

Blogging While Female: How Internet Misogyny Parallels “Real-World” Harassment

Jill Filipovic[†]

In early March 2007, *The Washington Post* published a front-page article titled “Harsh Words Die Hard on the Web: Law Students Feel Lasting Effects of Anonymous Attacks.”¹ It detailed an online message board called AutoAdmit, wherein anonymous posters leave hundreds of comments every day about law school admissions, top schools, and law firms—along with sexualized and sexually aggressive comments about female law students, whose pictures are regularly posted for commenters to evaluate. All of the women quoted in the article asked to remain anonymous out of fear that the posts on the message board might have negative consequences for their employment prospects. The article hit a nerve—because I was one of the women whose pictures and personal information were posted on AutoAdmit.

I found my name on AutoAdmit just after starting my first semester of law school at New York University. A fellow student emailed me a link to messages about “Jill F at NYU,” and I took a look around the board. My name came up several times, and was clearly a running joke that I didn’t get—someone would post something like, “Did an NYU student just spew on himself in torts?” and another would respond, “Was it Jill F?” Other posts made it clear that people on the board knew where I had spent the previous summer, what I looked like, and even the ethnicity of my boyfriend. Some anonymous commenters mentioned meeting me or seeing me at school. Others were aware of my feminist activism and threw out the usual slurs: bitch, whore, cunt.

I spent two years writing a feminist newspaper column, and I run a popular feminist blog (feministe.us). I’ve gotten my fair share of harassment and name-calling. I have fairly thick skin. But this felt different—this involved people I go to school with, whom I could not identify, but who knew me. I stopped

[†] New York University School of Law, J.D. expected 2008; New York University, B.A. 2005. I would like to thank Shannon Browne, Helena Phillibert, and Julie Rubenstein for their editorial advice, as well as Lauren Bruce, Ann Dana, Jess, Amanda Marcotte, Melissa McEwan, Maureen Moran, Jessica Valenti, and Susan Faludi for their insights. I would also like to thank Sumeet Sinha and Mary, Michael, and Christina Filipovic for their support.

1. Ellen Nakashima, *Harsh Words Die Hard on the Web: Law Students Feel Lasting Effects of Anonymous Attacks*, WASH. POST, Mar. 7, 2007, at A01.

making an effort to talk to my new classmates, I skipped a few days of class, and I stopped reading the message board.

A few months later, in January 2006, someone alerted a non-law-school friend of mine to more posts about me on AutoAdmit. I parsed through the board, and discovered notes about “Jill sightings.” I found comments reading, “that nose ring is fucking money, rape her immediately;” “I know that girl. Shes a feminazi. She’s the person always writing in washington square news [sic] about how men should be killed. She’s an incoming 1L. Uber-left wing, crazy bitch about sums it up;” “She would be a good hate fuck;” and “I really want to kick her in the box for some reason.” Someone posted my full name, email address, and AOL screen name. Several pictures of me were posted, and commenters weighed in on my appearance, complete with more remarks about sexual violence.²

After having remained silent about the posts for almost six months, I reacted on my own blog and posted about AutoAdmit. Eventually one of the AutoAdmit moderators got in touch with me via AOL instant messenger, and we declared a truce. He told the AutoAdmit posters to stop talking about me and I went back to blogging about feminist politics. Again, I stopped reading the message board.

Until a year later, when another NYU Law student emailed me with a link, this time to an online beauty contest for “The ‘Most Appealing’ Women @ Top Law Schools.” And under “The Girls,” along with a dozen other women from top law schools, there was J.F. at NYU, complete with pictures. One of the pictures was of me in a bathing suit, taken when I was on the beach in Greece. All were taken from my personal online photo account. At the bottom of the beauty contest site was a reference to AutoAdmit.³

I emailed the contest creators twice, asking to be removed.⁴ They refused and posted the content of one of my emails on the AutoAdmit board. The contest creators were regular posters on AutoAdmit, though not the owners or moderators of the site; the site owners claim they had nothing to do with the contest’s creation. Nevertheless, the contest and the message board were clearly tied, and the board was full of comments about the “Most Appealing” women. The contest was eventually taken down, but not because of complaints from women whose pictures were posted without their consent—rather, one of the contest creators, who goes by the handle “PaulieWalnuts,” angered other AutoAdmit regulars when he posted the full name of an AutoAdmit and “Most

2. In order to discourage traffic to the AutoAdmit website, citations to postings on that site have been deliberately omitted. Copies of the referenced threads are on file with the Yale Journal of Law and Feminism.

