Community Organizing and Direct Activism

*823 RETHINKING MINORITY COALITION BUILDING: VALUING SELF-SACRIFICE, STEWARDSHIP AND ANTI-SUBORDINATION

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I. Dominant Principles of Coalitions: Self-Interest, Partner Accountability and Equal Access to Power

AS Kevin Johnson recently noted, "[c]oalition is a fundamental tenet of the growing body of" [FN1] LatCrit Theory. Although minority group coalitions often trumpet lofty goals such as equality and justice for all, what many coalition members appear to want more than anything, individually and collectively, is their piece of the proverbial pie. It is this self-interested focus that makes minority group coalitions difficult to create and sustain. As several prominent scholars have reminded us, coalition building within and among disenfranchised groups is particularly fraught with peril. [FN2] This *824 is a result of the inevitability of conflict stemming from different perspectives on which group has suffered the most and therefore is most in need of help, not to mention intra- and inter-group racism, sexism, homophobia and other invidious structures that strain relations. Elizabeth Iglesias has noted that short-sighted essentialism and exclusivity hindered otherwise progressive movements--for instance, the labor movement's class-based struggle or the Chicano movement's racial essentialism. [FN3]

One might characterize the dominant coalitional paradigm as focusing on three principles: self-interest, partner accountability and equal access to power. "Self-interest" refers to the desire to pursue one's goals above everyone else's, including being so focused on one's own goals that one fails to recognize others' compatible interests. [FN4] Under this view, coalitions should be pursued only to the extent individual partners perceive the coalition to advance their interests more effectively than if they proceed alone. "Partner accountability" follows from the self-interest principle. Coalition partners must be individually accountable to the others in the coalition by adding value to the collective. Otherwise, the enterprise should be disbanded in favor of pursuing goals individually. Finally, "equal access to power" seeks to ensure that each partner receives as close to the same rights and power, and assumes as close to the same responsibility as the others in the coalition. If an employer discriminates against all people of color and each minority group that wants a job is equally represented among qualified applicants, equal access to power demands that the employer hire the same number of each group--e.g., one African American, one Asian American, one Latina/o American and so on. Equal access to power thus becomes an outgrowth of self-interest and partner accountability--partners know that their interests are being protected and that their colleagues are accountable if the coalition seeks to increase the power of each partner on an equal basis.

These three dominant principles might appear theoretically sound and pragmatically desirable. One might be concerned, however, that the overemphasis on individual coalition members' interests and accountability might lead to less rather than more trust, especially when pursuing equal access to power becomes elusive in the face of rather complex real world policy issues. Put another way, might principles that focus on

how *825 partners can help each other strengthen coalitions more than those principles that primarily pursue self-interest?

To put into perspective the difficulty of coalition-building among minority groups, Bob Chang and the late Jerome Culp point to the conflict between African Americans and Asian Americans over immigration and citizenship. [FN5] Often, African Americans, because of their long-held U.S. citizenship, find immigration issues of little relevance unless they know of a relative or friend who is not a citizen. Immigration and citizenship are, however, often at the top of many Asian American interest group agendas, especially given the large influx of Asian immigrants into the United States post-1965. Chang and Culp concluded that in such inevitable and difficult situations, sacrifices must be made and trust must be engendered. They wonder, however, whether true trust can develop among different individuals and groups absent any formal method of accountability. Richard Delgado is perhaps even less sanguine:

> [T]oday's outsider groups need to ponder what tasks are best accomplished in concert with others, and which are better undertaken individually. For some projects, justice turns out to be a solitary, though heroic, quest, and the road to justice is one that must be traveled alone, or with our deepest, most trusted companions. [FN6]

Conventional wisdom seems to suggest that the complexity of bridge-building requires a return to the principles of self-interest and partner accountability in order to ensure that access to power is equally available to all. Perhaps more to the point, coalitions that hold as their paramount objective the advancement of group members' individual self-interests may see their successes short-lived as partners disengage or desert once they perceive that their continued participation conflicts with their individual goals.

