



January 1995

Politically Incorrect

Recommended Citation

Politically Incorrect, 48 SMU L. REV. 411 (1995)

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POLITICALLY INCORRECT

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POLITICALLY CORRECT BEDTIME STORIES, James Finn Garner. New York: MacMillan Publishing Company. 1994. 79 pp. \$8.95.

WHO would have thought that the most devastating—and possibly final—blow to the political correctness (PC) movement would come from a short collection of bedtime stories written by a part-time author, part-time comedian? James Finn Garner, admittedly left of center and a Clinton voter, has done more to set back political correctness in this country with his book, *POLITICALLY CORRECT BEDTIME STORIES*,¹ than conservatives like Rush Limbaugh and Dan Quayle could ever hope. Garner's concise, insightful parody of classic fairy tales² marks the end of an era of futility in American universities and, hopefully, signals the beginning of genuine efforts to solve America's pressing social ills.³ Only time will tell what impact this book will have on university and law school education in this country, but one can envision profound consequences.⁴

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1. JAMES F. GARNER, *POLITICALLY CORRECT BEDTIME STORIES* (1994) [hereinafter *BEDTIME STORIES*].

2. Although originally planning to use the term "fairy tales," Garner abandoned the idea when he was informed of the term's heterosexual bias. Jonathan Yardley, "FABLES FOR THE PC '90s," *THE WASHINGTON POST*, Apr. 27, 1994, at B2.

3. Garner is one of several liberal authors who have deserted PC in 1994. See, e.g., WILLIAM A. HENRY, *IN DEFENSE OF ELITISM* (1994); HAROLD BLOOM, *THE WESTERN CANON: THE BOOKS AND SCHOOL OF THE AGES* (1994).

4. One reason why *BEDTIME STORIES* will have such a profound impact is that it has been (or certainly will be) read by more Americans than all of the other books on political

Bedtime Stories, a national best-seller, adapts thirteen classic fairy tales, such as *Little Red Riding Hood* and *Chicken Little*, to reflect the sensitivity of the nineties.⁵ Although progressive in nature, Garner believes that PC has gone way too far and that the best way to defeat the "Orwellian" aspects of PC is to embrace it so fully that its ridiculousness becomes apparent.⁶ Accordingly, *Bedtime Stories* rewrites our favorite childhood tales in such a way as to eliminate "any sexist, racist, culturalist, nationalist, regionalist, ageist, lookist, ableist, sizeist, specieist, intellectualist, socioeconomicist, ethnocentrist, phallocentrist, heteropatriarchalist, or other types of bias as yet unnamed."⁷ Garner, who concededly is trying to atone for the sins of his dead white European forefathers, was inspired to write *Bedtime Stories* when he came across a special-interest newsletter warning pre-school teachers about the ideological perils of such classic fairy tales as *Cinderella*, *Snow White*, and *Rumpelstiltskin*.⁸ The newsletter accused these classics of being inherently sexist and of frequently displaying disempowered women, and advised teachers to embarrass children who enjoyed such stories.⁹

Garner's post-modern, revisionist tales convert Cinderella's ugly step-sisters, for instance, into her differently-visaged sisters-of-step, the "mean" witch¹⁰ in *Rapunzel* into a "kindness-impaired" person, and the smelly troll in *The Three (Co-Dependent) Goats Gruff* into "odor-enhanced." Garner's version of PC doesn't stop at re-labelling adjectives; in an effort to stamp out all bias and prejudice he is compelled to change the outcomes of many stories. In *Cinderella*, for example, the Prince is the villain, not Cinderella's mother-of-step and sisters-of-step, and in *Little Red Riding Hood*, Grandma, Red and the Wolf conspire to kill the sexist, specieist, Neanderthal "woodchopper-person." Garner even endeavors to take the sexism out of spelling, by removing the "man" from woman and "men" from women, replacing them with "wommon" and "womyn," respectively.¹¹

But PC is more than language; it is an ideology, and one which *Bedtime Stories* strives to promote. In a bid to portray PC doctrine, Garner uses

correctness combined. By its fourth month in print, more than 200,000 copies of *BEDTIME STORIES* have been sold, and it has been on *THE NEW YORK TIMES* best-seller list for several weeks.

5. Garner is not the first to inject PC language into fairy tales. See, e.g., BRUCE LANSKY, *THE NEW ADVENTURES OF MOTHER GOOSE* (1993).

6. Art Carey, *Author Enjoys Fairy-Tale Success With His Satire*, *ORLANDO SENTINEL*, Aug. 18, 1994, at E1.

7. *BEDTIME STORIES*, *supra* note 1, at x.

8. Carey, *supra* note 6, at E1.

9. *Id.*

10. It is no longer appropriate to ridicule witches in any context, including the wearing of Halloween costumes. Katy Kelly, *Schools: Don't Dress Mean for Halloween*, *USA TODAY*, Oct. 5, 1994, at D1.

11. While this may seem overly cynical to some, feminist legal scholars have questioned the propriety of a language in which the term "woman" is a derivative of the term "man." See, e.g., L. Bender, *A Lawyer's Primer on Feminist Theory and Tort*, 38 *J. LEGAL EDUC.* 3, 16-17 (1988).