3. The site has since been deleted.

4. E-mail from Jill Filipovic to t14talent@gmail.com, xoxo.t14@gmail.com, (Feb. 23, 2007 19:57 EST) (on file with the Yale Journal of Law and Feminism); E-mail from Jill Filipovic to t14talent@gmail.com, xoxo.t14@gmail.com (Feb. 25, 2007 15:36 EST) (on file with the Yale Journal of Law and Feminism).

Appealing” contest reader who happens to be a male attorney at a major New York firm. Turning the contest over to the owners of AutoAdmit was PaulieWalnuts’ punishment, and the AutoAdmit owners took it down. Few posters seemed to mind that the pictures and personal information of female law students had also been posted.

Then the *Washington Post* article came out,⁵ setting off a storm of discussion on the AutoAdmit board and on legal and political blogs all around the Internet.⁶ The overriding themes of AutoAdmit defenders: Women who put their pictures online cannot complain when they are harassed; women should be grateful for the positive attention; women who speak out just want attention; and the women who object to having their privacy violated are trying to shut down First Amendment rights.⁷ In response to accounts from some of the “Most Appealing Women” contestants and other women crudely discussed on AutoAdmit about their difficulty getting jobs despite having good grades at top schools,⁸ University of Wisconsin law professor and blogger Ann Althouse wrote, “Too beautiful to appear in public? Too hot to be hired? Come on! What rational employer would deny you a job because idiots chatted about you on line in a way that made it [sic] obvious that the only thing you did was look good?”⁹

5. Nakashima, *supra* note 1.

6. See, e.g., Ann Althouse, Let’s Talk About Auto-Admit, Althouse, Mar. 17, 2007, <http://althouse.blogspot.com/2007/03/lets-talk-about-autoadmit.html>; Jack Balkin, The Autoadmit Controversy: Some Notes About Social Software, Code, and Norms, Balkinization, Mar. 9, 2007, http://balkin.blogspot.com/2007_03_04_balkin_archive.html; Ann Bartow, Something About the Timing Gives Me Pause, Feminist Law Professors, Mar. 8, 2007, <http://feministlawprofs.law.sc.edu/?p=1583>; Lindsey Beyerstein, Did Online Gossip Sink Law Student’s Career?, Majikthise, Mar. 7, 2007, http://majikthise.typepad.com/majikthise/_2007/03/did_online_goss.html; Dave Hoffman, A National Law Student Code of Conduct?, Concurring Opinions, Mar. 7, 2007, http://www.concurringopinions.com/archives/2007/03/a_law_student_c_1.html; Harold Hongku Koh, Dean of Yale Law School Condemns ‘Despicable’ Sexist Attacks on Students, Ms. JD, Mar. 9, 2007, <http://ms-jd.org/dean-yale-law-school-condemns-despicable-sexist-attacks-students>; Brian Leiter, Washington Post Runs Expose of “Law School” Chat Room Run by Penn Law Student, Brian Leiter’s Law School Reports, Mar. 7, 2007, http://leiterlawschool.typepad.com/leiter/2007/03/washington_post_1.html; Amanda Marcotte, Ann Althouse Is Exactly the Kind of Asshole Who Denies You a Job for Being Hot, Pandagon, Mar. 7, 2007, <http://pandagon.net/2007/03/07/ann-althouse-is-exactly-the-kind-of-asshole-who-deny-you-a-job-for-being-hot/>; Jessica Valenti, Hi, I’m Jill, and Scummy Law School Sleazebags Have Gone After Me, Too, Feministing, Mar. 7, 2007, <http://feministing.com/archives/006649.html> (reproducing and commenting on Jill Filipovic, Hi, I’m Jill, and Scummy Law School Sleazebags Have Gone After Me, Too, Feministe, Mar. 7, 2007, <http://www.feministe.us/blog/archives/2007/03/07/wapo-calls-out-law-school-pervs/>); Ilya Somin, Are Derogatory Posts on Anonymous Chat Sites Costing Law Students Jobs?, The Volokh Conspiracy, Mar. 11, 2007, <http://volokh.com/posts/1173598400.shtml>.