Nicolás Vaca's recent book, The Presumed Alliance, highlights the ways in which African Americans and Latinas/os in Los Angeles have long struggled over access to political power and employment opportunities. [FN7] Vaca attributes this conflict to the growth in the Latina/o population that has not led to proportional gains elsewhere, in part because of opposition *826 by African Americans. [FN8] The authors of Black Power, Stokely Carmichael and Charles Hamilton, would have approved; they believed that coalitions between African Americans and other groups could be formed only to the extent that these furthered the self-interests of each. [FN9]

Might there be a worthwhile alternative to the prevailing paradigm that may help address the practical obstacles raised by Vaca, or the appeals to self-interest articulated by Carmichael and Hamilton? In the next section, I argue that there might be a better alternative to the current approach to coalition building. I advocate an approach that centers on anti-subordination as a core value, reinforced by commitments to self-sacrifice and stewardship.

II. Alternative Principles: Self-Sacrifice, Stewardship and Anti-Subordination

How does an informal, voluntary out-group coalition go about engendering trust without establishing a way to ensure accountability apart from insisting on formal equality (which, in turn, might erode trust)? Perhaps one way out of this dilemma would be to re-center minority coalition-building around three concepts--self-sacrifice, stewardship and anti-subordination. Put differently, this coalition paradigm would hold as its paramount objective the promotion of anti-subordination through self-sacrifice and stewardship.

Anti-subordination as a focus of coalition-building is not a new idea. Early on, LatCrit co-founder Frank Valdes noted the need for LatCrit theory to "reference[ ] other anti-subordination theories and struggles." [FN10] Valdes also articulated that LatCrit theory must attend to "more than immediate self-needs" [FN11]--suggesting the need for self-sacrifice and compromise that Chang and Culp also recognized. My modest contribution is to suggest that a firmer embrace of these two principles, along with the notion of stewardship, might lead to a sustained and reinvigorated commitment to coalition building lacking perhaps in the conventional form.

Under this model, the purpose of coalition building would shift from self-interest to self-sacrifice, and from the desire to gain access to political *827 power to the alleviation of oppression in all its forms. Instead of viewing sacrifice as an inevitable, unfortunate consequence of coalition-building, it should instead take center stage as the main strategy for promoting anti-subordination. Coalition conflicts arise when individuals and groups become more concerned with advancing their own agendas by preserving hard-fought gains rather than promoting anti-subordination. This should come as no surprise given that minority group progress often results in both more political power and the alleviation of oppression. The key, however, is to ensure that promoting anti-subordination remains the top priority and that any political power that results from this project is used only to further the goal of anti-subordination, rather than to accumulate more power. Along with sacrifice, therefore, comes stewardship--the idea that any political gains made by the group are channeled back into promoting anti-subordination rather than the group's aggregation of power.

The most familiar example of self-sacrifice and stewardship in the name of anti-subordination might be the parents' relationship to children and grandparents in an extended family. This is often a hallmark, though not exclusively, of Asian and Latina/o cultures. Parents hold positions of socioeconomic power in the family, with children and elders as relatively less powerful figures. Although they are usually financially and physically superior to their children and their elders, parents in the family coalition willingly practice the twin concepts of self-sacrifice and stewardship for the benefit of their less powerful kin. From voluntarily getting up in the middle of the night to attend to a sick child, to taking their children to school, to providing food, clothing and shelter, to absorbing verbal abuse and disrespect, good parents sacrifice physical and material comforts to benefit their dependents, often without concern for any tangible economic or political return on their sacrifice. [FN12]

Skeptics might summarily dismiss the family analogy because families are often small, cohesive units, and even then are usually dysfunctional. But many are big and diverse (think of the Kennedy clan, from Teddy to *828 Arnold Schwarzenegger), and many are fully functional precisely because of the parents' (and in the case of larger clans, adults' and elders') commitments to self-sacrifice and stewardship. More importantly, self-sacrifice, stewardship and the commitment to anti-subordination provide a visionary center and alternative to the self-interested, individualistic and capitalistic viewpoint that governs most decision making surrounding whether or not to coalesce and join forces with others. The anti-subordination concern to support those in society who suffer for their self-sacrifice finds a voice in feminist scholarship. In the realm of family law, for example, some scholars have advocated greater public support for mothers, who, because of their commitment to child care, are often poorer than women who have chosen careers over families. [FN13]

As Robert Greenleaf, a pioneer in the concept of "servant-leadership" has written:

Becoming a servant-leader begins with the natural feeling that one wants to serve, to serve first. Then conscious choice brings one to aspire to lead. That

person is sharply different from one who is leader first, perhaps because of the need to assuage an unusual power drive or to acquire material possessions. For such people, it will be a later choice to serve--after leadership is established. The leader-first and the servant-first are two extreme types. Between them are the shadings and blends that are part of the infinite variety of human nature. [FN14]

Working for others first provides a check on the tendency to self-aggrandize, or the temptation, at the margin, to pursue one's self-interest at the expense of those who may be worse off than you.