The Three Little Pigs as a parable about American imperialism in Latin America, concluding the tale:

The three little pigs rejoiced that justice had triumphed and did a little dance around the corpse of [the] wolf.¹² Their next step was to liberate their homeland. They gathered together a band of other pigs who had been forced off their lands. This new brigade of "porcinistas" attacked the resort complex with rocket launchers and slaughtered the cruel wolf oppressors, sending a clear signal to the rest of the hemisphere not to meddle in their internal affairs. Then the pigs set up a model socialist democracy with free education, universal health care, and affordable housing for everyone.¹³

As in this quotation, Garner's use of PC language leaves him open to criticism. His critics claim that his application of PC language is extreme, abusive, and contrived and that he trivializes important issues.¹⁴ They claim that Garner, a first-time author, misuses PC in a cheap attempt to sell books.¹⁵ This critique should come as no surprise; after all, *Bedtime Stories* is parody, and parody of fairy tales, no less. No reasonable person would ascribe these linguistic excesses to the legitimate PC crusade, but one must admit their roots are firmly established in the PC movement, a movement personifying George Orwell's prophecy of a sloppy, abstract language "designed to make lies sound truthful and murder respectable, and to give an appearance of solidity to pure wind."¹⁶

Excessiveness aside, Garner is able to demonstrate the ineffectiveness and danger of PC, not to mention the fact that PC has become a lethal weapon against social change. PC, as *Bedtime Stories* so aptly illustrates, has outlived its purpose and, more importantly, may have done more harm than good to the noble causes of its founders. Rest assured, neither *Bedtime Stories* nor this review attacks the noble goals of the PC movement, most of which are beyond reproach. The founders of PC are, without question, some of this nation's leading scholars. But their efforts have been misguided, as Garner endeavors to illustrate. According to former Harvard law professor Derrick Bell, "Even the most well-meaning can err in the mission of good, . . . worsen[ing] conditions they seek to reform."¹⁷ From its inception, PC has been ridiculed by the conservative right and others opposed to social change. This was expected. But when moderate Democrats, like Garner, lose faith in PC, the time to reconsider the merits of the movement has arrived.

12. As the wolf huffed and puffed to blow down the brick house, he fell over dead from a massive heart attack brought on from eating too many fatty foods. Garner, however, in his quest to please all groups, explains in a footnote that wolf was a metaphorical construct and that no actual wolves were harmed in the writing of the story.

13. *Id.* BEDTIME STORIES, *supra* note 1, at 11-12.

14. Russel Miller, *Bedtime Stories For These Oh-So PC Times*, LOS ANGELES TIMES, Aug. 11, 1994, at E1; *PC Parodies Take Aim at Fairy Tales*, THE PHOENIX GAZETTE, Aug. 3, 1994, at A2.

15. *Id.*

16. GEORGE ORWELL, *Politics and the English Language*, in SHOOTING AN ELEPHANT 92 (1950).

17. DERRICK BELL, *CONFRONTING AUTHORITY* xii (1994).

Bedtime Stories illustrates, implicitly for the most part, the fatal flaws of PC, at least in the realm of linguistics. These flaws, some inherent in a semantic crusade and others politically motivated, have clearly outstripped the utility of PC. This review will examine each of these flaws in the context of *Bedtime Stories* and will strive to show that PC language was not only doomed from inception, but has devalued university education throughout the world.¹⁸ Following are a few theories that may help explain why PC language has had very little positive impact on America's campuses. These are only theories, none of which is supported by more than anecdotal evidence. But, these theories do help frame the debate over whether PC should be maintained in our colleges and law schools.¹⁹

I. SEMANTICS

Shakespeare once said that "[t]hat which we call a rose . . . [b]y any other name would smell as sweet."²⁰ Shakespeare's prose exhibits the foremost defect of PC language. That is, you cannot change people's perception of something merely by changing its name. By an early age we have all formed an opinion of roses; we know they come in many colors, have thorns and a sweet aroma. To change the name will not change one's opinion of roses because an opinion is based on one's perception, not on the term chosen for such beautiful flora. The best that semantics can achieve is momentary confusion, which will quickly dissipate once the new name is identified with the old perception.²¹

In the original version of Rumpelstiltskin the would-be princess was saved from the greedy prince by a short man named Rumpelstiltskin. Though a fictitious character, we all have a perception of Rumpelstiltskin. We see him as an old man less than, let's say, four-feet tall. A fact of life, regardless of propriety, is that some people are inclined to discriminate against and ridicule men of Rumpelstiltskin's height. All of us, those in favor of PC and those opposed, wish this were not so, but it is. The point Garner is making, however, is that changing the name of short people will

18. Although PC is usually thought of as exclusively American, it has been exported to colleges and law schools in other countries. While teaching law recently in Australia, I witnessed first-hand the importation of American political correctness into an Australian law school. PC has also been attacked in the United Kingdom by Prince Charles.

19. Other books debating the soundness of PC include J. CHOI & J. MURPHY, *THE POLITICS AND PHILOSOPHY OF POLITICAL CORRECTNESS* (1992); S. D. GAEDE, *WHEN TOLERANCE IS NO VIRTUE* (1993); ARE YOU POLITICALLY CORRECT? (Francis J. Beckwith & Michael E. Bauman eds., 1993); *DEBATING P.C.: THE CONTROVERSY OVER POLITICAL CORRECTNESS ON CAMPUS* (Paul Berman ed., 1992); *THE IMPERILED ACADEMY* (Howard Dickman ed., 1993).

