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Dr. Claudia Lozano

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The Free Market and Gender Relations: Political and Economic Power, Impunity, and the Murders of Women

Dr. Claudia Lozano¹

Contemporary democratic and market-based societies are characterized as much by freedom of choice and movement as they are by the growing state of insecurity in which people live. Throughout Latin America, women's participation in economic activities outside the home—as manual workers, students, consumers, entrepreneurs, and professionals—is growing, and they migrate in order to improve their living conditions.² However, women's participation outside the home as producers and consumers of goods and services has not led to a reduction in the types of violence directed specifically against them.³ Debate about rape and sex crimes occurring in Ciudad Juarez, Mexico or Argentina is tainted with prejudices that tend to legitimize the segregation of those women who are most at risk.⁴

Crimes against women in Ciudad Juarez, Mexico and Argentina are not just motivated by the desire to break the will and the bodily integrity of the feminized other, but by certainty that the perpetrator will be met with impunity. A culture of fear, combined with the growing concentration of power in international corporations and clientelistic political networks,⁵ empowers men who want to belong to those networks to transgress the law and social conventions that regulate the exchanges between persons. In sum, the crime and its outcomes—fear and impunity—work toward destabilizing civil rights in general and illegitimizing women's rights in particular.

In this article I focus on the rape and murder of women in Argentina at the hands of fraternities or gangs of men linked to groups with economic and political power. Liberal democracies suffer profound limitations in dealing with problems that arise from the unchecked movement of capital, deregulation, and emerging, multi-country illegal trade networks of drugs, prostitution, and pornography.⁶ What underlies these problems are extreme forms of exploitation and deep-seated sociocultural ideals corresponding to postmodern forms of patriarchy: the sexual contract between men and women based on ideals and values such as men's independence, freedom, and transgression and the subordination of women. In addition, the restoration of such ideals and values in fraternities or gangs of men has occurred within a context of increasing deregulation and growing economical inequalities.⁷ Within the realm of the political and business elite, the rebirth of values like independence, freedom, and transgression counteracts any sense of communality, equality, and responsibility. Carol Pateman posits that in modern societies the social contract regulates the exchanges between men as equals and as citizens, whereas the sexual contract regulates men's access to women and the subordination of women to men as men.⁸ This is why the debate on freedom hinges on the limits and rights of those who move within national and regional borders without any form of legal protection—the lack of protection contributes to the development of new crimes that particularly affect women.

Gang rapes of women are not novel and exist in many societies; however, this type of violence takes on distinctive features and consequences within the contemporary processes of capital accumulation on a global scale, reduction of government or state regulations, and growth of cultural homogenization. News and information currently travel beyond regional and national borders, and murders of young women at the hands of gang members with links to networks of social and political power frequently make the police or crime section of the daily papers. For over a decade, newspapers have been informing us on a regular basis that in Argentinean

provinces, in the same way as in Ciudad Juarez in Mexico, young students or manual workers are being brutally raped and murdered. What is unusual about these crimes is that after the brutal rape and murder, the bodies or parts of the bodies of these women are placed in positions that inform the public that the victim underwent a slow and painful death; she was the object of a macabre sacrifice or ritual in which we all participate through reading the papers and watching the report of the discovery of the body on television.⁹ The following description of women killed in Ciudad Juarez describes similar patterns to those found in Argentina:

Since 1993, more than 300 young women and girls, some as young as five years old, have been violently killed in Ciudad Juarez across the border from my hometown of El Paso, Texas. Their bodies were found strangled, mutilated, dismembered, raped, stabbed, and torched; some were so badly beaten, disfigured, or decomposed that the remains could not be identified. . . . The bodies of the victims, in some cases just bones and teeth and hair, were found in shallow graves in deserted areas on the outskirts of the city, in trash dumps, on the riverbank, near the train tracks, in downtown plazas, near the airport, in soccer fields, and off the highway. Bodies found recently have borne the same signature: tied hands, evidence of rape, genital mutilations. In February 2003, the body of a five-year-old girl was found with multiple stab wounds and her eyes removed.¹⁰

This type of crime displays the following salient features: the victims are women; the crime is excessively brutal; the perpetrators generally go unpunished; and the authorities provide clear evidence of their professional incompetence and inability to solve the case.¹¹ As demonstrated in the case of Catamarca, Argentina, the authorities can be directly or indirectly involved in covering up the crime and protecting its perpetrators.¹² Finally, the authorities, businessmen, politicians, journalists, intellectuals, and the general public suspect how these attacks took place and by whom, but also

understand that those individuals who report these attacks or give evidence relating to them will be made to pay.¹³

Central to the understanding of these types of crimes are specific conceptions of sociality that link masculinity, freedom, and power to manipulative and violent violations of the bodies of others, especially women and other members of the subaltern classes.¹⁴ An analysis of representations of these crimes—speeches, accounts, and images—reveals cover-up operations, which not only build the identity of the female victims as a category of persons subordinated to and controlled by men, but also identify the perpetrators as men and members of the ruling elite who are above the law. These operations contribute to producing a sense of impunity and fear that link ideals of power and authority with the actual capacity of the members of the elite to ignore or manipulate the law. In this way, the crimes represent control of the process of discriminating against, and creating inequality between, people and limiting the ability of victims to make use of legal resources in exercising their rights.

Comparing the United Kingdom, Brazil, and Argentina, I will analyze the murders of women from the point of view of the actual capacity of the violence to transform, generate, and consolidate a given social order. I will look at the sexual crime and its contributions to establishing differences and similarities between persons as gendered and class subjects: individual women and men as representations of poor women's lack of control and rich men's transgressions and power. As soon as we begin thinking in these terms, it will become apparent that weakness, poverty, misogyny, and male transgression and power are not stable motivations for crimes but dynamic social processes that link shared ideals of manhood with the desire for having power over individual lives and therefore require an explanation.¹⁵

As social anthropologist Rita Segato suggests in her analysis on Ciudad Juarez, what distinguishes these crimes is not merely the fact that the victim is transformed into waste and her free will is annihilated, but also that the crime sets an example to others.¹⁶ The open display of the raped body

signifies and reveals to the public something which is generally kept silent and hidden: the conflict between individual freedom and autonomy for all legal persons and the ideal of masculine autonomy and transgression against law and order.¹⁷ Ideals of freedom, independence, and transgression link masculine conquest and sexual desires, games, and excesses to cover-up operations arranged by the authorities regarding gang violence and crimes.¹⁸ These transgressions and the cover-ups simultaneously redefine the social arena as one ruled by abuse, impunity, and silence; a world in which judicial institutions and the rule of law they impose play no part in framing social action.¹⁹

The intrinsic and permanent relationship between a national security policy based on drastic violations of another's body, ideals of national autonomy and transgression of territorial property limits by security agents, and a policy of totalitarian control has its effects the world over.²⁰ However, past experience has shown that the way in which the relationship between gender, limits, integrity, and social authority is understood has always depended on context. For this reason, a cross-cultural perspective will help us understand how societies come up with different ways of "gendering" violence. An analysis of how rape and the killing of women are viewed in the United Kingdom, Brazil, and Argentina exemplifies the way different societies deal with the relationship between sexuality, gender, and violence and, therefore, can come to opposite conclusions on the motives and outcomes of violence.

In the next section, I will focus on modern forms of subjectivity and on the ways in which violence relates to the creation of the modern state, civil society, and individual rights in Europe and Latin America. Thereafter, I will concentrate on the different ways in which rape and the killing of women—sex crimes in England, "bloody rapes" in Brazil, and corporate crimes in Argentina—relate to representations of the gendered self in relation to the key values that organize modern forms of life: individual freedom, autonomy, and the rule of law. Intercultural comparisons provide

alternative ways of dealing with the modern repertoire and new ways of understanding the relationship between values like freedom, societal organization of politics and economics, and violence.

I. THEORETICAL DISCUSSION: VIOLENCE, IDENTITY, AND CITIZENSHIP

A common assumption in sociology is that the structure of nation states in Western societies was linked to the monopolization and centralization of acts of physical violence under bodies responsible for state security.²¹ This process is closely related to the rationalization of life through the internalization of coercion and social control of passions through reason.²² For Elias, control (*Zwang*) and self-control (*Selbstzwang*) of emotions through reason contributed effectively to the establishment and uniformity of social life.²³ Changes to the psyche lead to the constitution of self-controlled and autonomous individuals.²⁴ This new form of civilized subjectivity and sociality, the result of self-coercion and effective rationalization of life, displaced violence from the realm of daily life to that of specialized bodies—police, army, and navy—thus generating a civil society free from fear and impromptu outbreaks of violence.²⁵

However, the process of internalizing control of the body through normalization techniques is no stranger to conflict and social struggle. Modern economic, political, and legal changes cannot alone explain these shifts. Rather, the “manufacture” of the body of the self-controlled subject was a process intrinsic to those same social processes.²⁶ The gendering of sexual differences is context based and can therefore only be understood within a framework of gender struggle and the allotment of power in determining what is tolerable and accepted.²⁷

This notion of physical bodily differences as part of a gender and power struggle is particularly important in the analysis of sexual violence and sex crimes. In the twentieth century, social sciences utilized methods to analyze societies that were based on notions of balance and abstractions,²⁸ pushing

violence and passion aside—outside of society—and treating them as destructive aspects and/or manifestations of a breakdown in social order.²⁹ No longer at the center of sociological thoughts on violence were the repression of the passions into the unconscious³⁰ and hostility as a driving force for change in relationships between groups and individuals.³¹ The reason for this shift is not that the modern State is a less problematic arena, given that the State is shaped in conformation with the political arena as areas where the struggle for power between different agents takes place.³² Likewise, the body and the emotions are no less areas of conflict. But bodily habits and emotions—shame, humiliation, love, respect, fear, anger, rage, and impotence³³—were treated as natural properties of a person or social category of man or woman, instead of being seen as the result of socially constructed bonds.³⁴