7. See, e.g., Althouse, *supra* note 6; Peter L. Brooks, In Defense of Trash Talk, TalkBackNorthampton, Mar. 23, 2007, <http://talkbacknorthampton.blogspot.com/2007/03/in-defense-of-trash-talk.html>; Sifu Tweety Fish, New Frontiers in Privacy, The Poor Man Institute, Mar. 7, 2007, <http://www.thepoorman.net/2007/03/07/new-frontiers-in-privacy>.

8. Nakashima, *supra* note 1.

9. Ann Althouse, “For Many People The Internet Has Become a Scarlet Letter, an Albatross,” Althouse, Mar. 7, 2007, <http://althouse.blogspot.com/2007/03/for-many-people-internet-has-become.html>.

The owners of AutoAdmit, Jarret Cohen and Anthony Ciolli, told *The Washington Post* that the women in the contest invited harassment by posting their pictures online and on social networking sites like Facebook¹⁰—in other words, they were asking for it. Others argued that female law students could not possibly expect to have their privacy respected if they dared to post images of themselves on the Internet.¹¹ One has to wonder what this means for the privacy rights of the more than 100-million other people who use MySpace and Facebook.

The argument that women who have the audacity to show their faces online are asking to be demeaned and threatened with sexual violence is one that is leveled, quite simply, only at women. And the AutoAdmit incident is hardly a unique story;¹² rather, it is one event in a broader established pattern on the Internet of usually anonymous commenters harassing and sexually demeaning women in an effort to intimidate them out of public participation. Sexual assault has long been critiqued by feminists as a tool for the broad social oppression of women, with Susan Brownmiller famously arguing that, “It is nothing more or less than a conscious process of intimidation, by which all men keep all women in a state of fear.”¹³ At the heart of this aggression seems to be a more generalized offense at women’s public presence in “men’s” spaces—in politics, at law schools, online.

Earlier this year, feminist bloggers Amanda Marcotte and Melissa McEwan were hired by John Edwards to run his presidential campaign blog.¹⁴ Both women received threats in addition to standard harassment from anonymous emailers and other bloggers—much of which, as Marcotte wrote on her blog

10. Nakashima, *supra* note 1.

11. Comment by Ann Althouse on Ann Althouse, “Scummy Law School Sleazebags” in “a Massive Toilet of Racism and Sexism,” Althouse, Mar. 8, 2007, <http://althouse.blogspot.com/2007/03/scummy-law-school-sleazebags-in-massive.html>.

12. Or a story with an ending—a month after the *Washington Post* article came out and a year and a half after I first became aware that I was a target of AutoAdmit, the harassment has not stopped. After charges were dropped against the Duke lacrosse players accused of rape, I wrote a post on Feministe criticizing media outlets for publishing the accuser’s photograph and personal information. Jill Filipovic, *About That Duke Lacrosse Thing*, Feministe, Apr. 13, 2007, <http://www.feministe.us/blog/archives/2007/04/13/about-that-duke-lacrosse-thing/>. In response, AutoAdmit posters directed a series of threatening and sexually explicit comments toward me, which eventually segued into posting more of my pictures and critiquing my appearance. Sexual violence was a theme throughout: Commenters posted messages like, “I want to brutally rape that Jill slut,” “If I smash a brick over her head because she’s too slow to dodge it and then passes out, it counts as consent,” “I’m 98% sure that [Jill] should be raped (even if only in Internet Land),” “What a useless guttertrash whore. I hope someone uses my pink, fleshy-textured cylindrical body to violate her” (posted by “fleshlight”), “she deserves a brutal raping,” “I have it on good authority that Jill F has rape fantasies,” and “maybe you’d have to kill her afterwards [in response to a thread titled, “Be honest, everyone here would FUCK THE SHIT out of Jill Feministe].”

