

32 • Barbara Perry

DOING GENDER AND DOING GENDER INAPPROPRIATELY

Violence against Women, Gay Men, and Lesbians

DISCUSSION QUESTIONS

1. How does violence against women serve as a form of social control over all women? Why does Perry argue that sexual violence is also gendered violence? Do you think violence against women should be considered a "hate crime"?
2. How is violence against women shaped by race and class dynamics?
3. How is men's violence against both women and other men tied to the construction of gender? Why do you think violence against gay men is more common than violence against lesbians?

GENDER-MOTIVATED VIOLENCE: KEEPING WOMEN IN "THEIR PLACE"

Gender-motivated violence is predicated upon widespread assumptions regarding gender and gender-appropriate deportment. In particular, these assumptions revolve around constructions of gender that represent polar extremes inhabited by masculine and dominant men, and feminine and subordinate women. Violence is but one means by which men as a class enforce conformity of women as a class. Moreover, it is not necessary for all men to engage in violence against women, since the very threat of violent censure is constantly with women. Violence against women, then, is indeed a "classic" form of

hate crime, since it too terrorizes the collective by victimizing the individual. In so doing, hate crime against women reaffirms the privilege and superiority of the male perpetrator with respect to the female victim.

Feminist scholars acknowledge the parallel between violence against women—especially sexual violence—and the lynching of black males as means to exert control and create identity (Brownmiller, 1974; Rothschild, 1993; Pendo, 1994). There is little difference in the motives. Both groups are victimized because of their identity, often for very similar illusionary "violations": "for being uppity, for getting out of line, for failing to recognize 'one's place,' for assuming sexual freedoms, or for behaving no more provocative than walking down

the wrong road at night in the wrong part of town and presenting a convenient isolated target for group hatred and rage" (Brownmiller, 1974: 281). Just as racially motivated violence seeks to reestablish "proper" alignment between racial groups, so too is gender-motivated violence intended to restore men and women to "their place." Victims are chosen because of their gender and because of the assumptions about how they should enact their gender. The gender polarization that permeates U.S. culture is taken as a "natural," "given" fact, wherein women are expected to enact deference, men dominance. This dichotomy presupposes mutually exclusive scripts for males and females—scripts that constrain everything from modes of dress and social roles to ways of expressing emotion and experiencing sexual desire. It also defines any person or behavior that deviates from these scripts as problematic: unnatural, immoral, biologically anomalous, or psychologically pathological. Gender-motivated violence is a key means by which men and women rehearse their scripts, ensuring that women act "like women" in the bedroom, in the kitchen, in the workplace, and on the street.

GENDER, POWER, AND VIOLENCE

In each of these domains, gendered relations of power are enacted, albeit in slightly disparate forms. What unites the home, the workplace, and the street is that each historically has been a crucial site in efforts to establish an "appropriate" hierarchy in which men are dominant, women subordinate. Each has been the locus of struggles that have contributed to the empowerment of men and the relative disempowerment of women.

The United States is a male supremacist society wherein gender difference is constructed as gender inferiority and, ultimately, gender disadvantage. Consequently, women garner less power, prestige, and economic reward than men, who have consistently retained leadership and control in government, commerce, and family matters (Lorber, 1994). This is readily apparent in the legal history

that has helped shape gendered relations of power. Male privilege has long been guaranteed by legal proscriptions and silences that have simultaneously excluded women from involvement in the public sphere, while failing to protect them in the context of their private lives (Taub and Schneider, 1990). On the one hand, legal exclusions on women's enfranchisement, ownership of property, and employment (in law and medicine, for example) have meant that until well into the twentieth century, women were unable to participate fully in politics or the economy. Even today, restrictions on access to abortion or to social security provisions, for example, limit the participatory power of women.

On the other hand, law has also enabled the subordination of women within the home. The same nineteenth- and twentieth-century provisions that limited (married) women's ownership of property meant that married women, in particular, ceded autonomy to their husbands upon marriage. The historical tendency to exclude from criminal proceedings husband's rapes or assaults on wives similarly ensured the dominance of men who were merely exercising their "marital rights." The continued failure to recognize the value of women's domestic labor through some form of income support likewise helps to maintain women's economic dependence on men, both during and subsequent to marriage. This is exacerbated by inequitable divorce settlements and the intractable wage disparities between men and women.

At least with respect to family and domestic violence, men's perceived sense of "ownership" continues to provide a context for the victimization of girls and women. The structured inequality of women leaves them vulnerable to the presumption of male control by whatever means necessary. It establishes an environment in which men freely manipulate the terms of a relationship. Violence becomes one such means for him to prove that he is "the man" and therefore in control. This even extends to relationships with daughters, as in the case of incestuous assaults. Research consistently suggests that child sexual abuse within families is disturbingly common (Baskin and Sommers, 1998; Belknap, 1996).

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It is not unlike woman battering in the home, to the extent that it too is a display of men's control over women, and especially women's sexuality. As Elizabeth Stanko (1985) contends, incestuous assaults are an assertion of male "rights" of access to and control of the powerless female. Young girls especially are vulnerable to such victimization due to their place in the family, their lack of experience, and their femaleness, which Stanko equates with powerlessness.

The extensive research of R. Emerson Dobash and Russell Dobash has led them to identify four interrelated "sources of conflict" that, they argue, are most predictive of woman battering: "men's possessiveness and jealousy; men's expectations concerning women's domestic work; men's sense of the right to punish 'their' women for perceived wrongdoing; and the importance, to men, of maintaining or exercising their position of authority" (1998: 268). Uniting these four triggers is the sense that the man has the right, perhaps the duty, to express his masculine power through violent repression. The female partner in such a relationship is seen to have challenged the masculine authority of her partner. She is seen to have transcended the boundaries of appropriate behavior and deference—perhaps she spoke too long with another man, or sought employment outside the home, contrary to the "demands" of her partner. Such behaviors throw into question the masculinity of the perpetrator. If he cannot control "his woman," perhaps he is not really a manly man after all. By striking out in violence, he reasserts his dominant and aggressive masculinity.

This male concern with taking charge and taking control of the heterosexual relationship emerges repeatedly in research on domestic violence (Websdale and Chesney-Lind, 1998; Weisburd and Levin, 1994; Wolfe and Copeland, 1994; Dobash and Dobash, 1998). This is especially true for patriarchal and usually lower-class families. In such situations, the "essential" nature of the patriarch is interpreted as the responsibility to "dominate and control their wives, and wife beating serves both to ensure continued compliance with their commands and as a resource for constructing a 'damaged'

patriarchal masculinity. Thus, wife beating increases (or is intended to do so) their control over women" (Messerschmidt, 1993: 147).

