

HILLARY CLINTON, SARAH PALIN, AND MICHELLE OBAMA: PERFORMING GENDER, RACE, AND CLASS ON THE CAMPAIGN TRAIL

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INTRODUCTION

In *Our First Unisex President?: Black Masculinity and Obama's Feminine Side*,¹ Frank Rudy Cooper posits that President Obama consciously performed a feminine identity² in order to navigate the tricky waters of race and gender in the presidential election.³ Cooper notes that white popular culture perceives black masculinity as bipolar: there are “good blacks” and “bad blacks.”⁴ According to white popular culture, the “Bad Black Man is animalistic, sexually depraved, and crime-prone.”⁵ His counterpart, the “Good Black Man distances himself from black people and emulates white views.”⁶

Because of the image of the Bad Black Man, black men must take care not to show excessive anger.⁷ Obama is known for his “cool,” a somewhat feminine identity performance that comforts white citizens and distances him from the “dangerous” Bad Black Man. His conciliatory empathic style and willingness to negotiate with “evil” foreign powers made him appear more feminine than his female rival, Hillary Clinton, who performed a more masculine demeanor and espoused a tough stance toward Iran.

Although Obama's more feminine presentation downplayed white fear, it was also risky to his candidacy because it raised the question of whether he is masculine enough for the job.⁸ Ironically, perhaps it was his blackness that imbued Obama with sufficient masculinity to successfully walk the tightrope between being too masculine and too feminine,

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1. Frank Rudy Cooper, *Our First Unisex President?: Black Masculinity and Obama's Feminine Side*, 86 DENV. U. L. REV. 633 (2009).

2. Two types of identity include one's self identity and attributed identity, the impressions others have of a person. Identity is not a fixed phenomenon, but is created through negotiation (with oneself and others) and performance. Everyone works identity. Devon W. Carbado & Mitu Gulati, *Working Identity*, 85 CORNELL L. REV. 1259, 1261 n.2, 1263 (2000).

3. See generally Cooper, *supra* note 1.

4. Frank Rudy Cooper, *Against Bipolar Masculinity: Intersectionality, Assimilation, Identity Performance, and Hierarchy*, 39 U.C. DAVIS L. REV. 853, 857-59 (2006).

5. *Id.* at 857.

6. *Id.*

7. Cooper, *supra* note 1, at 654.

8. *Id.* at 633-34.

too black and too white. Cooper theorizes that Obama's success may actually have a gender- and race-bending effect, by removing stigma from "the feminine" and opening space for all persons, especially men who do not conform to masculine gender norms, to perform their identities in unconventional ways.⁹

While Cooper's essay does not directly address women in the political spotlight, its focus on Obama's feminization provokes the question of how white women and women of color can successfully perform their gender and racial identities in the public arena. The 2008 Presidential campaign highlighted three strong, interesting, and very different women—Hillary Clinton, Sarah Palin and Michelle Obama—who negotiated identity performances in the political limelight. Because of their diverse backgrounds, experience,¹⁰ and ages, an examination of how these three women performed their identities and the public response to them offers a rich understanding of the changing nature of gender, gender roles, age, sexuality and race in our culture. This study suggests that Professor Cooper's optimism that Obama's race and gender performances may have removed the stigma from "the feminine" may be misplaced, at least when it comes to women aspiring to high public office. Indeed, a review of the public's reaction to the gender, race, and class performances of these three women confirms that women aspiring to high public office continue to suffer intense public scrutiny of their gender performances.

Part I provides background for my analysis of these three women's identity performances and the public reactions to them. It discusses contemporary theories of identity performance, gender and leadership. Part II applies the theory and research to the public careers of Hillary Clinton, Sarah Palin and Michelle Obama and observes that although women still face significant obstacles in the public arena, there may be more acceptance of women as political candidates than in the past. The essay concludes that the candidacies of Hillary Clinton and Sarah Palin and the public appearance of Michelle Obama as a successful career woman, who is also a wife of the winning candidate, have moved women one step further toward equality in the national political scene. Moreover, the public may be more willing to consider women's identities to include a mix of both traditional family values and competence in one's career. By the same token, women's identities as aspiring political leaders continue to be problematic, and require women to negotiate a double bind: if they are too feminine, they are deemed incompetent. If they are too masculine, they are considered not likeable.

9. *Id.*

10. Hillary Clinton has served in three different public roles over a period of sixteen years. She served as first lady to Bill Clinton's Presidency, Junior Senator from New York, and candidate for President of the United States. She is now about to embark on a new role as Secretary of State.

I. IDENTITY, GENDER AND LEADERSHIP

This part explains the theory of identity performance at work—how individuals work their identities in workplaces. It then applies identity performance theory to the political arena, exploring the differences between performing one's identity at work and in political campaigns. Finally, it discusses research on gender and leadership that demonstrates that women in leadership positions are judged more harshly than their male counterparts. Because this is true, it is considerably more difficult for women leaders to navigate and perform their identities.

