

HERE COMES THE BRIDES' MARCH: CULTURAL APPROPRIATION AND LATINA ACTIVISM

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I said, "Hell, let's use the same people that were portraying that negative image of Gladys Ricart and place them in a position where they are going to have to show the other side of that story. Let's force them to show what domestic violence is really about." What I tried to do was turn the tables. Let's give them something dramatic that they're going to have to report on.

—Josie Ashton, on the use of bridal gowns in the Brides' March¹

I. INTRODUCTION

Domestic violence, though often disaggregated as a women's issue, is a social phenomenon that encompasses physical, sexual, emotional, economic, and psychological abuses; reaches across race, class, gender, sexual orientation, and socioeconomic background; and impacts everyone including children, the elderly, and the disabled. The image of an abused woman conveyed in popular culture and political rhetoric is fraught with stereotypes of poverty, low educational attainment, and cultural or ethnic predisposition to violence. Yet these misconceptions lead to a flattened and deeply flawed approach to a highly dimensional social epidemic. In America, "battering of women by husbands, ex-husbands and lovers [is] the single largest cause of injury to women," and "thirty-one percent of all women murdered are killed by husbands, ex-husbands and lovers."² This

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¹ Telephone Interview with Josie Ashton, Founder of Brides' March (Nov. 8, 2002).

² Joan Zorza, The Criminal Law of Misdemeanor Domestic Violence, 1970-1990, 83 J. Crim. L. & Criminology 46, 46 (1992) (quoting Nikki R. Van Hightower & Susan A. McManus, Limits of State Constitutional Guarantees: Lessons from Efforts to Implement Domestic Violence Policies, 49 Pub. Admin. Rev. 269, 269 (1989)); Michelle DeCasas, Protecting Hispanic Women: The Inadequacy of Domestic Violence Policy, 24 Chicano-Latino L. Rev. 56, 59 (2003) ("The percentage of female murder victims killed by intimate partners has remained at about 30 percent since 1976.").

article focuses specifically on heterosexual violence in the Latina/o community through the case of Gladys Ricart, a Dominican-American woman assassinated by an ex-lover on her wedding day, and the startling activism of the Gladys Ricart and Victims of Domestic Violence Memorial Walk ("Brides' March" or "March") that was born in her wake. Josie Ashton first initiated the Brides' March by wearing sneakers and a wedding gown with a picture of Ricart pinned to its front, and walking 1,600 miles from Miami to the Queens church where Gladys Ricart planned to wed. Subsequently, the collective movement of the Brides' March was created not only to pay tribute to Ricart's memory, but also to raise awareness about the impact of domestic violence and the need for resources devoted to the challenges facing many Latinas in particular.³ This article asserts that the Gladys Ricart case presents a cross-section of the dominant ideologies about domestic violence in the Latina/o community, and that the resultant Brides' March presents a vein of Latina activism that is, on the one hand, innovative and experience-based, and on the other, limited by patriarchal stereotypes.

Part II explores Latina identity as it is relevant to the leadership and participants of the Brides' March, as well as the clients cared for by organizations against domestic violence in the Washington Heights community. Part III discusses Gladys Ricart's struggle in her relationship with and separation from Augustin Garcia as an instructive case study of domestic violence within the Latina/o community. Part IV focuses on the media, community, and activist responses to Ricart's abuse and murder that precipitated the Brides' March. Part V critiques the Latina/o cultural narrative of the bride's white wedding gown, including the values and patriarchal stereotypes of Latinas and Latinos that underscore this performance. Part VI evaluates the advances and limitations inherent in appropriating the bridal gown as a symbol of Latina protest against domestic violence. The Brides' March has proven successful as a community-building activity in the short term by incorporating a great breadth of Latinas. Yet the appropriation of the wedding gown is ideologically problematic because it reinforces paternalistic conceptions of Latinas, presenting potential challenges to the long-term viability of the Brides' March as effective activism.

³ New York Latinas Against Domestic Violence, *Gladys Ricart and Victims of Domestic Violence Memorial Walk (Brides' March)*, 2002 Annual Report, *available at* <http://www.nylatinasagainstdv.org/2002%20Annual%20Report.doc> [hereinafter Annual Report].