That a great deal of domestic violence is in fact motivated by a presumed loss of control and ownership is apparent in the increased likelihood of victimization as women attempt to exit a relationship. When women seek to empower themselves, when they seek to achieve some personal autonomy by escaping an abusive relationship, they often become dangerously vulnerable to stalking, assault, even murder (Browne, 1995; Chaiken, 1998; Tjaden and Thoennes, 1998). In many relationships, separation is the moment when the quest for control becomes lethal. Browne's interviews with battered women who killed their partners revealed the extent to which men's attempts to retain control outlast the relationship. One participant maintained that "we were separating but I don't think that would have solved anything. Don always said that he would come back around—that I belonged to him" (Browne, 1995: 232). The spouse of another of Browne's subjects once wrote in his journal, "Every time, Karen would have ugly bruises on her face and neck. She would cry and beg me for a divorce, and I would tell her, 'I am sorry. I won't do it again. But as for the divorce, absolutely not. If I can't have you for my wife, you will die. No one else will have you if you ever try to leave me'" (Browne, 1995: 232). Men who batter attempt to assert their proprietary masculinity through violence. It is as if they fear that all appearance of masculinity, of dominance, of control is lost in the face of women's challenges to their authority. Their violence simultaneously reestablishes the appropriate place of the male and female partners; it is both male prerogative and female punishment.

Moreover, not all men need to engage in battering for it to have a debilitating effect on women. Indeed, the power of domestic violence is that—like other forms of bias-motivated violence—it is embedded in a systemic pattern of real and potential violence against women. The violence against a particular woman in the home is a reminder that any woman

in society is subject to violent control by men. In other words, "Men's power is not an individual, but a collective one. Women's lives are bounded by it. The threat of male violence outside the home... is an acutely intimidating reality to women who endure violence within their own homes" (Stanko, 1985: 57). Men correspondingly enact their "will to power" outside the home. Assaults, rapes, or homicides that are outside the bounds of an intimate relationship tend to be directed at individual women as proxies for the combined threats to masculine domination represented by women as a class. In their daily lives, all women, at any time, may be vulnerable to gender-motivated harassment, intimidation, and violence because they are women and because they represent the devalued, often threatening Other. Wherever a particular act lies on the continuum of violence, it is a "ritual enactment of domination, a form of terror that functions to maintain the status quo" (Caputi, 1993: 7).

As with racially motivated violence, gender-motivated violence often emerges in the context of what is perceived by men as a loss of relative position. Challenges to the collective hegemony of men often are met with aggressive attempts to reassert the "natural" dominance of men. It is, in these terms, a reactive expression of insecurity in the face of reconstituted femininities. It is no coincidence that violent crime perpetrated against women has risen so steadily in the three decades corresponding to the rise of the women's movement. Marilyn French (1992) and Susan Faludi (1991) carefully document what they refer to as the "War Against Women" and the antifeminist backlash, respectively. Both authors point to the increasing harassment and intimidation of women through violence and the threat of violence. As women have collectively striven to redefine themselves as autonomous actors, some men have been compelled to meet the challenge by resorting to the readily available resource of violence.

Marc Lepine is a case in point. On December 6, 1989, Lepine entered a classroom at Montreal's Ecole Polytechnique, systematically separated the male and female engineering students, and opened

fire on the women. Before he killed himself, Lepine had murdered fourteen women and seriously injured nine others. In his verbal harangue during the shooting and in his suicide note, Lepine made it clear that his assault was intended to punish the feminists he held responsible for his personal failures—in particular, his inability to get into engineering school. Lepine's response was extreme, but nonetheless illustrative of the male response to the "erosion of white male exclusivity and privilege" (Caputi and Russell, 1992: 13)...

Neil Websdale and Meda Chesney-Lind's (1998) review of recent domestic violence literature reveals the consistency with which researchers are able to identify a relationship between patriarchal ideals and wife battering. For example, studies by Dobash and Dobash have revealed that battering is most likely to occur where women challenge their partners about household (economic) decisions, and where women are perceived as having failed in their "wifely duties"—refusing sex, serving cold meals, or neglecting the vacuuming. In other words, violence is a reactive performance of masculinity in the face of oppositional performance of femininity.

Interviews with batterers and their victims are illuminating in this regard. Often, both are very much aware of the existence of shared patriarchal beliefs, and the role of violence in enforcing them. A Kentucky woman interviewed by Websdale makes astute observations on the consequences of her "inappropriate" performance of an oppositional form of femininity:

TAMARA: The man is the head of the household. The woman has no say. It doesn't matter about her morals and her feelings. Nothing.

WEBSDALE: Was your husband like that?

TAMARA: He tried to be. That was our biggest problem. I talked back. I had an opinion and wasn't allowed to have an opinion. And I'd say, "I don't care if you agree or not, honey, that's how I feel." That's one reason I was hit.

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Male batterers express the same ideological position, as is the case with this abusive male interviewed by Peter Adams, Alisa Towns, and Nicole Garvey:

Well, you got the male and you got the [laughing] female. And the male earns the bread and the woman brings up the family and that. . . . And it's a fact of life that only women can be a mother. There's no, there's no other way around it. And the man's still gotta go and earn the bread and the woman's still gotta have the children. (1995: 390)

Interviews with both battered women and their partners conducted by Dobash and Dobash (1998) reflect the paramount importance men place on *their needs* and their partners' ability to fulfill them. Often the only provocation to violence was the woman's failure to anticipate or fulfill her partner's expectations of her domestic femininity. One woman reported that

He was late and I'd started cooking his meal but I put it aside, you know, when he didn't come in. Then when he came in I started hearing it. I was standing at the sink and he just came up and gave me a punch in the stomach. . . . It was only because his dinner wasn't ready on the table for him. (1998: 147)

This theme appears again in Diana Russell's interviews with victims of marital rape. One participant revealed that

Oftentimes, he'd ask "where's my supper?" If it wasn't there, he'd hit me, even though I never knew when he'd be home because he was out with other women. (1990: 129)

A final illustration of the relationship between patriarchal beliefs and gendered violence is cited by Jane Caputi and Diana Russell:

In 1989, Curtis Adams was sentenced to 32 years in prison for torturing his wife in a ten-hour attack. After she refused anal sex, Adams handcuffed his wife, repeatedly forced a bottle and then a broomstick into her anus and hung her naked out the window—*taking breaks to make her read biblical passages adjuring women to obey their husbands*. (1992: 18, emphasis added)

In such patriarchal relationships, male batterers use violence to simultaneously prove their manliness and remonstrate "their women" for failing to prove their corresponding womanliness. An essential nature and set of roles is assumed for each, and when they are not forthcoming—when his ability to be a real man is thwarted by her refusal to be a real woman—violence often ensues. The enactment of violence is an enactment of masculine power and control, where it might otherwise be eroding.

