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"Women Have the Right to Fight!": The Contested Legacy of Second-Wave Feminism and Anti-Rape Politics in the Trials of Inez Garcia, 1974-1977

Megan Elizabeth Feulner
Graduate Center, City University of New York

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“Women Have the Right to Fight!”: The Contested Legacy of Second-Wave Feminism
and Anti-Rape Politics in the Trials of Inez Garcia, 1974-1977

by

Megan E. Feulner

A master's thesis submitted to the Graduate Faculty in Liberal Studies in partial fulfillment of
the requirements for the degree of Master of Arts, The City University of New York

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Shifra Sharlin

September 5, 2014

Date

Thesis Advisor

Matthew K. Gold

August 25, 2014

Date

Executive Officer

THE CITY UNIVERSITY OF NEW YORK

Abstract

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by

Megan E. Feulner

Advisor: Professor Shifra Sharlin

My paper takes as its central focus the trials of Inez Garcia, a woman who was charged with the murder of a man who helped rape her in Soledad, CA in 1974. Garcia’s trial in 1974, in which she was convicted of second-degree murder, and her retrial in 1977, in which the ruling was reversed, is often remembered as a cause célèbre of the second-wave women’s movement that united diverse activists and yielded a major feminist legal victory. However, I argue that close examination of the trial and the feminist activism around it reveals a more paradoxical legacy. First, I track how Garcia functioned as both a literal and figurative political cause in which myriad second-wave feminists mapped out a highly conflicting politics of self-defense in her name. Second, I contend that the trial has had minimal impact on the broader feminist antiviolenence movement.

Table of Contents

	Page
Abstract	iv
Introduction	1
Chapters	
1 A Feminist Cause: The Trials of Inez Garcia, 1974-1977	15
2 Paradoxes of Second-Wave Feminist Politics	28
Bibliography	52

Introduction

WOMEN HAVE THE RIGHT TO FIGHT!
STOP RAPE!
FREE INEZ!¹

So concludes the first page of “Inez Garcia: Womanpride Fighting Back,” a short booklet authored in 1975 by a group of California-based feminists who had organized for the cause of Inez Garcia, a woman who was charged with the murder of a man who helped rape her in Soledad, CA.² Frequently remembered as a cause célèbre of the second-wave women’s movement, Garcia’s trial in 1974, in which she was convicted of second-degree murder, and her retrial in 1977, in which the ruling was reversed, is one of the major feminist legal cases in which activists sought to rearrange the standard tropes regarding violence against women and the meaning of self-defense in both the U.S. law and culture at large. In focusing on the trials of Inez Garcia, I hope to offer a critical examination not only of specific issues for “one of the most controversial feminist legal cases of the decade,” as the *Village Voice* characterized it in 1976, but also a lens by which to probe more general considerations for feminist antiviolence history and theory.³

In a brief introductory essay, I outline the theoretical and historiographical contexts that inform my reading. Specifically, I ask: what are the stakes in considering Garcia’s trial on its own terms? What particular legacies of second-wave feminism complicate and contest the trial’s broader historical meanings? Following the introduction, I then give a detailed summary of Garcia’s legal battle from her arrest in March 1974 to her acquittal in March 1977. Because my

¹ “Inez Garcia: Womanpride Fighting Back,” pamphlet by the Free Inez Garcia Committee, 1975. Special Collections, University of Michigan Library.

² Ibid.

³ Suzanne Gordon, “Is Murder a Just Response to Rape,” *Village Voice*, February 9, 1976. <http://news.google.com/newspapers?nid=1299&dat=19760209&id=8vZNAAAIBAJ&sjid=PosDAAAIBAJ&pg=5968,2706796>.

broader argument hinges on the complex relationship between feminism and antiviolenace reform efforts, this narrative provides a critical lens into the reasons this case in particular drew such intense and widespread activist support in the 1970s. I use a range of sources—from memoirs, alternative press, and mainstream media coverage—to capture the overall tenor of shifting activist and press dialogue throughout the course of the two trials. In the final section, I hope to complicate the legacy of Garcia’s trial as evidence of feminist achievement and progress. More specifically, Garcia’s trial is often remembered as a major feminist legal victory and a site for diverse coalitional activism. I argue, however, that close examination of the trial and its activism resists simplistic interpretation. I make two main arguments. First, I track how Garcia functioned as both a literal and figurative political cause in which myriad second-wave feminists mapped out a highly conflicting politics of self-defense in her name. Second, and consequently, I contend that the theme of widespread feminist embrace of Garcia obscures the fact that this was a single legal victory—one with minimal impact on the broader feminist antiviolenace movement.

There are several reasons why I chose to focus on the Garcia case. First, the lack of detailed, critical inquiry into the specific components of the trial merits consideration. Garcia’s legal battle is often mentioned in histories of the second-wave women’s movement as one of the central feminist rape-self-defense trials that fostered collaboration between diverse activists at the national level in a period otherwise burdened by identity politics and separatist organizing.⁴

⁴ Sociologist Winifred Breines, for instance, describes the self-defense trials and the anti-rape agenda as a key rallying point for activists often divided over racial and class differences. She writes, “Campaigns in defense of women, usually poor and sometimes of color, who were victims of sexual violence and who sometimes had killed the perpetrator, brought together diverse women who otherwise would not have found common bonds.” Winifred Breines, *The Trouble Between Us: An Uneasy History of White and Black Women in the Feminist Movement* (New York: Oxford University Press, 2006), 157. For more general discussion of the popular feminist self-defense trials, cf. Bevacqua, *Rape on the Public Agenda*, 127-129; Brownmiller, *In*

Other popular trials at the time include that of Yvonne Wanrow, a Native American woman who fatally shot a child molester on her reservation in 1972; and Joan Little, an African-American woman who stabbed a white jail guard to death when he attempted to rape her in 1974.⁵ But despite its importance, no recent work examines in depth Garcia's trial on its own terms.⁶ Claiming Garcia's trial as part of the rich tradition of coalitional feminist activism certainly fits with her story in a broader sense; it is equally important to consider the particular context in which her trial unfolded—one that is markedly different in many respects from that of Little, Wanrow, and others.⁷

I take my cue here from philosopher Linda Martín Alcoff's arguments in favor of clarifying specific forms of discrimination as a better means to challenge them.⁸ In her 2006 book *Visible Identities: Race, Gender, and the Self*, Alcoff describes how "race and racism" in the U.S. function through the fixed terms of "...what many theorists call the 'black/white paradigm....'"⁹ In effect, any identity group that falls outside the white label is by default considered black—a process of racial categorization that then conceals the myriad forms of

Our Time, 218-222; Jones, *Women Who Kill*, 317-331; Rosen, *The World Split Open*, 182-183; Valk, *Radical Sisters*, 172-174.

⁵ Many scholars also include the trial of Dessie Woods, an African-American woman who fatally shot a white man who tried to rape Woods and her friend while hitchhiking in 1975. The story of Deborah Kantaeng, another woman from California who shot and killed her alleged rapist, also made headlines as news of Garcia's conviction broke in October 1974. See "Man's Death Probed in Rape Case," *Hartford Courant*, October 6, 1974. 3B2, ProQuest Historical Newspapers (552407219).

⁶ Journalist Jim Wood's *The Rape of Inez Garcia* remains the only book-length investigation of the Garcia trial. Published in 1976 to mixed reviews, the book ends after her 1974 conviction. See Jim Wood, *The Rape of Inez Garcia* (New York: Putnam, 1976).

⁷ Danielle McGuire's precise appraisal of Joan Little's case is exemplary in illustrating the merit of analyzing each trial in terms of specific historical legacies. See McGuire, *At the Dark End of the Street*, 246-278.

⁸ Linda Martín Alcoff, "Latinos, Asian Americans, and the Black-White Binary," chapt. 11 in *Visible Identities: Race, Gender, and the Self* (New York: Oxford University Press, 2006).

⁹ *Ibid.*, 248.

racism in particular historical, social, and legal contexts. While Alcoff acknowledges that at times racism functions in analogous ways for diverse identity groups, she ultimately argues that “the means and ideology” tend to differ.¹⁰ She sums up two consequences of defining race through the black/white binary: it falsely bolsters “a sense of inevitability to white domination;” and it conflates race with “color alone.”¹¹ To the latter point, she writes, “Racial oppression works on multiple axes...with color being the most *dominant* and currently the most *pernicious*. But color is not *exhaustive* of all the forms racial oppression can take.”¹² Thus, in more concrete terms, the history of the racial oppression of African-Americans is not identical with that of Latinos or Asian Americans in the U.S. (to use two of her examples).

I have paused to recount Alcoff’s arguments because representations of Garcia in feminist and media accounts has as much to do with her distinct position as a Latina women as with her better known symbolic status as a woman who defended herself against rape. Recurring focus on Garcia’s reputation as a faithful wife, her religious devotion and, following her conviction in 1974, her erratic behavior and feminine appearance point to discrete channels of discrimination that go beyond any single categorization of her case as about, for example, universal constructions of gender. Most importantly, the failure to unpack what Alcoff terms the “multiple axes” of racism—and by extension the other forms of discrimination that work through interrelated channels—has implications for the problematic trajectory of feminist antiviolence theories today.

Second, in-depth examination of feminist interest in Garcia shows how debates played out *in the course* of forging feminist politics and theories of rape and self-defense. In her 2013

¹⁰ Alcoff, *Visible Identities*, 263.

¹¹ *Ibid.*, 256.

¹² *Ibid.*, 259.

book *Feeling Women's Liberation*, Victoria Hesford argues for more nuanced engagement with our feminist pasts—one that deeply informs my own reading of the history of the women's movement, the case of Inez Garcia, and the abundant activism that emerged in turn.¹³ Buoyed by a desire to parse the vexed relationship between feminist and queer writings, Hesford suggests resisting the preemptive instinct to declare feminism's significance at the outset. Instead, she advocates for an "attention to the *productive detail* of the women's liberation movement," or the practice of tracking the processes and contentions by which feminist activism emerged.¹⁴ She elaborates on the historical and affective stakes in opting for ambiguity over resolution:

Reading along the grain of the movement's archive opens up the complexity of the movement's eventfulness to a scrutiny that does not reduce or foreclose the possibilities of meaning inherent to it; it also invites us to pay the kind of loving attention to a past that might make us want to turn away from it, rather than toward it.¹⁵

At base, Hesford's appeal requires the casting off of linearity in favor of multivalent, even paradoxical analysis that captures the "complex, contradictory, heterogeneous mess of any movement of era."¹⁶ Moreover, the women's movement in the 1970s was by no means "inevitable."¹⁷ In the specific case of Inez Garcia, for instance, feminist support of Garcia was never unanimous since activists approached self-defense in contradictory ways. Further, some materials illustrate conventional narratives about second-wave feminist politics, such as an overreliance on gender essentialism, static notions of patriarchal oppression, or the articulation of a collective identity as espoused, for example, in Chicana feminist writer Marge Piercy's searing

¹³ Victoria Hesford, *Feeling Women's Liberation* (Durham, NC: Duke University Press, 2013).

¹⁴ *Ibid.*, 6.

¹⁵ *Ibid.*, 13.

¹⁶ *Ibid.*, 12.

¹⁷ *Ibid.*, 10.

poem “For Inez Garcia.”¹⁸ Yet other documents chronicle less obvious concerns like the ambiguous relationship between feminism and violence in general—a topic that prompted Gloria Steinem to question the place of “vigilantism” in the movement in the May 1975 issue of *Ms. Magazine* devoted to Garcia.¹⁹ The trial of Inez Garcia is thus a site for exploring the process of claiming self-defense as a feminist issue.

Third, and most important, this historical moment is relevant to contemporary criticisms of feminist antiviolence politics. On the one hand, the coalitional support that Garcia attracted is significant in lieu of the following decade. The case stands in contradiction to what Lynn Chancer has described as the extreme “partialization” of identity-based social movements—or the stark splintering of racial and gender causes—in “high-profile” trials in the 1980s like the “Central Park Jogger” case.²⁰ Moreover, Garcia’s acquittal on the grounds of legitimate self-defense laid the groundwork for other explicitly feminist legal arguments, such as the “battered women’s defense.”²¹ But viewed in hindsight, the claim that legal reforms constitute a victory for the feminist anti-rape movement is in itself highly problematic. First, statistical underreporting for rape remains low as do arrest, prosecutorial, and conviction rates in cases of sexual assault.²² This fact is even more pronounced for minority women—despite the higher incidence of

¹⁸ Marge Piercy, *Early Grrrl: The Early Poems of Marge Piercy* (Wellfleet, MA: The Leapfrog Press, 1999), 62-64.

¹⁹ Gloria Steinem, “But What Do We Do With Our Rage?,” *Ms. Magazine* 111, no. 11 (May 1975): 51.

