critical resistance strategy for disempowered groups is to occupy and defend a politics of social location rather than to vacate and destroy it.

Vulgar constructionism thus distorts the possibilities for meaningful identity politics by conflating at least two separate but closely linked manifestations of power. One is the power exercised simply through the process of categorization; the other, the power to cause that categorization to have social and material consequences. While the former power facilitates the latter, the political implications of challenging one over the other matter greatly. We can look at debates over racial subordination throughout history and see that, in each instance, there was a possibility of challenging either the construction of identity or the system of subordination based on that identity. Consider, for example, the segregation system in *Plessy v. Ferguson* (163 U.S. 537, 1896). At issue were multiple dimensions of dominance, including categorization, the sign of race, and the subordination of those so labeled. There were at least two targets for Plessy to challenge: the construction of identity ("What is a Black?"), and the system of subordination based on that identity ("Can Blacks and whites sit together on a train?"). Plessy actually raised both issues, challenging both the coherence of race as a category, and challenging the subordination of those deemed to be Black. In his attack on the former, Plessy argued that the application of the segregation statute to him, given his mixed-race status, was inappropriate. The Court refused to see this as an attack on the coherence of the race system, and instead responded by simply reproducing the Black/white dichotomy that Plessy was challenging. Because Plessy was not, by virtue of his nonwhite ancestry, white, he had suffered no injury by not being treated like a white man. As we know, Plessy's challenge to the practice of segregating those who were nonwhite was not successful either. In evaluating various resistance strategies today, it may be useful to ask which of Plessy's challenges would have been best for him to have won—the challenge against the coherence of the racial categorization system, or the challenge to the practice of segregation?

The same question can be posed for *Brown v. Board of Education* (397 U.S. 483, 1954). Which of two possible arguments was politically more empowering—that segregation was unconstitutional because the racial categorization system on which it was based was incoherent, or that segregation was unconstitutional because it was injurious to children categorized as Black and thus oppressive to their communities? While it might strike some as a difficult question, for the most part, the dimension of racial domination that has been most vexing to African-Americans has not been the racial categorization as such, but the myriad ways in which those of us so defined have been systematically subordinated. With

particular regard to problems confronting women of color, when identity politics fail us, as they frequently do, it is not primarily because those politics take as natural certain categories that are socially constructed, but rather because the descriptive content of those categories and the narratives on which they are based have privileged some experiences and excluded others.

Along these lines, consider the Clarence Thomas/Anita Hill scandal. During the Senate hearings for the confirmation of Clarence Thomas to the Supreme Court, Anita Hill, in bringing allegations of sexual harassment against Thomas, was rhetorically disempowered in part because she fell between the dominant interpretations of feminism and antiracism. Caught between the competing narrative tropes of rape (advanced by feminists), on the one hand, and lynching (advanced by Thomas and his antiracist supporters), on the other, the raced and gendered dimensions of her position could not be told. This dilemma could be described as the consequence of antiracism's essentializing Blackness and feminism's essentializing womanhood. But recognizing as much does not take us far enough, for the problem is not simply linguistic or philosophical in nature. It is specifically political: the narratives of gender are based on the experience of white, middle-class women, and the narratives of race are based on the experience of Black men. The solution does not merely entail arguing for the multiplicity of identities or challenging essentialism generally. Instead, in Hill's case, for example, it would have been necessary to assert those crucial aspects of her location that were erased, even by many of her advocates—that is, to state what difference her difference made.

If, as this analysis asserts, history and context determine the utility of identity politics, how, then, do we understand identity politics today, especially in light of our recognition of multiple dimensions of identity? More specifically, what does it mean to argue that gendered identities have been obscured in antiracist discourses, just as race identities have been obscured in feminist discourses? Does that mean we cannot talk about identity? Or instead, that any discourse about identity has to acknowledge how our identities are constructed through the intersection of multiple dimensions? A beginning response to these questions requires that we first recognize that the organized identity groups in which we find ourselves are in fact coalitions, or at least potential coalitions waiting to be formed.

In the context of antiracism, recognizing the ways in which the intersectional experiences of women of color are marginalized in prevailing conceptions of identity politics does not require that we give up attempts to organize as communities of color. Rather, intersectionality provides a basis for reconceptualizing race as a coalition between men and women

of color. For example, in the area of rape, intersectionality provides a way of explaining why women of color have to abandon the general argument that the interests of the community require the suppression of any confrontation around intraracial rape. Intersectionality may provide the means for dealing with other marginalizations as well. For example, race can also be a coalition of straight and gay people of color, and thus serve as a basis for critique of churches and other cultural institutions that reproduce heterosexism.