Intuitively, this analysis implies that domestic violence perpetrated against women of color may be especially problematic. Christine Rasche (1995) maintains that many of the ethnic communities that have shaped the United States—Latinos, African Americans, Asians, and Native Americans in particular—are structured by rigid patriarchal norms that tend to render familial violence tolerable, if not invisible. However, Kimberlé Williams Crenshaw (1994) highlights the problematic nature of this assumption in light of the academic neglect of the "intersection of racism and patriarchy." What Crenshaw does make clear is that women of color are uniquely vulnerable to gendered violence because of their multiply determined structural disempowerment. They are often simultaneously oppressed by their class, gender, and racial position. That this is the case is also suggested by recent trends toward increasing domestic violence among the Navajo of the Southwest, for example (Zion and Zion, 1996). The traditionally egalitarian nature of these people has been distorted by their more recent history of racial discrimination and disempowerment. Racial and economic disadvantage, coupled with the incursion of Anglo gender ideals, has dramatically altered the place of Navajo women. Increasingly, like their white counterparts, Navajo women are expected to perform the rituals of domestic femininity as a complement to the male performance of patriarchy.

Contrary to popular mythology, African-American gender politics are characterized by neither the extreme matriarch nor the extreme patriarch. Rather, the performance of gender historically has been fluid. According to Beverly Greene (1997), rigid expectations of femininity

and masculinity have been "impractical" against the backdrop of economic marginalization of black men. While the importance of the family has been a constant, idealized notions of masculinity and femininity nonetheless have varied by class, region, and ethnicity.

This is not to say that domestic violence has not also been a constant. hooks' volumes consistently draw attention to the sexism that seems to permeate African-American culture, even where patriarchal performances of masculinity are not in question. hooks agrees that male-as-breadwinner has not always been a viable option as a resource for most young black males. Proof of masculinity instead is embedded in their aggression, their sexuality, or in their ability to discipline the family. Combine these options with the tendency to share with white males a devalued and disdainful perception of women, and the climate is ripe for domestic violence against "uppity black women" (hooks, 1981; 1992). Contemporary African Americans also can find legitimation for their violent subjugation of women in the Muslim glorification of the "feminine ideal." Women are expected to defer to men's natural superiority. Violence in this context allows men to exercise at once their aggressiveness, dominance, and holiness (hooks, 1981).

Espiritu's (1997) examination of the gender politics of Asian Americans also highlights the intersection of race, gender, and class. In contrast to what is often a very traditional division of labor and power in their homeland, Asian immigrants to the United States find that their abilities to maintain such boundaries are compromised. As Espiritu contends, Asian-American women are more likely to be employed, albeit in low-wage occupations, than either their counterparts at home or their male partners in the United States. Consequently, they assume an elevated position in the family as breadwinner and decision maker—a clear threat to the masculinity authority and place of their husbands. As in the parallel white patriarchal family, violence can come to represent a leveling influence....

SEXUALITY AND VIOLENCE

Paralleling the presumption of a normative division of labor, there exists the presumption of normative sexualities. The latter is especially crucial in helping us to understand sexual violence as gendered violence. Sexual assault serves a particularly dramatic role in the policing of gender boundaries and the control of women's sexuality, for it is the place wherein women become objectified as predominantly sexual beings in the service of men.

To the extent that women are sexualized—in the workplace, on the street, in the home—they are held accountable to a femininity that requires sexual responsiveness to men's advances. Just as the relative performance of masculinity and femininity assumes male proprietary rights, so too does it assume that sex with the woman of his choice is a man's right. Herein lies the context for gender-motivated sexual violence. As one rapist put it,

Rape is a man's right. If a woman doesn't want to give it, the man should take it. Women have no right to say no—women are made to have sex. That's all they're good for. (Curran and Renzetti, 1994: 207)

Just as a sense of entitlement underlies domestic violence, so too does it underlie sexual violence within and outside intimate relationships. As the above quote suggests, sexual access to women as a class is perceived as the inalienable right of men as a class. Sexual assault, then, is an institutionalized, rather than aberrant, means by which men can perform their masculinity while "symbolizing and actualizing women's subordinate position" (MacKinnon, 1991: 1302). Women's sexuality is a ready commodity, available to all. In other words, "all women are whores and, therefore, fair game; sexual violence is normal and acceptable" (Caputi and Russell, 1992: 18).

Entitlement takes on a special meaning in the context of sexual assault by intimates—both rape in marriage and acquaintance rape. In these situations, sexual assault takes on an additional validity, reinforcing the gendered power of men to control even the most intimate dimensions of women's

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lives. Earlier, I discussed the family as a preeminent site for the regulation of the sexual division of labor, through violence if necessary. The marital relationship is no less important for the regulation of sexuality, and women's sexuality in particular. It is the site at which men most readily and forcefully exercise their (hetero) sexual rights to a woman's body. Women are expected to "exchange" their sexual favors for a share of their husbands' paychecks, or for the dinner and a movie provided by their dates. This, according to tradition, is the appropriate way for a woman to express her gratitude, and of course, her femininity. Should she adopt an oppositional femininity—by saying "no"—she becomes vulnerable to violent reprobation. Such is the normativity of sexual entitlement, that rapists—and their victims—often don't acknowledge intimate rape as rape. Robin Warsaw (1994) reports that 84 percent of men who had committed date rape asserted that their actions definitely did not constitute rape. A victim of rape clearly articulates her victimizer's failure to recognize the severity of his assault:

He left me a note with one of those smile faces drawn on it. The note read "Denise, I woke up and you were gone. Catch ya later! Have a nice day. Bob." Minutes later, the phone rang. The voice belonged to a cheerful Bob. I think I called him a bastard or a fucker and I told him not to ever call me again, and then hung up. He called back, sounding surprised, asking, "Hey, what's the matter?" (Warsaw, 1994: 91).