III. Comparing the Dominant and Alternative Visions

As always, the devil is in the details. These principles may sound good, but may not be practical given that we live in a self-interested, individualistic and capitalistic society--if not world. Critics might contend that ensuring equal access to power and anti-subordination are essentially *829 the same goal: both involve the systemic closing of the gap between haves and have-nots. The only difference between the two, it is argued, is that the first chooses as its means the elevation of all subordinated groups on an equal basis, while the second aims to divest the mighty of their power rather than seek its accrual among the less privileged. There might be more than a semantic difference, however, especially at the margin, where most difficulties arise. A coalitional effort premised on pursuing anti-subordination rather than equal access to power will not focus principally on expanding its influence; rather, it will extend aid to the worse off whether within or without the coalition. An anti-subordination coalition will therefore concern itself less with the number of jobs or congressional seats its members occupy, but more with the idea that whoever occupies those jobs or creates laws for society's welfare does so with an eye toward benefiting the less-privileged, socioeconomic or otherwise.

A. Comparing the Models, Part 1: The Affirmative Action Debate

Using the example of affirmative action, [FN15] let me illustrate how the model I suggest--focusing on self-sacrifice, stewardship and anti-subordination--might be better than one that appeals to self-interest, individualism and capitalism. First, the typical "appeal to self-interest" strategy of coalition building: Sumi Cho recently wrote about coalition building strategies to advance the cause of affirmative action in the fight against state initiatives seeking their demise. [FN16] She recounts one meeting with professional consultants who advised that, in the fight against anti-affirmative action Initiative I-200 in Washington State, the best strategy would be to appeal to women voters rather than minorities. Focus groups revealed women as key swing voters who, when informed that they were the primary beneficiaries of affirmative action, would likely vote against I-200.

This appeal to women's self-interest backfired: I-200 passed because most of the women voters were white and identified with the harm done to their white sons and husbands, rather than with the benefit to them. Although one might characterize these women voters' motives as products of both self-sacrifice and stewardship, their decision to approve I-200 furthered oppressive ends. Specifically, it perpetuated white privilege at the expense of educational opportunities for people of color. Put differently, *830 the white women voters might have been concerned about ensuring "equal access to power"-- guaranteeing that all people, regardless of race or gender, have the opportunity to benefit from government programming. Wittingly or not, these voters neglected to consider that people of color and women often begin the race a few feet behind the majority, and that voting against I-200 would have helped narrow the gap between the classes, effectively promoting anti-subordination. In the end, their devotion

to family trumped appeals to these women's self-interest; as Cho noted in her account, "[e]xit polling and post-election interviews suggest a consistent pattern of white women's articulated concerns about affirmative action's negative impact on their male (and sometimes female) family members." [FN17]

More consistent with the proposed model is the action of the National Asian Pacific American Legal Consortium (NAPALC), which, throughout the infamous affirmative action litigation involving the University of Michigan, consistently supported the university against the claims of the white plaintiffs who were denied admission. In the suit involving Michigan's law school, [FN18] Asian Americans were specifically excluded from the affirmative action program, which included only African Americans, Latina/o Americans and Native Americans. Another group, the Asian American Legal Foundation, joined the white plaintiffs in arguing that affirmative action programs acted as an artificial ceiling, limiting the number of admitted Asian Americans in favor of other "less qualified" minority groups. [FN19] Instead of succumbing to this "divide and conquer" strategy, NAPALC decided to side with the other minority groups in coalition, filing an amicus brief before the United States Supreme Court in support of the university. [FN20]

Like the white women voters who acted in selflessness and stewardship by voting in favor of I-200 to support their white husbands and sons, NAPALC took a position contrary to many of their constituents' apparent interests. What was to be gained by an Asian American interest group advocating an educational program that specifically excluded them from consideration? While perhaps not immediately apparent to some, NAPALC acted in furtherance of the anti-subordination ideal. Arguably, *831 NAPALC knew that it could not support a position that, while perhaps furthering many of their constituents' interests, would not advance the principle of ending de facto segregation in higher education. [FN21]