20. W. Shakespeare, *Romeo and Juliet*, act 2, sc. 2, line 43, in 1 *THE PLAYS OF SHAKESPEARE* 153, 174 (H. Staunton ed. 1858-61).

21. There are some linguistic modifications that involve more than semantics. Take, for example, the pre-PC change from "dumb" to "mute," as the term used to refer to people who are unable to speak. For years, people who could not speak were considered unintelligent, hence the term "dumb." But, as science progressed, that the inability to speak was unrelated to intelligence became obvious. Thus, the term "mute" changed more than semantics, it changed a misconception.

not change people's opinion of them. Whether they are called diminutive, differently statured, vertically challenged, nonstandard height, or little people, all of which Garner uses in *Rumpelstiltskin*,²² one's perception of short people will not change. To borrow from a once-popular public service message: semantics don't stop discrimination, education does. But education is much more than masking the truth.²³

Feminist legal scholars have recognized the futility of semantic transformation in related contexts.²⁴ For instance, Professor Leslie Bender maintains that when the "reasonable man" tort standard was changed to "reasonable person," without a corresponding change in the substance of the standard, the modification had no positive effect for women. Professor Bender declares:

When [the reasonable man standard] was converted to "reasonable person," it still meant "person who is reasonable by my standards" almost exclusively from the perspective of a male judge, or law professor, or even a female lawyer trained to be "the same as" a male lawyer. Changing the word without changing the underlying model does not work.²⁵

Changing the name of the tort standard, according to Professor Bender, was simply a futile exercise in semantics, which had no impact on the application of the standard.²⁶ Women were subjected to the same discrimination under the new standard as they were under the old one because society's "perception" of the standard remained constant. Only the name had changed. Merely changing the name of the tort standard—in a thinly-veiled endeavor at equality—was futile. The same can be said of the linguistic modifications made by the PC movement.

Another example of PC's futility is the change in the terminology for leprosy. In an effort to protect people inflicted with leprosy, PC has renamed it "Hansen's Disease." But as one prominent physician asserts, "[r]enaming leprosy . . . only deepens the shame and perpetuates a conspiracy of silence. . . . The word leprosy is a medical term."²⁷ You cannot

22. BEDTIME STORIES, *supra* note 1, at 13.

23. World dictators have taken a cue from the PC crowd and now want to redefine the term "human rights" to include cultural and national particularities, believing that "human rights" connotes colonialist western values. *The Human Rights Show*, JERUSALEM POST, June 25, 1993.

24. See Bender, *supra* note 11, at 20-25; Linda M. Finley, *A Break in the Silence: Including Women's Issues in a Torts Course*, 1 YALE J. L. & FEM. 41, 57-60 (1989); Elizabeth M. Schneider, et al., *Feminist Jurisprudence — The 1990 Myra Bradwell Day Panel*, 1 COL. J. GENDER & L. 5, 19 (1991) ("[W]hen sensitivity to gendered pronouns crept into law, the reasonable man got linguistically transformed into the reasonable person. We thought that the gender problem was gone, right? Wrong. The linguistic transformation did not cure the underlying image."); Leslie Bender, *An Overview of Feminist Torts Scholarship*, 78 CORN. L. REV. 575, 579 (1993)

25. Bender, *supra* note 11 at 23.

26. *Id.*

27. Linda Keene, *Leprosy Not What It Used To Be*, SEATTLE TIMES, Sept. 30, 1994, at A1.

remove the stigma of leprosy, according to the physician, simply by changing its terminology.²⁸

Moreover, who is to say that today's politically correct term is less biased than yesterday's terminology? Take the PC term pre-woman, which is the enlightened replacement for girl. No doubt that the term girl, when used to refer to an adult female, is insulting. But, is referring to a five-year-old female as a girl insulting? Most people, surely, would think not. And is pre-woman any less insulting than girl. Pre-woman sounds like something less than a real woman. Won't future generations of women find this term insulting? If so, what term will we use next? There is another problem with the term pre-woman. Why is the term girl banned, but not the term boy? The term boy is at least as insulting to African-American men as the term girl is to adult women. Boy has been used to insult and denigrate African-Americans for centuries, but its use is still appropriate. This makes no sense.

If the goal of PC is to "neutralize" all masculine terms, such as man-power, manhole, garbage man and mankind,²⁹ then terms that are inherently negative in nature, like manhunt or man-eater, must also be neutralized. The converse is true for terms such as battered wife. In *The Bias-Free Word Finder: A Dictionary of Nondiscriminatory Language*,³⁰ nearly all gender-biased terms are converted to gender-free terms, but not the term battered wife. To neutralize this term, according to the author, would denote that men and women are equally battered and that is not the case.³¹ Hence, the reason for not neutralizing the term is that it accurately reflects the statistical evidence of spousal abuse. There is no doubt more wives are abused by their husbands than vice versa. But the statistics would also show that there are more men than women in the garbage collection business, yet that term is neutralized. The PC movement's selective neutralization, as this example illustrates, is inherently discriminatory and extremely hypocritical.