A. *Performing and Negotiating Identities in Workplaces*

In *Working Identities*, Devon Carbado and Mitu Gulati explain that individual identities are not fixed, but are negotiated and performed.¹¹ For example, a person negotiates between his sense of self or self identity and his attributed identity, how others perceive him. In order to achieve certain reactions from others, an individual may perform identity in different ways. For example, in a firm that values hard work, an employee may work late, mention to colleagues how tired she is because she has worked late so many evenings, or leave her office light on so it appears that she is there even after she leaves the office.¹² Carbado and Gulati posit that all individuals perform identity, but they demonstrate that when outsiders¹³ perform their identities at work, they risk working against some stereotypes but confirming others.¹⁴ For example, if a workplace values hard work, creativity and a quick intelligence, a black law firm associate may find performing his identity difficult. If he chooses to counter the stereotype that blacks are lazy by working diligently, his behavior may confirm in the minds of his employers the stereotype that blacks are not as intelligent or as quick as whites.¹⁵

All of these behaviors by outsiders entail not only public performances but also internal negotiations with the self about how much an employee is willing or able to perform an identity desired by the firm without losing a sense of self.¹⁶ Because members of outsider groups “perceive themselves as subject to negative stereotypes, they are also likely to feel the need to do significant amounts of ‘extra’ identity work to counter those stereotypes.”¹⁷

Even while attempting to conform to institutional values, an outsider might compromise herself and confirm negative stereotypes. If the

11. Carbado & Gulati, *supra* note 2, at 1260-61, 1261 n.2.

12. *Id.* at 1260.

13. For this purpose, “outsiders” include white women, persons of color, and gays and lesbians. *Id.* at 1268.

14. *Id.* at 1262, 1270.

15. *Id.* at 1292.

16. *Id.* at 1264.

17. *Id.* at 1262.

workplace values collegiality, for example, a young woman may choose to go out to bars after work with her colleagues, even though she sees herself as a loner or a homebody. This identity performance, however, may confirm the stereotype that women are sexual objects, and interested in having affairs with co-workers, especially if she joins in sexual banter or willingly goes to a strip club with her colleagues in order to fit in. Unlike a man who engages in the same behavior, the woman is viewed negatively because the firm defines collegiality in terms of what it perceives to be appropriate male behavior. Because societal norms continue to govern our judgments, a woman performing similar behavior runs the risk of disrespect.

Stereotypes are comparative measurements to the standard bearer: the white, middle class, heterosexual male. When we judge a black man as not hard-working or a Korean woman as too hard-working, the judgment is based on the view that the ideal worker¹⁸—the white, middle class, heterosexual male—works the proper amount. But the irony is that even if it were possible to engage in exactly the same behavior as their white, heterosexual, male counterparts, outsiders may fail to meet community norms. In cases where the amount of work performed is measured, stereotypes about outsiders would likely color insiders' perceptions of how much the outsiders worked. Stereotypes involving more qualitative judgments than the number of hours that a person works are even more difficult and risky to defeat. Professor Cooper makes this point when he explains that in order to avoid the stereotype of the Bad Black Man, President Obama performs his identity as less masculine, more feminine and community-oriented.¹⁹ Obama learned early in life that in order to accomplish his goal of living within the white society, he had to give comfort to whites and allay their fears that he may be an aggressive black male.²⁰

B. Performing Political Identities During Presidential Campaigns

People perform their identities in the workplace; in the political arena, too, all politicians attempt to perform their identities to please the electorate. During the long campaigns for President and Vice President, this is a complicated endeavor because unlike workplaces that have certain identifiable preferences and norms that remain fairly constant over time, the electorate represents a variety of different groups with different values whose views often change in reaction to ongoing current events. A candidate must perform an identity that is sufficiently constant to convey an air of confidence and imperviousness, but also sufficiently flexible to appeal to different constituencies and to respond to changing

18. JOAN WILLIAMS, UNBENDING GENDER 64-66 (2000) (describing the "ideal worker" norms in the workplace).

19. Cooper, *supra* note 1, at 636.

20. *Id.*

events. As events change, a candidate must adapt, performing identity in slightly different ways, while avoiding a charge that he or she is an opportunist. Getting “stuck” in an identity that is perceived to be inflexible and out of date, while simultaneously acting in erratic fashion as some claim that John McCain did, can be deadly to a campaign.

Because the roles of President and Vice President are gendered male and raced white, and because there has never been a woman or minority President or Vice President, an outsider running for these offices encounters obstacles that go beyond those faced by a heterosexual white male in negotiating and performing identity as a political candidate. Voters often claim to vote based on the candidates’ personal characteristics rather than on the issues.²¹ Because of stereotypes about the proper roles of men and women, and the normal cognitive process of categorizing, these voters will likely judge the candidates’ personal characteristics through a distorted lens. This lens can lead to biased evaluations of the candidates even though the voter is unaware of the error.²²

C. Gender Roles and Leadership

Notwithstanding sociologists’ and feminist scholars’ conclusion that gender roles are learned behaviors,²³ people generally view gender as naturally derived from biological sex, and expect others to behave in a manner that conforms to their biological sex. Women in leadership positions and doing jobs that are traditionally male are judged much more harshly than men. In “Goldberg” studies, for example, a participant evaluates resumes reflecting equivalent education and experience designated with men’s and women’s names. When the job is identified as requiring “male” characteristics, participants consistently rank the men’s resumes more highly than the women’s, even though the resumes are identical.²⁴

Gender roles and social incongruity explain these disparate results. Gender roles are widely held beliefs about the attributes of men and women and the roles they play in society. They are based on descriptive and injunctive norms: descriptive norms describe how women and men

21. Carol Polsky, *Looking Past Economy*, NEWSDAY, Nov. 1, 2008, at A14; Posting of Stuart O’Neill to Democratic Daily, <http://thedemocraticdaily.com/2008/10/10/mccain-trading-in-his-character-to-chase-the-news-cycle/> (Oct. 10, 2008, 4:45 p.m. EST) (using the title “McCain Trading In His Character To Chase The News Cycle”).