That is why in this article I treat violence as an intrinsic aspect of social processes. A violent interaction harbors within itself ambiguous moral values and can be considered a legitimate tool either for change or the perpetuation of social order. The way in which violence and its effects are analyzed always depends on the way in which power is defined by the theoretical approach used to analyze society.³⁵

In the nations of Latin America, where citizen participation is currently low and democracies are divided, political citizenship exists without State control of violence, under admissions by the legal system of police abuse, and in societies that isolate democracy from the independence of State powers and respect for civil rights and liberties. Teresa Caldeira, a social anthropologist, asserts that history shows us that the European model for controlling violence and promoting citizen participation based on civil rights is but one version of modernity and not in fact the most common.³⁶ The era of rights and individualization in Europe concealed societies that allowed grotesque habits.³⁷ As the quest for land and expansion engulfed Europe, colonial administrators left the modern repertoire of social contract among equals, body integrity, freedom, and citizen rights in Europe.³⁸

Caldeira argues that the genocide of the native population, the “manufacture of the body” in the colonies, and the creation of a “culture of fear” in Latin America coincided with peace in Europe and the introduction of sophisticated means of controlling violence and expanding citizenship.³⁹

This is particularly important when linking violence, sexuality, and a policy of rights because the value society places on sexual differences and rights is also ambiguous and related to particular conceptions of the self and its links to freedom, equality, authority, and order. For example, in Brazil, violence is considered a vehicle for change and the body a target for atonement and punishment—an example for society.⁴⁰ There are deep convictions that pain produces discipline, order, and knowledge.⁴¹ Torture and the disciplining of children, women, and other “weak” categories share a commonality:⁴² in both cases, pain is an instrument of authority intended to induce submission and compliance.⁴³ Inflicting pain upon a person’s body reflects the desire for absolute authority—an authority that obliterates differences and that lacks a language to elaborate them.⁴⁴ As a result, those in positions of authority show their power by attempting to purify their victims, correcting their character defects, improving their behavior, and inducing their compliance through inflicting pain on the body of those dominated: children, women, black people, the poor, and criminals.⁴⁵ This view of punishment and atonement legitimizes the drastic action on the body and the absence of respect for freedom and civil rights, to which I will return later.⁴⁶

There are two important theoretical points on violence. First, the use of violence does not indicate a breakdown in social order, but rather the struggle to sustain a model of order and authority. Second, representations of violence are related to culture and, throughout history, have been specific to the body, gender, and class.

Comparing sex crimes in England and murders of women—femicide—in Latin America yields two things: first, the sex crime becomes unnatural and makes the murder of Latin American women less exotic; and second, it

shows how these crimes have politico-systematic effects. The comparison effectively links the “micro” context of daily life to the “macro” context of the objectification of women by the State through a culture of fear, obedience, and silence.

In the next section, I will look at the interaction between representations of perpetrators and the meaning of their drastic action on the body of others in different social and cultural contexts. Plainly, I will look at the motives behind these acts and the resulting social and political outcomes. In this explanatory context, the murders are a sign of social relations that transcend them.⁴⁷

II. CROSS-CULTURAL COMPARISONS

A. Sex Crimes and the Desire to Kill in England

Sex crimes are a form of violence against women characterized by unequal physical strength between perpetrator and victim, the power of one individual to kill the other, and cruelty and criminal punishment. Given the heinous nature of the crimes, one hopes such crimes would meet minimal ambivalence by the common observer. This low level of ambivalence is not present with crimes categorized as “crimes of passion,” which tend to face maximum ambivalence by society.⁴⁸ In these cases, the “love” connection between perpetrator and victim, whether it is a spouse or a lover, obscures the criminal act to such an extent that the fact that one has killed the other tends to go unpunished.⁴⁹ This is due, in part, because the murder is not considered a common offense but rather a one-off crime prompted by feelings of love—that has boiled over or been ignored or frustrated—and not committed for the pleasure of killing, as is the case with sex crimes.⁵⁰

“Sex crime” is a term that emerges in legal documents, newspapers, and police literature in the United Kingdom, United States, and other Western countries. In these countries, sex crimes are talked about as being natural—something that goes without saying.⁵¹ The perpetrators, mainly men, kill

and mutilate the bodies of women, driven by a desire to obtain a particular type of sexual pleasure.⁵² There is a list of these murderers that fascinates readers and spectators the world over, the most famous name being Jack the Ripper.⁵³ This type of murderer does not kill merely one woman, but many. Likewise, this murderer meticulously plans the suffering of his victim, like a series of ritual acts performed on the body of the victim.⁵⁴ For academics Deborah Cameron and Elizabeth Frazer,⁵⁵ the categorization of a crime as a sex crime makes it clear that it is an exclusively masculine act and decidedly modern.⁵⁶ This is because there are no accounts of a “sexual” motive for female killers (i.e., women who kill to obtain sexual gratification).⁵⁷ Women do kill; however, in sex crimes, the murder and mutilation represent objects of desire themselves—things that produce sexual gratification to the perpetrator. It is the seeking of this gratification that is categorically masculine.⁵⁸ This is why a “sexual killer” can kill not just women, but also other men or children, because the very act of killing is a pleasurable act and, therefore, exclusively masculine.⁵⁹

Cameron and Frazer also view these crimes as modern because the emergence of sex crimes required the development of a series of social attitudes and discourses—by journalists and in literature, philosophy, medicine, sexology, psychiatry, and criminology.⁶⁰ Accordingly, the perpetrator is either engaging in deviant behavior that necessarily ends in a horrible crime or in a struggle for the attainment of modern ideals of individual freedom and independence.⁶¹ This struggle leads the perpetrator to break the law in a heroic-like rebellion against the social order, which is perceived as a restraint on individuality.⁶² Most narratives condemn the perpetrator as a deviant; similarly, psychology or existentialist philosophy never view the perpetrator as a normal person committing a deliberate act, and he is therefore in no way heroic.⁶³ Cameron and Frazer posit that the gender of the person is not a means of differentiation that clarifies the cause and effect of the perpetrator’s actions.⁶⁴ For this reason, criminal action is a product of individual malaise rather than the personification of ideals

regarding the relationship between the individual and society in modern patriarchal societies.⁶⁵

For Cameron and Frazer, the idea that a murder can be sexually motivated and give pleasure could only emerge under the influence of the Enlightenment and the new understanding of the relationship between subject and object that arose from knowledge of scientific disciplines such as psychiatry, sexology, and criminology.⁶⁶ The figure of the perpetrator is attributed to the impact of Enlightenment philosophy and to its preoccupation with Man as the creator, active agent of history, and object of knowledge.⁶⁷ Concerns with asserting modern values—individual freedom and independence instead of being subjected to divine rule and the conventions of community life—are reflected in texts on sex crimes.⁶⁸ In these texts, the desire to kill constitutes both an answer to the problem of freedom and individualism and a redefinition of the nature of sexuality and eroticism in a modern age.⁶⁹ In this context, the moral subject (or in our cases, the perpetrator) obtains free will by exercising his freedom and transcending social conventions.⁷⁰ This transcendence necessarily implies a defiance of rules and authority.⁷¹ The Enlightenment defined the subject as radically free of all restraint, capable of imposing on others, and dominating.⁷² The domination of the other then is an erotic act, intrinsically transgressive and beautiful, and, soon, the beauty begins to be associated with eroticism and transgression.⁷³ The desire of a man becomes a complex relationship of feelings—freedom, free will, and the predisposition to break with legal conventions—and the erotic bent of the transcendence of the ties of bodily individuation.⁷⁴ This is particularly apparent in the accounts of the perpetrators themselves who repeat the generic social conventions acquired in daily life; for example, “regardless of whether society thinks that [the crime committed] was right or wrong,” the perpetrator felt he had to do it.⁷⁵ Another perpetrator admitted having been influenced by the literary figures of Raskolnikov and Dostoevsky in his life and career as a sex attacker and murderer.⁷⁶ As Cameron and Frazer highlight, these are not

exactly exteriorizations of a personality out of context but examples of people engaged with the ideals, images and values of an age—the modern age.⁷⁷

In sum, the idea that killing a woman might be an act that brings sexual pleasure is something that requires the development of a particular cultural context, modernity, and new forms of men's individuation as a free and autonomous person. In this historical context, sexual pleasure began to be related to the transcendence of the bodily limits of the feminized other and the transgression of the norms that regulated human interactions in society. This is a way of defining the self close to modern forms of subjectivity, domination, and individualism.