²⁰ Lynn Chancer, *High-Profile Crimes: When Legal Cases Become Social Causes* (Chicago: University of Chicago Press, 2005), 143.

²¹ Victoria Law, “Sick of the Abuse: Feminist Responses to Sexual Assault, Battering, and Self-Defense,” In *The Hidden 1970s: Histories of Radicalism*. Edited by Dan Berger (New Brunswick, NJ: Rutgers University Press, 2010), 43.

²² For a summary of international statistics on reporting, prosecution, and conviction rates in rape cases, see Mary P. Koss, “Restoring Rape Survivors,” *Annals of the New York Academy of Sciences* 1087, no.1 (2006): 209-218.

violence committed against them.²³ Susan Caringella points out that this is, in part, a product of feminist activism over time. By the late 1980s, for instance, feminists largely abandoned rape as a significant issue because of their extensive legal achievements. In turn, less consideration was given to the overall efficacy of laws once implemented.²⁴

Additionally, feminist legal gains are deeply embedded in conservative state policies. Maria Bevacqua, for instance, observes that feminist reforms achieved mainstream reception largely because they aligned with the conservative “law-and-order agenda of the 1970s [which] was informed by a pronounced white fear of minority criminality.”²⁵ In particular, a growing body of scholarship has shown mainstream feminist antiviolence activism to be complicit with the neoliberal ideologies of racism, mass incarceration, securitization, and surveillance.²⁶ In her 2008 book *In an Abusive State: How Neoliberalism Appropriated the Feminist Movement Against Sexual Violence*, Kristin Bumiller argues the radical origins of the feminist antiviolence movement have been largely diminished through an “alliance” with the neoliberal state—an historical development that has had devastating effects on survivors of rape and domestic violence.²⁷

Bumiller describes in detail the consequences of this alignment between the feminist antiviolence movement and the neoliberal state. First, early feminist discourse on rape, expressed

²³ Beth Richie, *Arrested Justice: Black Women, Violence, and America’s Prison Nation* (New York: New York University Press, 2012), 40-43.

²⁴ Susan Caringella, *Addressing Rape Reform in Law and Practice* (New York: Columbia University Press, 2009), 1-2.

²⁵ Bevacqua, *Rape on the Public Agenda*, 119.

²⁶ See Kristin Bumiller, *In an Abusive State: How Neoliberalism Appropriated the Feminist Movement Against Sexual Violence* (Durham, NC: Duke University Press, 2008); Marie Gottschalk, *The Prison and The Gallows: The Politics of Mass Incarceration in America* (New York: Cambridge University Press, 2006); Beth Richie, *Arrested Justice: Black Women, Violence, and America’s Prison Nation* (New York: New York University Press, 2012).

²⁷ Bumiller, *In an Abusive State*, 2.

in the language of “gender war,” has facilitated narrow, misleading, and racialized labeling of stereotypical victims and criminals. These tropes, which have been recycled by the media, the police, and the courts, delimit credibility and access to justice.²⁸ Next, the surveillance function of the social service sector drives rape victims into the role of “clients” to be managed, while also forcing women of low socioeconomic status into further dependence on the welfare state (an institution that is increasingly hostile to their needs).²⁹ Bumiller further notes the frequent use of women’s antiviolence rhetoric and funding to bolster the “crime control” imperatives of the state which ultimately perpetuate these cycles.³⁰ This is perhaps most apparent in her observation that the Violence Against Women Act (VAWA), the only national piece of legislation on gender violence, allocates the vast majority of its funds to “prevention” measures like police training at the expense of more direct victim services like shelters.³¹

The racial and class dimensions of gender violence that get buried in mainstream feminist activism are the central concern of Beth Richie’s 2012 book *Arrested Justice: Black Women, Violence, and America’s Prison Nation*. While the severing of race and gender issues is certainly not a new phenomenon, Richie argues that it has taken on a new urgency in our current political climate which she terms “the buildup of America’s prison nation.”³² The “prison nation” is an expansive term that denotes “the ideological and public policy shifts that have led to the increased criminalization of disenfranchised communities of color, more aggressive law enforcement strategies for norm-violating behavior, and an undermining of civil and human

²⁸ Bumiller, *In an Abusive State*, 16-35.

²⁹ *Ibid.*, 63-95, 6.

³⁰ *Ibid.*, 36-62.

³¹ *Ibid.*, 144-145.

³² Richie, *Arrested Justice*, 3.

rights of marginalized groups.”³³ Richie further links current problems in the antiviolence movement to the historical marginalization of women of color. More specifically, she argues that the feminist antiviolence project can be characterized as a success only if one is socially privileged, complicit in “prison nation” ideologies, and inattentive to the way race, class, sexuality, and so forth change the experiences and needs of victims.³⁴ To paraphrase Richie, some “strategic decisions” that mainstream feminists have traded on include support for mandatory arrest laws, prohibition of crisis center services to women with “felony backgrounds,” lack of concern for “lesbian battering,” and disregard for police or “state violence.”³⁵

Scholars often locate the failures of the antiviolence movement, in part, in liberal reform campaigns that undercut earlier grassroots or radical efforts.³⁶ One recurring storyline goes as follows: “informal” and non-hierarchical shelters and crisis centers surrendered their independence to the state in the material need for resources, funding, and a more lasting stability and permanence.³⁷ Or as Bevacqua observes, the more radical aspects of feminism are diminished in

³³ Richie, *Arrested Justice*, 3.

³⁴ *Ibid.*, 3-4.

³⁵ *Ibid.*, 159-160.

³⁶ The division between radical and liberal strands of feminism in the mid-twentieth century has been a major theme in historicizing the second wave. Historian Alice Echols sums up the distinctions in liberal and radical feminist strategy and ideology as follows: “Whereas liberal feminism sought to include women in the mainstream, radical feminism embodied a rejection of the mainstream itself. And while liberal feminists defined the problem as women’s exclusion from the public sphere, radical feminists focused on the sexual politics of personal life.” Alice Echols, *Daring to Be Bad: Radical Feminism in America, 1967-1975* (Minneapolis, MN: University of Minnesota Press, 1989), 15.

³⁷ Bumiller, for example, describes shelters and rape crisis centers as “radical” and “grassroots” in origin and based on a “collective” structure and an explicit hostility to state intervention. But the growing need for resources and funding ultimately lead grassroots antiviolence activists to utilize state services in addition to legal and legislative reform tactics. Similarly, historian Anne Enke describes how early efforts of second-wave feminists included the establishment of shelters, clinics, and rape crisis centers, which often sprung up in women’s basements and were rooted in locally-based, “informal” political networks. Enke writes of the trajectory of these early feminist institutions: “All of them involved compromise: feminists left a deep and lasting imprint

the mainstream process of translating feminist ideals into a public policy.³⁸ But the distinction between grassroots and reformist feminism is fragile at best—belying the fact that they most often worked in tandem. This is by no means a new argument in the broader context of feminist historical literature. Local studies of second-wave feminism often emphasize that any clear distinctions between radical and liberal factions broke down in on-the-ground efforts. For instance, in her monograph on activism in Washington, D.C., Anne Valk writes of the regional dynamics between the two camps:

Although feminists used such categories to describe their approaches, their grassroots activities revealed frequent variations, compromises, and adaptations, suggesting that liberal and radical feminism often overlapped and transmuted to adapt to specific demands.³⁹

Indeed, even when at odds, oppositional political positions within the movement often facilitated mainstream public acceptance: the militancy of radical feminists allowed the liberal feminist line to appear less extreme.⁴⁰ Stephanie Gilmore's *Groundswell* makes a similar point about the role of the National Organization for Women (NOW), often considered a stand-in for liberal feminism, in Ohio, Tennessee, and San Francisco, CA. In contrast to its chapters in major urban centers, NOW chapters in suburban cities were often one of the only spaces in which more radically-minded feminists could gather and discuss strategies.⁴¹

Hesford remarks that one of the problems in understanding U.S. feminism's complexity is the way the movement is often framed in historical writings. She describes, for instance, how several writers and activists "tended to tell the same story;" in particular, through describing the

on mainstream institutions, but many felt that the process scarred the very soul of the movement" (21). See Bumiller, *In an Abusive State*; 2-5; Enke, *Finding the Movement*, 177-216.

³⁸ Bevacqua, *Rape on the Public Agenda*, 132-136.

³⁹ Valk, *Radical Sisters*, 4.

⁴⁰ *Ibid.*, 8.

⁴¹ Stephanie Gilmore, *Groundswell: Grassroots Feminist Activism in Postwar America* (New York: Routledge, 2012), 1-20.

feminist movement's initial success and subsequent failures by tracing a narrative arc that moves "from simplicity to complexity."⁴² Hesford links this trend to the very conventions of storytelling itself, or the desire to offer up a chronological narrative, in addition to traditional revisionist motives for claiming legitimacy.⁴³ Her critique signals a problem in understanding the feminist movement's precise relationship with the neoliberal state: is feminism directly complicit with or appropriated by state interests? Specifically, neither Bumiller nor Bevacqua, for instance, denies that reformist and radical feminists often worked together in daily politics. In fact, Bevacqua implicitly describes this dynamic of mutuality in her history of the anti-rape movement.⁴⁴ But in telling a story of feminist origins, both also frame radical ideology as distinct from liberal feminism. This, in turn, blurs the specific role that popular radical feminist theories of rape had in bolstering the state's agenda—by framing their earlier efforts in securing non-state crisis centers as qualitatively less flawed. The overall effect is to downplay the precise ways both radical and liberal strands have worked concurrently to generate feminist reform 'progress.'

I want to point out that focusing on only radical and liberal feminism is in itself problematic as a subject. Becky Thompson, for instance, has argued that the recurrent historical focus on tensions between the three 'main' strands of feminism (radical, liberal, and socialist)

⁴² Hesford, *Feeling Women's Liberation*, 7.

⁴³ *Ibid.*, 6-14. Hesford builds on a tradition of influential scholarship, including Joan Scott's essays on gender and history and Ann Laura Stoler's theories of the colonial archive.

⁴⁴ Bevacqua, *Rape on the Public Agenda*, 18-65. In her narrative of origins, Bevacqua emphasizes the distinction between radical and liberal feminists, decidedly crediting the former with generating early interest in rape as a subject of interest around 1970. She further describes the membership-based National Organization for Women (NOW) as belatedly interested in anti-rape organizing and, overall, casts liberal feminism as supplemental to the radical sect's grassroots efforts. But in tracking the larger arc of her evidence, she writes of their merging point: "Both the formal organizations of the women's rights branch and the small, grassroots groups of the radical branch of the second wave of the women's movement created a communications network for anti-rape activists just as they provided an organizational base on which the movement drew" (42).

elides the formative roles and intellectual production of women of color’s feminist work during the second-wave period.⁴⁵ But my intention here is not the erasure of diverse “feminisms,” but rather, just the opposite.⁴⁶ My interest in the disagreement over self-defense politics—via liberal and radical tactical debates—for the Garcia campaign hinges on complicating the recurrent claim that radical feminist politics has played a lesser role in the historical merging of feminist and conservative politics. By mapping out the points by which liberal and radical feminists worked in partnership, I hope to show how this dynamic often becomes obscured in the *process* of politics. In holding too tightly to the feminist progress narrative (Hesford’s point), scholars often subtly portray early radical feminist projects as less problematic even as they are critical of them. This ultimately obscures the myriad problems in radical feminist patriarchal ideology.⁴⁷

This background points to the crux of my analysis of the trial at hand. In the campaign for Inez Garcia, the façade of radical and liberal opposition masked how grassroots activists embraced a strictly feminist legal self-defense as they simultaneously called for anti-state tactics.

⁴⁵ Becky Thompson, “Multiracial Feminism: Recasting the Chronology of Second Wave Feminism,” in *No More Permanent Waves: Recasting Histories of U.S. Feminism*, ed. Nancy Hewitt (New Brunswick, NJ: Rutgers University Press, 2010), 39-60.

⁴⁶ Sociologist Benita Roth, who focuses on Black, Chicana, and white “feminisms,” uses the plural term to reject common depictions of feminism as the project of only white and middle-class women, or a false “whitewashed vision of second-wave feminist protest” (10). Benita Roth, *Separate Roads to Feminism: Black, Chicana, and White Feminist Movements in America’s Second Wave* (New York: Cambridge University Press, 2004).

⁴⁷ In a contemporary essay on the exclusivity of domestic violence shelters today, Emi Koyama describes the effects of early feminist decisions: “By focusing excessively on ‘the power of shared experiences among women,’ these radical feminists created a movement that discourages and suppresses the discussions about the specificities of each woman’s experiences within a complex matrix of social inequalities...” (216). For Koyama, the only way to “repoliticize” feminist antiviolence work is to explicitly center these myriad differences among women—differences that reveal violence against women is not only interpersonal, but deeply embedded in our political and institutional structures. Emi Koyama, “Disloyal to Feminism: Abuse of Survivors within the Domestic Violence Shelter System,” in *Color of Violence: the Incite! Anthology*, eds. INCITE! Women of Color Against Violence (Cambridge, MA: South End Press, 2006), 216.