22. Ann C. McGinley, *Viva la Evolucion!: Recognizing Unconscious Motive in Title VII*, 9 CORNELL J. L. & PUB. POL’Y 415, 421-46 (2000) (describing unconscious bias in decision making).

23. E.g., Judith Lorber, *Beyond the Binaries: Depolarizing the Categories of Sex, Sexuality and Gender*, 66 SOC. INQUIRY 143, 146 (1996) (“[G]ender . . . is a social institution that establishes patterns of expectations for individuals, orders the social processes of everyday life, is built into the major social organizations of society such as the economy, ideology, the family, and politics, and is also an entity in and of itself.”).

24. Alice H. Eagly & Steven J. Karau, *Role Congruity Theory of Prejudice Toward Female Leaders*, 109 PSYCHOL. REV. 573, 582, 587 (2002).

behave while injunctive norms are consensual expectations about how men or women should behave.²⁵

Most descriptive and injunctive norms about the sexes pertain to communal and agentic²⁶ behavior. Women are described as communal and are expected to act in others-oriented ways. The descriptive norm sees women as followers and as inappropriate leaders.²⁷ The injunctive norm forbids women from behaving in agentic ways; women who behave agentially are rated worse than men who engage in the same behavior.²⁸ Men are described as agentic and expected to exhibit aggression, ambition, dominance, independence, and self-confidence.²⁹ Women, on the other hand, are considered to be untrustworthy and are disliked in leadership roles, especially if their agentic style “entails exerting control and dominance over others.”³⁰

Role congruity theory considers congruity or incongruity between the gender role and leadership roles.³¹ Studies demonstrate that people see leadership roles as primarily agentic, and therefore requiring masculine traits.³² Women are typically at a disadvantage when applying for or working in leadership positions because their gender role conflicts with the qualities needed to perform the job. Male group members evaluate women’s work as less competent than that of men, even when the work is equally competent.³³ Moreover, women receive less attention at work for the same idea expressed the same way as men do.³⁴

When there is clear evidence that a woman is a good leader, she still experiences a disadvantage due to a conflict between leadership qualities and her gender role.³⁵ Even when women are perceived as successful,³⁶ both men and women rank them as less likeable than men based on their success at a “man’s job.”³⁷

This research demonstrates the difficulties caused by gender role incongruity that women experience when they work in men’s jobs or take on leadership positions. The public perceives these positions as requiring masculine traits, and masculine traits are considered to be superior to

25. *Id.* at 574.

26. An “agentic” person is one who takes control and leads. *Id.*

27. *Id.* at 576.

28. *Id.* at 576-90.

29. *Id.*

30. Alice H. Eagly et al., *Transformational, Transactional, and Laissez-Faire Leadership Styles: A Meta-Analysis Comparing Women and Men*, 129 *PSYCHOL. BULL.* 569, 573 (2003).

31. *Id.* at 575.

32. *Id.*

33. See Martha Foschi et al., *Gender and Double Standards in the Assessment of Job Applicants*, 57 *SOC. PSYCHOL. Q.* 326, 337 (1994).

34. See VIRGINIA VALIAN, *WHY SO SLOW?: THE ADVANCEMENT OF WOMEN* 131 (1998).

35. See Eagly & Karau, *supra* note 24 at 575-76.

36. *Id.* at 575.

37. Madeline E. Heilman et al., *Penalties for Success: Reactions to Women Who Succeed at Male Gender-Typed Tasks*, 89 *J. APPL. PSYCHOL.* 416, 426 (2004).

feminine traits.³⁸ By the same token, the public responds negatively to a woman who is too masculine. Because of these restraints, a woman who seeks a leadership position may try to perform her identity in a way that demonstrates her strength and ability to perform the requirements of the position without appearing too masculine. This is a difficult performance that, to date, has proved elusive to women running for President or Vice President. It is complicated by the changing societal views of women and their roles in the family and the workplace and by the public's and the media's hyper-vigilance of women's appearance and dress.

II. APPLYING THE RESEARCH TO HILLARY CLINTON, SARAH PALIN, AND MICHELLE OBAMA

This part looks at specific examples of Hillary Clinton, Sarah Palin and Michelle Obama, three women who have attempted to negotiate the tricky waters of gender and authority, and how the public reacted to their gender and race performances.

A. *Hillary Clinton*

Hillary Clinton was an accomplished lawyer and partner in a well-known law firm, graduate of prestigious Wellesley College and Yale Law School, first lady of Arkansas, law professor, and mother of one child in 1992 when her husband, Bill Clinton, announced his candidacy for President of the United States. Earlier, in 1975, when she married Bill Clinton in Arkansas, Hillary Rodham retained her own surname, a practice that was common among feminists of her age in order to avoid losing their identity and independence. Because of a chilly reception in Arkansas to her use of her birth name, presumably because she was too independent of her husband, she soon switched her name to Hillary Clinton.