Similar assumptions of the unobstructed right of men to women's bodies is evident in sexual assault within cohabiting and marital relationships. Even more so than dates or boyfriends, husbands hold their wives to the presumption of unrestricted sex-on-demand. That is part of her "role" as prescribed by narrow and rigid constructions of femininity. She is the sexual companion, often sexual property, of her mate. When women rebel against such prescriptions, they become vulnerable to the violent reassertion of their partners' aggressive sexuality and manhood, in a way that also is intended to remind them how they are expected to perform. This was the interpretation of rape offered by many of Russell's (1990) subjects:

I consented to sex with him when I didn't want to. . . . It was out of duty, I guess you'd say. He somehow conveyed to me that he expected it of me because I was his wife. (52)

With a husband, you feel forced. I have an obligation to my husband which is very bad. It's always been a man's world. (81)

He used to call me at work to come to him at once because he wanted sex. I used to work on Saturday and he didn't so he wanted me home. (92)

It was a very brutal marriage. He was so patriarchal. He felt he owned me and the children—that I was his property. In the first three weeks of our marriage, he told me to regard him as God and his word as gospel. If I didn't want sex and he did, my wishes didn't matter. (123)

Women and men learn very young that male sexual access to women is "naturally" unrestricted. In some cases, this lesson is learned in the home, when young girls become the victim of child sexual abuse. This practice normalizes sexual assaults against women. It also sexualizes them very early on, so that they become defined by their "sexual capital"; girls learn that their most valuable and manipulable asset is their sexuality. As Stanko puts it, "One basic part in some children's lives, however, can be a source of confusion: as part of the pink world, incestually assaulted children learn that their female role also entails sexual availability to men" (1985: 20). Perhaps, then, it is no accident that those victimized as children are vulnerable to revictimization as adults (Belknap, 1996).

These lessons are reinforced as girls and boys enter adolescence. Barrie Thorne's (1994) work on gender socialization in school settings suggests that adolescent girls are encouraged to cultivate a "culture of compliance and conformity" with respect to boys that may very well leave them vulnerable to sexual victimization. Conversely, boys begin to develop a sense of self that is predicated on mastery of their environment, including girls.

If women have not learned during earlier courtships that "their sexuality is not their own," the

lesson often is driven home after marriage (Stanko, 1985: 73). In fact, sexual assault is the ultimate abrogation of women's choice, autonomy, and self-determination. Forced sex reproduces masculine dominance and control like few other activities. It victimizes women in ways to which they are "uniquely vulnerable" (Rothschild, 1993: 270). Men's ability to overpower women sexually—by right—establishes them as master.

O'Sullivan's comparison of gang rapists and batterers suggests that in some respects, there are remarkable similarities in the dynamics of marital rape and gang rapes. Both appear to turn on "general beliefs in male supremacy, hostility toward women, and different standards for sexual behavior in men and women" (O'Sullivan, 1998: 89). However, there is also a crucial difference: "Gang rape is 'about' the relationship among men doing it rather than their relationship to the woman they are abusing. . . . [Marital rape] is more instrumental than expressive, with the goal of regulating the relationship between the man and his wife" (O'Sullivan, 1998: 105). In other words, gang rape has a different audience in mind, with a slightly different purpose. It is a display of sexual prowess for the group. It is a communal exercise whereby men degrade women while simultaneously proving their solidarity, their sexuality, and their manhood. They share in one another's sexuality through their sharing of the victim (O'Sullivan, 1998; Martin and Hummer, 1995; Sanday, 1998). Moreover, that gang rapes are especially likely in college fraternities should not come as a surprise, since these groups tend to be consumed with constructing and displaying masculinity. Few contexts are so meticulously orchestrated around a conception of hegemonic masculinity that "stresses competition, athleticism, dominance, winning, conflict, wealth, material possessions, willingness to drink alcohol, and sexual prowess vis à vis women" (Martin and Hummer, 1995: 473). In brief, few contexts provide such a ready recipe for gang rape as a display of heterosexuality, misogyny, and loyalty.

Just as in other situations involving coerced sex, gang rapists perceive their victims as sexual

commodities. Patricia Yancey Martin and Robert Hummer's (1995) investigation of fraternities suggests that sexual violence against women is seen by members as a sport or game in which women collectively are pawns, and in which the goal is to score sexually. Non-fraternity rapists share this notion of using a woman—any woman—as a vessel for a group adventure. The challenge is to perform for the group, regardless of the wishes of the interchangeable victim. As expressed by one such rapist,

We felt powerful, we were in control. I wanted sex and there was peer pressure. She wasn't like a person, no personality, just domination on my part. Just to show I could do it—you know, macho. (Scully and Marolla, 1993: 39)

Male sexual prowess is performed at the expense of the victim's autonomy. The victims are natural and ready outlets for the satisfaction of males' "explosive" or "insatiable" sexual appetites (Sanday, 1998; Messerschmidt, 1993). While men voluntarily and enthusiastically enact what is for them normal masculinity, their female victims are involuntarily and unwillingly forced to play the feminine role into which the culture has cast them: sexual conduits whose own pleasure is unimportant.

Women who are victims of gang rape are not in a position to exercise their autonomy. The sheer fact of being outnumbered by two, three, or seven men is itself an obstacle to resistance. Peggy Sanday cites one such case, where the victim was virtually paralyzed with fear:

The 17-year-old freshman woman went to the fraternity "little sister" rush party with two of her roommates. The roommates left early without her. She was trying to get a ride home when a fraternity brother told her he would take her home after the party ended. While she waited, two other fraternity members took her into a bedroom to "discuss little sister matters." The door was closed and one of the brothers stood blocking the exit. They told her that in order to become a little sister she would have to have sex with a fraternity member. She was frightened, fearing they

would physically see no escape. . . . I did a third with the next two in the room. There were sometimes more

Alternatively, she could be compromised or that is unforgivable victim." If she acted "like a lady" in the position O'Sullivan traces women who do keepers of sexual (1998: 85). Sanday denies the complicity of the liquor and vulnerable.