And who is to say that the new PC terms won't stereotype just as much as traditional English. Prostitutes are now called sex industry workers, but some higher-class call girls oppose being lumped together with run-of-the-mill streetwalkers.³² They believe that the term sex industry workers is over-inclusive and, as such, discriminates against those who practice

28. *Id.* More importantly, a change in the terminology may be dangerous. One leprosy victim failed to receive the proper treatment because medical personnel were unfamiliar with the term "Hansen's Disease." *Id.*

29. Even the "gingerbread man" has fallen prey to PC. The cookie has been renamed a "gingerbread person." Alex Bellos, *Gingerbread Persons Take the Biscuit for Political Correctness*, THE GUARDIAN, Jan. 22, 1994.

30. ROSALIE MAGGIO, *THE BIAS-FREE WORD FINDER: A DICTIONARY OF NONDISCRIMINATORY LANGUAGE* (1992).

31. Michiko Kakutani, *Today P.C. Word Cops Aren't Just Busting Academe*, SACRAMENTO BEE, Feb. 14, 1993, at F03.

32. Jerry Carroll, *Between the Lines on the Muni*, S.F. CHRON., Sept. 25, 1994, at 3/Z1.

prostitution at a more pristine level.³³ So from now on she's a call girl, and don't you forget it!

II. FREE AND OPEN DISCOURSE

If the worst thing about PC was its futility, then, arguably, there would be no harm, no foul. But, PC has wreaked havoc on college and law school campuses, and has significantly devalued university education. In less than half a decade, PC has done what ultra-conservatives have tried to accomplish for several centuries: put an end to free and open debate on college campuses, the one place where meaningful discourse was meant to flourish. There are two main reasons why PC has imposed a gag-order on American universities.³⁴

First, unless stationed at PC headquarters, where copies of the daily PC passwords can be secured hot off the press, one cannot expect to stay abreast of PC's constantly changing vocabulary. Without a working knowledge of this ever-changing lexicon, many students and faculty are apprehensive to discuss sensitive social issues. Even words that are in no way offensive have become targets of PC. Take the term Chinese Wall, for example. For decades, the term Chinese Wall has been used to describe the formal screening of attorneys in conflict-of-interest situations. The term is a metaphor for the Great Wall of China, one of the Earth's most prominent landmarks and the only artificial structure visible from space. Chinese Wall is used in admiration of this architectural accomplishment, not as some sort of racial epithet. Nevertheless, pity to the student who uses the term Chinese Wall in today's more enlightened law schools, as the wrath of the PC zealots who unilaterally replaced Chinese Wall with insulation wall will be unleashed.³⁵ So much for admiration.

Issues involving the physically handicapped exemplify the inhibiting effect PC has had on free and open discourse. On today's campuses, one is likely to shy away from a discussion of this issue, absent a PC-perfect vocabulary. How can someone be expected to enter a debate in which he or she does not speak the language? Are the physically handicapped referred to as differently abled, disabled, or some other newly invented term? Without such knowledge, the inclination is to avoid all such discussions or risk academic banishment.³⁶ And, absent meaningful discourse of the issues, everyone suffers: faculty, students, administrators and, most of all, the physically handicapped.

As an illustration of the inhibiting effect of PC, consider the following anecdote. A professor at Yale Law School had a habit of referring to

33. *Id.*

34. See generally, CHARLES J. SYKES, A NATION OF VICTIMS: THE DECAY OF THE AMERICAN CHARACTER (1992).

35. This is the term used by Professor Geoffrey Hazard. Others have suggested the term "ethical wall." See *Employers Insurance v. Albert D. Seeno Constr. Co.*, 692 F. Supp. 1150, 1165 (N.D. Cal. 1988).

36. It is safe to say that PC has come to embody the essence of parental advice, "if you can't say something good about someone, then don't say anything at all."

homemade wills as trailer-park wills. In using this term, he surely did not mean to insult people who live in trailer parks or, for that matter, poor people in general. He only meant that people at the lower end of the socio-economic scale (some of whom undoubtedly live in trailer parks) have a tendency to write their own wills, and, not surprisingly, many of these wills result in probate litigation. He had simply coined the phrase "trailer-park wills" to refer to such instruments.

Well, one day at the beginning of class, the professor gave an extensive apology for his use of the term trailer park wills. He explained that he did not mean to insult people who live in trailer parks and would cease using the term. What possibly could have caused a distinguished Yale Law School professor to change his teaching style? The PC police, of course, who roam the halls of places like Yale Law School. There is no way to know if the professor's reference to trailer-park wills was insulting to people who live in trailer parks. But one thing is almost certain: the person who complained about the language would not have been caught dead in a trailer park. This was not an effort to eliminate insults, but was a hypocritical crusade to police language.

Second, as previously stated, PC permeates more than vocabulary, it also influences ideology. Not only must terminology be used carefully, taking positions too far astray of those that are PC must also be avoided. The homeless issue epitomizes this ideological mine-field. There are many causes of America's homeless problem.³⁷ But, to be PC, you must agree that the primary (if not sole) cause is a shortage of affordable housing. If you espouse any other beliefs, such as alcoholism, drug addiction, welfare dependency, crime or mental illness—all of which undoubtedly contribute to the problem³⁸—you will be considered, at best, unenlightened, and, at worst, a bigot. A one-sided debate is no debate at all. As long as only one ideology is espoused in America's universities, meaningful debate of America's social problems will continue to degenerate.