B. "Bloody Rape" and the Duty to Rape in Brazil

In contrast to their British counterparts, Brazilian perpetrators act under a moral duty that transcends them.⁷⁸ Social anthropologist Rita Segato defines "bloody rape" as those rapes that occur in the anonymity of the streets, by unknown persons, and in which persuasion plays a little part; the act is committed by using force or by menacing to use force.⁷⁹ This kind of rape is the kind of violence against women that is clearly defined as a crime or offense.⁸⁰

Segato has analyzed Brazilian rapists' narratives, which describe the rapist as being part of a subjectless punitive structure within which he is a moralist, automatically performing a duty to force the woman to submit to the protection and rule of a man and erase all signs of her independence and self-determination.⁸¹ The rapists do not describe themselves as motivated subjects who set the scene for their own gratification and then achieve gratification by imposing their own desires on the bodies of others, regardless of the limits set by the law and by the opinions of others.⁸² Segato states that the rape follows a structure—traditional and naturalized—in which power manifests itself through the subordination of women.⁸³ Independence and self-determination therefore give women a status that

does not fit in with the overall picture that mandates either the control or protection of women.⁸⁴ Metaphorically speaking, all things feminine are a product of subordination and must be placed in a position that gives strength, power, and virility to the other—man.⁸⁵

Another interesting aspect of Segato's analysis is that the rapist does not have the same audience as the sex crime perpetrator; the Brazilian rapist's spectators are other men, a community of peers, either real or imagined.⁸⁶ The rape exemplifies the rapist's effective use of strength, his masculinity.⁸⁷ Again, the rapist is not isolated from his social environment but is an individual who is part of a community of peers that follow a social code based on masculinity—usurping the strength of others—and showing that masculinity to obtain status as a protector.⁸⁸ Finally, Segato asserts that, in the rape narrative, the rapist does not operate independently but is linked to society and a hierarchy defined by the theft and pillage of the power of women and the relative competence of peers; the latter determines his position within the hierarchy regardless of whether he likes it.⁸⁹

Rita Segato explains "bloody rape" as an emerging characteristic of a transition period between a society governed by gender status and a modern society governed by contractual relationships in which women acquire equal rights as citizens, independent and free.⁹⁰ In societies governed by community conventions, masculinity was a status that had to be earned, and women, or those who occupy the feminine position, were the awarders of the status.⁹¹ Rape is the act of usurping the sexual being of the other, giving the usurper a superior status in the sexual and community hierarchy and/or membership of the gang.⁹² The consequences of societal transitions are particularly problematic—contested and conflicting⁹³—and create conflicts for women given that "the unruly interstices opened up by the sudden imposition of a little reflected modernity and the subsequent disorganization of the traditional status system . . . let reemerge the natural right of appropriation of the female body when perceived as unprotected, that is, a state of nature seems to resurface."⁹⁴

Looking at the complexity of social interactions and the way in which violent acts such as rape function at a local level, it is difficult to isolate violence and treat it as though it was solely the product of the relations and sexual identity of a person: men are aggressive against women all over the world. A comparison between sex crimes in British society and “bloody rape” in Brazil shows that different conceptualizations of the person and their relationship to society define the meaning of violence. In both societies, conceptualizations of the person and the individual body as self-contained and separated from others coexist with conceptualizations of the body as a surface that can be exposed to drastic actions from the outside. In each case, the violence operates differently, shaping and defining differences and identities. What both the British and Brazilian cases have in common is that these are interactions where violence gives rise to a type of lethal bond with society that is characterized by anonymity but is resolved differently in each situation. In Britain, violence is exerted on the body of the person in the female role in order to assert a masculine identity that is independent, free, and in conflict with social convention; whereas in Brazil, the violence destroys the independence and the freedom of the victim. It is possible to conclude that though violence in both cases transforms the person in the female position—mostly women—into objects to use and throw away, in Britain, the process leads to sexual gratification, and in Brazil, it produces feelings of equality with peers and asserts masculinity as protector and punisher.

These comparisons do not necessarily imply that every perpetrator who rapes or kills another person develops feelings of freedom and autonomy or acts automatically in accordance with established social mandates. The motivation of an individual to rape another person depends on the particular circumstances that facilitate the occurrence of the rape, the biography of the perpetrator, the perpetrator’s understanding of sexuality, and the way the perpetrator connects his own sexuality with his social positions as man and as member of different social groups or categories. However, if he decides

to rape or kill a woman, he and the society in which he commits the rape explain his acts by a given set of socially constructed motivations. The crime as social phenomenon has to do not only with a given material infrastructure but also with an established set of social ideals, including representations and images, of what a person is or becomes when he or she commits or suffers sexual abuses. Consequently, rapes, along with sex crimes, are gendered in their representation.

In the next section, I shall look at contemporary corporate crimes against women and how these can only occur within the context of a society in which rules; judicial, executive, and legislative powers; and the political system—in other words, the key institutions of the liberal democratic system and modern State—do not function as intermediaries of social and political conflicts.

C. Argentina: The Murder of María Soledad Morales

Crimes against women, such as those that occur in Ciudad Juarez, Mexico and Catamarca, Argentina, are acts of violence that go beyond legal categorizations such as rape or homicide.⁹⁵ For example, in the case of María Soledad Morales in Catamarca, Argentina, the categorization of the crime as rape, followed by death aggravated by use of narcotics,⁹⁶ involves the designation of a series of rules of legally and morally sanctioned behavior that differentiates this crime from other homicides. In Argentinean criminal law, constructing the victim of a rape followed by death aggravated by use of narcotics involves attributing particular qualities to the people involved.⁹⁷ Initially, the homicide is treated as a generic crime where life is being protected.⁹⁸ However, once the rape and use of drugs is established, the sexual connotation of the homicide transforms the generic crime—a crime committed against life—into a specific crime committed against the victim's honesty (honesty meaning their sexual inexperience).⁹⁹ Thus, the crime is specifically based on the intimidation of the victim, the

use of physical force to damage the victim's will, and on the victim's sexual inexperience.¹⁰⁰

The crimes in Mexico and Argentina have some features in common with the "bloody rapes" in Brazil and the sex crimes in Britain. However, because the crimes are so spectacular, the murderers are met with impunity (and the collaboration of the authorities with the perpetrators), and the bodies are publicly displayed; as a result, these crimes are distinguishable from those in Brazil and Britain. Rita Segato includes this form of crime in the category of corporate crime, meaning that the men who rape and kill are members or intend to become members of male fraternities that effectively control the life and death of the population in a given territory.¹⁰¹ However, not all corporate crimes, and the power stemming therefrom, are the same. For example, in Mexico, corporate power derives from international companies that fight for the control of the frontier; but in Catamarca, Argentina, corporate economic power is based on access to public resources and controlled by ruling families and clientelistic political networks.¹⁰²

What is critical to understanding these crimes in Mexico and Argentina is that they produce impunity through the exercise of power and control. The perpetrators of corporate crimes are members of mafia gangs associated with political and business networks that link the participation in social activities, entertainment, and sexual pleasures to access to economic, social, and political resources in a given territory.¹⁰³ Corporate crimes demand more than the desire to transgress bodily limits and social norms; they demand even more than the shared will of the members of a gang to control the movements, sexual exchanges, and lives of the population of a given neighborhood. Corporate crimes require the will and actual control of economic and political institutions to organize cover-up operations and influence the media, judiciary, and political systems.¹⁰⁴

In the case of Argentina, the motive behind these corporate crimes lies in the desire and conviction of the perpetrators to belong to clientelistic political networks where employment, credit, and services are available

under the protection of ruling families. In these regions of the country, the reproduction and the upward social mobility of the working and middle class households depend on fluid relations to clientelistic political networks.¹⁰⁵ Within these networks, power is asserted through key values linking sexual attraction to resistance, transgression, and abuse of working-class women with indigenous backgrounds and to loving submission, marriage, and public power of the white professional elite women.¹⁰⁶

The murder of María Soledad Morales exemplifies what happens when working-class women enter the arena of sexual competition and exchanges without protection, instead of following the formal course of marriage within the extended family network.¹⁰⁷ In this arena, the sexual excesses and violence of the perpetrators transform the bodies of young working-class women into objects of conquest, use, and abuse; membership in the gang becomes a sign of control, not only of women's bodies and sexuality, but also of other men that do not belong to the network and have no control over judicial and political institutions. The systematic transgression of limits and norms is transformed by the members of the gang as a means of empowerment and an occasion for proving the internal cohesion and loyalty of the members in front of those who are considered outsiders.

In 1990, María Soledad Morales, a sixteen-year-old girl, was raped, murdered, and mutilated by a group of young men with the support of the Catamarca provincial police.¹⁰⁸ María Soledad was last seen alive in a club in Catamarca with her boyfriend and his friends, sons and nephews of high-ranking government officials.¹⁰⁹ Three days later, passers-by discovered María Soledad's raped and mutilated body on the side of a dusty road.¹¹⁰ Sexual violence, including that which leads to the death of the victim, is not unusual practice in Argentina, but this case hit the provincial and national headlines because it unleashed a wave of civil disobedience.¹¹¹ Essentially, the young girl had been handed over by her boyfriend to the perpetrators of the crime.¹¹² These were politically "loyal" men and/or were related to the ruling elite, whereas María Soledad and her boyfriend did not belong to any

socially privileged group.¹¹³ The rape and murder highlighted the existence of extreme violence and continued existence of relationships of domination.