The literature, however, reveals the tendency of gang rapists. Offenders often excessive consumption member boasts

We provide them to get wild. We do it with one. . . . I have overproof alcohol or anything else. I will do a number. (1995: 477-478)

The "number" of victims render them in a position of a loss of control. That women are especially vulnerable is especially evident. This both in fact seen as sexual passivity illustrate the disadvantage of the

would physically harm her if she refused. She could see no escape. Each of the brothers had sex with her, as did a third who had been hiding in the room. During the next two hours, a succession of men went into the room. There were never less than three men with her, sometimes more. (1998: 498)

Alternatively, the victim's ability to consent may be compromised by her state of intoxication, a factor that is unfortunately often used to "blame the victim." If she had been a "good girl," if she had acted "like a lady," she would not have put herself in the position to be so dramatically violated. Chris O'Sullivan traces this to the cultural perception that women who do not adhere to their roles as gatekeepers of sexuality are "fair game for exploitation" (1998: 85). Such popular interpretations, however, deny the complicity of the offenders in providing the liquor and in exploiting the victim when she is vulnerable.

The literature on campus gang rape, in particular, reveals the normativity of alcohol use as a precedent to gang rape (O'Sullivan, 1998; Sanday, 1998). Offenders often plan and coordinate their victims' excessive consumption of alcohol. One fraternity member boasted that

We provide them with "hunch punch" and things get wild. We get drunk and most of the guys end up with one. . . . Hunch punch is a girl's drink made up of overproof alcohol and powdered Kool-Aid, no water or anything else, just ice. It's very strong. Two cups will do a number on a female. (Martin and Hummer, 1995: 477-478)

The "number" that such drinks do on women is to render them incapable of resistance, either because of a loss of coordination or a loss of consciousness. That women are but the vessel of men's sexuality is especially evident here, where women could not possibly be expected to attain any pleasure from the act. This bothers the participants not at all; it is in fact seen as an extension of women's normative sexual passivity. A couple of examples will suffice to illustrate the dynamics whereby fraternity men take advantage of their intoxicated victims.

In the Florida State case, the ringleader met the victim at an off-campus drinking club and invited her back to his fraternity for a "party." . . . At the fraternity house, her host gave her a bottle of wine, which she finished. He carried her unconscious to the communal shower room and summoned three other men. His best friend left his own date waiting downstairs in the hall to join in the assault. After sexually assaulting her, the four classy men wrote fraternity slogans and "hatcher gash" on her thighs, dumped her in the entry hall of another fraternity and called 911. At the hospital, her blood alcohol level was found to be potentially lethal and semen from several different men was found in her vagina. (O'Sullivan, 1998: 101)

It was her first fraternity party. The beer flowed freely and she had much more to drink than she had planned. It was hot and crowded and the party spread out all over the house, so that when three men asked her to go upstairs, she went with them. They took her into a bedroom, locked the door and began to undress her. Groggy with alcohol, her feeble protests were ignored as the three men raped her. When they finished, they put her in the hallway, naked, locking her clothes in the bedroom. (Sanday, 1998: 498)

Whether drunk or sober, the victim's sexuality often is invoked to justify the perpetrator's behavior. As noted previously, victims often are portrayed as "whores" or "sluts" who have violated the standards of femininity, and so deserve to be themselves violated for their impropriety. In such contexts, women are presumed to enjoy gang rape. This allows the construction of the perpetrators as men involved in the legitimate performance of heterosexuality with willing participants. Their behavior is a natural reaction to the seductress in their midst. It is not they who have schemed to assault the victim, but the victim who has somehow schemed to "fire them up." The following example illustrates the presumption of consent:

A 19-year-old woman student was out on a date with her boyfriend and another couple. They were all drinking beer and after going back to the boyfriend's dorm room, they smoked two marijuana cigarettes. The

other couple left and the woman and her boyfriend had sex. The woman fell asleep and the next thing she knew she awoke with a man she didn't know on top of her trying to force her into having sex. A witness said the man was in the hall with two other men when the woman's boyfriend came out of his room and invited them to have sex with his unconscious girlfriend. (Sanday, 1998: 498)

That victimized women are presumed to be always willing, available, and receptive to male "advances" also is apparent in the rationales of gang rapists interviewed by Diana Scully and Joseph Marolla (1993). Rapes of women hitchhikers were justified under the pretext that they must have been prostitutes and therefore "enjoyed it." Gang date rape involved the planned communal assault of one group member's date. This, too, was rendered acceptable by impugning the sexual promiscuity—read inappropriateness—of the victims: "Usually the girl had a bad reputation, or we know it was what she liked" (Scully and Marolla, 1993: 40). One participant admitted to committing twenty or thirty such assaults on "girls who were known to do this kind of thing." He also believed that "it might start out as rape, but then they [the women] would quiet down and none ever reported it to the police" (Scully and Marolla, 1993: 40). Obviously, the women "enjoyed" or even "invited" their victimization. Consequently, men imagined themselves to have established their sexual prowess by their demonstrated ability to satisfy even a protesting woman.

Such demonstrations are at the core of gang rapes. To themselves and their peers, such behavior is not deemed aberrant or deviant. Quite the contrary, it is a show of manliness and camaraderie among friends. Again, it is apparent that the intended audience is not the woman involved. She is a secondary player, interchangeable with any other available woman. What is important is that the men involved solidify their individual and collective identities as heterosexual performers. The show is for the coparticipants. The communal activity permits the concurrent display of sexuality, fearlessness, and camaraderie. O'Sullivan expresses the value of gang

rape to its participants as "a performance put on for other men, proving one's masculinity through heterosexual dominance and exploitation of women. It is a way of co-operating and competing with male friends through a shared risky and risqué, socially sanctioned (in the sense that it's something to brag about among men, although not something to write home to mother about) behavior" (1998: 105). Gang rape signifies the commitment of the participants to the group and to masculine norms of behavior. It is a very public enactment of loyalty to the brotherhood of Man over Woman. And it is a confirmation of the aggressive sexuality of each of the group members. That it is seen as a crucial test of one's heterosexual mastery is evident in the finding that those who refuse to participate are branded "unmanly," possibly homosexual (Sanday, 1998; Martin and Hummer, 1995).