III. EMBEDDED AND CONCEALED DISCRIMINATION

According to Professor Bender, the change from reasonable man to reasonable person was not only ineffective, but also embedded years of discrimination against women into the tort standard.³⁹ That is, the reasonable man standard, which had been molded over the centuries with a male in mind, was now being marketed as a gender-neutral standard.⁴⁰ All of the standard's inherent male bias was, according to Professor

37. To be PC, of course, one should refer to the homeless as "the underhoused." See Kakutani, *supra* note 31.

38. There have been estimates that as many as 65 to 85% of the homeless have drug, alcohol or mental illness problems. *More Than Housing, Addiction, Mental Illness Plague the Homeless*, THE SAN DIEGO UNION-TRIBUNE, May 20, 1994, at B6. Even the current administration has recognized the role drugs, alcohol and mental illness play in the homeless dilemma. *Clinton Tackles the Homeless*, SACRAMENTO BEE, June 1, 1994, at B6.

39. Bender, *supra* note 11, at 22-25.

40. *Id.*

Bender, transplanted into a so-called neutral test.⁴¹ The male-orientation of the standard remained the same, but advocates for change assumed equality had been achieved by means of the name change.⁴² Not only was this untrue, but it also caused advocates of change to rest on their laurels.⁴³

The same arguments can be made about PC language. Take the term vertically challenged, for instance. This term is meant to remove bias in the terminology used to refer to short people. As shown earlier, the term fails to achieve this goal while, more importantly, embedding people's discrimination against short people into a "neutral" term. As a result, advocates for change are inclined to accept victory, assuming that discrimination against short people has been eliminated. Their claim to victory is a bit premature.

In addition to embedding past discrimination into so-called neutral terms, PC has also forced bias underground, thereby making it more difficult to detect. As far as appearances are concerned, PC has converted Archie Bunker into a sensitive man of the nineties.⁴⁴ Although Archie still possesses the same prejudices, PC has taught him to disguise his biases. In the 1970s, one knew where he stood with Archie Bunker. If Archie despised you or your kind it was easy to detect. But not today. Today, thanks to the PC movement, Archie has learned to discriminate without detection.⁴⁵ Americans are coming to realize that the Archie Bunker of the 1990s is worse than the Archie Bunker of the 1970s. While one could have easily discerned his bias in 1970s and sought appropriate redress, detecting his bias today is not so easy. The concealed discrimination of the PC era is proving more destructive than its 1970s predecessor, as one African-American college student recently noted:

Back in the '60s, racism was easier, I guess, to spot, because we saw it. . . . But now it's to the point where you can work right next to a gentleman that does not like your color and you would never know it, because he knows how to hide it. [Racism in the 1990s is just] harder to spot.⁴⁶

41. *Id.*

42. *Id.*

43. *Id.*

44. I hesitate using Archie Bunker as an embodiment of non-PC for two reasons. First, many of the most fervent advocates of PC may be too young to remember "All in the Family." Second, it is ironic that a character like Archie, who taught America so much about race relations and prejudice, would never be allowed on television today. No network executive in his or her right mind would touch "All in the Family" in the nineties because to do so would not be PC.

45. As an example of PC's concealing effect, consider the term crime. Many African-Americans believe that in the PC era crime has become a euphemism for the unmentionables, such as race and class. According to Professor Patricia Fernandez-Kelly of the Hopkins Institute for Policy Studies, when "[w]e cannot use the old language of racism . . . we come up with all kinds of politically correct terms to refer to the same problems. When we say 'crime,' we're really saying we are afraid of lower-class black people." Sandy Banisky, *Sadness for Family, Relief for Community*, BALTIMORE SUN, Aug. 19, 1994, at 1A.

46. *The MacNeil/Lehrer NewsHour: Young, Frustrated & Black* (Educational Broadcasting, May 16, 1994) (transcript available in NEXIS).

"The great enemy of clear language is insincerity. When there is a gap between one's real and declared aims, one turns as it were instinctively to long words and exhausted idioms, like a cuttlefish squirting out ink."⁴⁷ PC embodies this belief, as PC has become the language of concealment not only for those who discriminate, but also for those who advocate liberal programs like affirmative action. There is no better evidence of this phenomenon than the Association of American Law Schools' *Placement Bulletin*,⁴⁸ which is the publication used by law schools to solicit applications for faculty positions. After briefly perusing this brochure, one suspects that the law schools are either schizophrenic or practicing the age-old art of concealment. On the one hand, each school claims to be seeking the best candidate for the job, a person with top-notch credentials in both legal scholarship and law teaching. But on the other hand, the schools are imploring all members of "underrepresented groups" to apply by stressing their commitments to "diversity."⁴⁹ Are these schools truly searching for the best candidate for the job or are they using PC terms like diversity and underrepresented groups to mask some other intent?⁵⁰ If the latter is true, this use of PC language is every bit as distressing as Archie Bunker's.

IV. CHANGE BREEDS ANIMOSITY

Humans are creatures of habit that abhor change, especially change that seems preposterous. The PC movement's efforts to compel modifications to our language have been met with great resistance. As shown earlier, these modifications are, at best, futile and, at worst, dangerous. But there is another problem with PC language. The change itself breeds animosity. If one disliked short men before PC, the change to vertically challenged is not likely to decrease this animosity. On the contrary, forcing the bigots to change vocabularies will increase the enmity, not decrease it, as PC advocates had hoped.