After María Soledad's body was found, protests, referred to as the "Silent Marches,"¹¹⁴ took shape under the leadership of a nun; María Soledad's fellow pupils (from her Catholic school), who felt the injustice of the crime; and her relatives.¹¹⁵ The Silent Marches made it clear that the threats from those in power, lack of respect for civil rights, and impunity for perpetrators of crimes had not ceased with the end of dictatorship in 1983.¹¹⁶ The massive scale of the marches, along with the ongoing investigation by journalists, eventually forced the national government to intervene in provincial matters, and the governor, Ramón Saadi, was forced to resign.¹¹⁷ Mr. Saadi resigned because he had contributed to the cover-up operation by threatening and bribing judges, witnesses, and civil servants, including police, expert witnesses, and other public officials. During the preliminary investigation and trial, a series of practices—threats, torture, intimidation, and improper influence on judicial discretion—came to light which systematically infringed on the rights of those involved.¹¹⁸

Remarkably, the situation was not unusual because of the recourse to civil disobedience and the organizing of the Silent Marches, but rather that some of the demonstrators requested political intervention for the interrogation process. Argentina's political culture is such that relations between citizens and the State are viewed in terms of civil resistance to the abuse and breakdown of law and order perpetrated by the authorities.¹¹⁹ In the Morales case, however, some of the demonstrators—amongst them the victim's father—asked the then-President of Argentina and the Minister of the Interior to send a police force specialized in interrogations to the province of Catamarca.¹²⁰ The Commissioner that was sent had a reputation in the province of Buenos Aires for being extremely tough on criminals.¹²¹ However, human rights organizations and the press had broad reservations about this unit because they used torture to obtain information during their interrogations.¹²² As it turned out, during the court case that followed in

1998, the Commissioner and his assistants participated in the cover-up operation by developing false hypotheses and following false clues.¹²³

Despite the social activism resulting from María Soledad's murder, her case illustrates the impotence of a government and political actors unwilling to respond to this type of violence using enacted laws and regulations. The judges' statements on the Morales case were published extensively in reports and articles in newspapers and stressed that the events that lead to the death of María Soledad were related to the risks that the sexual transgression of men causes young working-class women in the social and political context of ruling families and clientelistic networks, places where a few powerful families control the distribution of public and private resources.¹²⁴ The resulting uniform deregulation of all economic activities and decentralization of the State apparatus, especially in regions where the civil society does not create autonomous economical and social institutions, reinforces social inequality, and restricts the exercise of the civil rights.

Because the national government does not control and enforce sanctions against the powerful families, the role of social movements and the press becomes even more important in fighting crimes against women. In Catamarca, young people of both sexes and different social classes have access to public education. They also participate in student exchange programs across provinces and use the media to shape their ideas about who they are and what they can expect from the society in which they live, including ideas about private education, conspicuous consumption, public display of the body, consumption of stimulants, and freedom of movement and sexual choice.¹²⁵ However, in a society where the public realm is dominated by family clans and their clients, young people who have no access to these networks have no legal guarantees that their rights will be respected. This is why action from social movements and the press, by generating alternative channels of social communication, is critical to guaranteeing that public opinion remains independent from local practices and questions local understandings of the relationship between gender,

freedom, responsibility, and access to judicial, political, and economic resources.¹²⁶

Analysis of the construction of the Morales case demonstrates how violence and murder become “sex crimes” only in relation to particular understandings of relationships, order, and power. In Argentina, ideas of power and the exercise of authority to mock, abuse, and control prevail and are rooted in the local history of colonization, the implementation of market relation, and the nation-state. This interpretation sheds light on the collaboration between the institutions and the perpetrators of the crime, as well as on the creation of civil movements that question the acts of public agents and demand separation of the powers of the State.¹²⁷ Given the cover-up operation, corporate crime is a form of violence against a social category—women—faced with varying levels of moral ambivalence; those who have something to gain from the activities of the clientelistic network are only minimally interested in the moral implications of these crimes. In contrast, there is great interest in the moral implications of these crimes by those who are on the receiving end of the mockery, threats, and abuse.¹²⁸

In these cases, it is fundamental to bear in mind the feminist assertion that these crimes cannot be explained by individual or group deviation, but rather that these cases show us how people symbolize relationships.¹²⁹ These different forms of symbolizing the self in relation to others organize social interactions—sexual conquest, social mobility, and access to political power—by specific historical context and in its various—discursive—forms according to context.¹³⁰ Since the beginning of the twentieth century, women have been gaining freedom and independence, and participating in politics, the expanding global economy, and media culture. It is key to my argument that, in this context, perpetrator, victim, State agents, and the public all share the same sexual imagery, though their perceptions and experiences as gendered subject might vary. According to their experiences as gendered individuals and shared ideals of what men or women can do to be treated as valuable people, they wish to transform themselves and the

way they live as gendered subjects. They wish to participate in the contemporary world and explore the new possibilities and positions opened by the economic and cultural processes of globalization. That is to say: they share the code, accept it, and act according to it.¹³¹

1. Lessons Learned From the Morales Case

The marks found on the body of María Soledad—examples of the rape, mutilation, and annihilation of her free will—show us how growing freedom and independence of women is used to uphold authoritarianism and to strengthen the idea of patriarchal and despotic power. There are three key elements to highlight in order to understand how the display of the body and female seduction consolidate certain forms of power such as mockery, abuse, and control of the other. The first element is the use made of sexuality and emotions—attraction and trust—by gang members who organize entertainment and nights out. Next is the desire to use the body and break the will of others, evident from the state in which the corpse of the victim is found: drugged excessively, beaten, raped repeatedly, and mutilated.¹³² The final element is the desire to annihilate and exercise total control of social institutions by creating a parallel reality through mutilating and publicly displaying the corpse, destroying evidence when the corpse is discovered, manipulating the investigation, and influencing the media. Judicial officials, as well as politicians, businessmen linked to the media, and professionals, were all involved in the Morales cover-up.¹³³ These are not cases where masculine sexual desire is based on fantasies of total freedom and breaking with the real social order, but rather we see the desire for transgression, obliteration of the will of others, and development of a social and political environment based on the concealment of reality and the implicit—though denied—threat of violence.

Furthermore, in these cases, there is no explicit desire to kill for pleasure, and the sole aim is not to command the other. Whereas rape is seen as part of the conquest and out of control sex games, the death of the victim is an

unintended consequence which takes the aggressors by surprise and for which they do not take responsibility. As in the case of sex crimes, such as rape, the fulfillment of sexual desire is associated with ideas of transcendence and transgression of order—both individual and collective—and manifests itself through a series of calculated acts to weaken the will of the victim. The aim of these acts is not to strengthen ideals of freedom and independence using the body of the victim but rather to annihilate them, generating virtual or parallel realities based on abuse, the power to kill, and the capacity to control the media, economic, and legal resources.

This aim becomes particularly clear in the expressions of the perpetrators and their defenders, who present the perpetrators as victims of organized political plots orchestrated by “subversives,” referring to leaders of social movements that demand the truth be found.¹³⁴ Again, these crimes are not an expression of an underlying ailment, but are an integral part of the instrument used to perpetuate an authoritarian and patriarchal political culture in the context of a consumerist modernization and the depoliticization of individual and collective choice—all the while causing the most damage to young women.

D. Differences and Similarities in Understanding the Killing of Women

Deborah Cameron and Elizabeth Frazer’s analytical model stresses the association between specific understandings of masculinity and modern philosophical and scientific discourses for explaining sexual crime rather than focusing on the socialization process within the family and State institutions. These authors explicitly criticize Freudian readings of criminal cases because grand theories, such as psychoanalysis, presuppose a fixed relationship between eroticism and violence experienced during early childhood due to close contact between the mother and the child, in the frame of which the child develops both the desire for the mother and murderous impulses toward her.¹³⁵ If we treat this relation as universal—as a human constant that finds expression in different discursive

conjunctures—the theory fails to explain why many forms of erotized violence are also gendered. In their analysis of “sexual murder,” Cameron and Frazer make a strong argument for a radical historical and discursive conception of the relationship between sexuality and violence by showing that “the lust to kill” only appears in spaces of the world where there is anonymity and social mobility.¹³⁶

In contrast, for Rita Segato, the key factor in explaining “bloody rapes” is the socialization process during the transition between societies ordered according to gender hierarchy to a modern society in which individuals—men and women as equals—regulate their interactions by following abstract principles codified by the law.¹³⁷ In Segato’s model, emphasis is placed on the crisis of identity experienced by a rootless and disoriented man in cities where, as in Brasília, people must travel long distances to get in touch with others and they have little communalities.¹³⁸ The dissolution of social boundaries and break-up of community regulations awaken feelings of fragility that are counteracted by the violent appropriation of the women’s sexual self.¹³⁹

Lastly, my analytical model stresses the fact that representations—written, oral, and audiovisual—and social experiences might be understood and interpreted in different ways by different groups of people. I argue that social transformation—growing autonomy from familiar and community ties and expansion of civil rights for all legal persons—affects both women and men, but the outcomes of such transformations on individual lives and the elaboration of gender and class boundaries and identities vary.

Masculinity and femininity are processes of becoming rather than statuses of being. The acquisition of a valuable feminine or masculine position is a conflicting life process that demands investments, an elaboration of contradictions derived from the desire to participate and be part of the global process, and real chances to accomplish these expectations. In societies where power differences are grounded in accessing economic, political, and legal resources, violence and the

violation of the civil rights of women are unspoken realities. The connection between interpersonal violence, cover-up operations, and the manipulation of judicial institutions contributes to the perpetuation of impunity and inequalities. In such a context, the achievement of a politically autonomous and economically independent female identity is something that presupposes great risk and challenge.