Thus, even though activists might have rejected working within traditional institutional channels—what the Free Inez Garcia Committee dubbed “the Man’s legal system”—they often did just that.⁴⁸ More to the point, though feminists described a diverse range of approaches to self-defense in writings on the trial, such as the suggestion to organize local women’s groups for protection or the need for women’s martial arts classes, Garcia’s victory is only evidence of a legal version of self-defense.⁴⁹ Further, what enabled such widespread support of Garcia was, in part, the flawed epistemic premise of female essentialism and timeless patriarchy. In positioning Garcia as an example to all women, many feminists actively obscured the specific ways differential social locations refract experiences of violence. This resulted in an overextended symbolic deployment of Garcia as universally representative. In turn, certain facts about her legal victory have received less attention: that this was at base a murder trial (no rapist was ever charged) or that the media often portrayed her in terms antithetical to the feminist campaign.⁵⁰ Though she had widespread support from various movements and organizations—including the Black Panther Party and the United Farm Workers of America—an analysis of the broader dimensions of her case illustrate that more mainstream institutions often subverted the feminist message.

Finally, I want to state that the activist campaign that ensued on Garcia’s behalf gestures at many of the unresolved paradoxes that linger for feminist anti-rape politics. In this way, the

⁴⁸ “Inez Garcia: Womanpride Fighting Back,” pamphlet by the Free Inez Garcia Committee, 1975. Special Collections, University of Michigan Library.

⁴⁹ The subject of self-defense as a viable tactic for feminism continues in contemporary debates. At issue is whether preemptive strategies such as martial arts training are collectively-based or individualizing, in which the latter scenario is construed as placing the burden of rape on individual women. For a positive appraisal of self-defense, see Ann Cahill, “In Defense of Self-Defense,” *Philosophical Papers* 38, vol. 3 (2009), 363-380. For criticism, see Carine M. Mardorossian, “Toward a New Feminist Theory of Rape,” *Signs* 27, no. 3 (2002): 743-775.

⁵⁰ This first point is made by Maria Bevacqua: no rapists were charged in either Joan Little’s or Inez Garcia’s case. See Bevacqua, *Rape on the Public Agenda*, 129.

trial of Inez Garcia is neither a simple success nor a total failure for second-wave feminists. On an individual level, Garcia won a legal battle. Yet this is not the framework for my critique. In 1977, her acquittal was widely considered a victory not only by liberal feminists but by diverse bands of activists. And yet the precise meaning of her actions—as justifiable self-defense or vigilante justice—was a major point of contention both within the feminist movement and beyond it. The trial, then, was not only about broad-based solidarity or a collective model of feminist self-defense—two themes that continue to shape its historical legacy. The support that Garcia elicited illustrates that deeply conflicting ideas about feminist identity and antiviolenace politics coexisted at the outset.

Chapter 1: A Feminist Cause: The Trials of Inez Garcia, 1974-1977

On March 19, 1974, a 30-year-old woman named Inez Garcia was preparing dinner at the two-bedroom apartment she had recently rented in Soledad, CA. With her 11-year-old son Johnny, Garcia had moved from Miami, FL to Soledad three year earlier to be near her husband Juan, an anti-Castro activist who was serving time in the prison there for his involvement with a political bombing in Los Angeles. Garcia, who was raised in New York City's Spanish Harlem by her Cuban and Puerto Rican family, was supporting herself and her son by working in the local farm industry where she was alternately a day laborer in the fields and a caretaker for the other workers' children.⁵¹

Around 8 p.m. two local men named Luis Castillo and Miguel Jiminez arrived at her Soledad residence. Both men were heavily intoxicated and looking for Garcia's roommate, Fred Medrano, a Vietnam War veteran who planned to move to Texas with his fiancé once Garcia finished moving in.⁵² When Medrano returned, Castillo and Jiminez physically assaulted him and then left the building. What happened next is a matter of debate. According to Garcia, she went outside after the scuffle to make sure the men had left the property wherein she was shoved behind the house, restrained by Jiminez, and raped by Castillo. Garcia went back inside, received a threatening phone call from Jiminez, and loaded a .22-caliber hunting rifle. Deeply shocked and distressed, Garcia then called her extended family in Miami to tell them of her assault. Approximately twenty minutes later, Garcia left the house to confront Castillo and Jiminez. She found both men a few blocks away, where they were again attacking Medrano. When Jiminez

⁵¹ Wood, *The Rape of Inez Garcia*, 12; "Viva Inez!" Monograph by Inez Garcia Defense Committee, 1974. Special Collections. Shields Library, University of California-Davis.

⁵² Ibid.

brandished his knife, she shot her rifle six times. Her gunfire fatally wounded Jiminez while Castillo escaped and took shelter in a nearby park until police arrived.⁵³

Garcia was taken to the Soledad police station that night for questioning where she immediately confessed to killing Jiminez. Both she and Medrano were arrested and soon after indicted by a grand jury on charges of first-degree murder.⁵⁴ In the meantime, Garcia's affluent Miami relatives secured for her defense the legal counsel of Charles Garry, the famous San Francisco-based attorney long associated with leftist causes, most notably for his work defending Huey Newton and other members of the Black Panther Party.⁵⁵ Three months later, Garcia was released on \$5,000 bail. Garry initially considered the case "a straightforward matter."⁵⁶ But as he learned more details, two key elements challenged his preliminary assessment and posed specific legal obstacles to his defense strategy. First, the lapse of time (at least twenty minutes) between the sexual assault and the homicide made Garcia vulnerable to allegations of "premeditated murder;" that during the gap she had "formed the specific intent to kill Jiminez."⁵⁷ Second, there was no police record of Garcia's rape, leaving her without any proof of the assault or concrete evidence of her motive. Soledad police claimed that Garcia never reported the rape, while Garcia stated that she attempted to tell them but found it impossible to express the details given their dismissive attitude.⁵⁸

Garry recognized that the trouble Garcia encountered in trying to report the rape would resonate with women's rights advocates and he arranged for Garcia to meet with local feminists

⁵³ Wood, *The Rape of Inez Garcia*, 12, 98; "Viva Inez!" Monograph by Inez Garcia Defense Committee, 1974. Special Collections. Shields Library, University of California-Davis.

⁵⁴ Wood, *The Rape of Inez Garcia*, 27; see also Charles Garry and Art Goldberg, *Streetfighter in the Courtroom: The People's Advocate* (New York: E.P. Dutton, 1977), 218-219.

⁵⁵ Wood, *The Rape of Inez Garcia*, 28-29.

⁵⁶ Garry and Goldberg, *Streetfighter in the Courtroom*, 217.

⁵⁷ *Ibid.*, 218.

⁵⁸ *Ibid.*

to relay her story.⁵⁹ Anti-rape organizing was a primary concern for the women's movement in the mid-1970s, and her plight elicited the devoted support of a cohort of West Coast feminists (many from Berkeley and San Francisco) who called themselves the Inez Garcia Defense Committee. The group raised funds, distributed informational materials, held press conferences, organized daily transportation of activists, and even rented a house near the Monterey courthouse to shelter Garcia and her supporters for the duration of her legal battle.⁶⁰ To national papers like the *New York Times*, Garry announced that underpinning his defense strategy was the "unwritten law," or "the right of a woman who has been raped to take the law into her own hands to protect her integrity."⁶¹ And in the months leading up to the trial, the Defense Committee vigorously promoted Garcia as a courageous symbol of a woman's right to self-defense and a revealing example of the institutional and societal disregard of rape victims everywhere. The *New York Times* reported on their efforts: "Rallies have been held in Mrs. Garcia's honor, leaflets distributed and articles written in underground newspapers, all picturing the beautiful woman as heroine because she went to such violent and unusual lengths to seek retribution."⁶² By late summer, the Defense Committee had succeeded in capturing local, national, and international attention from fellow activists and mainstream media alike.

The trial of Garcia and codefendant Medrano, both charged with first-degree murder for the shooting of Jiminez, began at the Monterey County Superior Court in Salinas, CA in August 1974. While Garry had touted the righteousness of the "unwritten law" defense to press, his legal

⁵⁹ Garry and Goldberg, *Streetfighter in the Courtroom*, 221.

⁶⁰ Wood's book documents the Inez Garcia Defense Committee's campaign in detail.

⁶¹ Lacey Fosburgh, "Assertion of Rape and 'Unwritten Law' Form a Coast Woman's Murder Defense," *New York Times*, August 31, 1974, 32. ProQuest Historical Newspapers (119967232).

⁶² *Ibid.*

strategy in the courtroom relied instead on an “impaired consciousness” line of argument.”⁶³ Conversely, the prosecution, argued by District Attorney Arthur Baudrick, maintained there was no evidence that Garcia was raped, stressed the case was a “simple murder charge,” and asserted that Garcia and Medrano had planned to kill Jiminez to settle a dispute over local drug sales.⁶⁴ Central to Baudrick’s case was his contention that Garcia used the rape allegation to deflect attention away from the murder.⁶⁵ Yet most problematic for the defense was that presiding Judge Stanley Lawson insisted that because there was no legal proof of rape, it was therefore irrelevant to the trial. During Garry’s opening remarks, Lawson interjected: “Counsel, I cannot permit this. We are trying a woman for murder. There is no man on trial for rape, and the attitude of the police for rape or murder, as far as I am concerned, has nothing to do with the guilt or innocence of this woman.”⁶⁶

Over the next few weeks, both sides attempted to piece together their version of the events of March 19 with disputed details and conflicting testimonies. To the anger of Garcia’s supporters, Castillo took to the stand and testified that he did not rape her, even snickering when Garry posed the question to him during cross-examination.⁶⁷ Another key witness for the prosecution was Cristoforo Solis, a friend of Medrano’s, who had returned to the Soledad apartment with him that night. Solis testified that he witnessed Medrano stating his intention to kill Jiminez and heard Garcia offer to execute the murder since her extended family was well-off

⁶³ Garry and Goldberg, *Streetfighter in the Courtroom*, 228-230; Wood, *The Rape of Inez Garcia*, 146. Many of Garcia’s supporters objected to Garry’s use of psychiatric testimony.

⁶⁴ Quoted phrase in Leroy F. Aarons, “Rape as Murder Defense: Woman Says She Killed in Frenzy After Attack,” *Washington Post*, September 22, 1974, A2. ProQuest Historical Newspapers (146131197).

⁶⁵ Garry and Goldberg, *Streetfighter in the Courtroom*, 224; Wood, *The Rape of Inez Garcia*, 76-79.

⁶⁶ Garry and Goldberg, *Streetfighter in the Courtroom*, 223; Wood, *The Rape of Inez Garcia*, 84.

⁶⁷ Garry and Goldberg, *Streetfighter in the Courtroom*, 224-225; Wood, *The Rape of Inez Garcia*, 107.

and could easily arrange for her acquittal. Yet several points in Solis's testimony proved inconsistent under further probing by Garry.⁶⁸ Further, the prosecution could make no connection between Garcia and drug use or sales, begging the question of her motive, or why Garcia would offer to handle the killing for a mere acquaintance.⁶⁹

Baudrick also called to the stand three of Garcia's friends—Alicia Alcaez, Rosa Bracamonte, and Juan Carbajal—whom she met up with immediately after the shooting. Alcaez confirmed that when Garcia first arrived at Bracamonte's house, she stated that her motive for killing Jiminez was that the two men either raped or had tried to rape her, though she could not recall the precise wording that Garcia used. Moreover, she maintained that though Garcia's blouse was slightly torn, the group suggested that she did not look messy enough for the police to believe her allegations of rape. Thus, Alcaez ripped Garcia's shirt to make the tear more pronounced and then directed her nephew, Juan Carbajal, to hit Garcia's face several times as visible proof of attack. Finally, two neighborhood youths testified to witnessing the shooting from their front porch. Both asserted that Garcia had been driven to the scene—contradicting Garcia's testimony that she had walked the five blocks to the scene alone. However, their view was partially obstructed so they lacked concrete details.⁷⁰

Most critical to the defense's case was the testimony of Dr. Jane Oldden, an expert witness who met with Garcia three times before the trial to evaluate her mental health. Oldden stressed that Garcia was neither sociopathic nor insane and asserted that Garcia exhibited the

⁶⁸ Garry and Goldberg, *Streetfighter in the Courtroom*, 225-226; Wood, *The Rape of Inez Garcia*, 110-116.