Hillary Rodham graduated from law school in 1973, a time when women began to attend law school in significant numbers. She was among the first generation of women to enjoy the benefits of the civil rights laws' guarantees of equal employment and educational opportunities for women.³⁹ Despite the legal protections, "second wave" femi-

38. See R.W. CONNELL, *MASCULINITIES* 15-16 (2d ed. 2005) (explaining that Alfred Adler and others posited that the polarity between masculine and feminine traits saw female traits as inferior).

39. Title VII of the Civil Rights Act of 1964, which went into effect in 1965, made it unlawful to discriminate against an applicant or employee because of her sex. Title VII of the Civil Rights Act of 1964, Pub. L. No. 88-352, 78 Stat. 241 (1964) (codified as amended at 42 U.S.C. § 2000e-2(a) (2006)). It was amended in 1972 in order to make state governments subject to the Act. Title VII of the Civil Rights Act of 1964, Pub. L. No. 92-261, 86 Stat. 103 (1972) (codified as amended at 42 U.S.C. § 2000e-2(e) (2006)). Title IX of the Civil Rights Act of 1964 made it unlawful to discriminate in education because of sex. Title IX of the Civil Rights Act of 1964, Pub. L. No. 88-352, 78 Stat. 241 (1964) (codified as amended at 42 U.S.C. § 2000c-6 (2006)). In 1972, the 1964 Civil Rights Act was amended to apply to public employers and universities. Title IX of the Civil Rights

nists⁴⁰ like Hillary Clinton had to fight for equal rights in employment. Many women believed that they had to work harder than their male counterparts to earn respect. Because these women were path breakers at work, many downplayed their roles as mothers and wives and sexual partners. These women performed their identities at work as efficient, hard workers because of the fear that colleagues would not take them seriously if they viewed them first as mothers and wives and second as professionals. While the second wave feminists matured during an era of more sexual freedom than their mothers, those who entered the professions performed their identities at work as asexual beings in order to avoid being treated as sexual objects by their male counterparts. Included in this asexual performance was work clothing that deemphasized their sexuality.

Clinton, the first career woman to serve as first lady, had significant problems performing her gender on the national scene. From almost the moment she appeared on the political scene as Bill Clinton's wife, Hillary suffered the public's disregard. Much of the reaction to Hillary stemmed from deep-seeded unconscious and conscious biases against independent women who perform their gender identities in professional and independent ways, and are not sufficiently submissive to their husbands.⁴¹ Hillary Clinton's identity performance was a threat to men and to those women who had made a choice to live in more traditional marriages. These women viewed their work lives outside the home, if they worked outside the home at all, as secondary to their husbands' careers, and they spent a large percentage of their time caring for their husbands and children.

Hillary Clinton also made some serious political mistakes in Bill Clinton's campaign, which contributed to the public's dislike of her. Early in the campaign, Hillary performed her identity in a way that showed disrespect for other women's choices and that made men uncomfortable. She disparaged non-working mothers when she asked sarcastically whether she should have stayed home and baked cookies instead of working as a lawyer.⁴² Many members of the public interpreted this comment as demonstrating Clinton's lack of empathy with stay-at-home moms who struggled to manage their households and care for their chil-

Act of 1964, Pub. L. No. 92-261, 86 Stat. 103 (1972) (codified as amended at 42 U.S.C. § 2000c-6 (2006)).

40. "Second Wave Feminism" is the term used to describe the feminist movement of the late 1960's and the 1970's. STANFORD ENCYCLOPEDIA OF PHILOSOPHY, TOPICS IN FEMINISM 2.1 (Mar. 15, 2004), <http://plato.stanford.edu/entries/feminism-topics/#FemBelFemMov>. I use the term in quotation marks in the text because it ignores the waves of abolitionist and post-abolition feminism.

41. See generally VALIAN, *supra* note 34 (discussing the effect of unconscious bias on women's success and the psychological studies supporting her conclusions).

42. Jack Hitt, *Bill and Hill and History; Southern Consort: A Guided Tour of His Good Ol' Soul*, WASH. POST, Oct. 21, 1993, at C1 ("The reason Hillary's remark—'I could have stayed home and baked cookies'—provoked such a projectile vomiting of rage below Washington is because she so openly represents a full rejection of Southern womanhood.").

dren. Clinton added salt to the national wound by stating that she was not like Tammy Wynette, the famous country singer who sang, "Stand by Your Man."⁴³

Once she became the first lady, Hillary Clinton's high-powered education and career as a corporate lawyer and her husband's insistence that she was an equal partner in the White House, combined with her disastrous attempt to redesign the health care system, led to even greater unpopularity. The public perceived her as arrogant and condescending, masculine and too rough around the edges. Distancing herself from her feminine side in order to demonstrate her strength, Clinton was the butt of ridicule and scorn. Her popularity ratings plummeted.