13. SUSAN BROWNMILLER, *AGAINST OUR WILL: MEN, WOMEN AND RAPE* 15 (Ballantine Books 1993) (1975).

14. John M. Broder, *Edwards’ Bloggers Cross the Line*, *Critic Says*, N.Y. TIMES, Feb. 6, 2007, at A16.

Pandagon, “could be summed up, ‘You have a pottymouth, you stupid cunt.’”¹⁵ Besides claims that the women needed “a good fucking” and were “filthy mouth slut[s],” Marcotte reports that several e-mail writers made rape threats,¹⁶ and McEwan was harassed at her home.¹⁷ Most of the threatening emails included some sort of sexual comment. And anonymous individuals were hardly the only ones sending sexist messages: Mainstream commentators, bloggers, and conservative pundits focused on Marcotte and McEwan’s perceived lack of proper feminine propriety to go after them.

Multiple right-wing male bloggers linked to pictures of Marcotte, with one blogger asserting that she “imagines herself as some vixen, her career existing a notch above the skin trade.”¹⁸ One commenter referred to Marcotte as a man, a “he-she,” and “one of those transgender things.”¹⁹ McEwan’s picture was also linked to by a commenter who called her a “total skank.”²⁰ Still others weighed in on Marcotte and McEwan’s physical appearance, debating whether they were “hotties” and whether the men would have sex with either woman.

The “hot or not” game is standard fodder for attacks on women—feminist women in particular. For example, Google “boobgate” and you will undoubtedly come across a picture of Jessica Valenti, the twenty-eight-year-old editor of the popular site *Feministing.com*.²¹ Valenti was one of several prominent bloggers invited to meet President Bill Clinton last September. A group photo was taken, with Valenti standing toward the front. In the photo, Valenti is young, pretty, and has breasts—and that was enough for all hell to break loose in conservative blogging circles. “Jessica writes one of those blogs that are all about using breasts for extra attention,” wrote Ann Althouse, the same blogger who weighed in on the AutoAdmit debacle, in a post titled “Let’s

15. Amanda Marcotte, *People Who Claim to Love Jesus Write Me*, Pandagon, Feb. 13, 2007, <http://pandagon.net/2007/02/13/people-who-claim-to-love-jesus-write-me/>.

16. *Id.* (“It’s just too bad your mother didn’t abort you. You are nothing more than a filthy mouth slut. I bet a couple of years in Iraq being raped and beaten daily would help you appreciate America a little. Need a plane ticket?”).

17. Paul the Spud, *This Needs to Stop, Shakespeare’s Sister*, Mar. 27, 2007, <http://www.shakespearessister.blogspot.com/2007/03/this-needs-to-stop.html> (describing a person “blocking her driveway and pounding on her door”).

18. Dan Riehl, *Damn, Riehl World View*, Feb. 5, 2007, http://www.riehlworlview.com/carnivorous_conservative/2007/02/damn.html.

19. Comment by RoyalOak on *Computer Glitch Corrected; Celebrity-Face-Matching Software Now Produces More Accurate Results, Ace of Spades HQ*, Feb. 8, 2007, <http://ace.mu.nu/archives/215002.php> (“By the look of her, she must be one of those transgender things. How do you reference her then? He, she or it?”).

20. Comment by Impartial Observer on *Computer Glitch Corrected; Celebrity-Face-Matching Software Now Produces More Accurate Results, Ace of Spades HQ*, Feb. 9, 2007, <http://ace.mu.nu/archives/215002.php> (“Turns out Marcotte is a hottie compared to McEwan. No wonder these two hate men so much. They’re total skanks—who in their right mind would shag and take care of either one of them?”).