III. CONCLUSION: THE FEMINIST CRITICAL PERSPECTIVE

In conclusion, I would like to highlight the methodological aspect of my analysis of these cases from the feminist critical perspective.¹⁴⁰ If we share Rita Segato's view that rape is an act of expropriation and usurpation with the aim of enhancing a male hierarchical status and the resulting control over the individual and social body, gang rape has more than one interlocutor.¹⁴¹ On the one hand, there is the victim and perpetuation of the ideal of the heteronomous woman, disciplined and reduced to the role of giver of the masculine status.¹⁴² On the other, there are the killers—the gang and its members—who, in order to become real men and legitimate “sons of power”¹⁴³ become part of a virile association, accumulating the perks of association through having broken the will of the victim and taken possession of her body.¹⁴⁴ This appropriation shapes a series of relationships which can be analyzed bearing in mind the following aspects.¹⁴⁵

First, there is a spatial dimension in the provinces and the frontiers. For example in Argentina, the frontiers, especially the northwestern provinces, are treated, and shaped, as places and expressions of cultural anachronism, technological backwardness, socioeconomic inequality, and political dependence on the central metropolitan areas of the country. However, the provinces are also the places from which political networks of power and alliances are run. The clientelistic political networks of the northwestern provinces promoted economic liberalization and the implementation of a deregulated, delocalized economy and a lifestyle based on the corruption of

willpower, unlimited consumption, and waste. In this way of life, corruption, excessive consumerism, and abuse of power coexist with poverty and extreme political dependence.

Second, there is the event and the actors. The rape of the individual body and the power to kill are related to feelings of fear and dependence by women and impunity for the perpetrators. These are the basic emotional and physical devices that organize social relations in the provinces. Here, these crimes contribute to boosting the feelings of insecurity in women and subaltern population that reinforce the consensus that justice in Argentina is for the privileged few. The crimes also show the ties of clientelistic loyalty that bind the elite to the rank and file in sexual, economic, and political terms.

Third, there is the issue of cultural meanings. As mentioned earlier, crimes against women do not occur in a cultural vacuum but are part of a system of communication rooted in a history of conquest, colonization, and domination of the individual and society. Extensive family networks have made use of the machinery of colonial and State administration to obtain perks and usurp the strength of indigenous women, perceived as the “others,” “easy prey,” or rebellious “Indian women” who served as free labor.¹⁴⁶ The subject exerting the violence is valued, in this case, not through an accumulation of capital but through usurping rights and making those rights a privilege for the few. The victims and their loved ones occupy the lower rungs of the social hierarchy and from them unlimited contributions are expected.

Last, there is the accumulation of capital. This is represented by the media corporations who have an audience capable of taking in horrific deeds and enjoying them without pause. This was less obvious initially when María Soledad’s corpse was discovered and the Silent Marches were organized, which were true acts of cultural resistance. However, as the years went by, people became desensitized to the crime as though it were a melodramatic, television reality series, and the perpetrators became heroes,

psychologically broken and in need of understanding. During the months of the trial, the sex lives of those involved came under scrutiny and became the object of the voyeuristic gaze of an audience willing to consume sex, violence, lies, and power without taking responsibility for understanding their consumption.

¹ Research fellow of the Berliner Programm zur Förderung der Chancengleichheit für Frauen in Lehre und Forschung. The author would like to thank all of the participants in The South-North Exchange on Theory, Culture, and Law 2006—Free Market Fundamentalism: A Critical Review of Dogmas and Consequences conference, as well as Daniel Bonilla, Angel Oquendo, Erin Glass, and Laura Hawes.

² Forty to 42% of women twenty-years-old or older participate in the labor force in Argentina, Costa Rica, Chile, Mexico, and Uruguay; up to 50% to 55% in Bolivia and Colombia; 44% to 48% in Brazil and Venezuela; and 50% in the United States of America. A detailed analysis of the relationship between massive migration from rural to urban areas, growing access to educational services, exposition to a urban culture and its impact over growing rates of women's participation in formal and informal economic activities outside their homes is available. See Francisco León, *Mujer y trabajo en las reformas estructurales latinoamericanas durante las décadas de 1980 y 1990*, Proyecto CEPAL/ECLAC, U.N. Doc. Serie mujer y desarrollo FRG/98/S24 No. 28, 12-15 (Sanitago de Chile, Sept. 2000), available at <http://www.eclac.cl/publicaciones/xml/4/6974/lcl1378e.pdf>.

³ UNIFEM defines violence against women and girls as “[a] universal problem of epidemic proportions. Perhaps the most pervasive human rights violation that we know today.” Violence against women is a major cause of death and disability for women sixteen to forty-four years old. In no country in the world are women safe from domestic violence and half of the women who die from homicides are killed by their current or former husbands or partners. In Brazil, 13% of the deaths of women of reproductive age were homicides, of which 60% were committed by the victims' partners. Although women are more at risk of violence from their intimate partners than from other persons, sexual violence by non-partners, relatives, neighbors, work colleagues, or strangers exists. Estimations of the prevalence of sexual violence by non-partners are difficult to establish because, in many societies, sexual violence remains an issue of deep shame for women. This underreporting is the reason why statistics on rape extracted from police records, for example, are notoriously unreliable. UNIFEM, VIOLENCE AGAINST WOMEN FACTS AND FIGURES 1-2, http://www.unifem.org/attachments/gender_issues/violence_against_women/facts_figures_violence_against_women_200611.pdf (last visited Mar. 9, 2007). See also Lucía Dammert, *Violencia criminal y seguridad pública en América Latina: la situación en Argentina*, Proyecto CEPAL/ECLAC, U.N. Doc. División de Desarrollo Social L/CL 1439-P No. 43, 10-12 (Sanitago de Chile, Nov. 2000), available at <http://www.eclac.cl/publicaciones/xml/0/5720/lcl1439.pdf>;

MINISTERIO DE JUSTICIA Y DERECHOS HUMANOS, SISTEMA NACIONAL DE INFORMACIÓN CRIMINAL, INFORME ANUAL DE ESTADÍSTICAS POLICIALES 9, 14-17, 37, 104 (1999). (reporting on “delitos contra la honestidad”); AMNESTY INTERNATIONAL, MAKING VIOLENCE AGAINST WOMEN COUNT: FACTS AND FIGURES, <http://news.amnesty.org/index/ENGACT770342004> (last visited March 9, 2007).

⁴ It should be noted that similar types of crimes occur in Guatemala as well. The focus of this particular article is on Argentina and to a lesser degree, Ciudad Juárez, Mexico.

⁵ See Eric Wolf, *Kinship, Friendship, and Patron-Client Relations in Complex Societies*, in THE SOCIAL ANTHROPOLOGY OF COMPLEX SOCIETIES (Michael Banton ed., 1968) (further reading on patron-client ties).

⁶ See generally Ruth Sautu, *La Corrupción Endémica en un País Prebendario*, in CATÁLOGO DE PRÁCTICAS CORRUMPTAS: CORRUPCIÓN, CONFIANZA Y DEMOCRACIA 51, 71-80 (Ruth Sautu ed., 2004) (analysis of capital flow, deregulation, and corruption in Argentina); EDUARDO BASUALDO, SISTEMA POLÍTICO Y MODELO DE ACUMULACIÓN EN LA ARGENTINA 69 (2001) (quoted by Ruth Sautu). UNIFEM defines trafficking in women and girls as an activity that

involves the recruitment and transportation of persons, using deception, coercion and threats in order to place and keep them in a situation of forced labour, slavery or servitude. Persons are trafficked into a variety of sectors of the informal economy, including prostitution, domestic work, agriculture, the garment industry of street begging

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UNIFEM, VIOLENCE AGAINST WOMEN, *supra* note 3, at 5.

⁷ See CAROL PATEMAN, THE SEXUAL CONTRACT 2-3, 22-23 (1988) (comprehensive analysis of civil freedom and modern fraternal patriarchy).

⁸ *Id.* at 2, 3.

⁹ See e.g., RITA LAURA SEGATO, LA ESCRITURA EN EL CUERPO DE LAS MUJERES ASESINADAS EN CIUDAD JUÁREZ: TERRITORIO, SOBERANÍA Y CRÍMENES DE SEGUNDO ESTADO (2006).

¹⁰ Alicia Gaspar de Alba, *The Maquiladora Murders 1993-2003*, AZTLÁN: J. OF CHICANO STUD., Fall 2003, at 3, 4. See Susana Cisneros et al., *Un estudio estadístico sobre feminicidios en la provincia de Buenos Aires*, in FEMINICIDIOS E IMPUNIDAD 7-23 (2005) (figures and facts on women’s murder in Argentina). See also Marta Fontenla, *Feminicidios en Mar del Plata*, in FEMINICIDIOS E IMPUNIDAD 35-48 (2005) (describing cases in Argentina).

¹¹ In 1997, during the trial against the perpetrators of María Soledad Morales’s murder, the press extensively reported on how the members of the police, instead of following the usual procedures, followed orders that prevented the preservation of evidence. For example, victims’ corpses were washed before the pathologist took samples. For examples of Argentinian newspaper articles on the Morales case, see Hector Gambini et al., *En un mes hay avances sobre como murió María Soledad*, CLARÍN, Sept. 15, 1997, at 40-41; Hector Gambini et al., *Otros dos testigos dicen que recibieron intimidaciones*, CLARÍN, Sept. 16, 1997, at 44; *La Policía sabía de quién era el cadáver antes de identificarlo*, CLARÍN, Sept. 19, 1997, at 41.

¹² In Catamarca, Argentina, the authorities followed wrong leads, let the perpetrator go, or threatened the judges. See, e.g., *La fuga*, PÁGINA/12, Feb. 14, 1991, at 1; *Contra el*

reloj y por la puerta trasera, PÁGINA/12, Feb. 14, 1991, at 14; *Catamarca la caldera del diablo*, PÁGINA/12, Feb. 21, 1991, at 1; *Hasta el árbitro lo apunta*, PÁGINA/12, Feb. 21, 1991, at 22. See also Fontenla, *supra* note 10, at 35-47 (describing cases in other provinces of Argentina).

¹³ See generally NORMA MORANDINI, CATAMARCA (1991) (for further reading on the Morales case).