⁶⁹ Garry writes of his defense strategy: "...if there was no rape the whole thing made no sense. Medrano was not that badly hurt and though Garcia, too, had been beaten, this was not sufficient cause to send her out to kill two young men. It had to be the emotional trauma of rape that provided the impetus for the killing." See Garry, *Streetfighter in the Courtroom*, 229.

⁷⁰ Garry and Goldberg, *Streetfighter in the Courtroom*, 227-228; Wood, *The Rape of Inez Garcia*; 122-130.

symptoms of rape trauma—severe weight loss, broken sleep, guilty feelings, and only partial memory of the incident.⁷¹ In the aftermath of the rape, Garcia acted in “... ‘a deeply dissociated state of altered or impaired consciousness.’”⁷² Oldden further stated: “‘Only something as extreme as rape would provoke her to violent retribution.’”⁷³ Considering Garcia’s strong Roman Catholic faith, Garry also arranged for Father Eugene Boyle to testify on the Church’s conventional stance on rape. Boyle explained that Garcia’s actions were not only understandable but also admirable given the premium Roman Catholic doctrine places on marital fidelity.⁷⁴

On October 4, 1974, the jury of seven women and five men found Garcia guilty of second-degree murder after almost three days of deliberation. They failed to reach a verdict for Medrano, who was released on grounds of a mistrial.⁷⁵ A few weeks later, on October 21, Judge Lawson handed down the maximum sentence of 5-years-to-life. Garcia remained composed throughout the hearing, but her supporters were outraged as more than one hundred activists inside and outside the Monterey courthouse chanted slogans like “Free Inez!” and “Fight rape!” further strengthening their commitment to her release.⁷⁶ Lawson again emphasized his opinion that rape was not at issue in the Garcia case. A reporter for the *Chicago Tribune* described the scene: “Directing his remarks to the gallery of Garcia supporters, the 68-year-old judge said:

⁷¹ Garry and Goldberg, *Streetfighter in the Courtroom*, 229; Wood, *The Rape of Inez Garcia*, 142-143.

⁷² Garry and Goldberg, *Streetfighter in the Courtroom*, 229.

⁷³ Wood, *The Rape of Inez Garcia*, 146.

⁷⁴ Garry and Goldberg, *Streetfighter in the Courtroom*, 231; Wood, *The Rape of Inez Garcia*, 153-157.

⁷⁵ Associated Press, “Alleged Rape Victim Convicted for Murder,” *Los Angeles Times*, October 5, 1974, C16. ProQuest Historical Newspapers (157588523).

⁷⁶ Associated Press, “Calif. woman gets 5 years-life for slaying the alleged rapist,” *Boston Globe*, October 22, 1974, 2. ProQuest Historical Newspapers (822106054); “Did Inez Garcia Have a Right to Kill? A Jury Says No,” *People Magazine*, October 21, 1974, <http://www.people.com/people/archive/article/0,,20064582,00.html>.

‘This was not a rape trial—it was a murder trial....Whether Inez Garcia was raped is problematical....There’s a question of whether a woman has the right to execute a man who raped her. Where do you draw the line?...Thank the Lord we have a government of laws. You are urging a government of men.’⁷⁷

Further, as another writer for *The London Observer* reported, Lawson also directly dismissed Garry’s impaired consciousness defense: “He said after the assault on her, Mrs. Garcia had found time to make two telephone calls, pick up a friend as driver and load a rifle before ‘going off on the prowl like a huntress.’”⁷⁸

Many Garcia supporters were outraged by Judge Lawson’s comments—one cluster of activists even organized a protest in front of his house with the purposefully provocative chant: “‘Free Inez Garcia! Rape the judge and see what he does!’”⁷⁹ But dissatisfaction with the ruling went beyond her base of local California advocates as a flurry of statements from feminist organizations across the U.S. condemned the ruling. One activist from the Feminist Women’s Health Center in California described to the press the scope of feminist actions targeting the injustice of Garcia’s conviction:

‘Thousands of women are expected to strike Monday and attend the demonstration across the country. They will protest Mrs. Garcia’s conviction and affirm women’s rights. There will be protests in the San Francisco Bay Area, one in Detroit, one in Iowa City, and later on, one in Chicago. Groups of women will march on the United States embassies in London and Paris.’⁸⁰

⁷⁷ Jack Hemstock, “Inez—a murderer or a victim of law?,” *Chicago Tribune*, October 21, 1974.

⁷⁸ Charles Foley, “Students fight to free woman who killed rapist,” *London Observer*, October 27, 1974, 8. ProQuest Historical Newspapers (476238252).

⁷⁹ Hemstock, “Inez—a murderer or a victim of law?”

⁸⁰ *Ibid.*

While a representative from the national group, Women Against Rape (WAR), proclaimed, in a pithy statement indicative of generalized feminist sentiment: ““We call for Inez Garcia’s acquittal on grounds of self-defense.””⁸¹

As Garcia served her sentence at the California Institute for Women, anti-rape activists continued to highlight the broader issues that her case signaled: the victim-blaming practices of police, courts and media and the necessity of a legal precedent for women’s right to self-defense. But activists did not lose sight of the specific case at hand. In the weeks following her conviction, a second local activist group formed in San Francisco, CA, aptly named the Free Inez Garcia Committee (FIGC), to bolster the original Defense Committee’s efforts in raising money and focusing attention on Garcia’s appeal.⁸² Several mainstream membership-based organizations also worked to unite diverse social movement activists around her cause—shifting the focus away from gender alone to the racial, ethnic, and cultural dimensions that complicate experiences of sexual violence. One particularly significant “coalition” that reflected this broad-based collaboration included the Women’s Legal Defense Fund, the National Black Feminist Organization, the D.C. Rape Crisis Center, the Feminist Alliance Against Rape, and the Washington, D.C. chapters of the National Organization for Women, the National Conference of Puerto Rican Women, and the League of United Latin-American Citizens.⁸³

By the summer of 1975, mainstream press interest in Garcia’s case dulled as the focus shifted to the unfolding trial of Joan Little. Some outlets blamed feminists outright for interfering with Garcia’s trial by manipulating her image for their own ends and instructing her to appear

⁸¹ Charles Foley, “Women Say Law is Guilty of Rape,” *London Observer*, October 20, 1974, 1. ProQuest Historical Newspaper (476305698).

⁸² “Inez Garcia: Womanpride Fighting Back,” pamphlet by the Free Inez Garcia Committee, 1975. Special Collections, University of Michigan Library.

⁸³ Marlene Cimon, “Washington on View: Susan Haldeman’s First Case,” *Los Angeles Times*, October 25, 1974, G1. ProQuest Historical Newspapers (157544258).

unapologetic so as to fit with their narrative of a woman's uncompromising right to protect herself. Others pegged Garcia's trial as a "poor test case" for the anti-rape movement due to the "time lapse" between the alleged rape and the shooting and for her "uncouth behavior in court."⁸⁴ In the meantime, amidst clashes with Garry over his impaired consciousness defense—for casting Garcia's actions as irrational and thus capitalizing on the longstanding duality of female anger as pathological and male anger as normal—groups like the FIGC called for a more explicitly "feminist defense" that relied on the "just provocation" of her actions if her appeal was granted. They soon arranged for Susan Jordan, a young lawyer from San Francisco who was later associated with the legal group known as the Women's Self-Defense Law Project, to take over as Garcia's attorney.⁸⁵

On December 29, 1975, the California Court of Appeals reversed Garcia's conviction of second-degree murder, ruling that Judge Lawson "had erred when instructing the jury on reasonable doubt."⁸⁶ Garcia was released on \$5,000 bail pending retrial.⁸⁷ Jordan candidly announced to reporters that she intended to argue that Garcia had acted in "legitimate self-defense."⁸⁸ In a confident tone, she further emphasized the paramount role that feminists played in changing the dominant social ideas and institutions about gender and rape that plagued

⁸⁴ "Motive for Murder," *Economist* (London, England), April 12, 1975, 71. The Economist Historical Archive, 1843-2010.

http://find.galegroup.com.ezproxy.gc.cuny.edu/econ/infomark.do?&source=gale&prodId=ECON&userGroupName=cuny_gradctr&tabID=T003&docPage=article&docId=GP4100096151&type=multipage&contentSet=LTO&version=1.0.

⁸⁵ "Inez Garcia: Womanpride Fighting Back," pamphlet by the Free Inez Garcia Committee, 1975. Special Collections, University of Michigan Library.

⁸⁶ United Press International, "Woman Wins Reversal in Death of Alleged Rapist's Accomplice," *New York Times*, December 30, 1975, 14. ProQuest Historical Newspapers (120235373).

⁸⁷ United Press International, "Inez Garcia Released on Bail," *Los Angeles Times*, January 12, 1976. ProQuest Historical Newspapers (157913250).

⁸⁸ Associated Press, "Second Coast Trial Begins Today in Reputed Rape-Revenge Slaying," *New York Times*, February 14, 1977, 18. ProQuest Historical Newspapers (123500752).

Garcia's first trial: "The world has changed since 1974 in the area of rape, and the world and the laws have changed to a large extent because of actions like Inez's, her defense and her trial and the work that the women's community has done."⁸⁹ Testimony for the retrial, presided over by Monterey County Superior Judge Nat A. Agliano, began on February 14, 1977 at the same Salinas courthouse.⁹⁰ In contrast to Garry's approach, Jordan's defense relied, at core, on outlining the rationality of Garcia's motive in shooting Jimenez: when he called her and verbally threatened further harm, Garcia perceived herself to be in imminent danger. Her perception of danger was further heightened when Jimenez waved his knife at Garcia when she confronted him on Monterey Street. Thus, the time lag between the rape and the homicide—the troubling detail that prompted charges of premeditated murder in the 1974 trial—could now be accounted for in legal terms through the logic of self-defense. Also notable in Jordan's defense strategy was her commitment to undermining gender-based legal discrimination and cultural myths about rape. For instance, under voir dire, she probed potential jurors for their own prejudices about gender and rape—selecting only those who recognized their misconceptions. She later explained the significance of this line of questioning: "And the lights started to go off, because it was so clear that some jurors had one standard for the bad girls who got raped, and another standard for their daughters. They really began to engage in the dialogue."⁹¹

⁸⁹ Associated Press, "Second trial opens for woman convicted in rape-related slaying," *Baltimore Sun*, February 14, 1977, A3. ProQuest Historical Newspapers (541096418).

⁹⁰ Ibid.

⁹¹ "The Case of Inez Garcia: Interview with Susan Jordan," in *Dear Sisters: Dispatches from the Women's Liberation Movement*, ed. Rosalyn Baxandall and Linda Gordon. (New York: Basic Books, 2000), 203. See also "Inez Garcia Acquitted of 'Rape-Related' Killing," *Washington Post*, March 5, 1977, A5. ProQuest Historical Newspapers (146787091); Elizabeth Schneider et al., "Representations of Women who Defend Themselves in Response to Physical or Sexual Assault," in *Women's Self-Defense Law Cases: Theory and Practice*, ed. Elizabeth Schneider (Charlottesville, VA: The Michie Company, 1981), 1-39.

District Attorney Baudrick once again led the prosecution, adhering to the same approach he used in Garcia's first trial: that her motive for murder was drug-related. Though, he still failed to connect Garcia to any concrete incident of drug use or to a relationship with Medrano beyond casual acquaintance.⁹² Moreover, Castillo pleaded his Fifth Amendment right against self-incrimination and never testified in the retrial as to the events of March 19, 1974.⁹³ Jordan, on the other hand, introduced a series of new witnesses who provided additional context for the lack of evidence that Garcia was raped. For instance, Arthur Gibbons, a Salinas police detective, described how rape victims have no typical response to rape when reporting and offered the opinion that the Soledad police should have further investigated Garcia's original statement. Jordan also called to the stand Dr. Dolores Jiminez, a San Francisco-based clinical psychologist, who described Garcia's initial response to the rape—in calling her relatives in Miami—as consonant with the traditional Latino cultural view that rape also represents an attack on the victim's family honor. Such background also accounts for the deep shame Garcia felt when she first tried to report the sexual assault.⁹⁴

On March 4, 1977, Inez Garcia was acquitted of second-degree murder by the jury of ten men and two women.⁹⁵ To the myriad activists who remained focused on her cause, the ruling signaled a major achievement for the anti-rape movement. The *Los Angeles Times* described the scene through the highly charged emotional reactions of her dedicated advocates: "The Monterey County courtroom, packed with about 75 partisan supporters of the defendant, exploded into a

⁹² Susan Rothaizer, "Inez Garcia Acquitted," *off our backs* 7, no. 3 (1977). ProQuest (197138857).

⁹³ Associated Press, "Retrial Clears Woman in Revenge Slaying for Rape," *Los Angeles Times*, March 5, 1977, B1. ProQuest Historical Newspapers (158220475).

⁹⁴ Rothaizer, "Inez Garcia Acquitted."