CULTURAL PERMISSION TO HATE

An implicit thread has run throughout this discussion of gender-motivated violence: cultural permission to hate and to victimize women is typically bestowed upon men. Abundant myths, stereotypes, images, and ideologies simultaneously support gendered and unequal relations of power, labor, and sexuality as well as the resultant gender-motivated violence. Cultural assumptions about men, women, and the relationships among and between them condone and often encourage victimization of women as women, because they commonly objectify and minimize the value of women. In other words, "men physically and emotionally abuse women because they can, because they live in a world that gives them permission" (Pharr, 1988: 14). For example, actual and potential victims of sexual violence are all too often portrayed as fantasizing about and therefore enjoying their victimization. Movie images, pornographic magazines, even commercial advertising often paint a portrait in which women may initially resist, but ultimately willingly and enthusiastically participate in their own violation. Hence, "No Means Yes" and other such rape myths abound to distance the offender from culpability. "Boys will be boys," after all!

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This discussion of gender-motivated violence began with the acknowledgment that our culture assumes a masculine and feminine essence—traits, characteristics, capacities that clearly distinguish Man from Woman. Part of that binary is the construction of women as either “good” or “bad,” depending upon their adherence to their prescribed role (Sheffield, 1987). If femininity is enacted through nurturing, submissive, passive behavior, then the woman is good; if it is enacted through selfishness, aggression, promiscuity, or resistance, the woman is bad and so deserves whatever she gets by way of violent retribution. The Bad Woman is herself to blame for male violence directed at her: “women who are beaten by their intimate partners, raped by strangers or acquaintances, or even killed somehow deserve their victimization because of their own fallibility, misjudgement or provocation” (Miller, 1995: 232–233).

Cultural constructs surrounding women’s experiences of violence overwhelmingly lay blame on the victim. If only she had not been out alone; if only she had prepared a hot, appetizing meal; if only she had not dressed so provocatively, she would not have been assaulted, battered, or raped. In other words, if she had “done femininity” appropriately rather than oppositionally, she would not have suffered. Violence is a predictable response to women who violate the gender order. In contrast, the male offender is exonerated, often rewarded. He is “doing masculinity” normally; he is performing masculinity in a socially sanctioned, legitimate manner, in accordance with his right and duty to chasten non-conforming women.

Sheffield (1989) identifies what she refers to as “gender violence myths” that perform this function of releasing males from culpability. Rape myths include:

- all women want to be raped
- no woman can be raped if she doesn’t want it
- she asked for it
- she changed her mind *afterward*
- she said no but meant yes
- if she’s going to be raped, she may as well lie back and enjoy it

Among the wife-battering myths:

- some women need to be beaten
- a good smack will straighten her out/shut her up
- she needs a beating to keep her in line
- she must have provoked it

Sexual harassment is often justified because:

- she was seductive/flirting
- she was in a workplace where she didn’t belong
- she misunderstood “friendliness”

In the context of a culture that holds so tenaciously to these sorts of excuses, women who are assaulted become suspect. She must have done something “inappropriate” to incite the violence. Moreover, it is not just the perpetrators who cling to the popular mythologies. Friends and family of the victim are likely to question her role in the process; police officers carry the assumptions into their investigation of reports of gender-motivated violence; and judges and attorneys are infamous for their tendency to try the victim rather than the offender in cases of sexual assault and domestic violence.

Sheffield (1987) argues elsewhere that the good/bad woman dichotomy is especially problematic for women of color, who, according to strictures of the racial hierarchy, can never achieve “goodness.” It is the presumption of the inherent inferiority of black women that long left them vulnerable to unpunished and unpunishable rape at the hands of white men. That black women are uniquely vulnerable to gendered violence is implicit in Opal Palmer Adisa’s observation that “African American women are more likely to be raped than any other woman, are least likely to be believed, and most often watch their rapists treated with impunity or mild punishment” (1997: 196). Women of color typically are not viewed as “real” victims. More so even than white women, women of color are characterized as inviting violent assault. The latitude allowed them for enacting femininity is even more circumscribed than that allowed white women. African-American women, for example, are “safe” only when enacting the roles of “mule” or “Mammy.” So narrow are these notions of black

womanhood that few women could possibly live up to them. Consequently, black women are assigned the label—often by black and white cultures alike—Jezebels, matriarchs, or uppity black women. It is this intersection of race, gender, and sexuality that shapes the victimization of black women and other women of color (Crenshaw, 1994; Collins, 1993). As noted earlier, it is the Jezebel image of the black prostitute that is perhaps most damning. It constructs black women as sexually promiscuous and therefore enticing, seductive. It is “impossible” to rape a prostitute since she is always on the job.

Aída Hurtado confirms the contrasting imagery of white and black femininity. While the former share in the privilege of white men through their enactment of emphasized femininity, the latter are denied such access and are instead the objects of white masculine power and aggression:

In many ways the dual conception of women based on race—“white goddess/black she-devil, chaste virgin/nigger whore, the blond blue-eyed doll/the exotic ‘mulatto’ object of sexual craving”—has freed women of color from the distraction of the rewards of seduction. Women of color “do not receive the respect and treatment—mollycoddling and condescending as it sometimes is—afforded to white women.” (Hurtado, 1989: 846; quoting Joseph, 1981)

In other words, race conditions the gender imagery to which women are held accountable, especially in terms of their sexuality. While both white women and women of color are vulnerable to gendered violence, the cultural permission for such victimization varies dramatically. As argued above, white women are often victimized because they are perceived to have crossed some boundary of appropriate feminine behavior; women of color because they are perceived to be, “by nature,” sexually available and provocative. In short, white men’s subordination of white women and women of color “involves holding them accountable to normative conceptions of essential womanly nature in different ways” (West and Fenstermaker, 1993: 168).

ANTI-GAY VIOLENCE AND THE CONSTRUCTION OF GENDER

As the foregoing discussion suggests, the contemporary practices of gender politics result in a situation where *men in general* benefit from the subordination of women. Clearly, a dominant masculinist project is the subordination of women by men. However, no less important is the “denial of authority to some groups of men” (Connell, 1987: 109). Significantly, the intersection of the division of labor, power, sexuality, and culture, as outlined above, means that there also exists a hierarchy of masculinities in which some are subordinated to others. Relations of power operate between masculinities and femininities, but also between an array of masculinities. Not all men share in the ability to exercise control at either the macro- or microsocial level. Below a hegemonic masculinity are arrayed a series of subordinated masculinities. Working-class men are subordinate to capitalists; black men to white; homosexuals to heterosexuals. Goffman may have overstated the case only slightly when he identified ideal—or “hegemonic”—masculinity as “a young, married, white, urban, northern, heterosexual Protestant father, of college education, fully employed, of good complexion, weight and height, and a recent record in sports. . . . Any male who fails to qualify in any of these ways is likely to view himself—during moments at least—as unworthy, incomplete and inferior” (1963: 128). The crucial point here is that the nonqualifiers not only “feel inferior, but are so judged. This is the standard according to which the hierarchy of masculinity is created, resulting in stigmatized and marginalized “out-groups.” It is among these subordinated masculinities that we find homosexuals.