21. See, e.g., Chris Lawrence, *Boobgate Becomes Whiteygate, Signifying Nothing*, Sept. 19, 2006, <http://blog.lordsutch.com/archives/3555>.

take another look at those breasts.”²² Althouse continued, “Then, when she goes to meet Clinton, she wears a tight knit top that draws attention to her breasts and stands right in front of him and positions herself to make her breasts as obvious as possible?”²³ Cracks about Monica Lewinsky, blue dresses and interns ensued.²⁴ Jessica’s picture was plastered all over right-wing blogs, with the requisite evaluation of her attractiveness, her chest, her choice of clothing, and her sexual allure.²⁵ Valenti, the only explicitly feminist blogger at the gathering—which included five other women—was also the only blogger in the photograph targeted by large-scale harassment.

Eighteen-year-old Liz Funk wrote a piece titled “Feminist? Or Just -Ing?” for the Huffington Post blog, weighing in on what other feminists and self-proclaimed feminists were saying about Valenti. She described Valenti as “perky, educated (and cute),” gave credence to Althouse’s accusations, and characterized Feministing’s content as “cute” and “bubbly,” while noting disapprovingly that the first woman to comment in support of Valenti’s reaction to the scandal was an empathetic “fetish model.”²⁶ And while, by the end of the post, she grudgingly supported Feministing, Funk spent ample time criticizing Valenti for writing about sex and boobs—“[n]early everyday, [Feministing] is updated with risqué and often sexually implicative content. Its logo is the silhouette of a sexy woman showing off her curves.”²⁷ She also argued that Feministing’s emphasis on sex is not unusual for “us[ing] women’s sexuality to attract women readers. Sex sells . . . and women buy it.”²⁸ While it may be true that sex sells, Feministing is a website that regularly tackles issues like reproductive rights, sexual harassment, and breast cancer—its coverage of sex is more to educate than to titillate.

While feminist women are attacked more frequently, they are not the only targets. Being a woman in a traditionally male-dominated career, like law or technology, seems on its own sufficient to spark sexualized online harassment.

22. Ann Althouse, Let’s Take a Closer Look at Those Breasts, Althouse, Sept. 15, 2006, <http://althouse.blogspot.com/2006/09/lets-take-closer-look-at-those-breasts.html>.

23. *Id.*

24. *See, e.g.*, Comments by Ann Althouse, David, and MadisonMan on *id.*, Sept. 15, 2006.

25. Helen Smith, We Don’t Support Groppers Except for Bill Clinton, Dr. Helen, Sept. 16, 2006, <http://drhelen.blogspot.com/2006/09/we-dont-support-groppers-except-for.html>; Glenn Reynolds, Modern Feminism Defies Gender Stereotypes with Statements Like “Ann Althouse is a Nasty Old Crone,” Instapundit, Sept. 16, 2006, <http://instapundit.com/archives/032595.php>; Eric, Not Keeping Abreast of Current Affairs, Classical Values, Sept. 18, 2006, http://www.classicalvalues.com/archives/2006/09/not_keeping_abr.html.

26. Liz Funk, Feministing: Feminist? Or Just -Ing?, Huffington Post, Oct. 12, 2006, http://www.huffingtonpost.com/liz-funk/feministing-feminist-o_b_31572.html (revised since original posting).

27. *Id.*

28. *Id.*

The women targeted by AutoAdmit are one example; technology blogger Kathy Sierra is another.²⁹

Sierra stopped blogging in March 2007 after receiving a series of threats of hanging, suffocation, throat-slitting, and rape, as well as having her home address, social security number, and other personal information posted online. A photograph of Sierra was altered to feature her head in a noose.³⁰ One commenter wrote about having “open season” on her, and that “this includes the famous bruise o flex memory foam allowing you to beat this bitch with a bat, raise really big welts, that go away after an hour, so you can start again.”³¹ In the comments section of her post about the threats, a person posting under the name “Hitler” wrote, “Better watch your back on the streets whore . . . Be a pity if you turned up in the gutter where you belong, with a machete shoved in that self righteous little cunt of yours.”³²