⁹⁵ Associated Press, "Retrial Clears Woman in Revenge Slaying for Rape."

cheer when the verdict was read. Several women burst into tears.”⁹⁶ Similarly, another newspaper reported that “support seemed little diminished from its early intensity when Garcia was first tried and convicted.”⁹⁷ Susan Jordan expressed to the press her hope that this new outcome would set a legal precedent for other women who injure or kill in self-defense.⁹⁸ While the ICI: A Woman’s Place bookstore collective in Oakland, CA, “closed its doors in celebration of Inez Garcia’s victory” for the first time in over a decade since its founding.⁹⁹ Later that month, on March 8, around two hundred of Garcia’s supporters marched in her honor at International Women’s Day festivities in Berkeley, CA.¹⁰⁰ And in the weeks following the acquittal, feminists at the national level continually endorsed Garcia as a testament to the anti-rape movement’s tangible progress. For instance, Del Martin, a NOW member and delegate for the San Francisco Commission on Women, proclaimed: “I think there is a changing attitude about rape....The age old advice of ‘relax and enjoy it’ is no longer viable. What’s happening now is that women are finding strength in other women.”¹⁰¹ For Martin, Garcia’s legal victory signaled a more general shift in social attitudes about rape and, further, a shift that testified, in large part, to women’s solidarity that feminism offered.

At first glance, the simple fact that Inez Garcia was acquitted in her 1977 retrial attests to the accuracy of claiming the case as a feminist success story. In addition, it was Susan Jordan’s distinctly feminist legal defense—in contrast to Garry’s use of a more “irrational” line of

⁹⁶ Associated Press, “Retrial Clears Woman in Revenge Slaying for Rape.”

⁹⁷ Associated Press, “Feminist Leaders Hearted By Acquittal of Inez Garcia,” *Washington Post*, March 6, 1977, 22. ProQuest Historical Newspapers (146839934).

⁹⁸ United Press International, “Woman freed in slaying of rapist’s guard,” *Baltimore Afro-American*, March 12, 1977, 2. ProQuest Historical Newspapers (532339310).

⁹⁹ Judy Grahn, *A Simple Revolution: The Making of an Activist Poet* (San Francisco, CA: Aunt Lute Books, 2012), 220.

¹⁰⁰ Rothaizer, “Inez Garcia Acquitted.”

¹⁰¹ Associated Press, “Feminist Leaders Hearted By Acquittal of Inez Garcia.”

argument—that secured the victory. But these successes belie the more paradoxical meanings of her case. The imagery of Garcia as “the rape victim who fought back” pervades activist dialogue at the time. But her acquittal is less an argument in favor of a uniformly feminist self-defense, than for a lens through which to probe the deeply paradoxical range of ways feminists articulated politics in her name. More importantly, close examination of dissent over the meaning of Garcia’s actions opens up her trial to a broader consideration of the legacy of second-wave feminism. Thinking through the schisms between the figurative deployment of Garcia and the facts of her trial illustrate why the campaign for Garcia does not fit narrowly into the feminist storyline of success touted in the aftermath of her acquittal. As one Garcia supporter phrased it, “It’s important that women see it as a model for action...It is possible to fight back and it is your right to fight back.”¹⁰² But precisely how did Garcia represent a “model for action”? Close examination of the feminist terms of what constituted ‘fighting back’ is nothing if not contradictory.

¹⁰² Associated Press, “Feminist Leaders Hearted By Acquittal of Inez Garcia.”

Chapter 2: Paradoxes of Second-Wave Feminist Politics

Many scholars have argued that feminist self-defense emerged in reaction to a growing conservatism in the 1970s.¹⁰³ On the one hand, the framing of Garcia as a “brave sister” marks a distinct contrast to popular media and filmic representations of sexual violence during the decade.¹⁰⁴ For instance, Marilyn Johnson describes how press outlets seized on the lurid details of murder cases featuring (only white and middle-class) female victims like Kitty Genovese and “the Career Girl Murders” of Janice Wylie and Emily Hoffert as part of a larger fear-baiting scheme to blame women for the increase in “urban crime.”¹⁰⁵ Historian Georgina Hickey argues that feminist calls for self-defense training emerged in part as a reaction to “conservative” approaches in U.S. advice literature for women in the 1960s and 1970s.¹⁰⁶ Self-defense in these

¹⁰³ While second-wave feminists’ interest in self-defense emerged in a particular historical context, the subject is inextricably linked to shifting debates about the appropriate role of women in public space. According to Estelle Freedman, before the 1960s, the mandate of “chivalrous male protection” shifted briefly in the Progressive Era when a concerted women’s campaign ensued against “the masher,” a nickname for white male street harassers. See Estelle Freedman, *Redefining Rape: Sexual Violence in the Era of Suffrage and Segregation* (Cambridge, MA: Harvard University Press, 2013), 191-209.

¹⁰⁴ Quoted phrase from Wood, *The Rape of Inez Garcia*, 119.

¹⁰⁵ Marilyn S. Johnson, “The Career Girl Murders: Gender, Race, and Crime in 1960s New York,” *WSQ: Women’s Studies Quarterly* 39, no. 1 and 2 (2011): 244-261. Most importantly, Johnson notes that this renewed emphasis on safety targeted white women only, particularly the elite and educated women moving to cities at high rates in midcentury. Despite the higher statistical reality of violence for African-American and Latino women, the media consistently focused on white female victims and African-American male perpetrators (248). Yet Johnson concludes that the overall effect of this false image of interracial crime was the hindering of both gender and racial justice campaigns by encouraging suburban white flight and conservative policy reforms (257).

¹⁰⁶ Georgina Hickey, “From Civility to Self-Defense,” *WSQ: Women’s Studies Quarterly* 39, no. 1 and 2 (2011): 77-94. Hickey tracks a critical transition in the tone and content of “etiquette manuals and advice books” aimed at women’s behavior in public throughout the twentieth century (79). Her larger point is that earlier guides, based on manners, are qualitatively more liberating for women given the “conservative” articulations of self-defense. She writes, “Counter to the common assumption that women’s freedoms have only steadily increased over the course of the century, the earlier assumptions of civility may have actually allowed more room for

popular “manuals” was defined not as physical resistance, but rather through tactics of avoidance and the cultivation of “paranoia” as the most effective strategies for safety.¹⁰⁷ Hickey describes the advice as part of a punitive push-back on feminist upheaval: “Telling women to be wary, to stay at home, to never be alone, and to obey their fears certainly encouraged them to internalize the backlash and believe that the opportunities opened by second-wave feminism actually put women at great physical risk.”¹⁰⁸ Thus, as an antidote to the dominant cultural and visual literacy of the 1970s, the widespread feminist embrace of Garcia’s actions as radical makes sense.

But the context of conservative reaction does not exhaust the reasons feminists engaged with the issue of self-defense. In her 1981 essay “Rethinking the Seventies: Women Writers and Violence,” feminist critic Elaine Showalter argues for an additional catalyst: a feminist interest in violence that was both real and imagined.¹⁰⁹ She writes of the literary trends to mark the decade:

Women’s novels are testing the limits of the liberated will and the metaphysics of violence. What are the irrational forces of evil and violence that collide with one’s life? Are they outside the self, in male society? Or are they also within the self, in fantasy, guilt, and hate? The phantom killer is obviously a monitory figure; he may also be a projection of female violence, the extreme form of an anger woman have only recently begun to imagine and explore. Although its fictional forms are more disturbing than we might have predicted, violence as a fantasy was an undercurrent of feminist thought during the decade.¹¹⁰

For Showalter, cultural saturation in depictions of both violent and violated women in the 1970s—in popular novels like Judith Rossner’s 1975 novel *Looking for Mr. Goodbar*—reflected women’s varied *explorations* of violence as much as conservative counterattacks.¹¹¹ Neal King

women to act, and act without fair of negative physical or social repercussions, in public space” (91).

¹⁰⁷ Hickey, “From Civility to Self-Defense,” 85-88.

¹⁰⁸ *Ibid.*, 88.

¹⁰⁹ Elaine Showalter, “Rethinking the Seventies: Women Writers and Violence,” *The Antioch Review* 39, no. 2 (1981): 156-170.

¹¹⁰ *Ibid.*, 159.

¹¹¹ *Ibid.*, 164-165.

and Martha McCaughey touch upon a similar sentiment in their assessment of the central paradox in rape-revenge movies: “Most feminists oppose violence, define it as patriarchal and oppressive, yet often enjoy scenes in which female characters defend themselves, save the day, seek revenge, and get away with it in the end.”¹¹² This disconnect between reality and fantasy, between standing against violence and taking it up as a revolutionary cause, is an important context for mapping out the points of contention for feminist articulations of self-defense. In the following critique, I show how the slippage between fantasies of retaliation and extralegal revenge tactics underscore why many second-wave feminists disagreed on the precise terms of self-defense politics.

For the Inez Garcia Defense Committee, the construction of Garcia’s symbolic value was crucial to their ability to attract attention beyond the local scene. That Garcia’s case, in particular, was taken up is in part due to external factors, such as the celebrity status of her first lawyer Charles Garry, the regional proximity to cities like San Francisco (as historian Stephanie Gilmore dubs it “a hotbed of radical activism”), and a general press interest in the women’s movement in the 1970s.¹¹³ But it was local supporters who first publicized Garcia. At a pretrial press conference, held at the U.S. Customs House in San Francisco, CA, Defense Committee members distributed to reporters an information sheet titled “Viva Inez” which states their reason for promoting her.¹¹⁴ After a brief summary of the details in both English and Spanish, the paper reads:

¹¹² Neal King and Martha McCaughey, introduction to *Reel Knockouts: Violent Women in the Movies*, ed. Neal King and Martha McCaughey (Austin, TX: University of Texas Press, 2001), 2.

¹¹³ *Ms. Magazine* reporters Nan Blitman and Robin Green write of Garry’s role in the trial’s publicity: “From the moment this famous, 65-year-old radical lawyer accepted the case in June, it ceased to be the obscure and simple one it had first seen.” See Nan Blitman and Robin Green, “Inez Garcia on Trial,” *Ms. Magazine* 111, no. 1 (May 1975), 50; Gilmore, *Groundswell*, 97.

¹¹⁴ Wood, *The Rape of Inez Garcia*, 13.

For defending herself against brutal and senseless attack, Inez Garcia is accused of premeditated murder. Her attacker is free. Thousands upon thousands of women have been attacked and raped and countless more live in fear of rape. Inez is one of the few to defend herself so bravely. Her case is an example to everyone, for until men stop attacking women, women must be free to defend themselves by whatever means necessary.¹¹⁵

The statement illustrates key points in the original construction of Garcia as a movement icon.

First, they claim that Garcia has universal appeal; in other words, that she is exemplary to all women. Second, that Garcia represents a subversive figure—as a disruption in the conventional depiction of rape victims as passive, vengeful, willing, or provocative.

Many second-wave feminists saw Garcia's actions as a distinct form of political violence. This view parallels radical feminist theories of rape as a patriarchal tool characteristic of the period. In her 1975 bestseller *Against Our Will: Men, Women and Rape*, Susan Brownmiller famously defines rape as “nothing more or less than a conscious process of intimidation by which *all men* keep *all women* in a state of fear.”¹¹⁶ Brownmiller's definition of rape as an act of male violence is premised on two claims. Rape occurs *because of* the biological difference in male and female genitalia; that “the human male was a natural predator and the human female served as his natural prey.”¹¹⁷ And, further, that few women fight back against assailants because they are “trained to be rape victims” by adhering to feminine social scripts.¹¹⁸ In other words, popular feminist theories like Brownmiller's rely on a neat distinction between sex (as

¹¹⁵ “Viva Inez!” Monograph by Inez Garcia Defense Committee, 1974. Special Collections. Shields Library, University of California-Davis; also quoted in Wood, *The Rape of Inez Garcia*, 13.

¹¹⁶ Susan Brownmiller, *Against Our Will: Men, Women and Rape* (New York: Fawcett Books, 1975), 15. Maria Bevacqua remarks that Brownmiller's definition “reflected the ideological developments” of the broader movement. See Bevacqua, *Rape on the Public Agenda*, 60.

¹¹⁷ *Ibid.*, 16.

¹¹⁸ *Ibid.*, 309.

biological) and gender (as social construction). Such theories are also made in the name of all women and all men—what many scholars have termed feminist essentialism.