The animosity will also increase if people perceive that the linguistic changes are conferring special treatment on certain groups. Professor Lucinda Finley warned of this obstacle in discussing whether there should be a reasonable woman standard in tort law.⁵¹ A reasonable woman standard, she believed, might be perceived as special treatment for women, in essence, "letting them off the hook."⁵² This perceived special

47. GEORGE ORWELL, *Politics and the English Language*, in SHOOTING AN ELEPHANT (1950).

48. ASSOCIATION OF AMERICAN LAW SCHOOLS PLACEMENT BULLETIN (AALS Oct 7, 1994).

49. Diversity seems to be synonymous with racial balancing, a practice the Fourth Circuit Court of Appeals recently held unconstitutional. *Dodbereky v. Kirwan*, 1994 U.S. App. LEXIS (4th Cir. May 10, 1994).

50. HENRY, *supra* note 3, at 169-70.

51. Finley, *supra* note 24, at 64.

52. *Id.*

treatment would result in more hatred, which, alone, is enough reason to oppose cosmetic changes to our vocabulary.

V. REVISIONIST HISTORY

We study history because history is said to repeat itself. The study of history will better prepare us to deal with complex issues in the future, as "[t]hose who cannot remember the past are condemned to repeat it."⁵³ This truism, of course, assumes that we have an accurate version of history to study. The revisionists of the PC movement are undertaking to rewrite history in the same way that Garner rewrote the classic fairy tales. Regardless of the severity of past prejudices, rewriting history to sensitize the language and issues is a dangerous exercise. To sanitize American history is to deny such issues as slavery and gender inequality. How can we expect future generations to handle historically-cyclical problems better than our generation if we give them a watered-down version of history?

The presumption that concealing discrimination from our children will make the problem disappear is also naive. In *Bedtime Stories*, Garner labors to erase all forms of discrimination from fairy tales, similar to what is happening in high school textbooks in many parts of the country. Indeed, classics like *The Adventures of Huckleberry Finn* have been black-listed in some PC communities due to offensive language.⁵⁴ Is shielding children from the cold, hard facts wise? Discrimination and offensive language exist. Will our children be prepared to deal with them if they have been raised on PC-coated material? In Garner's world, there is no discrimination based on color, height, weight, appearance, gender, religion, ethnicity, etc. This is not the real world, no matter how much we wish it were so.

VI. POLITICAL WEAPON

One can disagree with all of the reasons I have given to discard PC. But one must admit that PC has become a lethal weapon for the conservative right, a weapon used to ridicule and embarrass anyone even remotely associated with PC. Conservatives like Rush Limbaugh have used PC to convince millions of Americans that liberals are outside the mainstream. The term "PC" is used today to describe "Orwellian bureaucracies, crusading do-gooders [and] brainwashed victims of state-directed propriety."⁵⁵ As *Bedtime Stories* so aptly illustrates, PC, when used in its extreme, is ridiculous. Something so easily discredited is not worth preserving, especially when you consider its minuscule value. PC

53. GEORGE SANTAYANA, 1 *THE LIFE OF REASON ON THE PHASES OF HUMAN PROGRESS* 284 (1905).

54. HENRY, *supra* note 3, at 52-53.

55. George Case, *The War Against Political Correctness Backlash Lends Credence to Blinkered Thinking*, VANCOUVER SUN, July 27, 1994, at A15.

has become a considerable political liability,⁵⁶ which is reason enough to abandon it.⁵⁷

The onslaught of articles, books and essays attacking PC proves its total lack of utility. Pick up any newspaper in the country and you are likely to see at least a couple of articles ridiculing some position taken by the PC crowd. These attacks are not partisan politics, for many are based on a concrete application of common sense. Even staunch liberals have begun to abandon PC. William Henry, a life-long liberal, card-carrying member of the ACLU and a Pulitzer Prize winning author (for works on gay and feminist issues), recently deserted PC in his book *In Defense of Elitism*.⁵⁸ Harold Bloom, a liberal professor at Yale University, has done likewise in his book entitled *The Western Canon: The Books and School of the Ages*.⁵⁹ Yet, the PC advocates continue to press their case for a linguistic utopia, albeit without a true core of support.

VII. SELECTIVE ENFORCEMENT

Not all discriminatory and insulting language is forbidden by PC. Some groups, notably men and, to an even greater extent, lawyers, are targets of open discrimination and bias.⁶⁰ Male-bashing has become a favorite pastime of the nineties.⁶¹ There are more than a dozen talk shows devoted almost exclusively to blaming men, particularly white men, for everything from menopause to the civil war in Rwanda. If that's not enough, peruse some of the tabloid and "magazine" headlines at the supermarket checkout stands. Seemingly, Elvis is the only male above reproach. At a time when even thinking bad thoughts (much less expressing them) of any other group is taboo, males, and especially those of Anglo-Saxon descent, have become the country's punching bags.⁶² As one feminist author recently observed, this era is destined to be known as a time when "anybody was better than a white male."⁶³

Where is the PC crowd? Why have they not come to the rescue of white males? Most of the founders of PC are white males, albeit from the upper-echelon (financially) of the species, so why have they not put a stop to this abuse? Well, it may be because white males are responsible

56. Ultraconservative groups, like the neo-nazis and skinheads, are exploiting the tide of revolt against PC to their own violent ends. *Id.*

57. Some have even suggested that things are so bad in the PC movement that politically correct has come to be politically incorrect and vice versa. Carolyn Davis, *The High-Pitched Squeal From the Right*, THE PLAIN DEALER, July 31, 1994, at 1C.