It was not until she suffered the humiliating experience of her husband's public infidelity that she became more popular. Thus, as a victim, and specifically as a woman victim, Hillary became more human and more likeable. This response to Hillary Clinton's personal problems is ironic given that she had struggled to perform her identity to demonstrate her strength and invulnerability. It was her feminine vulnerability that raised her popularity in the ratings. Nonetheless, while this vulnerability was an attractive trait in a first lady, it may not have been attractive in a candidate for the Senate or the Presidency. For this reason, Hillary Clinton performed her gender in order to command respect and attention without inviting scorn. Like Obama's mission, this is a tricky assignment. Clinton downplayed her femininity and emphasized her toughness in order to compensate for being a woman, and to earn respect for her competence and experience. Masculinities research demonstrates that men and women value masculinity more than femininity, so it makes sense that a woman candidate should put forth a masculine image.⁴⁴ By the same token, it is dangerous to do so because people do not like women who are too masculine.⁴⁵ Hillary Clinton, therefore, found herself in a double bind: Either act more feminine and be judged incompetent or act masculine and be considered unlikeable.

As a senator, Clinton gained respect of her colleagues, but the public was initially very cool to her Presidential campaign. As is typically demonstrated by the leadership research, the populace considered her competent, but not necessarily likeable, because she was a woman acting as a leader in a masculine job. She came across as a genderless policy wonk. She had a slight rise in New Hampshire when she showed her feminine side by breaking down on the campaign trail, and a significant

43. See Gwen Ifill, *The 1992 Campaign: Democrats Trapped in a Spotlight*, *Hillary Clinton Uses It*, N.Y. TIMES, Feb. 3, 1992, at A12.

44. See, e.g., Emmanuel Reynaud, *Holy Virility: The Social Construction of Masculinity*, in FEMINISM & MASCULINITIES 136, 142-44 (Peter Murphy ed., 2004) (arguing that man imposes femininity on women in order to establish his power and to produce the opposite of his own freedom and independence).

45. See, e.g., Heilman et al., *supra* note 37, at 426.

rise in popularity when she found her voice half-way through the primaries. Instead of humorless and shrill, Clinton now was strong and she empathized with the economic problems of Middle America. This was a very risky balancing act like the one in which Barack Obama had to engage. Like Obama, who was criticized for “playing the race card” when he mentioned that he did not look like the other men on the paper currency, an allusion to his race,⁴⁶ Hillary was criticized for “playing the gender card” when she talked about the “all-boys’ club of politics” to students at Wellesley.⁴⁷ The public, evidently, did not want the candidates to make the electorate confront its unconscious racial and gender biases. A silent pact between the electorate and the candidates required the candidates to perform their identities and to design their candidacies to appear “beyond gender” and “beyond race.” Nonetheless, gender and race were constant subtexts of the campaigns.

Hillary Clinton was able to retain her strength, but soften and feminize her image by expressing concern for families in the industrial states who were in tough economic straits. But she also used Barack Obama as a foil in performing her identity. She avoided a too-feminine appearance and sought to demonstrate strength by criticizing Barack Obama and portraying him as inexperienced and not tough enough to do the job. In this way, as Professor Cooper mentions, Hillary was often considered the tougher and more masculine candidate in the democratic primary.

Throughout her career, Hillary Clinton suffered criticism for her dress and appearance. During her campaign for President, she was criticized for her pant suits, a symbol of women’s empowerment since the 1960’s.⁴⁸ This criticism demonstrates the bind that women often face when they appear in public. The public evaluates women’s competence and authority based partially on their clothing.⁴⁹ Community norms for women’s dress and appearance are stricter than those for men’s. While men are more often rated as “average” in looks, their female counterparts are rated more frequently as “above average” and “below average.”⁵⁰ This double standard creates an additional burden on women running for public office. A sixty year old woman who apparently struggles with her

46. See Cynthia Tucker, *Cards on the Table: Like it or Not, Race a Factor in '08*, ATLANTA J.-CONST., Aug. 6, 2008, at 18A.

47. Kerry Howley, *Hillary Never Played the Gender Card*, CHICAGO SUN-TIMES, Nov. 18, 2007, at B3.

48. Frank James, *Thank YLS for Clinton Pantsuits*, http://www.swampolitics.com/news/politics/blog/2008/06/by_frank_james_how_many.html (noting that Ives St. Laurent designed the pantsuit in the 1960’s for working women, and that it has been a symbol of women’s empowerment since its design); see also Robin Givhan, *Wearing the Pants*, WASH. POST, Dec. 9, 2007, at A24, available at <http://tinyurl.com/cd6lrz> (noting that Clinton wore skirts and jackets as first lady, and wears pantsuits in the campaign to show toughness, but she also notes the variety of colors Clinton’s pantsuits were that allowed her to stand out among her rivals).

49. See Katharine T. Bartlett, *Only Girls Wear Barrettes: Dress and Appearance Standards, Community Norms, and Workplace Equality*, 92 MICH. L. REV. 2541, 2553 (1994) (citing studies by Sandra M. Forsythe).

50. See *id.* at 2564.

weight, Clinton may not have gained public approval for her clothes even if she had dressed in high style feminine clothing. The pant suit was her uniform, like the men's suits were their uniforms. Men, however, are considered more powerful and sexy as they age, while women lose their appeal as their waists thicken and their hair turns grey. Clinton showed her masculine toughness by wearing pants, while distinguishing herself as feminine by choosing pant suits of many brilliant colors.