This was the basic theoretical premise that underpinned much early activist embrace of Garcia's cause. For instance, after the 1974 conviction, one supporter remarked, "Within patriarchal society, women who 'take the law into their own hands' are defying their assigned role of passivity, and to break from an established role is a *political* act."¹¹⁹ Yet not only did feminists advocate rejection of traditional feminine behavior, they also sought to undermine widespread cultural stigmatization of women's anger as unhealthy and abnormal. As I noted earlier, many feminists vehemently rejected Charles Garry's defense strategy in her first trial for this very reason: "impaired consciousness" implied that Garcia shot Jimenez in a state of psychological disassociation. Writing about the trial in 1974 for the radical feminist magazine *off our backs*, Madeleine Janover explains:

The only way Inez could have been acquitted then, was to manipulate the jury into seeing that she is just another emotionally disturbed female. But Inez stated quite clearly that she knew exactly what she was doing and that to defend her dignity, she would do it again. When they realized that they could not pass the *political off as insane*, they locked her away.¹²⁰

Likewise, the Free Inez Garcia Committee touched on precisely the same theme: "Any of us who acts [*sic*] as though we are free, as though we have self-determination, dignity, and the skills to defend ourselves, is labeled *unhealthy, hysterical, and unlawful*."¹²¹ A radical feminist politics of self-defense, then, relied on both the denunciation of conventional femininity evidenced, for instance, in the campaign mantra "fight back," and on the simultaneous recuperation of female strength as heroic, righteous, and sane.

¹¹⁹ Madeleine Janover, "Rape is a political crime," *off our backs* 4, vol.11 (1974), 8. ProQuest (197151541). Emphasis mine.

¹²⁰ Ibid. Emphasis mine.

¹²¹ "Inez Garcia: Womanpride Fighting Back," pamphlet by the Free Inez Garcia Committee, 1975. Special Collections, University of Michigan Library. Emphasis mine.

In this vein, Garcia offered compelling material for artistic and creative meditations on the injustices of sexual violence and the need for alterative imagery. For instance, in a poem titled “For Inez Garcia,” Chicana feminist writer Marge Piercy deploys Garcia as a symbol of the collective power of feminist identity.¹²² The subject of the poem is a broader exploration of the meaning of female agency in a sexist society. As Piercy poses the question:

What does it mean to say No?
What does it mean to say No to superior force?¹²³

For Piercy, the “superior force” is patriarchy and, hence, “woman’s honor” is submerged in socialized gender roles, or how women are “trained to give way.”¹²⁴ Her answer to the gendered power imbalance under patriarchy is evidenced in her linguist shift to the plural term ‘women’:

Let Inez Garcia, Joan Little become
two faces in a crowd of women, an army
each defending her body, defending her sister,
defending the frail ghost of the new whole
conscious self struggling to stand upright
and walk, like a year-old child.¹²⁵

Couched in the language of renewal and rebirth, Piercy calls up Garcia as a single node in a budding new identity: feminist collectivity. Piercy appeals to feminist identification as based not only in mutual support, but also active defense (as opposed to “the prone corpse of our passivity”).¹²⁶ In another poem by Susan Grathwohl, Garcia is cited directly only once in the title, “In Defense of Inez Garcia.”¹²⁷ The thematic crux of the poem is the devastating and ongoing trauma of rape against a backdrop of institutional incompetence. The narrator opens

¹²² Piercy, *Early Grrrl*, 62-64.

¹²³ *Ibid.*, 62.

¹²⁴ *Ibid.*

¹²⁵ Piercy, *Early Grrrl*, 64.

¹²⁶ *Ibid.*

¹²⁷ Susan Grathwohl, “In Defense of Inez Garcia,” online edition, *The American Poetry Review* 8, no. 2 (March/April 1979). <https://www.aprweb.org/poem/defense-inez-garcia>.

with the profoundly unsettling image of rootlessness provoked by rape as her home is now a crime scene:

You don't go back to your place
for three days—the sperm
stains on the velvet sofa
soak in; black smudges around
the light switches stick
to grease and sweat, incomplete
whorls, no fingerprints.¹²⁸

With each line of verse, a pervasive sense of irrationality and anxiety builds in the narrator as police fail to make any progress in finding the rapist, consistently show insensitivity, and finally ineptitude. Details throughout illustrate that the narrator is not meant to be Garcia. The final stanza is thus most revealing for the titular reference:

At the end of the month,
they drop the case.
You think you see the rapist on the subway.
Day after day, down on the station,
you wait in the dark mezzanine.¹²⁹

Without recourse to justice, the narrator remains in a state of limbo—“waiting”—as she is haunted each day by the memory of her rape. Garcia thus works here to juxtapose the narrator through the finitude of her actions (which, at the same time, represent an alternative to police inadequacy).

Similarly, some rape survivors saw Garcia as a stand-in for their own fantasies of retaliation—recalling Showalter's remarks on feminist interest in “violence as a fantasy.”¹³⁰ For instance, Jim Wood remarks, of Garcia's local base of activists, “The women also spent considerable time fantasizing about appropriate punishments for rapists. The proposals ranged

¹²⁸ Grathwohl, “In Defense of Inez Garcia.”

¹²⁹ Ibid.

¹³⁰ Showalter, “Rethinking the Seventies,” 159.

from the bizarre (stuffing a large fish up the rapist's anus) to the traditional (castration, a punishment which, with the loss of eyes, dates back to William the Conqueror). Implicit in their violent images was the recognition that rape was itself an act of utmost violence."¹³¹ In another example, in an interview with Susan Brownmiller, Susan Rothaizer, a founding member of the Defense Committee, describes the details of her own rape while hitchhiking as a college student in Massachusetts years earlier.¹³² Rothaizer never reported the rape, remained deeply "humiliated" by it, and often engaged in fantasies of exacting revenge on her two rapists. Rothaizer remarks of her decision to organize for Garcia's acquittal: "It crystallized something for me...I could channel my rage in a positive way."¹³³ For Rothaizer, Garcia's trial represented a constructive and cathartic outlet by which to work through the traumatic aftermath of her own rape.¹³⁴ Even more tellingly, Brownmiller reports: "Several of the core group of eight women on the Garcia defense committee had been raped."¹³⁵

Yet the legitimate anger that Garcia's narrative tapped into went beyond the discursive realm to a discussion of tactics. On the one hand, the constant shifting between figurative and literal self-defense follows again from the logic of rape as act of patriarchal warfare. For instance, the opening lines to the 1973 radical feminist position paper "Rape: The All American Crime" read:

Rape is the perfect example of a woman's experience in a sexist society, the ultimate act of aggression which binds the victim still closer to her oppressors. Rape is both a symbolic and an actual means of keeping a woman in her place: for every rape that *does*

¹³¹ Wood, *The Rape of Inez Garcia*, 51.

¹³² Susan Brownmiller, *In Our Time: Memoir of a Revolution* (New York: Dell Publishing, 1999), 219.

¹³³ Ibid.

¹³⁴ Nicola Gavey finds a similar theme in combing through the archive of second-wave feminist anti-rape materials—in what she terms "retaliation fantasy catharsis," which could also take the form of "rebellious humor" in creative expression. See Nicola Gavey, "Fighting Rape," in *Theorizing Sexual Violence*, ed. Renée J. Heberle and Victoria Grace (New York: Routledge, 2009), 101.

¹³⁵ Brownmiller, *In Our Time*, 219.

take place there are thousands of possible rapes in the back of a woman's mind every time she walks down the street. The controls exerted by this fear effectively limit the freedom of all women, and in fact encourage women to seek out men as protectors from other men.¹³⁶

In other words, because rape is dually “symbolic and actual,” all women live in fear which, in turn, forecloses female agency at a societal level. To dismantle rape in the context of feminist patriarchal theories, then, entails a multi-pronged campaign of both cultural and physical resistance.

But the translation of self-defense to the strategic realm proved more divisive. For some, the revenge fantasies that fed Garcia's symbolic power took literal form. In her memoir *A Simple Revolution*, poet Judy Grahn recounts an incident of failed retaliation on a local rapist.¹³⁷ Grahn first describes how her community of lesbian feminist activists worked tirelessly on behalf of Garcia. But in the months after her conviction, a deep-seated frustration set in. When a friend tells them that a local woman has been raped, the group exacts a plan to seek retribution. The plot is to “capture him, take him to the judge's house, and tie him to the base of a huge tree with a note about his crime.”¹³⁸ She continues:

We had no reason to believe that the police or any other authorities would do anything except laugh at us, ignore or further mistreat her, make a joke. Inez with her rifle and her sense of ‘women's honor’ represented an end to this, a sea change of the seriousness with which women were beginning to take our treatment at the hands of men and at the hands of society that hypocritically pretended to protect us. Inez was about women taking the matter on for ourselves. We thought that by taking an action, we could be supportive of Inez.¹³⁹

¹³⁶ Karen Lindsey et al., “Rape: The All American Crime,” in *Dear Sisters: Dispatches from the Women's Liberation Movement*, ed. Rosalyn Baxandall and Linda Gordon. (New York: Basic Books, 2000), 195.

¹³⁷ Grahn, *A Simple Revolution*, 214-220.

¹³⁸ *Ibid.*, 218.

¹³⁹ *Ibid.*

Though the incident came to naught (they failed to find the man after driving around for hours), her explanation of their motivation is revealing in itself. Grahn perceived the plot as a direct extension of their advocacy for Garcia.

Grahn's account is by no means exceptional. In their 1975 booklet, the Free Inez Garcia Committee remarks that feminist "tactics" include both actions "to prevent rape as well as taking collective action following a rape." In other words, it entails both preventive and retributive methods, hinged on women's solidarity: "The most essential element for any activity is to get together with women you can trust." More specifically, they recommend simple "publicity" efforts, such as putting up posters to ruin a rapist's reputation. Another suggestion includes "retaliation" strategies, for instance, in openly harassing rapists with "midnight phone calls, tire slashing, broken windows...." Most notably, the authors emphasize a starkly anti-state position: "Remember the issue of security and visibility if using such tactics, for a libel suit would be a possible result, and though we might prove our charges, being caught in the Man's legal system ties up our energy."¹⁴⁰

But other feminists explicitly objected to these tactics. The May 1975 issue of *Ms.* *Magazine* headlining Garcia's first trial frankly illustrates the main point of contention. The cover features a close-up photo, taken by Annie Leibovitz, of a despondent-looking Garcia (her eyes tearstained)," juxtaposed with a banner that reads "Rape Victim or Murderer? Inez Garcia on Trial." The fact that *Ms. Magazine's* cover questions the very terms of Garcia's status—as victim or killer—is significant. Scholar Amy Erdman Farrell remarks of the magazine's national reach: "*Ms.* almost immediately became the popular icon of the women's movement,

¹⁴⁰ "Inez Garcia: Womanpride Fighting Back," pamphlet by the Free Inez Garcia Committee, 1975. Special Collections, University of Michigan Library.

synonymous, for many Americans, with the women's movement itself."¹⁴¹ In her article for the issue, Gloria Steinem asks: "Yet, what *do* we do with the rage? It is clearly there—and, if combined with little faith in legal remedies, it seems sure to produce vigilantism. Our question must be: At what cost to women?"¹⁴² Though Steinem is inconclusive, her use of the term "vigilantism" denotes a point of fracture in the veneer of seamless support for Garcia. More specifically, it indicates that some feminists saw the time gap between Garcia's assault and her shooting of Jiminez as evidence of vigilante justice—not righteous self-defense or even the justifiable outcome of rape trauma. In another example, Wood describes a scene in Garcia's pretrial campaign when she meets with a "Monterey anti-rape group" and relays "she was glad she'd killed Miguel Jiminez and wished she'd killed his accomplice. The women, themselves rape victims, were shocked."¹⁴³ Wood attributes the negative reaction to class differences in which these "mostly middle class" women "found naked hate frightening."¹⁴⁴

Part of the problem was that in spite of claims to a collective identity, or "a crowd of women" defenders, the feminist movement failed to agree on the ultimate goal or even the more

¹⁴¹ Amy Erdman Farrell, *Yours in Sisterhood: Ms. Magazine and the Promise of Popular Feminism* (Chapel Hill, NC: The University of North Carolina Press, 1998), 1. Farrell points out that one standard dismissal leveled on *Ms.* is that it is simply a purveyor of liberal feminism. However, she argues that a more accurate description for its platform is "popular feminism," which allowed for incredibly diverse feminist positions within its pages. Farrell writes, "Even if one focuses exclusively on the articulation of feminism by those primary voices in *Ms.*...one finds contradictions and complexities" (4). Her comments quite accurately capture the magazine's overall coverage of the trial. The three articles on Garcia in the May 1975 issue include a wide range of viewpoints: Nan Blitman and Robin Green's largely impersonal report on the trial facts; Gloria Steinem's short and inconclusive piece; and Maria Del Drago's personal reflection on Garcia as a Latina woman and an explicit defense of her.

¹⁴² Steinem, "But What Do We Do With Our Rage?," 51.

¹⁴³ Wood, *The Rape of Inez Garcia*, 40-41.