¹⁴ See TERESA CALDEIRA, CITY OF WALLS: CRIME, SEGREGATION AND CITIZENSHIP IN SAO PAULO 367-375 (2000) (regarding drastic intervention on the body of others).

¹⁵ In everyday life, people's behavior is used to differentiate them from others as being "weak," "poor," "misogynous," or an "offender." For example, if a black husband kills his white wife his asocial behavior might be explained in terms of his imagined lower status as "black" and even his inability to solve tensions derived from a hierarchical racial imagery. However, the same behavior can also be explained in terms of "racializing" or even "hatred of women"—misogyny. The complexity of the explanation used in order to understand why a person—black or white—decides to kill another depends on several factors, including an individual's position on the outcomes of "racializing" and "sexualizing" human behavior. In other words, it depends on the way in which we understand the relationship between bodily differences, discourse, and human action.

¹⁶ Rita Segato makes a very important insight as she points out that the corporate crimes are ritual acts directed not only to the victims, but also to others. In those performances, the perpetrators of the crime not only show their will to break the bodily integrity of the victim, but they also show that they belong to a fraternal network that has the killing power (*poder de muerte*) over the lives of the inhabitants of a given territory. Segato defines the "regime of power" that such fraternities produce and re-produce by the act of raping and killing women as a "second state." Segato, *supra* note 9. It is important to note that Segato works in the Mexican border territory, where the power of the nation-state as a regulatory system based on the law seems to be eroded. My concern in this article is more with the interface between private or fraternity violence and the compulsory, authoritative power of public institutions such as security and justice.

¹⁷ Another important connection was made by Deborah Cameron and Elizabeth Frazer as they assert that "the lust to kill" is a modern construct. Deborah Cameron & Elizabeth Frazer, *Cultural Difference and the Lust to Kill*, in *SEX AND VIOLENCE: ISSUES IN REPRESENTATION AND EXPERIENCE* 156, 160 (Penelope Harvey & Peter Gow eds., 1994). Whereas Cameron and Frazer are concerned with how this construct operates to create a sense of individual autonomy and freedom against the compulsive force of the law, my concern is how the individual autonomy of women is eroded by the articulation of private and public violence.

¹⁸ See Claudia Lozano, *La vida es un racimo de ilusiones: Sexualidad, género y violencia en Catamarca*. MORA, Dec. 2005, at 101-120; Claudia Lozano, *Gewalt gegen Frauen - Gegen Bewegungen an der Peripherie und ihre Bedeutung für die Demokratisierung Argentiniens: Der Fall María Soledad Morales in der Provinz Catamarca* (2006) (unpublished manuscript, on file with the author).

¹⁹ *Id.*

²⁰ See the insights of Penelope Harvey related to the kind of gender relations, identities, and senses of "danger" and "protection" created through the "Cold War" in Europe.

Penelope Harvey, *Die Geschlechtliche Konstitution von Gewalt*, in *SOZIOLOGIE DER GEWALT* 122, 123-24 (Kölner Zeitschrift für Soziologie und Sozialpsychologie ed. 1997). See also JUDITH BUTLER, *VIDA PRECARIA: EL PODER DEL DUELO Y LA VIOLENCIA* 93-94 (2006) (ideas on the suspension of rights and the relationship to a politic of national defense against terrorism in the United States).

²¹ NORBERT ELIAS, ÜBER DEN PROZESS DER ZIVILISATION 323, 324 (1997); CHARLES TILLY, THE POLITIC OF COLLECTIVE VIOLENCE 26-30 (2003); MAX WEBER, *WIRTSCHAFT UND GESELLSCHAFT* 821, 823 (Johannes Winckelmann, ed., 2002).

²² See MAX WEBER, *WIRTSCHAFT UND GESELLSCHAFT* 681-87 (Johannes Winckelmann, ed., 2002).

²³ ELIAS, *supra* note 21, at 323, 324, 339-40.

²⁴ *Id.* at 331, 342, 349.

²⁵ *Id.* at 332, 323, 347.

²⁶ THOMAS LAQUEUR, *MAKING SEX* 11 (1990).

²⁷ *Id.*

²⁸ GEORGE E. MARCUS & MICHAEL M. J. FISHER, *ANTHROPOLOGY AS CULTURAL CRITIQUE* 9-11 (1986).

²⁹ See generally ROBERT K. MERTON, *SOCIAL THEORY AND SOCIAL STRUCTURE* (1949) (providing an explanation of the relationship between social structure, expectations, and deviated behavior).

³⁰ See ELIAS, *supra* note 21, at 340-347, 355, 416 (quoting Freud).

³¹ GEORG SIMMEL, *2 AUFSÄTZE UND ABHANDLUNGEN 1901-1908*, 335-45 (2001).

³² The development of the State goes hand in hand with the development of a *field of power*, understood to be a space within which those who possess capital (of different sorts) fight particularly for the power of the State. PIERRE BOURDIEU, *RAZONES PRÁCTICAS* 100 (1997) (author Lozano's translation).

³³ Bourdieu uses notions such as dispositions, habits, and perceptive diagrams to indicate the socially constructed nature of social action—the relational status of human behavior. PIERRE BOURDIEU, *LA DOMINACIÓN MASCULINA* 55-57 (Joaquín Jordá trans., 2000); PIERRE BOURDIEU, *MEDITATIONEN* 223-25, 298, 299 (Achim Russer et al. trans., 2001).

³⁴ By socially constructed bonds, I mean the imposition of a particular social order on the body.

³⁵ This definition is based partly on writings about violence by Penelope Harvey, *supra* note 20, at 124.

³⁶ “[D]ifferent histories of citizenship, histories like Brazil’s, where social rights are highly developed but civil rights are not protected or where political rights have a convoluted history of being guaranteed only to be taken away again” CALDEIRA, *supra* note 14, at 371.

³⁷ *Id.* at 369.

³⁸ *Id.*

³⁹ In Brazil, social rights enjoy greater legitimacy than civil and individual rights. *Id.* at 371, 372 (quoting social anthropologist Michael Taussig).

⁴⁰ “[H]uman rights violations (especially by the state) are routine. This specific configuration does not arise in a social and cultural vacuum: the delegitimation of civil rights is deeply embedded in a history and culture in which the body is unbounded and

manipulable and pain and abuse are seen as instruments of moral development, knowledge, and order.” *Id.* at 372.

⁴¹ *Id.*

⁴² In her commentary on Scarry’s text on the relationship between torture, pain, and the production of truth, Caldeira points out that, for Scarry, pain destroys all meaning in one’s life and the role of torture is precisely to produce a “fiction of absolute power.” *Id.* at 366.

⁴³ *Id.*

⁴⁴ *Id.*

⁴⁵ *Id.*

⁴⁶ *Id.* at 366, 367, 369.

⁴⁷ “Discourses about gender and gender categories are not powerful because they provide accurate descriptions of social practices and experiences, but rather because, amongst other things, they engender women and men as persons who are defined by difference. . . .” HENRIETTA MOORE, A PASSION FOR DIFFERENCE 50, 51 (1994).

⁴⁸ See MYRIAM JIMENO, CRIMEN PASIONAL: CONTRIBUCIÓN A UNA ANTROPOLOGÍA DE LAS EMOCIONES 23, 30 (2004).

⁴⁹ *Id.*

⁵⁰ *Id.*

⁵¹ Cameron and Frazer do not explicitly distinguish between “sex murder,” “sexual murder,” “sex crime,” and “sexual crime.” They use “sexual murder” and “sex murder” to refer to “the lust to kill” and a cultural context in which the act of killing women is connected to men’s desire and sexual gratification. They use “sex crime” to refer to a “later discursive context in which the act to kill a women is connected to abnormality and . . . to an animal impulse periodically ‘breaking out’” and to assert that “their abnormality consists in a failure to be truly or properly masculine” Cameron & Frazer, *supra* note 17, at 157-58, 163.

⁵² *Id.* at 157.

⁵³ “The canon of clear cases includes a number of famous mass-killings: those of Jack the Ripper, Kürten, the Boston Strangler, Christie, Brady” The authors consider that this list has three things in common: “it contains not a single woman . . . none of the cases . . . occurred earlier than 1888 . . . all these men are white” This implies that the category “sexual murder” is distinctively modern, Western, and exclusively masculine.

Id.

⁵⁴ *Id.* at 157-58.

⁵⁵ *Id.*

⁵⁶ Deborah Cameron is an academic working in the field of literature and women’s studies in England and the United States. Elizabeth Frazer is an academic working in the field of sociology, politics, and economics. She has authored many books and articles on politics, social and feminist theory, sexual differences, political knowledge, and feminism.

⁵⁷ Cameron & Frazer, *supra* note 17, at 157-58.

⁵⁸ *Id.*

⁵⁹ Cameron and Frazer did not find representations of women sex crime perpetrators in literature. Murders committed by women have been widely documented, but, as

perpetrators, women's motives are described as vengeance or expressions of freedom from oppressive relationships. The aim is never sexual pleasure. Likewise, neither in the Middle Ages nor in the classical period are there representations of sexually motivated crimes. In other words, sex crimes did not appear in literature (fiction or otherwise) until the nineteenth century. *Id.*

⁶⁰ *Id.* at 159-60.

⁶¹ *Id.* at 160-61.

⁶² Nevertheless, from a feminist point of view both visions are deconstructed: "They can be shown to share a refusal to engage with the gender systematicity of sexual murder . . . They also share an assumption that the roots of this kind of violence lie in individual pathology . . ." *Id.* at 159-60.

⁶³ *Id.* at 159.