Some may balk at the two prior examples as not being grounded empirically. Put differently, how do we know that successful coalitions can be built on grounds other than appealing to self-interest with the promise of greater power? In the social sciences, social movement theorists have studied various coalitional movements--from environmentalism to feminism to the civil rights movement to gay rights coalitions--and have concluded that appeals to self-interest and emotionalism do not accurately explain these successes. In his plea that law professors pay more attention to the study of social movements, Edward L. Rubin observes that aside from the fact that many members of these coalitions were "outsiders" --whites among blacks, men among women, straights among gays--"[a]t a deeper level, [social scientists] perceived, and were willing to take seriously, the desire of these movements to effect larger social transformations that were more closely linked to their members' beliefs than to their interests or immediate dissatisfactions." [FN22] Thus, some whites joined the civil rights movement not because it was in their interests, but because it was the right thing to do. Pursuing anti-subordination as the touchstone of a coalitional effort embodying the principles of self-sacrifice and stewardship is a similar enterprise.

B. Comparing the Models, Part II: The Immigration Debate

There are, of course, more difficult scenarios than the two I describe above, one of which was posited by Chang and Culp earlier. How do Asian Americans convince African Americans to support more immigrant-friendly policies, possibly contrary to their self-interest, amidst fears that Asian American immigrants will take jobs away from African American U.S. citizens? How might selflessness, stewardship and anti-subordination work in this instance? United States citizenship and residence is a privilege--increasingly so in this post-9-11 world. [FN23] As such, those who possess this privilege have a duty

to wisely steward the benefits that this status conveys. Non-U.S. citizens are disadvantaged because of their immigration status. Despite their unenviable position at the bottom of the American racial hierarchy, African American U.S. citizens are privileged vis-à-vis non-citizen Asians and should be stewards of that privilege--not to maintain its *832 luster but to benefit those without it. Recognizing citizenship status as a privilege and, therefore, a source of oppression, African Americans should share that privilege and support immigrant-friendly policies Asian Americans advocate. In return, Asian Americans should take seriously African Americans' concern about job displacement and should develop partnerships with the African American community to provide appropriate opportunities. Asian Americans' motivation should not be guilt or self-interest arising out of the commitment to support their immigration policies, but rather the selflessness and stewardship that come from the privilege of a higher economic status that many African Americans lack.

Perhaps most importantly, Asian Americans and African Americans should welcome this paradigm shift. Instead of approaching the coalition with caution and suspicion, both groups should view the relationship through the lens of self-sacrifice, stewardship and anti-subordination, rather than self-interest, partner accountability and equal access to power. This new approach should appeal to Asian Americans and African Americans as a means of expanding family values that both cultures hold dear, hopefully engendering trust without creating formal channels of accountability.

IV. Implementing the Alternative Model: How to Begin and Sustain These Three Principles

But how does one get there from here? Even if we were to assume that two groups embarking on a prospective coalition embraced the three principles of self-sacrifice, stewardship and anti-subordination, what assurances might they have that all will go well in the absence of some prior, long-term trust relationship between the parties? I argue that there are three component parts that mirror the three principles of self-sacrifice, stewardship and anti-subordination, and these are (1) walking by faith in anti-subordination, (2) self-sacrifice and stewardship start with the individual and (3) small steps are O.K.

A. Walking by Faith in Anti-Subordination

As an overarching approach, I believe coalition partners need to have faith that pursuing anti-subordination is a goal worth fighting for, regardless of short-term costs and long-term obstacles. In his recent book, A Stone of Hope, David L. Chappell argues that during the 1960s, northern white liberals believed that appeals to reason would eventually bring Jim Crow segregation to an end--that liberal education would convince the segregationist South of its immorality. In contrast, black civil rights leaders held out no such hope:

> Like the Hebrew Prophets, these thinkers believed that they could not expect the world and those institutions to improve. Nor could they be passive bystanders. They had to stand apart *833 from society and insult it with skepticism about its pretensions to justice and truth. They had to instigate catastrophic changes in the minds of whoever would listen, and they accepted that only a few outcasts might listen. They had to try to force an unwilling world to abandon sin--in this case, "the sin of segregation." The world to them would never know automatic or natural "progress." It would use education only to rationalize its iniquity. [FN24]

One less-emphasized legacy of the civil rights movement just might be the coalition's faith in faith rather than reason--that the moral foundation of their enterprise could solidly sustain them despite some resistance from their allies (the northern whites who relied on reason rather than faith) and massive opposition from their enemies (the

southern segregationist whites). In the end, members of this interracial, interclass movement kept their eyes on the prize and promise of racial and economic justice for all. They nonviolently pursued that goal in the face of daunting physical, psychological, legal and social, often violent, obstacles.