While many in the blogosphere rallied around her, detractors accused her of overreacting³³ and whoring for attention.³⁴ Even Markos Moulitsas—the owner of Daily Kos, the most popular progressive blog on the Internet—wrote that bloggers like Sierra exaggerated death threats and should get off the computer if they are unwilling to ignore harassment.³⁵ “Look, if you blog, and blog about controversial shit, you’ll get idiotic emails,” Moulitsas wrote. “Most of the time, said ‘death threats’ don’t even exist—evidenced by the fact that the crying bloggers and journalists always fail to produce said ‘death threats’ . . . If they can’t handle a little heat in their email inbox, then really, they should try another line of work.”³⁶

These tactics—the rape threats, the manufactured First Amendment outrage, the scrutiny over physical appearance, the shock at women asserting themselves, the argument that people who take threats seriously are

29. Jessica Valenti, *How the Web Became a Sexist’s Paradise*, GUARDIAN, April 6, 2007, at 16, available at <http://technology.guardian.co.uk/news/story/0,,2051580,00.html>; see also Brad Stone, *A Call For Manners in the World of Nasty Blogs*, N.Y. TIMES, April 9, 2007, at A01.

30. Valenti, *supra* note 29.

31. Comment on unknown blog post on unclerbobism, <http://unclerbobism.wordpress.com/> (The unclerbobism blog has since been “archived or suspended for violating [the] Terms of Service” of its host, WordPress.com), reproduced by image pasted in comment by Kathy Sierra on Kathy Sierra, *Death Threats Against Bloggers are NOT “Protected Speech”* (Why I Cancelled My ETech Presentations), *Creating Passionate Users*, Mar. 26, 2007, http://headrush.typepad.com/creating_passionate_users/2007/03/as_i_type_this_.html (image since removed). The quote has been re-printed by David Marcus, *I Want to Stab You and Play with Your Blood*, Kuro5hin, Apr. 1, 2007, <http://www.kuro5hin.org/story/2007/3/30/22320/3779>.

32. Comment by Hitler on Sierra, *supra* note 31, Mar. 27, 2007.

33. E.g., Comments thread on Digg.com entry linking to Sierra, *supra* note 31, *Death Threats Against Bloggers are NOT “Protected Speech”* (Kathy Sierra): *To Where Has the Blogging Community gone?*, Mar. 26-28, 2007, http://www.digg.com/tech_news/Death_threats_against_bloggers_are_NOT_protected_speech_Kathy_Sierra.

34. Comment by zong on Sierra, *supra* note 31, Mar. 27, 2007 (“Christ, shut the fuck up you dumb slut. Nobody cares. Go whore for attention elsewhere.”).

35. Markos Moulitsas, *Death Threats and Blogging*, Daily Kos, Apr. 11, 2007, <http://www.dailykos.com/story/2007/4/12/22533/9224>.

36. *Id.*

overreacting, the assertion that women want and like sexualized insults—are long-standing tools used to discredit and cut down women who transgress traditional gender roles and challenge male authority.

Second-wave feminist Kate Millet was put on the cover of *Time Magazine*, only to be viciously attacked for her sexuality and her failure to conform to conventional beauty standards—macho English actor Oliver Reed told her on a late-night British talk show to “Give us a kiss, Big Tits.”³⁷ The Riot Grrrls of the 1990s were regularly booed at shows for putting girls at the front of the mosh pit,³⁸ were called man-haters by male musicians and the (now defunct) music weekly *Melody Maker*, and regularly had audience members calling them bitches, cunts, and sluts and telling them to “take it off” during performances.³⁹ Female politicians, perhaps best exemplified by Hillary Clinton, are routinely characterized as shrill, bitchy, ball-busting, or hysterical, and are branded as “mannish” or accused of lesbianism.⁴⁰

These kinds of sexualized insults reflect attempts to put women in their place, just as rape threats attempt to keep women fearful in an effort to relegate them to the domestic sphere. Women are routinely warned out of moving through public spaces (walking home alone at night, drinking in bars, going to parties) because “something might happen”—that “something” always a reference to sexual assault. And when women are assaulted, news media, individual women, and even feminist organizations almost always offer a backward-looking evaluation of what she could have done differently to prevent her own victimization. Statistically, women are far more likely to be victimized at home than out of it.⁴¹ Men are much more likely to be the victims of violent crimes in general, and are more likely to be victimized in public.⁴² Yet men are rarely admonished for drinking in bars, or lectured about the need to “protect themselves” by curtailing their activities. Sexual assault and, to a greater degree, the very threat of sexual assault, is used to keep women fearful, and to deter them from public participation.