⁶⁴ *Id.* at 159-60.

⁶⁵ *Id.* at 159-60.

⁶⁶ *Id.* at 160-63.

⁶⁷ *Id.*

⁶⁸ *Id.*

⁶⁹ *Id.* at 160.

⁷⁰ *Id.*

⁷¹ *Id.*

⁷² *Id.* at 161-63.

⁷³ *Id.*

⁷⁴ *Id.* at 161.

⁷⁵ *Id.* at 162.

⁷⁶ *Id.*

⁷⁷ "[T]hese instances tell us a great deal about our culture . . . and about the cultural nature of persons and their acts. In this sense the murder is a discursive phenomenon . . ."

⁷⁸ *Id.*

⁷⁸ "Bloody rapes" is my translation of Rita Segato's term "violación cruenta." RITA LAURA SEGATO, *LAS ESTRUCTURAS ELEMENTALES DE LA VIOLENCIA* 21, 22-24 (2003).

⁷⁹ *Id.* at 30-31.

⁸⁰ *Id.* at 21.

⁸¹ *Id.* at 26-30.

⁸² *Id.* at 23, 26.

⁸³ *Id.* at 26-30.

⁸⁴ *Id.* at 26-30, 31.

⁸⁵ *Id.* at 26-27, 31-32, 38-39.

⁸⁶ *Id.* at 33-34.

⁸⁷ *Id.*

⁸⁸ *Id.* at 31.

⁸⁹ *Id.* at 31, 37-38.

⁹⁰ *Id.* at 29-31.

⁹¹ *Id.* at 29-32.

⁹² *Id.* at 30-31.

⁹³ This is controversial among women within the feminist movement in Brazil. Sonia Alvarez asserts that, in 1985, the pressure created by the local Paulista women's movement led the Council's Commission on Violence Against Women to persuade the São Paulo Secretary of Justice to create the first Delegacia da Mulher (DDM), "[a] police precinct staffed entirely by specially-trained female officers to process cases of rape, sexual abuse, and domestic violence." Sonia Alvarez, *The Transformation of Feminism and Gender Politics in Democratizing Brazil*, in *THE WOMEN'S MOVEMENT IN LATIN AMERICA* 13, 41 (Jane Jaquette ed., 1994).

⁹⁴ SEGATO, *supra* note 78, at 31.

⁹⁵ See generally DIANA WASHINGTON VALDEZ, COSECHA DE MUJERES (2005) (describing crimes in Ciudad Juarez); Nuestras Hijas de Regreso a Casa Home Page, <http://www.mujeresdejuarez.org/pizarra.htm> (for the English version, see <http://www.mujeresdejuarez.org/EUversion.htm>) (last visited Mar. 9, 2007).

⁹⁶ For more about the Morales case, see the following local newspaper articles: *El crimen bajo otra luz*, PÁGINA/12, Sept. 4, 1997, at 18-19; *Dos acusaciones para un mismo caso* PÁGINA/12, Sept. 5, 1997, at 15; *Algo podrido agita a Catamarca desde la violación de la estudiante*, PÁGINA/12, Sept. 22, 1990, at 8; Hector Gambini, *La declaración de 4 peritos macó el vuleco en el juicio*, CLARÍN, Sept. 4, 1997, at 46-47; Ricardo Larrondo, *Los jueces se basaron en los dichos de 76 Testigos*, LA NACIÓN, Mar. 11, 1998, at 16; Fernando Rodríguez, *Los jueces revelan secretos del proceso que conmovió al país*, LA NACIÓN, Sept. 10, 2000, at 22. See also MORANDINI, *supra* note 13, at 113-34. In addition to being categorized by the court as rape followed by death, the press and feminist experts treat it as "femicide" and relate it to other crimes that reflect similar patterns. The research on femicide has just begun in Argentina. Patterns that have been found in murders include the following: the recruitment of young girls in provincial cities by members of gangs related to the political elite; sexual abuses, rape, death, and bodily mutilation of young girls; participation of the police; public exposition of the bodies; and organization of cover-up operations with the support of provincial and national authorities. See generally Fontenla, *supra* note 10, at 40-41 (describing local news coverage on femicide and writings about the victims of corporate crimes).

⁹⁷ See CÓD. PEN. ARG., TÍTULO I, CAPÍTULO I, ARTÍCULOS 79-81; *id.* at TÍTULO III, ARTÍCULOS 118-24.

⁹⁸ *Id.*

⁹⁹ As this relates to the Morales case, see Eduardo Videla, *Cuatro hipótesis para una noche de horror* PÁGINA/12, Aug. 23, 1997, at 2-3; Eduardo Videla, *Ya sabemos como la mataron*, PÁGINA/12, Aug. 23, 1997, at 2-3. For a very interesting anthology on criminal law and feminist and gender analysis, with a detailed discussion related to the tipifications of "sexual crimes" from a gender point of view, see LAS TRAMPAS DEL PODER PUNITIVO (Haydée Birgin ed., 2000) (in particular, articles by Lucila Larrandart, *Control social, derecho penal y género*, at 85, 98-107; Graciela Edit Otano, *La mujer y el derecho penal*, at 111, 118-24; Marcela Rodríguez, *Algunas consideraciones sobre los delitos contra la integridad sexual de las personas*, at 137, 149-69; Alberto Bovino, *Delitos sexuales y justicia penal*, at 175, 222-40).

¹⁰⁰ In Argentina, before the 1998 reform of the Penal Code, rape was considered a crime when "carnal access"—penetration of the male sex organ into the vagina or anus of the

victim—had not been consented to by the woman. In 1998, rape was reconceptualized to account for the victim's physical integrity and right to self-determination over her own body. In theory, these victims could be men as well. However, the victims of these acts are mainly women and, thus, the focus of this article. Inés Hercovich, *Las oprimidas sospechadas*, DEBATE FEMINISTA, Oct. 2002, at 8, 9, 14.

¹⁰¹ See Segato, *supra* note 9, at 11 (definition and analysis of the relationship between gender, sexuality, violence, and international corporations).

¹⁰² See Ester Hermitte & Carlos Herrán, *Sistemas productivos instituciones intersticiales y formas de articulación social en una comunidad del Noroeste Argentino*, in PROCESOS DE ARTICULACIÓN SOCIAL 238, 245-50 (Ester Hermitte & Leopoldo J. Bartolomé eds., 1977) (describing local patronage networks). See also LARRY SAWERS, THE OTHER ARGENTINA 23-25, 152-53, 173, 199, 221-22, 245-47 (1996) (describing the relationship between local, national clientelistic political networks, control of local economic resources, and state power).

¹⁰³ Lozano, *supra* note 18, at 101, 105-06; MORANDINI, *supra* note 13, at 61-73, 199; Segato, *supra* note 9, at 11-12.

¹⁰⁴ Lozano, *supra* note 18, at 105, 106.

¹⁰⁵ *Id.* See also Ignacio Azcune, *El poder de los parentescos*, in REVISITA TODO ES HISTORIA, Sept. 1991, at 34-37 (describing local patronage networks); MORANDINI, *supra* note 13, at 26-42.

¹⁰⁶ Lozano, *supra* note 18, at 111-15; MORANDINI, *supra* note 13, at 97-110.

¹⁰⁷ Lozano, *supra* note 18, at 115.

¹⁰⁸ For further readings on the Morales case, see local newspapers: *Algo podrido agita a Catamarca desde la violación de la estudiante*, PÁGINA/12, Sept. 22, 1990, at 8; *Siete mil personas marcharon por el asesinato de la estudiante*, CLARÍN, Sept. 28, 1990, at 36.

¹⁰⁹ See also *Polémica en Catamarca por el asesinato de la estudiante*, CLARÍN, Sept., 20, 1990, at 30; *Sigue la convulsión por el asesinato y habría 4 detenidos*, CLARÍN, Sept. 30, 1990, at 34-35; *Crimen de Catamarca: piden la intervención de Menem*, CLARÍN, Oct. 13, 1990, at 27. María Soledad Morales's boyfriend, Luis Tula, was found guilty as an accessory to the murder and sentenced to nine years in prison. In 1998, Guillermo Luque, son of Parliament Member Ángel Luque, was convicted of rape and murder and sentenced to twenty years imprisonment. Pedro Lipcovich, *Este fallo le hace mucho bien al país*, PÁGINA/12, Feb. 28, 1998, at 1, 2-6; Virginia Messi et al., *Condenaron a 21 años de prisión a Guillermo Luque y a 9 a Luis Tula*, CLARÍN, Feb. 28, 1998, at 1, 46-52.

¹¹⁰ See *Algo podrido agita*, *supra* note 108; MORANDINI, *supra* note 13, at 113-34.

¹¹¹ See *Catamarca repite otra marcha del silencio*, PÁGINA/12, Oct. 4, 1990, at 13; *18.000 personas reclamaron que se detenga al asesino de María Soledad*, CLARÍN, Oct. 12, 1990, at 22-23.

¹¹² See *Luis Tula se burló del amor de ella y la entregó*, CLARÍN, Mar. 11, 1998, at 43; MORANDINI, *supra* note 13, at 14-16 (further readings on the Morales case).

¹¹³ The sons of the chief of police and a mayor were part of the gang, but their participation in the events could not be proved. Hugo Ibáñez and Eduardo Méndez, members of the gang who worked with Mr. Luque, were arrested on suspicion of murder. However, during their ensuing trial, their case was dismissed for lack of evidence. The same happened with high-ranking officials, as well as private individuals involved in the

cover-up who were acquitted during later trials or had their cases dismissed in federal court. Pedro J. Frías, *Catamarca, una estructura de dominación*, LA NACIÓN, Nov. 26, 1990, at 7; *Nunca se juzgó a los encubridores*, LA NACIÓN, Sept. 8, 2000, at 15.