¹⁴⁴ *Ibid.*, 41.

immediate tactical objective of feminist self-defense initiatives.¹⁴⁵ This issue is immediately clear when considering the sheer diversity of techniques that often coexisted in a single source. For instance, a *Los Angeles Times* listing in August 1975 advertised a feminist self-defense rally hosted by the group Orange County Stop Rape Inc. The agenda for the day included “dispensing whistles,” self-defense training, and the distribution of fliers with information on Garcia’s trial.¹⁴⁶ In yet another example, a reporter for the *Chicago Tribune* described a slew of vigilante episodes—in particular one in which a group of Florida feminists “slashed” an alleged rapist—in addition to martial arts training.¹⁴⁷ She writes of the sundry tactics within this emergent women’s self-defense platform, “The approaches and philosophies vary, and some recommend jabbing combs, keys, bottle openers, and cork screws into attackers’ faces. Others give specific advice on how to aim umbrellas and other sharp objects most effectively.”¹⁴⁸

In a 1975 article for *off our backs*, Marlene Schmitz reports on a conference held by the D.C. Coalition to Support Inez Garcia and Joann Little [*sic*]. Her description of the scene highlights this general incoherence and a sense of ambiguity among Garcia advocates in exacting a long-term objective. She writes:

The experiences of the speakers with the police and courts hardly pointed to these institutions as our source of defense. Yet, when a woman in the audience told us that she had been receiving calls from a man threatening her with murder, the response was ‘call the police,’ followed by an air of bewilderment which hung over the rest of the conference.¹⁴⁹

¹⁴⁵ Quoted phrase is from Marge Piercy’s poem mentioned earlier in the paper. See Piercy, *Early Grrrl*, 64.

¹⁴⁶ “Dateline,” *Los Angeles Times*, August 8, 1975. ProQuest Historical Newspapers (157787292).

¹⁴⁷ Patricia Anstett, “Defining Defense Against Rape,” *Chicago Tribune*, September 9, 1975, B3. ProQuest Historical Newspapers (169403854).

¹⁴⁸ *Ibid.*

¹⁴⁹ Marlene Schmitz, “On violence,” *off our backs* 4, no.11 (1975). ProQuest (197133193).

In another example, a 1974 news report of a feminist demonstration in Washington, D.C. describes a “heated debate” that ensued over the precise meaning of Garcia’s actions.¹⁵⁰ A passerby asks the group to distinguish the exact goal of their activism: is it legal reform or vigilante justice? In response, a D.C. Rape Crisis Center worker “‘agreed that police and courtroom procedures had to be changed. ‘But until then,’ she said, ‘we have to take the protection of our dignity into our own hands.’”¹⁵¹

This confusion in terms ultimately evidences the coexistence of legal and radical feminist strategies in campaign activism. That Garcia could not report her rape—out of familial shame, social fear, and police skepticism—was both logical and incendiary for activists. Some advocates, like the FIGC, articulated self-defense as an alternative to police and law. Notably, the group expressed an awareness of the racist dimensions of state violence:

White men have been raping Black women since the time of slavery, when female slaves were outright chattels, to be used as the masters saw fit. The flip side of this is that Third World women are not believed when they report rape to the police.¹⁵²

But their anti-state rhetoric obscured the fact that Garcia’s campaign was never outside the legal realm, as the group simultaneously described their decision to work with Susan Jordan and called for a “genuine feminist self-defense” in the courtroom.¹⁵³

Other accounts support the fact that there was no distinct split between liberal and radical strategies in the campaign. In an article on U.S. feminist developments for the *Irish Times*, one activist describes how, in contrast to the 1960s, institutional and grassroots women’s groups worked in partnership for Garcia’s release: “In 1975, most of the issues which were originally

¹⁵⁰ Barbara Bright-Sagnier, “50 Turn Out to Protest Calif. Sentence,” *Washington Post*, October 22, 1974, B11. ProQuest Historical Newspapers (146113678).

¹⁵¹ *Ibid.*

¹⁵² “Inez Garcia: Womanpride Fighting Back,” pamphlet by the Free Inez Garcia Committee, 1975. Special Collections, University of Michigan Library.

¹⁵³ *Ibid.*

labeled as ‘women’s lib’ have become key issues for all women’s organizations. For example, nation-wide support has been generated for Jo-Ann Little [*sic*] and Inez Garcia, two women who have been charged with murder in rape-connected cases.”¹⁵⁴ She continues:

Support for both women has come from a broad spectrum of women’s groups, including the established women’s organizations, indicating the widening support for issues once viewed as ‘radical.’ The interest in Garcia and Little, two uneducated, minority group women, is also a new sign of solidarity between American women which is crossing racial and class lines.¹⁵⁵

Indeed, it is the theme of “solidarity” across racial and class lines that largely defined the self-defense trials in the aftermath of her acquittal. But for the feminist antiviolence movement, the activist’s quote also signals a more complex layer of the Garcia campaign: the strong intermingling of grassroots and reform efforts in the push for her legal victory. In other words, though feminists diverged over the meaning of her case—as evidence of the need to change sexist and racist institutions, organize women’s self-defense classes, or consider vigilante-staged actions—their diverse political stances were always simultaneously about securing a feminist legal precedent for self-defense.

At issue is, more generally, the epistemic foundation of Garcia’s universal symbolism. To be sure, this rhetoric proved powerful, even “visceral” for many activists.¹⁵⁶ But in significant ways, Garcia was not representative of all women or even most rape victims. Here, I do not mean to imply that Garcia deviated from a more typical or normative victim, but rather to stress that there is no such thing. Carine Mardorossian, for instance, writes of the “...futility of looking for

¹⁵⁴ Debbie King, “News Feature: No Going Back Now,” *Irish Times*, August 8, 1975, 12. ProQuest Historical Newspapers (527397082).

¹⁵⁵ *Ibid.*

¹⁵⁶ Blitman and Green, “Inez Garcia on Trial,” 52. The authors write: “Across, the country, women responded viscerally to [Garcia’s] act.”

common characteristics among women who are victims of sexual assaults.”¹⁵⁷ In describing her own experiences as a feminist antiviolence activist, Mardorossian stresses that victims, sexual assaults, and their aftermaths are never monolithic and their meaning often changes “over time.”¹⁵⁸ In other words, Garcia’s symbolic reach was both expansive and also overdetermined. Because the trial functioned as a stand-in for such an abundance of actual problems—as in the need for cathartic revenge imagery or as a representation of wholesale institutional injustice—the facts of her case are less visible.

These points by no means invalidate Garcia’s personal struggle or her legal win. But they do have bearing on the larger implications of her case, considering the immense activism it inspired, for feminist antiviolence history. As Maria Bevacqua remarks, of a deeply troubling theme that links the popular feminist self-defense trials together, “Perhaps most significantly, not one of these three cases brought an accused rapist to trial in a courtroom.”¹⁵⁹ While Garcia endured two legal battles and served a partial prison term, Castillo was never charged with rape—even after Garcia’s retrial. That the case was at base a murder trial signals that it has had less influence on feminist efforts to change the conditions for rape victims through police and law.¹⁶⁰ Further, Victoria Law makes the distinctive point that the major feminist self-defense trials each represent “...more impersonal forms of violence.”¹⁶¹ Thus, Law notes, feminist backing of their causes coincided with the exclusion of movement interest in women with

¹⁵⁷ Mardorossian, “Toward a New Feminist Theory of Rape,” 754.

¹⁵⁸ *Ibid.*, 764.

¹⁵⁹ Bevacqua, *Rape on the Public Agenda*, 129.

¹⁶⁰ In addition to Bevacqua, Susan Brownmiller makes a similar observation in her memoir: “Some people felt that the rape defense cases, and the battered women’s defense cases that followed in their wake, were tantamount to giving women a license to kill. I did not share this alarmist perspective, but neither did I feel that fund-raising concerts for murder defendants were the best way to promote rape consciousness.” Brownmiller, *In Our Time*, 222.

¹⁶¹ Law, “Sick of the Abuse,” 39-56. Quote from page 39.

extended histories of sexual abuse, or “battered women’s acts of self-defense.”¹⁶² Though Garcia’s case gestured at the problems rape survivors face in institutional settings, distinctions like Bevacqua’s and Law’s illustrate that the trial itself had at best minimal bearing on the larger problems in U.S. rape laws.

Moreover, Garcia’s symbolic construction was not limited to feminists. Activists originally sought to cast Garcia as an icon of feminine defiance and a testament to unfair policies. But the general public often received a less subversive message. In her classic study *Women Who Kill*, Ann Jones observes that heightened interest in the topic of “female criminality” frequently turns up in periods when women’s rights are in flux and ultimately signals a more pervasive angst about transforming gender roles.¹⁶³ Thus, lurid attention to the scandals of ‘violent women’ often bolsters conservative attacks on female autonomy at large by playing up the “fear that women, released from some traditional restraints, will turn to unbridled evil, mayhem, and murder.”¹⁶⁴ Or, as Helen Birch succinctly puts it, “And precisely because she is relatively rare, the woman killer presents a far more dramatic spectacle than her male counterpart. Male violence is, after all, old news.”¹⁶⁵ Thus, though many feminists sought to validate Garcia, tracking the media construction of her as a news item reveals the feminist agenda often took a backseat to more exploitative narratives.

In her influential study *Virgin or Vamp: How the Press Covers Sex Crimes*, Helen Benedict describes the longstanding media practice of describing rape victims in the binaristic

¹⁶² Law, “Sick of the Abuse,” 46.

¹⁶³ Ann Jones, *Women Who Kill* (New York: The Feminist Press at CUNY, 2009), 28-29.

¹⁶⁴ *Ibid.*, 29.

¹⁶⁵ Helen Birch, introduction to *Moving Targets: Women, Murder, and Representation*, ed. Helen Birch (Los Angeles: University of California Press, 1994), 2.

terms of “virgin or vamp.”¹⁶⁶ She writes, “As a result of the rape myths, a sex crime victim tends to be squeezed into one of two images—she is either pure and innocent, a true victim attacked by monsters—the ‘virgin’ of my title—or she is a wanton female who provoked the assailant with her sexuality—the ‘vamp.’”¹⁶⁷ At the outset, the press ostensibly endowed Garcia with the qualities of, to use Maria Del Drago’s term, “a hapless victim,”¹⁶⁸ a faithful wife and mother who had been “plucked from an obscure, drab existence.”¹⁶⁹ Tinged with racial, ethnic, and class-based bias, the *New York Times* reported on her apparent resilience in the face of pitiable obstacles: “Despite her lack of education, history of emotional problems, and marriage at age 15, Mrs. Garcia seems to possess pockets of strength.”¹⁷⁰ Following her 1974 conviction, however, the tone shifted drastically. Almost immediately the term “slaying” replaced “murder” as the preferred buzzword in headlines.¹⁷¹ In turn, focus shifted to her callous lack of remorse and courtroom outbursts as evidence of revenge in the place of self-defense. That media frequently framed Garcia as unhinged and combative starkly contrasts with the larger feminist goal to normalize women’s anger and violence in reaction to assault. Consider, for instance, the cumulative impact of sexist language in the following excerpt from the October 1974 issue of *People Magazine*:

¹⁶⁶ Helen Benedict, *Virgin or Vamp: How the Press Covers Sex Crimes* (New York: Oxford University Press, 1992). In addition to the pressures of newsroom politics, Benedict notes that racist, sexist, and classist bias frequently factors into corporate media selection processes (3-11).

¹⁶⁷ *Ibid.*, 18.

¹⁶⁸ Maria Del Drago, “The Pride of Inez Garcia,” *Ms. Magazine* 111, vol. 11 (May 1975), 84. Del Drago uses the term as a criticism of the press coverage.

¹⁶⁹ Leroy F. Aarons, “Rape as Murder Defense: Woman Says She Killed in Frenzy After Attack,” *Washington Post*, September 22, 1974, A2. ProQuest Historical Newspapers (146131197).

¹⁷⁰ *Ibid.*

¹⁷¹ See, for example, “Woman Gets Prison in Slaying Case,” *Los Angeles Times*, October 22, 1974, 3. ProQuest Historical Newspapers (157526444); Associated Press, “Second Coast Trial Begins Today in Reputed Rape-Revenge Slaying,” *New York Times*, February 14, 1977, 18. ProQuest Historical Newspapers (123500752).