I do not suggest that the fight for equality is over, despite some observers' belief that we now live in a post-Civil Rights age. Rather, I agree with many that the fight for anti-subordination is made more complex by intersecting identities, [FN25] complicated further when one tries to take individuals and put them into groups and then coalitions of groups. That should not, however, dissuade minority coalition groups from taking the plunge if everyone keeps in mind the ultimate goal of anti-subordination.

B. Self-Sacrifice and Stewardship Start with the Individual

Often, the task of forming a broad-ranging, eclectic coalition appears so daunting that prospective coalition partners view the project as an endless Prisoner's Dilemma or, if you like, a game of "chicken." That is, a group leader may feel compulsion to get his or her group out first before getting taken advantage of by the other group or by some bigger outfit. Many times this analysis leads to an inability to get off square one.

That is why I think it is incumbent upon individuals who have been blessed with gifts to share to step up and lead by example. Put differently, self-sacrifice and stewardship start with the individual. In her exhortation to comfortable law teachers and law schools to restore to their rightful place practical service and teaching alongside the oft-preferred scholarship mission, Deborah Rhode has written, "law professors who are now churning out unreadable and unread tomes could instead be actually *834 helping someone. Or more effectively teaching students to do the same. Or educating general audiences on legal problems and assisting policymakers on responses. Not every academic has the talent or taste for grand theory." [FN26] I do not suggest that we abandon our quest for better coalition group theorizing, but in that quest, let us not forget that praxis is important.

And there are many individuals who have taken the twin principles of self-sacrifice and stewardship seriously. Like Mahatma Gandhi before him, Dr. Martin Luther King, Jr. was a nonviolent servant. In his Pulitzer Prize-winning biography, Bearing the Cross, David J. Garrow argues that King would have preferred the quiet life of a clergyman-academic, but chose instead to take up the jeremiad against segregation at great personal cost to himself. [FN27] Unlike King's white, northern liberal allies, he did so without placing undue reliance on the power of reason to effect long-term change. In King, we see the juxtaposition of the faithful steward and the servant-leader: a charismatic intellectual answering the call to fight for the rights of the poor and people of color, despite the personal abuse he had to endure because of it.

Aside from King, there were and are many different individuals whose stewardship and self-sacrifice underscored their commitment to anti-subordination. Less well-known in the popular media than King is Bayard Rustin, a gay black man who, despite being a key strategist and speechwriter for King, was nonetheless marginalized by the black establishment because of his sexual orientation. [FN28] Some may criticize Rustin for not having pushed the gay rights agenda enough; more might question the hypocrisy of a black Civil Rights movement that might embrace a Loving v. Virginia [FN29] but not a Lawrence v. Texas. [FN30] Both points are well-taken. I merely want to emphasize that in King and Rustin we see individuals who shared their gifts to pursue anti-subordination at a high personal cost to themselves. As conservative columnist Andrew Sullivan has written admiringly of Rustin:

　　　　[A]mazingly, Rustin never showed bitterness. He had every right to be inflamed

against the white establishment, which at one point sentenced him to hard labor on a chain gang as punishment for his early civil rights protests. And he had every reason *835* to be embittered by his black allies, for their acquiescence in the gay baiting. Yet somehow he rose above both. In one telling incident, he completed his sentence on the chain gang by writing a conciliatory letter to the sadistic white officer who ran the prison. Somehow, Rustin never succumbed to the anger that was his right; his spirit remained as light and as positive as his beautiful tenor voice. [FN31]