Herek explicitly places homophobic violence in its sociocultural context: “Anti-gay violence is a logical, albeit extreme extension of the heterosexism that pervades American society. *Heterosexism* is defined here as an ideological system that denigrates and stigmatizes any nonheterosexual form of behavior, identity, relationship or community” (1992: 89). From this point of reference

Herek goes on to discuss institutional practices that marginalize gay men and women, and how these practices, to be effective, must be seen as “unnatural,” or as “deviant” presentations of gender that are not transmitted through traditional channels (1992: 90). The subsequent discussion of persecution at the

As one potential consequence of gender, gay men and women are often perceived as “deviant” while simultaneously being expected to “do the same” as straight men. At the same time, the “deviant” label is used to justify late, and expensive, medical treatments by which your body is challenged to “do the same.” In short, both the construction of masculinity and the active homophobia are part of a process of devaluation and denunciation of

GAY-BASHING AND THE CONSTRUCTION OF GENDER

Violence against gay men and women (Bensinger, 1993) is a sanctioned political act in the colonial United States, and is made possible by various forms of oppression. Homosexuals, alongside Gerns and Berrill, 1993) noting the pinning of camps, returned sympathy with Heger, 1980; 1993) the United States and extralegal (Duberman, 1993)

Herek goes on to trace the ideological and institutional practices that serve to denigrate and marginalize gay men and lesbians. From the exclusion of gays from civil rights and hate crime protections, to biblical condemnations of homosexuality as "unnatural," to curricular constraints on positive presentations of homosexuality, heterosexism is transmitted through cultural institutions (Herek, 1992: 90). The implication of this is that gays are subsequently rendered invisible at best, worthy of persecution at worst.

As one potential resource in the accomplishment of gender, gay-bashing plays the dual role of reaffirming the perpetrator's ability to "do gender," while simultaneously punishing the victim's propensity to "do gender inappropriately." At one and the same time, this practice serves to define, regulate, and express sexuality. It is a forceful resource by which young men, in particular, can regulate challenges to the binaries of gender and sexuality. In short, both hegemonic and subordinate forms of masculinity are shaped and maintained through active homophobia. In particular, hegemonic masculinity is accomplished through the simultaneous valuation of aggressive heterosexuality and the denunciation of homosexuality.

GAY-BASHING AS A RESOURCE FOR CONSTRUCTING MASCULINITIES

Violence against homosexuals is not a new problem (Bensinger, 1992). Historically, it has been a legally sanctioned policy, as in medieval Europe or the colonial United States where sodomy was punishable by various forms of mutilation, or even death. Homosexuals were imprisoned and exterminated alongside German Jews in Nazi death camps (Herek and Berrill, 1992: 1). Some American "liberators," noting the pink triangles worn by gay men in the camps, returned the "deviants" to their prisons in sympathy with the Nazis' intentions (Gran, 1995; Heger, 1980; Plant, 1986). The McCarthy era in the United States was a period of extensive legal and extralegal persecution of gay men and lesbians (Duberman, 1993; Adam, 1995).

While most (but not all) American states have eliminated legislation that would criminalize the sexual practices of gays and lesbians, the gay community continues to suffer as victims of hatred, harassment, and violence. Moreover, attacks against homosexuals tend to be among the most brutal acts of hatred. They often involve severe beatings, torture, mutilation, castration, and sexual assault. They are also very likely to result in death (Comstock, 1991; Levin and McDevitt, 1993). NGLTF annual audits consistently report disproportionate evidence of "overkill" in gay-related homicides (1996; 1997; 1998). In fact, more than 60 percent of such homicides show evidence of "rage/hate-fueled extraordinary violence... (such as dismemberment, bodily and genital mutilation, use of multiple weapons, repeated blows from a blunt object, or numerous stab wounds)" (NGLTF, 1995: 18). Frequently, the mutilation or dismemberment follows death, as if to wipe out the victim's identity.

What accounts for the persistence of violence against gays? Perhaps a consideration of the common traits shared by its perpetrators provides some insight. Consistently, the data show that they are "predominantly ordinary young men" (Comstock, 1991: 2; Hamm, 1994). In particular, they are young white men or adolescents, often from working-class or middle-class backgrounds (Berk, Boyd, and Hamner, 1991; Berrill, 1992; Hamm, 1994). With this in mind, Comstock is quite right to insist that sociological and sociocultural, rather than psychodynamic, processes are at work. It is vital to recognize anti-gay violence as an active exercise in the construction of gender. Such an understanding allows us to examine hate crime in its immediate subjective context by drawing attention to the interactions and implied meanings of actors and their audiences. Yet it also demands that we consider the historical and cultural contexts that inform those meanings, so that we might understand the ways in which identities are shaped both by our engagement with others and by our structural background.

Gay-bashing provides young men in particular with a very useful resource for doing gender, especially for accomplishing hegemonic masculinity.

It is an interesting paradox that while masculinity is assumed to be "natural," it also appears to be so fragile "that one must always guard against losing it" (Hopkins, 1992: 123; Kaufman, 1992). Gay-bashing thus allows perpetrators to reaffirm their own masculinity, their own aggressive heterosexuality, in opposition to this nonconformist threat. As an activity, it is tailor-made for this construction of masculinity, since it allows the visible demonstration of the most salient features of manliness: aggression, domination, and heterosexuality.

Recall West and Zimmerman's (1987) contention that gender is situationally managed. Doing gender is to be understood in the context in which it occurs. The task of gender is reaccomplished in a diversity of social settings, each of which may demand different accountable activities. Thus, "even though one is recognized as a man (or boy) prior to evidenced masculinity, evidence must also be forthcoming in order to merit that continued 'unproblematic' status" (Hopkins, 1992: 124). In this context, the practice of violence against gays provides one such situational resource for men to establish their masculinity. And it does so in both negative and positive terms: by establishing what a man *is not* and what he *is*.

Gay-bashing provides proof of manhood, which is especially important for young males who are constantly challenged to prove their virility. The perpetrator proves, by his actions, that he is unafraid to fight, as any real man must be. And, he is unafraid of engaging in illegal attacks on his victims—again a sign of his manhood.