Hillary Clinton's experience demonstrates that "second wave" brand of feminism is dead, at least when it comes to public acceptance of a woman candidate running for high public office. As a candidate, Clinton was considered unattractive when she emphasized her asexuality, toughness and competence, while downplaying her softer side—the considerable empathy she has for children and families. As she demonstrated more empathy, she became more acceptable to the public. Thus, the double bind played itself out in Hillary Clinton's campaign. While she did not negotiate the tricky waters perfectly, she learned as her campaign progressed to appear more feminine and less as a woman acting tough.

B. Sarah Palin

Unlike Hillary Clinton, the nation has known Sarah Palin for only a short time. When John McCain announced her as his running mate, the curiosity about Sarah Palin, a moose-hunting, conservative, forty-four year old woman who had served as Alaska's Governor for two years, was intense. Palin electrified the Republican Convention during her acceptance speech in which she consciously performed her gender and class identities and walked a fine line between being assertive and masculine and retaining her femininity. She performed her female gender by dressing in a feminine but professional way, wearing her hair long around her shoulders and by emphasizing her role as a mother of five children. She made deferential comments about her husband—that he was her "guy." She acted as the supportive wife in praise of her running mate, John McCain. But as she smiled in a feminine manner, she adopted a tough, masculine style, lambasting Barack Obama, and talking about his community organizing in a disparaging and condescending manner. She jokingly referred to herself as a "hockey mom" stating that the only difference between a hockey mom and a pit bull is lipstick. In pit bull style, Palin repeatedly attacked Barack Obama. After her attack and her speech were over, Palin carefully resumed her feminine performance, holding her infant son on stage as her other four children and her husband surrounded her. Her lipstick still shone through.

Throughout the campaign and after losing the election, Palin performed her gender and class. During the Vice Presidential candidates' debate, Palin asked Vice Presidential candidate Joe Biden if she could call him "Joe," winked at the audience, made overt entreaties to the "Joe-

six packs” who were watching, and attacked Joe Biden repeatedly. Palin continued the fierce attacks on Obama in masculine style, accusing him of “palling around with terrorists” and questioning his patriotism. In contrast, she simultaneously presented herself as a maverick, a mother and a wife. Upon losing the election, Palin performed her gender by inviting reporters to interview her while she prepared dinner in the kitchen of her home.

Sarah Palin is an appealing personality because of her good looks, her quick smile, her careful grooming and her ability to use her gender to soften an extraordinary toughness. She is also appealing in a populist way, a Western woman who is a member of the National Rifle Association, who knows how to gut a moose and prefers moose stew to more delicate foods. But her femininity is not at risk because she makes clear her pro-life stance and her lived experience of giving birth to an infant, knowing that he had Down Syndrome. Thus, Palin performs her femininity in the most important arena—in her role as mother. While she has tough traits and practices, she is not threatening because she has not broken with her “natural” role. She is still a feminine woman in dress and lifestyle, in her role as mother, in her belief in her family, and in her deference to her man. Her pit bull manner on the job can be “cute” and non-threatening but effective because, in the end, she defers to her god, her running mate, her pastor and her husband. Even when faced with the challenge of a seventeen year-old daughter who was pregnant out of wedlock, Palin performed in a post-feminist and yet traditional way. She welcomed the new infant into her family and supported her daughter while simultaneously rejecting the possibility of an abortion.⁵¹

Palin’s gender performance starkly contrasts with that of Hillary Clinton. While Hillary Clinton used a gender strategy of gender denial and avoidance, Palin, in subtle and not so subtle ways, emphasized her gender. Hillary Clinton offered a tough, masculine approach, downplaying her role as wife and mother and her sexuality. Even when she was younger, Clinton wore clothing that deemphasized her sexuality, and during her campaign for the presidency, she was criticized for her various colored pant suits and flat shoes. Sarah Palin, too, offered a tough approach, but it can not be characterized as too masculine. She emphasized her role as mother and wife. She placed her family front and center. She dressed in designer jackets and tight, pencil-thin skirts with very high heels, wore her hair long or in a feminine upsweep, and displayed a significant amount of makeup. She was perceived as sexy by many who viewed her candidacy. In sum, Sarah Palin fully embraced her gender,

51. Imagine the consternation if Obama’s family had similar problems. The stereotype of black families with unwed mothers would likely have defeated his presidency.

and broke from the “second wave” feminist approach of downplaying gender.⁵²

Palin’s candidacy soon began to demonstrate weakness because of her lack of experience on the national scene, her lack of foreign policy knowledge, her perceived lack of curiosity, and the contradiction between her “down-home” style and her clothing expenditures.⁵³ She suffered severe criticism from liberals and conservatives, men and women.⁵⁴ The criticism is legitimate if directed at her lack of understanding of foreign affairs, especially because John McCain is advancing in years. By the same token, some argued that her experience was superior to Barack Obama’s, and that she was treated worse than he, in part, because she is a woman.