C. Small Steps Are O.K.

Finally, a word about outcomes. Starting small is O.K. Every victory, no matter how minor or symbolic, is worth celebrating if it furthers the goal of anti-subordination. Not too long ago, our little town of Carlisle, Pennsylvania saw the naming of its newest public high school building after a prominent African American schoolteacher from the days of segregation. It was the first time any school building had been named for a woman or an African American. A broad coalition of mostly white school board leaders, the black churches, the local NAACP branch and many concerned citizens worked tirelessly to achieve this important milestone. [FN32] While critics may question whether this symbolic victory has yielded measurable benefits to Carlisle's African American community, this was clearly a move in the right direction and should be celebrated as such. As Voltaire has said, "[t]he best is the enemy of the good." [FN33] Not that we should be satisfied with mere symbolic victories when material conditions have not changed, but we should recognize that these symbolic victories may form the basis for changes in material conditions. Conventional principles of coalition building suggest that in numbers, there is strength. With that I agree. I would only add though that strength should not be pursued for its own sake, but for the elimination of oppression and the promotion of anti-subordination.

In closing, I would note as a final example that LatCrit embraces many of the principles of coalition building I have emphasized here. [FN34] Its founders are to be congratulated for their energy and vision.

Footnotes:

[FNa1]. Professor of Law, Penn State University, vcr1@psu.edu. I thank Beth Lyon and Frank Cooper for their hospitality and invitation to participate; my co-panelists and the audience at LatCrit IX for their useful remarks during my oral presentation; Tanya Hernandez and Kevin Johnson for their detailed, thoughtful and insightful comments on an earlier draft that greatly improved this piece; Dean Phil McConnaughay for his commitment to my work; and, most important, my family in the Philippines, and Corie, Ryan and Julia for their constant love and support.

[FN1]. Kevin R. Johnson, The Struggle for Civil Rights: The Need for, and Impediments to, Political Coalitions Among and Within Minority Groups, 63 La. L. Rev. 759, 767 (2003). LatCrit scholars have devoted considerable time and effort in addressing coalition-building and its challenges. See, e.g., Symposium Cluster, Inter-Group Solidarity: Mapping the Internal/External Dynamics of Oppression, 53 U. Miami L. Rev. 761, 761-862 (1999) (surveying various perspectives on building interracial coalitions through prism of LatCrit theory); Symposium Cluster, Latinas/os and Inter-Group Jurisprudence: Building LatCrit Communities and Coalitions, 2 Harv. Latino L. Rev. 467, 467-501 (1997) (presenting five articles with different perspectives on difficulty in building minority communities and coalitions). Indeed, the Seventh Annual LatCrit Conference was specifically dedicated to coalition theory. See Steven W. Bender & Keith Aoki, Seekin' the Cause: Social Justice Movements and LatCrit Community, 81 Or. L. Rev.

595, 596 (2002) ("LatCrit … adopted the theme Coalitional Theory and Praxis: Social Justice Movements and LatCrit Community.").

[FN2]. See, e.g., Eric K. Yamamoto, Interracial Justice 8 (1999) (illustrating through examples how conflicts between minority groups contribute to failed efforts to sustain minority coalitions); Robert S. Chang & Jerome McCristal Culp Jr., After Intersectionality, 71 UMKC L. Rev. 485, 490-91 (2002) (concluding that more research is needed to solve problems relating to multiple identities, political accountability and inter-group conflicts in order to strengthen coalition building); Richard Delgado, Linking Arms: Recent Books on Interracial Coalitions as an Avenue of Social Reform, 88 Cornell L. Rev. 855, 871 (2003) (theorizing that self-interest in assimilating to white culture has been factor in minority coalition struggles); Johnson, supra note 1, at 771 (stating that limited conceptualizations about what "civil rights" means and inter- and intra-minority racism stand as roadblocks to effective coalition building); Adrien K. Wing, Civil Rights in the Post 9-11 World: Critical Race Praxis, Coalition Building, and the War on Terrorism, 63 La. L. Rev. 717, 728 (2003) (commenting on reports that indicated African Americans and Latinas/os were in favor of law enforcement targeting Muslims post 9-11).

[FN3]. Elizabeth M. Iglesias, International Law, Human Rights, and LatCrit Theory, 28 U. Miami Inter-Am. L. Rev. 177, 181 n.4 (1997) (noting how these movements failed due to their inability to look beyond needs of their specific constituencies and cooperate politically).