With identity thus reconceptualized, it may be easier to understand the need for, and to summon the courage to challenge, groups that are after all, in one sense, "home" to us, in the name of the parts of us that are not made at home. This takes a great deal of energy, and arouses intense anxiety. The most one could expect is that we will dare to speak against internal exclusions and marginalizations, that we might call attention to how the identity of "the group" has been centered on the intersectional identities of a few. Recognizing that identity politics takes place at the site where categories intersect thus seems more fruitful than challenging the possibility of talking about categories at all. Through an awareness of intersectionality, we can better acknowledge and ground the differences among us and negotiate the means by which these differences will find expression in constructing group politics.

Notes

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1. I use "Black" and "African-American" interchangeably throughout this article. I capitalize "Black" because "Blacks, like Asians, Latinos, and other 'minorities', constitute a specific cultural group and, as such, require denotation as a proper noun." (Grenshaw 1988, p. 1332 n. 2, citing MacKinnon 1982, p. 516). By the same token, I do not capitalize "white," which is not a proper noun, since whites do not constitute a specific cultural group. For the same reason I do not capitalize "women of color."
2. It is important to name the perspective from which one constructs one's analysis; and for me, that is as a Black feminist. Moreover, it is important to acknowledge that the materials that I incorporate in my analysis are drawn heavily from research on Black women. On the other hand, I see my own work as part of a broader collective effort among feminists of color to expand feminism to include analyses of race and

- other factors such as class, sexual orientation, and age. I have attempted therefore to offer my sense of the tentative connections between my analysis of the intersectional experiences of Black women and the intersectional experiences of other women of color. I stress that this analysis is not intended to include falsely, nor to exclude unnecessarily, other women of color.
3. During my research in Los Angeles, California, I visited Jenesse Battered Women's Shelter, the only shelter in the Western states primarily serving Black women, and Everywoman's Shelter, which primarily serves Asian women. I also visited Estelle Chueng at the Asian Pacific Law Foundation, and I spoke with a representative of La Casa, a shelter in the predominantly Latino community of East L.A.
 4. Indeed one shelter provider reported that nearly eighty-five percent of her clients returned to the battering relationships, largely because of difficulties in finding employment and housing. African-Americans are more segregated than any other racial group, and this segregation exists across class lines. Recent studies in Washington, D.C., and its suburbs show that sixty-four percent of Blacks trying to rent apartments in white neighborhoods encountered discrimination. (Thompson 1991, D1). Had these studies factored gender and family status into the equation, the statistics might have been worse.
 5. Racial differences marked an interesting contrast between Jenesse's policies and those of other shelters situated outside the Black community. Unlike some other shelters in Los Angeles, Jenesse welcomed the assistance of men. According to the director, the shelter's policy was premised on a belief that given African-American's need to maintain healthy relations to pursue a common struggle against racism, anti-violence programs within the African-American community cannot afford to be antagonistic to men. For a discussion of the different needs of Black women who are battered, see Richie 1985, p. 40.
 6. 8 U.S.C. + s 1186a (1988).
 7. The Marriage Fraud Amendments provided that, for the conditional resident status to be removed, "the alien spouse and the petitioning spouse (if not deceased) jointly must submit to the Attorney General . . . a petition which requests the removal of such conditional basis and which states, under penalty of perjury, the facts and information." 8 U.S.C. + s 1186a(b)(1)(A). The amendments provided for a waiver, at the attorney general's discretion, if the alien spouse was able to demonstrate that deportation would result in extreme hardship, or that the qualifying marriage was terminated for good cause. (+ s 1186a(c)(4)). However, the terms of this hardship waiver have not adequately protected battered spouses.
 8. Immigration Act of 1990, Pub. L. No. 101-649, 104 Stat. 4978, H.R. Rep. No. 723(D), 101st Cong., 2d Sess. 78 (1990), reprinted in 1990 U.S.C.A.N. 6710, 6758.
 9. H.R. Rep. No. 723(D), 101st Cong., 2d Sess. 79, (1990) reprinted in 1990 U.S.C.A.N. 6710, 6759.
 10. One survey conducted of battered women "hypothesized that if a person is a member of a discriminated minority group, the fewer the opportunities for socioeconomic status above the poverty level and the weaker the English language skills, the greater the disadvantage." (Pagelow 1981, p. 96). The seventy minority women in the study "had a double disadvantage in this society that serves to tie them more strongly to their spouses."
 11. There can be little question that women unable to communicate in English are severely handicapped in seeking independence. Some women thus excluded were even further disadvantaged because they were not U.S. citizens and some were in this country illegally. For a few of these, the only assistance shelter staff could render was to help reunite them with their families of origin (Pagelow 1981, pp. 96-97). Non-English-speaking women are often excluded even from studies of battered women because of their language and other difficulties. A researcher qualified the statistics of one survey by pointing out that "an unknown number of minority group women were excluded from this survey sample because of language difficulties" (Pagelow 1981, p. 96). To combat this lack of appropriate services for women of color at many shelters, special programs have been created specifically for women from particular communities. A few examples of such programs include the Victim Intervention Project in East Harlem for Latina women, Jenesse Shelter for African-American women in Los Angeles, Appa Gar in Chicago for South Asian women, and, for Asian women generally, the Asian Women's Shelter in San Francisco, the New York Asian Women's Center, and the Center for the Pacific Asian Family in Los Angeles. Programs with hotlines include Saki for South Asian Women in New York, and Manavi in Jersey City, also for South Asian women, as well as programs for Korean women in Philadelphia and Chicago.
 12. For example, the Rosa Parks Shelter and the Compton Rape Crisis Hotline, two shelters that serve the African-American community, are in constant conflict with funding sources over the ratio of dollars and hours to women served. Interview with Joan Greer, Executive Director of Rosa Parks Shelter, in Los Angeles, California (April 1990).
 13. Interview with Joan Greer, Executive Director of Rosa Parks Shelter, in Los Angeles, California (April 1990).
 14. Most crime statistics are classified by sex or race, but none are classified by sex and race. Because we know that most rape victims are women, the racial breakdown reveals, at best, rape rates for Black women. Yet, even given this head start, rates for other nonwhite women are difficult to collect. While there are some statistics for Latinas, statistics for Asian and Native American women are virtually nonexistent. In this regard, Ali's arguments bear much in common with those of neoconservatives who attribute many of the social ills plaguing Black America to the breakdown of patriarchal family values (see Raspberry 1989, p. C15; Will 1986a, p. A23; Will 1986b, p. 9). Ali's argument shares remarkable similarities with the controversial "Moynihan Report" on the Black family, so called because its principal author was now-Senator Daniel P. Moynihan (D-N.Y.). In the infamous chapter entitled "The Tangle of Pathology," Moynihan argued that:

The Negro community has been forced into a matriarchal structure which, because it is so out of line with the rest of American society, seriously retards the progress of the group as a whole, and imposes a crushing burden on the Negro male and, in consequence, on a great many Negro women as well. (p. 29)
 15. The source of the resistance reveals an interesting difference between the Asian-American and African-American communities. In the African-American community, the resistance is usually grounded in efforts to avoid confirming negative stereotypes of African-Americans as violent; the concern of members in some Asian-American communities is to avoid tarnishing the model minority myth. Interview with Nilda Rimonte, Director of the Everywoman Shelter, in Los Angeles, California (April 19, 1991).
 17. On January 14, 1991, Senator Joseph Biden (D-Del.) introduced Senate Bill 15, the Violence Against Women Act of 1991, comprehensive legislation addressing violent

- crime confronting women. S. 15, 102d Cong., 1st Sess. (1991). The bill consists of several measures designed to create safe streets, safe homes, and safe campuses for women. More specifically, Title III of the bill creates a civil rights remedy for crimes of violence motivated by the victim's gender (+52-301). Among the findings supporting the bill were "(1) crimes motivated by the victim's gender constitute bias crimes in violation of the victim's right to be free from discrimination on the basis of gender" and "(2) current law [does not provide a civil rights remedy] for gender crimes committed on the street or in the home." S. Rep. No. 197, 102d Cong., 1st Sess. 27 (1991).
18. 137 Cong. Rec. S611 (daily ed. Jan 14, 1991), statement of Sen. Cohen.
 19. *48 Hours: Till Death Do Us Part* (CBS television broadcast, February 6, 1991).
 20. Letter of Diana M. Campos, Director of Human Services, PODER, to Joseph Semidei, Deputy Commissioner, New York State Department of Social Services, March 26, 1992 (hereinafter *PODER Letter*).
 21. Roundtable Discussion on Racism and the Domestic Violence Movement, April 2, 1992 (transcript on file with the *Stanford Law Review*). The participants in the discussion—Diana Campos, Director, Bilingual Outreach Project of the New York State Coalition Against Domestic Violence; Elsa A. Rios, Project Director, Victim Intervention Project (a community-based project in East Harlem, New York, serving battered women); and Haydee Rosario, a social worker with the East Harlem Council for Human Services and a Victim Intervention Project volunteer—recounted conflicts relating to race and culture during their association with the New York State Coalition Against Domestic Violence, a state oversight group that distributed resources to battered women's shelters throughout the state and generally set policy priorities for the shelters that were part of the coalition.
 22. I follow the practice of others in linking antessentialism to postmodernism. (See, generally, Nicholson, 1990.)
 23. I do not mean to imply that all theorists who have made antessentialist critiques have lapsed into vulgar constructionism. Indeed, antessentialists avoid making these troubling moves, and would no doubt be receptive to much of the critique set forth herein. I use the term vulgar constructionism to distinguish between those antessentialist critiques that leave room for identity politics and those that do not.

Section II

Feminist Theory and Legal Norms