Because of the obvious flaws in Palin’s candidacy apart from gender, it is impossible to determine whether and to what extent her gender performance affected her candidacy, either positively or negatively. We do know, however, that Palin’s candidacy sparked intense and protracted debate. Palin’s style raises the question of whether a woman who performs her gender in a family-conscious, sexy fashion will simultaneously be able to prove to the electorate that she is competent, tough and skilled enough to serve as President of the United States. If so, Palin’s popularity would signal a sea change in gender politics. It would confirm the death of “second wave” feminism’s focus on gender androgyny and independence as symbols of competence and ability. Instead, it would likely show that a muted sexuality, combined with a willingness to conform to gender norms regarding motherhood may be attractive in a woman candidate so long as she also engages in masculine performances when necessary. The reaction to Palin’s candidacy may indicate that women must accept the double bind and simultaneously negotiate a “split personality” where they at times emphasize their femininity and at other times their masculinity.⁵⁵ Palin’s success resulted largely from her failure to challenge gender norms while strategically emphasizing femininity or masculinity as needed.

52. Since her return to Alaska, Palin continues to perform her gender identity as mother and new grandmother publicly. The web page for the Alaska Governor has an announcement of the birth of her 17 year-old daughter, Bristol’s, baby. *Governor Welcomes Her First Grandchild Tripp Easton Mitchell Johnston*, <http://gov.state.ak.us/news.php?id=1593> (last visited Jan. 19, 2009). The web page also contains a link to a site about Palin’s infant son who has Down Syndrome. Alaska Governor Sarah Palin, <http://gov.state.ak.us/trig.html> (last visited Jan. 19, 2009).

53. See Andy Barr, *Tarnished Pols Look to Burnish Images*, POLITICO, Nov. 16, 2008, available at <http://www.politico.com/news/stories/1108/15645.html>; Kate Zernike & Monica Davey, *Win or Lose, Many See Palin as Future of the Party*, N.Y. TIMES, Oct. 29, 2008, at A21.

54. See, e.g., Liam Julian, *Palin Must Connect on an Intellectual Level—But Will She? Can She?*, ORLANDO SENTINEL, Oct. 30, 2008, at A15 (noting that conservatives George Will, Peggy Noonan and David Brooks criticized Palin for her lack of experience and seriousness).

55. I am indebted to Frank Rudy Cooper for the concept of the “split personality.”

C. Michelle Obama

The public did not evaluate Michelle Obama as a political candidate because she did not run for political office herself. Nonetheless, the reaction to Michelle Obama's gender performance adds insight to changing gender roles and the importance of gender, age, and racial identity to the public. Like Hillary Clinton, Michelle Obama is an accomplished professional, career woman. A graduate of Princeton University and Harvard Law School, she worked at a prestigious law firm in Chicago, eventually moving to a job as an executive at a hospital. There was, however, less attention paid to Michelle Obama's career success during the campaign than to that of Hillary Clinton when Bill Clinton ran for the White House. This lack of media focus on Michelle Obama's accomplishments may indicate that America is more comfortable with women with careers today than it was sixteen years ago when Hillary and Bill Clinton surfaced on the national political scene. Moreover, Michelle Obama appears to be more relaxed and comfortable in her own gender skin than Hillary Clinton was. Hillary Clinton, who is a generation older than Michelle Obama, may have felt an anxiety and a need to prove herself as a professional, a need that is much less common with younger women today.

Notwithstanding her relatively relaxed demeanor at the time of the election, Michelle Obama's introduction to national politics was not smooth. At first, she was considered too outspoken and too critical of her husband, and perhaps not as domesticated as many of the public would like. She openly expressed ambivalence about his running for the presidency, discussed the tensions in their marriage because of his schedule, and admitted he had morning breath, snored, and left his dirty socks on the floor.⁵⁶ She received negative press attention when, referring to her husband's success in the primaries, she stated "for the first time in my adult life I am really proud of my country."⁵⁷ Reaction to this comment quickly turned to racial politics. She was characterized as an "angry" and "militant" woman, and one commentator mentioned that he did not want to do a "lynching" of Michelle Obama until the facts were clear.⁵⁸ Another article characterized her campaign opponents as depicting Michelle Obama "as an unpatriotic angry black woman nursing racial grievances despite her successful life story."⁵⁹ As Professor Verna Wil-

56. See Patricia J. Williams, *The Power of One*, 8 BLACK RENAISSANCE/RENAISSANCE NOIRE 42, 45 (Winter/Spring 2008); Margery Eagan, *Marriages Give Clues to Candidates' True Colors—Or Do They?*, BOSTON HERALD, Jan. 1, 2008, at 4; Andrew Herrmann, *Fame Puts Squeeze on Family Life: Many Hurdles as Obamas Seek Balance*, CHICAGO SUN TIMES, Oct. 19, 2006, at 6.

57. *The Belle of Capitol Hill*, IRISH TIMES, Nov. 8, 2008, at 5.

58. See Don Frederick & Andrew Malcolm, *Top of the Ticket Campaign '08: Race for the White House; How Deep Did Romney End Up Digging into his Pocket?*, L.A. TIMES, Feb. 24, 2008, at A16; see also Michael Graham, *Michelle, No Belle!*, BOSTON HERALD, Feb. 21, 2008, at 19.