¹¹⁴ See generally CARLOS EDUARDO FIGARI, IDENTIDAD DE GÉNERO Y ACCIÓN COLECTIVA: EL “MOVIMIENTO DE MUJERES CATAMARQUEÑAS” EN LAS MARCHAS DEL SILENCIO COLECCIÓN GÉNESIS (2007); ELSA PONCE, DEL ATRIO AL VEREDÓN: CATAMARCA PROTESTA SOCIAL EN SILENCIO? (2005).

¹¹⁵ The first of the “Silent Marches” was organized by María Soledad Morales’s fellow students. The school pupils formed a column and walked silently from the school to the central plaza of the capital city of Catamarca (about four hundred meters). They stopped in front of the cathedral and stayed silently for fifteen minutes every Thursday. The first Silent March took place on September 14, 1990, four days after María Soledad’s body was found in Catamarca. Between September and October 1990, the marches were more or less spontaneous and mainly organized by pupils of the different high schools of the city and surrounding neighborhoods. In October, the parents of the school pupils and the dean of the high school, Martha Pelloni, decided to build up an organization, “La Comisión Pro Esclarecimiento” (Enlightenment Commission), in order to have a formal representation of the social movement in front of the local and national authorities. For further readings on the Morales case, see local newspaper articles: *18.000 personas volvieron a marchar pidiendo justicia*, CLARÍN, Dec. 21, 1990, at 41; *¿Qué hay detrás del silencio?*, CLARÍN, Dec. 30, 1990, at 32-33; Alberto Lopez, *Del nepotismo a la intervención*, PÁGINA/12, Jan. 5, 1991, at 3.

¹¹⁶ From 1976 to 1983, between eight thousand and thirty thousand people were kidnapped, tortured, and disappeared under the action of state terrorism and the systematic violation of human rights by internal Argentinean security forces. See e.g., Elizabeth Jelin, *The Politics of Memory: The Human Rights Movements and the Construction of Democracy in Argentina*, LATIN AMER. PERSPECTIVES, Spring 1994, at 38-58, available at <http://www.jstor.org/view/0094582x/di013091/01p0037f/0>.

¹¹⁷ Ramón Saadi belongs to a family that has been in control of economic resources and political posts in the province of Catamarca since 1949. See Marcelo Gallo & Roberto Angaromo, CATAMARCA DESPUÉS DEL SILENCIO, 25-28, 205 (1996); SAWERS, *supra* note 102, at 23-25, 152-153, 173, 199, 221-222, 245-247. See also Jorge Zicollilo & Néstor Montenegro, LOS SAADI 30-38 (1991).

¹¹⁸ See *Catamarca otra vez sin juez: Querida, ya volví*, PÁGINA/12, Jan. 17, 1991, at 14; *Una plegaria por la intervención*, PÁGINA/12, Jan. 18, 1991, at 17; Eduardo Videla, *Hasta el árbitro lo apunta*, PÁGINA/12 Feb. 22, 1991, at 11; *Después de la sentencia habrá María Soledad III*, PÁGINA/12, Feb. 18, 1998, at 14. See also Bovino, *supra* note 99, at 186-97 (highlighting the problem of the rights of the victims in the criminal justice system).

¹¹⁹ See Eduardo Videla, *Buenos muchachos*, PÁGINA/12, Jan. 13, 1991, at 12-13 (further reading on the Morales case). See generally JAVIER AUYERO, CONTENTIOUS LIVES (2003) (analysis of recent social movements led by women in Argentina).

¹²⁰ *Patti sale echando humo*, PÁGINA/12, Jan. 5, 1991, at 2-3; *Marcha un Patti*, PÁGINA/12, Jan. 9, 1991, at 6. (further reading on the Morales case).

¹²¹ *¿Qué tipo de presiones puede haber?*, PÁGINA/12, Jan. 11, 1991, at 6 (further reading on the Morales case).

¹²² Más que como testigo, Luis Patti declaró como un abogado de Luque, CLARÍN, Dec. 17, 1997, at 16 (further reading on the Morales case).

¹²³ See, e.g., Ruth Stanley, *Violencia Policial en el Gran Buenos Aires: ¿Necesita el Neoliberalismo una Policía Brava?*, in *VIOLENCIA Y REGULACIÓN DE CONFLICTOS EN AMÉRICA LATINA* 237-253 (Klaus Bodemer et al. eds., 2001) (study on police involvement in abuses).

¹²⁴ See generally Virginia Messi & Luis Mercado, *Para el tribunal, la coartada de Guillermo Luque fue armada*, CLARÍN, Mar. 11, 1998, at 42-43; *Luis Tula se burló del amor de ella y la entregó*, CLARÍN, Mar. 11, 1998, at 43; Larrondo, *supra* note 96; Rodríguez, *supra* note 96 (further reading on the Morales case).

¹²⁵ Lozano, *supra* note 18, at 117-19.

¹²⁶ *Id.* at 113,114. See also, newspaper articles on the Morales case: Jorge Halperín, *Las mujeres, agentes de un cambio*, CLARÍN, Mar. 1, 1998, at 53; Eliseo Verón, *La sintonía entre la sociedad y los medios*, CLARÍN, Mar. 1, 1998, at 56; David Viñas, *Un linaje invicto, que nos rescata de todo lo negativo*, CLARÍN, Mar. 1, 1998, at 58.

¹²⁷ See, e.g., María del Carmen Feijóo & Marcela María Alejandra Nari, *Women and Democracy in Argentina*, in *THE WOMEN'S MOVEMENTS IN LATIN AMERICA* 109 (Jane S. Jaquette ed., 1994); DIANA TAYLOR, *DISAPPEARING ACTS: SPECTACLES OF GENDER AND NATIONALISM IN ARGENTINA'S "DIRTY WAR"* 257-63 (1997).

¹²⁸ Lozano, *supra* note 18, at 119

¹²⁹ See MOORE, *supra* note 47, at 66-70; Henrietta Moore, *The problem of explaining violence in the Social Science*, in *SEX AND VIOLENCE*, *supra* note 17, at 138-54; PATEMAN, *supra* note 7 (feminist discussions on gender and social and psychoanalysis).

¹³⁰ SEGATO, *supra* note 78, at 85-105.

¹³¹ Lozano, *supra* note 18, at 120.

¹³² See generally *La declaración de 4 peritos marcó el vuelco en el juicio*, CLARÍN, Sept. 4, 1997, at 46; *Un lugar destinado a la trampa*, PÁGINA/12, Feb. 27, 1998, at 17 (further reading on the Morales case).

¹³³ See generally *Temo la sentencia*, PÁGINA/12, Feb. 3, 1998, at 13; *Una coartada por las dudas*, PÁGINA/12, Feb. 5, 1998, at 15; *Quedó preso un ex asesor de Saadi acusado de falsificar coartadas*, PÁGINA/12, Feb. 12, 1998, at 14; *Los señores y sus vasallos*, PÁGINA/12, Feb. 25, 1998, at 17; *Ultimas imagenes del naufragio*, PÁGINA/12, Feb. 25, 1998, at 17; *Los Hermanos sean unidos*, PÁGINA/12, Feb. 25, 1998, at 17; *El tercer juicio por María Soledad*, PÁGINA/12, Feb. 28, 1998, at 5; *Opinan los enviados de Página/12*, PÁGINA/12, Mar. 1, 1998, at 12 (further reading on the Morales case).

¹³⁴ See generally *Acausaciones, anónimos y denuncias en Catamarca*, CLARÍN, Oct. 27, 1990, at 20; *Acusan de subversiva a una religiosa*, CLARÍN, Nov. 17, 1990, at 22; *Mera Figueroa comparó a las marchas con el alzamiento de los carapintadas*, CLARÍN, Dec. 8, 1990, at 24; *Menem dijo que las protestas en la calle no conducen a nada*, CLARÍN, Dec. 12, 1990, at 30; *Mera Figueroa y Salonia censuraron las acusaciones de la hermana Pelloni*, LA NACIÓN, Dec. 8, 1990, at 10; MORANDINI, *supra* note 13, at 88-91 (further reading on the Morales case).

¹³⁵ Cameron & Frazer, *supra* note 17, at 168.

¹³⁶ *Id.* at 168-169.

¹³⁷ SEGATO, *supra* note 78, at 30.

¹³⁸ *Id.*

¹³⁹ *Id.*, at 37-38.

¹⁴⁰ By “feminist critical perspective” I mean a perspective that takes seriously three aspects of social life. First, the social problem of the relationship between civil rights, citizenship, and authoritarian political cultures. Second, the gender question of the body as a site of women’s and minorities’ oppression, as well as a site of emancipation. Last, my interest in the theoretical question of how to think about the relationship between ideals, body, and emotions in the construction of social relationships and the elaboration of power.

¹⁴¹ Segato, *supra* note 9.

¹⁴² *Id.*

¹⁴³ “The sons of power” was the metaphor used by those who participated in the Silent Marches to describe the attackers. *See, e.g., Dicen que el caso no se aclaró porque la mató gente poderosa*, CLARÍN, Oct. 10, 1997, at 58.

¹⁴⁴ MORANDINI, *supra* note 13, at 101-10.

¹⁴⁵ Segato, *supra* note 9, at 8.

¹⁴⁶ MORANDINI, *supra* note 13, at 67-73, 77-81.