Hers was not, insisted the *sultry* Mrs. Garcia, a simple act of cold-blooded murder. Rather, she told a Monterey, Calif. court this month, she had gone looking for Jimenez in a *vengeful rage* last March less than an hour after he and a friend, Luis Castillo, had dragged her from her Soledad apartment and Castillo had raped her. ‘I’d have walked all night to find them!’ she *sarled* from the witness stand. ‘I’m only sorry I missed Luis!’¹⁷²

Yet an even more important lens for understanding the media’s gendered construction of Garcia is her Puerto Rican and Cuban heritage. In another essay for the May 1975 issue of *Ms. Magazine*, Maria Del Drago writes that the general public perceived Garcia as a highly contradictory figure, an “enigma of passivity and defiance” because they lacked context: of Latina cultural traditions and the embedded connections between “macho” familial ideals, religious conviction, and an intermingling of shame, respect, and “fierce pride.”¹⁷³ She elaborates on Garcia’s actions at her first trial, “So in the courtroom, hearing her humiliation treated as irrelevant and her own word disbelieved or denied, this Latina pride burst forth.”¹⁷⁴ While many have noted Garcia’s Latina identity as a factor in generating widespread coalitional support, less consideration has been given to the discrete ways it structured her representation. Kimberly Nichele Brown suggests, for instance, that Garcia received considerably less media scrutiny than Joan Little—despite the fact that both were minority women.¹⁷⁵ She writes, “Garcia was a devout Catholic mother and a woman of a lighter complexion than Little, and much was made of her beauty and sexual innocence.”¹⁷⁶ But Brown’s comment misses the way beauty later functioned in tandem with Garcia’s flare-ups in court at her first trial.¹⁷⁷

¹⁷² “Did Inez Garcia Have a Right to Kill? A Jury Says No,” *People Magazine*, October 21, 1974, <http://www.people.com/people/archive/article/0,,20064582,00.html>. Italics mine.

¹⁷³ Del Drago, “The Pride of Inez Garcia,” 54, 84.

¹⁷⁴ *Ibid.*, 84.

¹⁷⁵ Kimberly Nichele Brown, *Writing the Black Revolutionary Diva: Women’s Subjectivity and the Decolonizing Text* (Bloomington, IN: Indiana University press, 2010), 174.

¹⁷⁶ *Ibid.*

¹⁷⁷ Although, in lieu of the vast scope of press that Garcia’s two trials generated, Brown’s remark is at other times exactly right, even for some explicitly feminist coverage. For example, Blitman

That Garcia was primarily described in terms of her feminine beauty and highly erratic nature are in fact mainstays of stereotyping Latina identity through static binaries. Deborah Vargas writes that Latina women are often framed through “extreme representations as either hot-blooded spitfire or dutiful mother.”¹⁷⁸ She continues, on its broader function, “In a U.S. context, then, representations of Latina sexuality as hot-blooded and excessive become the markers of what is morally wrong, set against the good morals and hegemonic U.S. citizenship values of non-Latino whites.”¹⁷⁹ A brief survey of some phrases media attached to Garcia highlights this point: “black-eyed, black-haired, beautiful”; “attractive”; “screamed in anger”; “hunted down”; “haughty, bitter, and vengeful.”¹⁸⁰ In this sense, Garcia traversed both poles of a flattened stereotypical narrative.

Prior to the retrial, another common thread was to blame “militant feminists” outright for her conviction.¹⁸¹ For example, Robert Kirsch, in a 1976 review of Jim Wood’s journalistic

and Green, writing in *Ms. Magazine*, state, “Half Cuban and half Puerto Rican, velvety beautiful and model elegant, Inez Garcia herself seemed more likely to be on an RC Cola billboard in Spanish Harlem than sitting there at the defendants’ table, a political symbol on trial for murder.” See Blitman and Green, “Inez Garcia on Trial,” 52.

¹⁷⁸ Deborah R Vargas, “Representations of Latina/o Sexuality in Popular Culture,” in *Latina/o Sexualities: Probing Powers, Passions, Practices, and Policies*, ed. by Marysol Asencio (New Brunswick, NJ: Rutgers University Press, 2010), 121.

¹⁷⁹ *Ibid.*

¹⁸⁰ Jack Hemstock, “Inez—a murderer or a victim of law?,” *Chicago Tribune*, October 21, 1974, 5. ProQuest Historical Newspapers (171120421); Charles Foley, “Women Say Law is Guilty of Rape,” *London Observer*, October 20, 1974, 1. ProQuest Historical Newspapers (476305698); “People: California sentence outrages feminists,” *Newsday*, October 22, 1974; Associated Press, “Second Coast Trial Begins Today in Reputed Rape-Revenge Slaying,” *New York Times*, February 14, 1977, 18. ProQuest Historical Newspapers (123500752); Arthur Unger, “PBS special ‘manages to oversimplify as it complicates,’” review of *The People vs. Inez Garcia*, directed by Rena Down, *Christian Science Monitor*, May 23, 1977, 22. ProQuest Historical Newspapers (512002984).

¹⁸¹ The phrase “militant feminists” figures prominently in trial coverage. For example, one reporter writes, “Feminists maintain that women who have been raped have little recourse within the law. Some militants recommend killing the attacker and claiming self-defense.” See

account on the trial, directly castigates feminist theatrics and their unfeminine behavior for interfering with the trial: “But the true believers—with their hissing, comments, street theater in and outside the courtroom, biases loudly expressed, with their showing off and patronizing condescension—did not help Inez.”¹⁸² He continues by stating that feminists “certainly helped convict her” with their “arrogant ideological imperialism that made them believe they were doing her a favor by promoting her martyrdom.”¹⁸³ Another reviewer, displaying a blatant heterosexist prejudice toward feminists, writes, “It’s hard not to agree with the prosecutor that Inez’s supporters—two of whom appeared in court wearing goatees and men’s clothing—hurt her case. It’s a shame.”¹⁸⁴ This is evidenced, for example, in the deliberately alarmist headlines connecting feminism and violence that featured prominently in press coverage of the case. Some striking examples include “Feminists back killing of assailant” and “Men are going to be killed.”¹⁸⁵ Thus, Garcia was by no means afforded the label of a worthy victim; instead at best her victim status was often hollowed (as a ploy for the “militant feminist” agenda) or outright denied (in revenge narratives).

But the issue as to whether Garcia spoke for herself or if supporters scripted her to advance a political platform was not limited to conservative media. Jim Wood, for instance,

“Feminists back killing of assailant,” *Baltimore Sun*, October 26, 1974, A3. ProQuest Historical Newspapers (538842844).

¹⁸² Robert Kirsch, “Inez Garcia: A tale of 2 Rapes,” review of *The Rape of Inez Garcia*, by Jim Wood, *Los Angeles Times*, April 2, 1976, The Book Report, E11. ProQuest Historical Newspapers (158081257).

¹⁸³ *Ibid.*

¹⁸⁴ Unsigned review of *The Rape of Inez Garcia*, by Jim Wood, *Kirkus Reviews*, February 16, 1975. Academic Search Complete (5731444).

¹⁸⁵ “Feminists back killing of assailant,” *Baltimore Sun*, October 26, 1974; Kathleen Hendrix, “Women Take the Offensive on Rapists,” *Los Angeles Times*, December 8, 1974, E1. (157738400) ProQuest Historical Newspapers.

describes Garcia as “shy” and “apolitical” in early Defense Committee demonstrations.¹⁸⁶ But with feminist support, she “gradually became able to speak in public, giving a clenched fist with her talk.”¹⁸⁷ Likewise, Susan Jordan has described Garcia as an entirely hesitant feminist icon: “‘She hated every minute of it. She was a very reluctant symbol of the women’s movement. She would go out there and carry on, talk about women, but this was not her milieu. She did not welcome this role. After the trial ended, she left the next morning.’”¹⁸⁸ Del Drago remarks that underlying the motif of Garcia as a simple pawn of the women’s movement is the “racist assumption that she could not possibly be making her own decisions.”¹⁸⁹ But the refrain of feminist manipulation is less an issue to be proved than it is a lens by which to open up broader questions about agency and feminist tactics.

In other words, one problem in deciphering this aspect of the trial is that Garcia’s own voice is strikingly absent beyond media and legal accounts. In their article “Survivor Discourse: Transgression or Recuperation?” philosophers Linda Alcoff and Laura Gray describe the problematic rhetorical politics of disclosing trauma in both venues.¹⁹⁰ They argue that feminist calls for sexual assault survivors to “speak out” fail to account for the possibility of exploitative co-optation by dominant discourses like the law or media.¹⁹¹ Alcoff and Gray depict this repressive potential by submitting “survivor speech” to Michel Foucault’s account of the Christian confessional: “...although confessional modes of discourse may appear to grant survivors an empowering ‘permission to speak,’ they give the expert mediator the power to

¹⁸⁶ Wood, *The Rape of Inez Garcia*, 18, 23.

¹⁸⁷ *Ibid.*, 22.

¹⁸⁸ “The Case of Inez Garcia: Interview with Susan Jordan,” *Dear Sisters*, 203.

¹⁸⁹ Del Drago, “The Pride of Inez Garcia,” 84.

¹⁹⁰ Linda Alcoff and Laura Gray, “Survivor Discourse: Transgression or Recuperation?,” *Signs* 18, no. 2 (1993): 260-290.

¹⁹¹ *Ibid.*, 261-263.

determine the legitimacy of survivor discourse.”¹⁹² In turn, experts—such as judges, therapists, or journalists—are entrusted with the task of the interpretation and authentication of a victim’s narrative. Not only is survivor autonomy diminished, but disclosures are likely to be deemed either pathological or “sensational.”¹⁹³ Departing from Foucault, however, Alcoff and Gray contend that we should not give up on survivor speech altogether, but instead “create new discursive forms and spaces in which to gain autonomy within this process.”¹⁹⁴

Alcoff’s and Gray’s arguments about the challenges for “survivor speech” point to more base-level problems on the subject of activist manipulation in Garcia’s trial. Specifically, the media frequently circumscribed Garcia’s testimony so as to sensationalize her story while mapping her onto a specific stereotype. As in, for instance, the single line carried by numerous news sources and emphasizing only her lack of remorse: “‘I killed the guy and I missed Luis but I meant to kill him too,’ she said. ‘The only thing is that I’m sorry I missed Luis.’”¹⁹⁵ Further, Garcia had to recount the details of her rape in the courtroom not once but twice—an arena that ultimately forestalls “survivor speech” by leaving it open to authoritative discretion. At one level, her retrial—particularly for Jordan’s focus on her rationality and sexist discrimination in the law—signals one answer to their call for “new discursive forms” within institutional settings. Yet it is striking that many remarked that Garcia appeared “demure” and “a model of decorum” in her 1977 retrial, as opposed to her “volatile” demeanor in the first trial.¹⁹⁶ In effect, it illustrates that inroads within the law are at best partial. In their 1975 report for *Ms. Magazine*, Blitman and Green remark of the trial: “But in the end, the courtroom turned out to be a poor

¹⁹² Alcoff and Gray, “Survivor Discourse,” 271.

¹⁹³ *Ibid.*, 275-282.

¹⁹⁴ *Ibid.*, 287.

¹⁹⁵ Associated Press, “Alleged Rape Victim Convicted for Murder,” *Los Angeles Times*, October 5, 1974, C16. ProQuest Historical Newspapers (157588523).

¹⁹⁶ Brownmiller, *In Our Time*, 222.

forum for big issues.”¹⁹⁷ Most likely, the authors intended the comment in the direct context of her 1974 conviction (in which case their appraisal was premature). But the statement strikingly anticipates the much broader and deeply troubling dynamic between feminist activism and legal reform.

For the feminist anti-violence movement in the 1970s, the legal battles of Inez Garcia—“the rape victim who fought back”—offered what appeared to be an expansive platform by which activists could generate dialogue around core issues: the inefficacy of police; the blatant sexism of the law; and the necessity of self-defense initiatives.¹⁹⁸ Further, as evidenced in the diverse groups that worked for Garcia’s acquittal, these messages proved salient for many. But underlying the theme of widespread solidarity is the fact that feminists diverged over the precise meaning of Garcia’s actions. For many radical feminists, Garcia signaled a heroic image of female power in stark contrast to the female murder victims that made headlines that year. Following from her early construction as a movement symbol, Garcia also became part and parcel of a radical feminist “political” campaign to end patriarchal rape. Some activists interpreted her 1974 conviction as evidence of the need for vigilante-based actions to be taken up by local feminist collectives. Still other feminists used Garcia’s narrative for a more imaginative politics through revenge fantasies or a poetic exploration of trauma and violence. And finally, other activists refused to condone Garcia—was she a victim or murderer (as *Ms. Magazine’s* 1975 cover posed it)? Yet even worse than some feminists’ disavowal was the mainstream media’s sensationalized coverage of her case which constructed her—through specific stereotypes—as a hollow victim or a vengeful “huntress.”¹⁹⁹ In tracking the *process* of politics

¹⁹⁷ Blitman and Green, “Inez Garcia on Trial,” 52.

¹⁹⁸ *Ibid.*, 50.

¹⁹⁹ Foley, “Students fight to free woman who killed rapist.”

over the course of her campaign, Garcia's acquittal is not simply a testament to meaningful and broad-based feminist activism. Her legal win has had at best a minimal bearing on the larger problems of institutional racism and sexism.

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