58. WILLIAM HENRY, *IN DEFENSE OF ELITISM* 170 (1994).

59. HAROLD BLOOM, *THE WESTERN CANON: THE BOOKS AND SCHOOLS OF THE AGES 1-12* (1994).

60. Other groups claim they too have been excluded from PC's umbrella of protection, including, conservative Christians, Catholics, Arabs, and veterans, to name just a few.

61. See, Arthur Austin, *Deconstructing Voice Scholarship*, 30 HOUS. L. REV. 1671, 1683-84 (1993).

62. This is especially troubling considering that white males will soon comprise a minority of the work-force in America.

63. Kathleen Parker, *Don't Trash History with Male Bashing*, ORLANDO SENTINEL TRIBUNE, Apr. 23, 1993, at E1.

for all that is bad in the world. White males have bought and sold slaves, prevented women from voting, started numerous wars, and perpetrated countless other dastardly acts. So maybe it is time they took their medicine.

Or is fear the reason for the white man's silence? Fear that if they respond to the criticism they will be deemed racists, sexists, or some other "ists." How can a white male defend his forefather's slave trade or spousal abuse? He can't. There is no defense for such action. But should the son answer for the father's sin, particularly in this age of sensitivity? Considering the results of the 1994 elections, the answer is apparently "no."

"What happens when you cross a pig with a lawyer? Nothing, there are some things even a pig won't do."⁶⁴ In this age of PC, when jokes about race, religion and gender are strictly off limits, the one group that is still open to ridicule is lawyers, as amply demonstrated by the above quip. Lawyer-bashing is thriving in this era of sensitivity. If you do not believe it, go to the local bookstore and pick up a copy of *Dead Lawyers and Other Pleasant Thoughts*, or *Lawyers and Other Reptiles*, or maybe a magazine such as the *Anti-Shyster*, or turn on the television to watch a lawyer get roped and hog-tied in a Miller Lite commercial. Lawyers are constantly portrayed as thieving, conniving shysters who can't wait to get their hands on your wallet.⁶⁵ This description accurately portrays some lawyers, but not all attorneys are shysters, just as not all physicians are quacks. But, generalizations, which are forbidden to be used against other groups, are fine when referring to lawyers. If any other group in society were subjected to such abuse, the PC police would immediately issue a cease and desist order. Squeezed between the conservative right's indictment of lawyers for the business recession and the liberal left's inherent distrust of the legal establishment, lawyers are the last bastion of witty banter in this era of political correctness. Apparently, selective enforcement is an essential component of the PC paradigm.

VIII. ARABIAN PROVERBS, SHAKESPEARE AND THE ANDY GRIFFITH SHOW

"I thought I was abused because I had no shoes until I met a man who had no feet."⁶⁶ Much can be gleaned from this ancient Arabian proverb, but is using someone else's misfortune in order to feel better about yourself politically correct? Is there a place for human comparison in a world where everyone is guaranteed not only equal opportunities, but equal outcomes? If there is no place for such comparisons, then the message of this maxim will be lost on a whole generation raised on PC, a generation who altogether fails to appreciate its good fortune.

64. Adrienne Drell, *Courting a New Image*, CHICAGO SUN-TIMES, July 28, 1993, at 33.

65. Roni Rabin, *Professional Courtesy*, NEWSDAY, July 1, 1993, at 60.

66. JACOB M. BRAUDE, *SPEAKER'S ENCYCLOPEDIA OF STORIES, QUOTATIONS AND ANECDOTES* 338 (1955), *reprinted in* RESPECTFULLY QUOTED 316 (S. Platt ed. 1989).

Besides devaluing American education, PC has also taken a good deal of the fun out of life. Forms of entertainment appropriate a decade ago are now forbidden. Three examples will suffice. The first is Halloween, a long-time favorite of American children.⁶⁷ A decade ago, children could be seen running the streets on Halloween dressed as witches, goblins, bums, devils or angels. But no more. All of these costumes have been declared politically incorrect because, for instance, "real" witches find witch costumes insulting.⁶⁸

The second example comes from television. The *Andy Griffith Show*, a popular sitcom in the 1960s, introduced America to a character named Otis Campbell. Otis was the town drunk, who every Friday and Saturday night drank excessive amounts of illegal liquor. Otis was a hilarious character who could make even the most stoic viewer laugh. No one could possibly have been insulted by his representation of an alcoholic. This portrayal was just clean fun. Nevertheless, one cannot imagine Hollywood casting a town drunk in a current sitcom. In today's Hollywood, the networks continue to crank out *Cosby Show* clones, which often resemble PC and multicultural propaganda more than entertainment. Sitcoms today mix sharp one-liners with issues like AIDS, homelessness or child abuse. Call me old-fashioned, but I can't laugh intermittently during a show on child abuse. A show without a "message," however, would be condemned today, for evidence of such condemnation just look at the abuse levelled on shows like *The Simpsons* and *Married With Children*. If we can't laugh at ourselves, who can we laugh at?