[FN4]. I thank Tanya Hernandez for this important insight. One might think about this strand of self-interest as being akin to the unintentional tort of negligence--one should know that one's actions might cause harm to another.

[FN5]. See Chang & Culp, supra note 2, at 491 (describing cultural differences that prevent African and Asian Americans from being able to form effective coalitions).

[FN6]. Delgado, supra note 2, at 884.

[FN7]. See Nicolás C. Vaca, The Presumed Alliance: The Unspoken Conflict Between Latinos and Blacks and What It Means for America 52-61 (2004) (presenting this situation as one where zero-sum conflict worked against African American and Latina/o cooperation). For a thoughtful response and argument regarding the limitations of Vaca's thesis, see Ed Morales, Brown Like Me?, The Nation, Mar. 8, 2004, at 23, 27 (arguing that while Vaca identifies initial steps needed to build interracial coalitions, he also reinforces counterproductive notions, including that estrangement from African Americans is essential to Latina/o success).

[FN8]. See Vaca, supra note 7, at 52 (reporting that African Americans were unwilling to lose control of municipal jobs even when they were over-represented and Latinas/os were under-represented).

[FN9]. See Stokely Carmichael & Charles V. Hamilton, Black Power 79-80 (1967) (stating that inter-group coalitions can form only when groups recognize their respective self-interests, believe that they stand to benefit from coalition, accept their relative independence and realize that they have specific, not general, goals).

[FN10]. Francisco Valdes, Under Construction--LatCrit Consciousness, Community, and Theory, 85 Cal. L. Rev. 1087, 1094 (1997) (asserting that LatCrit theory is ultimately working towards social justice for all by incorporating Latina/o struggles into larger framework of oppression).

[FN11]. Id. (arguing that LatCrit is fighting all forms of oppression, so focus on individual

needs is too narrow).

[FN12]. Certainly, one could argue that an adult's decision to care for an elderly parent may be motivated by a belief that it is her obligation to care for her parent just as her parent cared for her in her youth; still, such an act would not be selfish in any economic sense--unless the adult child expects that she will receive an inheritance or some material benefit as payment for her efforts. This conception of selflessness finds support in cultural feminist literature that seeks to reflect and celebrate the differences between the roles of mothers and fathers. Martha Fineman, for instance, has sought to recapture the positive aspects of traditional understandings of motherhood with respect to nurturing and child-rearing that are lost in either a patriarchal or gender-neutral re-formulation of family law and policy. See, e.g., Martha Albertson Fineman, The Neutered Mother, 46 U. Miami L. Rev. 653, 655 (1992) (decrying "transfiguration of the symbolically positive cultural and social components of parenting typically associated with the institution of motherhood into the degendered components of the neutered institution of 'parenthood'"); see also Martha Albertson Fineman, The Neutered Mother, the Sexual Family, and Other Twentieth Century Tragedies 9 (1995) (arguing that society places practical and ideological burdens on mothers who choose to be "caretakers").

[FN13]. See, e.g., Mary Becker, Caring for Children and Caretakers, 76 Chi.-Kent L. Rev. 1495, 1527 (2001) (noting financial and cultural advantages that working women have in contrast to women who are "only" mothers); Martha Albertson Fineman, Contract and Care, 76 Chi.-Kent L. Rev. 1403, 1406 (2001) (advocating that society should support caretaker needs because caretaking labor is essential to society's perpetuation); Katharine B. Silbaugh, Accounting for Family Change, 89 Geo. L.J. 923, 968 (2001) (stating that children should be viewed as "public good"). Although a detailed exploration of the different strands of feminist legal theory is beyond the scope of this essay, those interested in a clear and thoughtful exposition of the literature should see generally Martha Chamallas, Introduction to Feminist Legal Theory (2d ed. 2003) (providing overview of feminist legal theory and its different perspectives).

[FN14]. Robert K. Greenleaf, Servant-Leadership, in Insights on Leadership, 18-19 (Larry C. Spears ed., 1998).

[FN15]. As Kevin Johnson correctly pointed out to me, affirmative action coalitions are not the only game in town. Interracial coalitions have been built and proposed around topics as diverse as racial profiling and electoral politics. See, e.g., Robert S. Chang & Keith Aoki, Centering the Immigrant in the Inter/National Imagination, 85 Cal. L. Rev. 1395, 1431-38 (1997) (discussing electoral politics); Kevin R. Johnson, The Case for African American and Latina/o Cooperation in Challenging Racial Profiling in Law Enforcement, 55 Fla. L. Rev. 341, 341-53 (2003) (discussing racial profiling).