Like all social actors, gay-bashers act with an eye to their audience (Herek, 1992; 1992b). How will they be evaluated? What is the message their actions carry? In part, violence against gays provides visible, documented proof of offenders' unquestionably straight sexuality. As Messerschmidt contends, physical violence against gay men in front of other young, white, working-class men reaffirms what they define as natural and masculine sex—heterosexuality (1993: 100). Karen Franklin takes a similar position, arguing that "in group assaults the homosexual victim can be seen as fundamentally

a dramatic prop, a vehicle for a ritualized conquest through which assailants demonstrate their commitment to heterosexual masculinity and male gender norms" (1998: 12). Gay-bashing provides a resource through which young men can confirm not only what is natural, but what is culturally *demanded* of them in performance of their particular style of masculinity.

Thus, while violence against gays serves as a verification of the perpetrator's bravery and machismo, it also serves as a disclaimer of his homosexuality. The taunts the young adolescent males often favor—such as, "What are you, a fag?"—are frequent reminders of the inviolability of the artificial boundaries between the sexes. Hostility against homosexuals can be accounted for as an assertion of its opposite, that is, heterosexuality. The gay-basher could not possibly be mistaken for a homosexual, since he willingly assaults homosexuals. The active substantiation of his homophobia simultaneously removes any doubt about the offender's sexuality. Similarly, the epithets cast by the perpetrator distance him from the dreaded Other, once again offering obvious proof that he is of the "in-group" rather than the "out-group" constituted by homosexuals. The Blue Boys, an avowed homophobic group of young men interviewed by Michael Collins, offer an extreme illustration of this point:

We chose the blue baseball bat because it's the color of the boy. The man is one gender. He is not female. There is no confusion. Blue is the color of men, and that's the color that men use to defeat the anti-male, which is the queer. (1992: 193)

As this statement implies, gay-bashing also provides the ideal context in which young men can conclusively establish what they *are*, in other words, manly, virile men. Recall the importance of accountability here: one must be seen (and interpreted) to be masculine in the prevailing sense of the term. And violence is a tried and true means to this end. . . .

As outlined previously, "doing gender" explicitly is concerned with structuring differences between males and females, with creating "essential"

natures specific to temporary situations upon the non-Homosexual. They do not possess or femininity to become or refuse to be masculine or sexuality traits so conscientious lapsing into gays violate established sanctioned for absolute femininity and finally to two teenage refusal to "beat at knife-point," being a failure of his emasculation account,

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natures specific to each gender. Consequently, contemporary sexuality (and marriage) is predicated upon the normalcy of opposite-sex relationships. Homosexuals apparently refuse to play this game. They do not sufficiently accomplish either maleness or femaleness; they have not even attempted to become one of the "natural" sexes. Homosexuals refuse to be forced into these binary categories of masculine or feminine. Thus, by definition, homosexuality transcends the boundaries our culture has so conscientiously erected between the genders, lapsing into the category of deviance. Additionally, gays violate the sanctity, the "naturalness" of established gender identities. That is, they are sanctioned for *presumably* failing to practice either absolute femininity or masculinity. Such violations ultimately make them vulnerable to stigmatization and finally to violent repression. William Hassel's two teenage assailants clearly were hostile to his refusal to "be a man." Throughout the attack—at knifepoint—the pair challenged his masculinity, beating him for crossing the gender line, for being a failed man. They threatened to complete his emasculation physically. According to Hassel's account,

They made me address them as "Sir." They made me beg them to be made into a real woman. They threatened to castrate me. They threatened to emasculate me. They called me "Queer," "Faggot." One of them urinated on me. They threatened me with sodomy. (1992: 144–145)

... Because homosexuality challenges the fundamental assumptions of what it is to "be a man," it inevitably is assigned an inferior status in this gender hierarchy. The institutional norm of heterosexual masculinity is affirmed in the media, legislation and social policy, and police practices, to name but a few (Kaufman, 1987; Carrigan et al., 1987). The 1978 Briggs Initiative was an early attempt to expel homosexuals from the education system. Restrictions on "domestic partner" benefits disadvantage gay couples. And tax status is based on the traditional heterosexual marriage—doubly problematic since most states outlaw gay marriages.

At the level of the informal social order, gay-bashing serves a no less effective, but certainly more violent, disciplinary mechanism. Violence is used as a tool of subordination intended to maintain the powerlessness of homosexuals. Tim Carrigan et al. are worthy of a lengthy quotation on this point:

The history of homosexuality obliges us to think of masculinity not as a single object with its own history but as being constantly constructed within the history of an evolving social structure, a structure of sexual power relations. It obliges us to see this construction as a social struggle going on in a complex ideological and political field in which there is a continuing process of mobilization, marginalization, contestation, resistance, and subordination. It forces us to recognize the importance of violence, not as an expression of subjective values or of a type of masculinity, but as constitutive practice that helps to make all kinds of masculinity. (1987: 89)

Violence simultaneously conditions both hegemonic and subordinate masculinities. As such, it is an integral weapon within the structure of power relations. This is especially obvious when gays collectively challenge their subordination. The last decade has seen a dramatic increase in the activity and visibility of a vibrant gay and lesbian movement. This visibility has been a two-edged sword. On the one hand, it has resulted in valuable gains in gay rights. On the other hand, it has engendered great hostility and backlash. Just as Native Americans and women, for example, are at increased risk of victimization during periods of activism, so too are gays more vulnerable when they find their voice. This is evident in the increased violence leading up to gay rights referenda in Maine, Colorado, and Oregon. Kathleen Sarris's experiences in Indiana are not atypical. She had played a leadership role in Justice, Inc.'s efforts to promote pro-gay activities. Following a widely publicized press conference, Sarris suffered weeks of telephone harassment and hate mail. The harassment culminated in a brutal beating and sexual assault by a man claiming to be

acting for God; that what he was doing was God's revenge on me because I was a "queer," and getting rid of me would save children and put an end to the movement in Indiana. (Sarris, 1992:202)

...Ultimately, then, gay-bashing is a practice motivated by the discomfort, even hostility toward those Others who cross the gender boundaries of sexuality, power and labor, who refuse to "do gender appropriately." In almost Durkheimian fashion, violence against gays reasserts the normative order around gender by rewarding the perpetrators (explicitly or implicitly) for accomplishing masculinity in a "manly manner" while punishing the victims for refusing to do so.

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