The final example proves that PC is an equal opportunity censor, as even the classics are subjected to Orwellian scrutiny. Jane Brown, headmistress of a London district primary school, recently refused to take her students to a performance of Shakespeare's *Romeo and Juliet* at the world-renowned Covent Gardens Ballet and Opera House.⁶⁹ Why, you ask? Because, according to Ms. Brown, *Romeo and Juliet* is a "blatantly heterosexual love story."⁷⁰ Ms. Brown refuses to involve her students in the heterosexual culture until books, movies and the theater reflect all forms of sexuality.⁷¹ If PC is meant to promote tolerance, then tolerance must be extended to all groups, including heterosexuals, even blatant,

67. In addition to Halloween, PC has taken aim at Christmas, in particular Santa Claus, who, it is claimed, reinforces the cultural male-as-norm system. See Kakutani, *supra* note 31.

68. A Barbie (Doll) Liberation Organization has been formed to combat the gender stereotypes promoted by Barbie Dolls. In one of their first operations, the group kidnapped a supply of Barbie Dolls and G.I. Joe Dolls and switched their voice boxes. The Barbies now said "Eat Lead, Cobra," and the G.I. Joes extolled the benefits of shopping. *Tainted by Experience*, THE LONDON TIMES, Feb. 10, 1994.

69. Raymond Coffey, *Ban Romeo? Wherefore Art Thou Orwell?* CHI. SUN-TIMES, Jan. 23, 1994, at 5.

70. *Id.*

71. *Id.*

hormonally-challenged heterosexuals like Romeo and Juliet. Intolerance in the name of tolerance is unacceptable.

IX. CONCLUSION

"Ours is the age of substitutes: instead of language, we have jargon; [and] instead of principles, slogans."⁷² What impact will *Bedtime Stories* have on this age of jargon in our universities and law schools? Only time will tell. But, *Bedtime Stories* will, almost assuredly, be read by more Americans than all other books and articles on political correctness combined. Garner's extreme use of PC language will, therefore, most likely achieve its goal: convincing Americans that PC is out of control and must be stopped. Garner's message is not directed at Rush Limbaugh's ditto-heads, as these people jettisoned PC years ago. Garner is addressing the large block of Americans that consider themselves slightly to the left or right of the political center. This is mainstream America, and this is the audience of *Bedtime Stories*. If PC loses mainstream America, it will be destined for the same fate as platform shoes and "Billy Beer." If history does not look kindly upon PC, Garner will have contributed greatly to this destiny.⁷³

Two final anecdotes to demonstrate the excesses of PC language:⁷⁴ A student of mine recently told me that there is now a computer program designed to scan documents to ensure politically correct language.⁷⁵ This program was used by a local company to "PC" some financial documents. In these documents, the company had referred to its financial status by using the phrases "in the black"⁷⁶ and "in the red," two phrases used, of course, to reflect the profitability of the company. When the document was sanitized by the PC program, these phrases were changed to "in the African-American" and "in the Native American." One suspects that this is a slightly different meaning than intended by the company.

Second, my experience with a foreign graduate student at Yale Law School exemplifies the absurdity of PC language. The graduate student was European and spoke very little English. One day during lunch he asked me what the difference was between the phrases people of color and colored people. He had been using the phrases interchangeably, but noticed that the latter had caused considerable discomfort in his colleagues. He had checked the dictionary and discovered that the term

72. Eric Bentley, *I Have a Bright Idea*, THE NEW REPUBLIC, Dec. 29, 1952, at 22.

73. I guess the bottom-line is: Do we want to live in a world where Roger Daltrey sings of that hearing-impaired, linguistically-impaired, visually-impaired pre-adult who sure plays a kindness-impaired pinball?

74. There are more examples of PC's absurdity than a person can count in one lifetime. For instance, the National Pork Producers Council recently complained that reference to extravagant government spending as pork was not politically correct. *Passage of SOS Initiative Won't Cause Sky to Fall*, SAN DIEGO UNION-TRIBUNE, Sept. 1, 1994, at B13.

75. The truthfulness of this account is unknown, nonetheless demonstrating the perception of PC in mainstream America.

76. PC advocates oppose the use of the term black in any negative context, such a blackball, blackmail, black eye, or black sheep. See Kakutani, *supra* note 31.

colored was defined as having color or of color. Hence, he logically assumed that people of color meant precisely the same thing as colored people. Grammatically, he was entirely correct. Politically, however, he could not have been more wrong. But try explaining this to someone who barely understands English.

Fortunately, PC has not taken hold outside of colleges and law schools. The effectiveness of PC depends upon its power to banish, a power that does not exist in most circles. So, middle America has ignored the call of PC. But some PC advocates are unwilling to concede defeat, even as the core of PC support—liberal academicians—is beginning to erode.⁷⁷ Rather, they have decided to legislate PC language. In Raritan, New Jersey, for instance, the town council recently passed legislation that bans profane, vulgar or indecent language in public, as well as insulting remarks or comments to others.⁷⁸ PC is attempting to use the real police to accomplish what its own forces have failed to achieve: a linguistically utopian society.⁷⁹ This is PC run amok, and the time has come to end the charade. Had the efforts expended on PC during the past decade been aimed more at meaningful solutions and less at superficial semantics, there is no telling what progress could have been made toward eliminating America's social problems.

77. See *supra* note 3 and accompanying text.

78. *Curses! Law Would Ban Naughty Words*, MILWAUKEE JOURNAL, Oct. 9, 1994, at A12.

79. Singapore, a country known for strict social engineering, has also legislated PC language. "Singapore Takes a New Look at Old Words," CHICAGO TRIBUNE, Jan. 22, 1994, at A6.

Comments