[FN16]. Sumi Cho, Understanding White Women's Ambivalence Towards Affirmative Action: Theorizing Political Accountability in Coalitions, 71 UMKC L. Rev. 399, 403-04 (2002) (noting how current coalition building theories have failed to incorporate white women).

[FN17]. Id. at 410.

[FN18]. See Grutter v. Bollinger, 539 U.S. 306, 316-17 (2003) (describing petitioner's claims and policy at University of Michigan that precipitated lawsuit).

[FN19]. See Brief of the Asian American Legal Foundation as Amicus Curiae in Support of Petitioners, Grutter v. Bollinger, 539 U.S. 306 (2003) (Nos. 02-241, 02-516), available at 2003 WL 152363 (summarizing reasons for support of university's "race-conscious approach").

[FN20]. See Brief of Amici Curiae National Asian Pacific American Legal Consortium, Asian Law Caucus, Asian Pacific American Legal Center, et al., in Support of Respondents, Grutter v. Bollinger, 539 U.S. 306 (2003) (Nos. 02-241, 02-516), available at 2003 WL 400140 (noting that mandated diversity was used to limit Asian American students because they qualified for admission in numbers that exceeded their percentage of population).

[FN21]. I do not discount the argument that some NAPALC constituents (Filipino Americans, for example) would benefit from an affirmative action program, although they clearly would not have benefited from Michigan's program unless these constituents self-identified as part of another group.

[FN22]. Edward L. Rubin, Passing Through the Door: Social Movement Literature and Legal Scholarship, 150 U. Pa. L. Rev. 1, 10 (2001) (commenting on fact that movements' leaders were often not movements' primary beneficiaries).

[FN23]. See, e.g., Wing, supra note 2, at 728-31 (discussing post-9-11 legislation that adversely impacts interests of noncitizens).

[FN24]. David L. Chappell, A Stone of Hope 3-4 (2004) (noting that Christian and Jewish "prejudices and superstitions" fueled African American civil rights movement).

[FN25]. See generally, Darren Lenard Hutchinson, Identity Crisis: "Intersectionality," "Multidimensionality," and the Development of an Adequate Theory of Subordination, 6 Mich. J. Race & L. 285, 307-09 (2001) (discussing intersectionality model of analysis and its impact on subordination).

[FN26]. Deborah Rhode, The Professional Responsibilities of Law Professors, 51 J. Legal Educ. 158, 161 (2001).

[FN27]. See David J. Garrow, Bearing the Cross 17-48 (1986) (recounting King's apprehensive involvement in Montgomery bus boycott and his educational background).

[FN28]. See Andrew Sullivan, The "Invisible Man," Time, Jan. 20, 2003, at 41 (noting that marginalization forced Rustin into invisibility).

[FN29]. 388 U.S. 1 (1967) (holding Virginia's anti-miscegenation statute unconstitutional).

[FN30]. 539 U.S. 558 (2003) (holding Texas's criminal anti-sodomy statute unconstitutional).

[FN31]. Sullivan, supra note 28, at 41 (remarking that Rustin's positive demeanor persisted despite treatment he endured).

[FN32]. See, e.g., Elizabeth Gibson, Groups Propose Diversity Tribute; Carlisle School Board Urged To Name Building After Black Teacher, Harrisburg Patriot, Apr. 3, 2002, at A01, available at 2002 WL 2989363 (listing groups and individuals who advocated decision to name school after Emma Thompson McGowan).

[FN33]. Justin Kaplan, Bartlett's Familiar Quotations 306 (16th ed. 1992) (quoting Voltaire).

[FN34]. For example, the concept of "rotating centers" of focus ensures that each yearly conference emphasizes different issues of subordination so that all members of LatCrit

examine the myriad ways in which oppression manifests itself in contemporary society. See, e.g., Symposium, LatCrit IV: Rotating Centers, Expanding Frontiers: LatCrit Theory and Marginal Intersections, 23 U.C. Davis L. Rev. 751 (2000) (commenting on characteristics of articles comprising LatCrit IV).