59. Maria Puente, *What Kind of First Lady Will She Be?*, USA TODAY, Dec. 18, 2008, at 1A.

liams describes the criticism, “Mrs. Obama was an authentically and stereotypically Black woman: angry, sassy, unpatriotic, and uppity.”⁶⁰

Although a descendent of slaves and the daughter of working class parents from the South side of Chicago, Michelle Obama, according to her political enemies, had no right to criticize her country. In essence, many appeared to criticize her for her lack of gratitude to the country.⁶¹ If she had not backed off and adopted a more pleasing, submissive stance, Michelle Obama may have ruined her husband’s chances for the presidency, tainting him, as “too black.”⁶² Ironically, however, it may be that Michelle Obama’s open and strong statements, especially those about her husband, actually helped her husband by feminizing him and reducing the chance that he would appear too aggressive or dangerous to the public.

By the time of the Democratic Convention at the end of August 2008, Michelle Obama had tamed her image. No longer was she the outspoken, critical wife. Now, she performed her identity as the supportive spouse who drew a touching picture of her husband’s driving them home from the hospital with their new baby. The main focus on Michelle Obama ever since has been on her traditional roles as wife and mother and on her unique fashion style. Scores of articles have been written about her fashion sense, her down-to-earth yet stylish clothing, and the attention she has paid to selecting a school and creating a home in the White House for her children.⁶³

Even though the country may be more comfortable with Michelle Obama as a traditional first lady and mother and wife of a traditional family, the fact is that she is a very accomplished career woman. Although she does not emphasize her accomplishments, neither she nor the press has hidden her career successes. Given her high powered background, many have wondered what role she will play as first lady.⁶⁴ While it is unclear exactly what Michelle Obama’s role will be, it seems highly unlikely that Michelle Obama will limit her sphere to that of the traditional mother and wife. Michelle Obama, however, appears to have learned the lesson that Hillary Clinton learned the hard way: to tread carefully into the gendered political arena. In fact, Michelle Obama, like

60. Verna L. Williams, *The First (Black) Lady*, 86 DENV. U. L. REV. 833, 834 (2009) (footnotes omitted).

61. See, e.g., Stuart Taylor, Jr., *Obama’s Wife and Spiritual Advisor*, NAT’L JOURNAL, Apr. 5, 2008 (criticizing Michelle Obama for her comments and her lack of gratitude).

62. Social science research demonstrates that politically active first ladies receive more negative press coverage. See Gregory S. Parks & Quinetta M. Roberson, *Michelle Obama: Intersectionality, Implicit Bias, and Third-Party Associative Discrimination in the 2008 Election*, <http://ssrn.com/abstract=1248302> (posted on SSRN on Aug. 22, 2008).

63. See, e.g., Marie Puente, *Excitement Builds Over Obama’s Fashion Sense*, USA TODAY, Dec. 18, 2008, at 2A; Angela Burt-Murray, *Let Michelle Obama’s Real Self Shine*, CNN.COM, Dec. 11, 2008, <http://www.cnn.com/2008/POLITICS/12/11/burt-murray.michelle.obama/>.

64. See, e.g., Burt-Murray, *supra* note 63.

Hillary Clinton and Sarah Palin, may have achieved her popularity by enacting a “split personality” once she and her backers realized the backlash created by her outspoken independence earlier in the campaign. Her comments over the past few months seem more traditionally female and they emphasize her role as wife and mother. She may, however, in the future show her more independent masculine side as she takes on policy issues of military families.

CONCLUSION

The stories of Hillary Clinton, Sarah Palin and Michelle Obama raise many questions about whether the country is ready to accept women as equal players in the highest political offices. Clinton lost her bid to a strong candidate, but she received more votes than any other woman in the history of the nation. And, her ability to connect with blue collar workers in the industrial states of the Northeast and Midwest demonstrates that the voters were able to overcome their unconscious or conscious biases that rate women as less qualified than men to lead. Contrary to the research results, many appeared to find Clinton both competent and likeable as her candidacy progressed, and she connected with voters on economic issues.

Palin’s candidacy eventually imploded because of her lack of experience and readiness to be president, but the initial excitement about her candidacy suggests that the electorate may accept a woman who performs her identity by proudly displaying her family and acknowledging her roles as wife and mother. If Palin’s failed candidacy demonstrates that the country will not accept women as tokens, but will apply the same standards of knowledge, competence and experience to women as to men, that is a good message.

Although she did not run for high office, Michelle Obama’s experience during the campaign and after indicates that the country still wishes to see a traditional family in the White House. Her ultimate popularity, however, may result not only from her performance as a traditional wife and mother, but also from the comfortable manner in which she appears to embrace both her family and her professional lives.

If the country is ready for a woman President, the important question is whether the country will accept women without requiring performances that volley back and forth between feminine warmth and masculine toughness. Hillary Clinton’s, Sarah Palin’s and Michelle Obama’s experiences indicate that, even today, women have to perform their identities in particular ways. They still suffer from the double bind, and must negotiate the fine line of acceptable identity behaviors. One thing we do know: “second wave” feminism is dead, rejected not only by men but also by women in the electorate. To the extent that “second wave” feminism imposed rigid restrictions on women to behave like men, perhaps this is not a bad thing. But to the extent that a masculine style is com-

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fortable or natural for a particular woman, the new order may represent a rigid restriction as well. Moreover, with the demise of feminism, what is left? Will the electorate give women the opportunity to be themselves? This is unlikely, even if we could agree upon what “being oneself” would mean.