Similarly, street harassment is leveled at women as a reminder that they do not have the same right as men to move through public space. While street harassment today is justified by pointing to what women are wearing or how they are walking, it is hardly a new phenomenon—it reflects long-standing

37. Neil Lyndon, *I Warned Them it Was a Bad Idea to Invite Oliver; Neil Lyndon Relives His Saturday Night on Television*, INDEPENDENT (London), Jan. 29, 1991, at 14.

38. Le Tigre World, Kathleen Hanna, *My Herstory*, http://www.letigreworld.com/sweepstakes/html_site/fact/khfacts.html (last visited Apr. 11, 2007).

39. *Id.*

40. See, e.g., EDWARD KLEIN, *THE TRUTH ABOUT HILLARY: WHAT SHE KNEW, WHEN SHE KNEW IT, AND HOW FAR SHE'LL GO* (2005).

41. DIANE CRAVEN, BUREAU OF JUSTICE STATISTICS SPECIAL REPORT: SEX DIFFERENCES IN VIOLENT VICTIMIZATION, 1994, at 1 (Sept. 1997), available at <http://www.ojp.usdoj.gov/bjs/pub/pdf/sdvv.pdf>.

42. Bureau of Justice Statistics Violent Crime Trends by Gender of Victim, <http://www.ojp.usdoj.gov/bjs/glance/vsx2.htm>; CRAVEN, *supra* note 41.

discomfort with women who exit the domestic sphere, and a cultural tie between leaving the house and engaging in sexual activity. Traditionally, the defining characteristic of a “common woman” was “not the exchange of money, not even multiple sexual partners, but the public and indiscriminate availability of a woman’s body.”⁴³

The anonymous online attacks on female bloggers and law students follow a similar narrative. When women write about politics or technology, or when they pursue an education in a traditionally male field like law, they are reminded of their secondary status through sexualized insults, rape threats, and beauty contests. Men certainly live with their fair share of nasty online attacks, but women are harassed in a very particular way. Men are generally attacked for their ideas or their behavior; when Internet aggressors go after women, they go straight between the legs. They remind her that even if she is a top student at a top law school, her primary purpose is decorative; they remind her that even if she is a popular blogger, her sexual allure (or lack thereof) makes her not worth listening to; they remind women in general that the punishment for displeasing men—even anonymous men online—will be at best sexually insulting, and at worst sexually violent.

Sexual assault and street harassment have hardly kept women inside, and anonymous online insults, threats, and humiliations will not stop women from attending law school or voicing their opinions on the Internet. But they may have a chilling effect. The anonymous men who created the “Most Appealing” law women contest, and the various commentators who weigh in on the appearance of female bloggers, are sending a clear message: You do not have as much of a right to be here as we do.

“The public woman was originally a prostitute,” Susan Faludi, a Pulitzer-Prize winning journalist and author of *Backlash: The Undeclared War Against American Women* and *Stiffed: The Betrayal of the American Man*, told me.⁴⁴ “Women, if they wanted to maintain their honor, did not speak in public. Here we see the vestiges of that. You have women who are speaking out, and they’re attacked for their sexuality. Basically, the subtext of all the vitriol they’re getting is, ‘you whore.’ What’s changed?”⁴⁵

43. RUTH MAZO KARRAS, COMMON WOMEN: PROSTITUTION AND SEXUALITY IN MEDIEVAL ENGLAND 10 (1996).

44. Telephone interview with Susan Faludi (Feb. 15, 2007).

45. *Id.*