II. PROBLEMATIC RELEVANCE OF LATINA IDENTITY

The identifiers “Latina,” “Latino,” and “Latina/o community” concentrate a multitude of experiences in national origins, modes of American assimilation, historic immigration patterns (e.g., colonization, political turmoil), class and educational backgrounds, bilingualism, religiosity, American regionalism, gender, sexual orientation, race, and self-determination into one or two essential categories. For example, a person (or a family or a community) may self-identify more strongly as Mexican, Puerto Rican, or South American than “Latina.” Furthermore, an individual who identifies as part of a complex category and therefore chooses, based on the context, to alternate between identifiers (for example, “Puerto Rican” and “Latina”) may have outsiders view her identity as relatively monolithic.

Nonetheless, many commonalities of experience arise when members of these overlapping groups avail themselves of the cultural and legal institutions through which claims of domestic violence are discussed and processed, making the focus on Latina identity relevant to critiquing the activism of the participants of the Brides’ March. This article adopts an intersectional analysis of the Brides’ March that aims to address all of the dynamic components of identity.⁴ Conventional approaches to studies of people of color employ an additive approach (e.g., “race plus gender plus poverty”) that favors the efficiency of applying pre-existing solutions for treating “different” people caught in the mainstream. An additive approach ignores many situational differences and often leads to a paternalistic competition and ranking of identities. The intersectionality theory acknowledges that identity labels are incomplete because people live their identities as relationships of simultaneously relevant experiences. An intersectional analysis can be used to raise awareness of domestic abuse among Latinas because it evokes the interaction of multiple experiential situations at stake and helps generate a pragmatic and instructive understanding of the problem.

This article posits that the identities of the Brides’ March participants are informed in many ways by shared racial, gender, and cultural experiences that require new analysis. Responding to domestic violence presents challenges to Latinas that many other women would not face.⁵ For example, abused Latina women who are marginalized by poverty

⁴ This paper applies Kimberlé Crenshaw’s theory of intersectionality. See Kimberlé Crenshaw, *Mapping the Margins: Intersectionality, Identity Politics, and Violence Against Women of Color*, 43 Stan. L. Rev. 1241 (1991).

⁵ Jenny Rivera, *Domestic Violence Against Latinas by Latino Males: An Analysis of Race, National Origin, and Gender Differentials*, 14 B.C. Third World L.J. 231, 234-35 (1994) (“Indeed, many factors converge to place boundaries on battered Latinas. They experience vulnerability and helplessness because of a dearth of bilingual and bicultural services from social service providers and shelters. In addition, Latinas commonly found in the United States may experience cultural isolation.”).

and language barriers, or who feel pressured by their insular immigrant communities, face this challenge of difference from the mainstream on multiple fronts. Many Latinas share a need for Spanish-language resources and a means of ending abuse that allays their fear of losing their own or their family's immigration status or income. It would be a mistake to ascribe these concerns to one essential "Latina" agenda. These considerations are both under-inclusive to the extent that an immigrant woman from China may face the same language barrier and social pressures, and over-inclusive to the extent that many native English-speaking Latinas have greater access to political and economic resources, but face other obstacles to separation from violence, such as concern for the safety or custody of their children.

With these challenges in mind, critical discussion of Latina/o experiences is useful for significant reasons. First, criticism of Latina identity underscores the diversity of needed resources among Latinas as a collective. Second, it highlights new political and communal efforts, as well as common pressures, to conform to dominant American stereotypes of gender, religious, and familial roles.⁶ Third, many Latina survivors of domestic violence experience common difficulties with utilizing available resources, both while they are abused and during the process of reporting the crime, that other survivors would not experience.⁷ This experience is a persistent obstacle to individual women and to the general discourse about domestic violence in predominantly Latina/o communities. The women who are the subjects of this paper identify themselves as Latina and the activist leadership against domestic violence in Washington Heights organizes itself (and the Brides' March) under the name New York Latinas Against Domestic Violence ("NYLADV").⁸ This self-identification is a statement that the community they form shares distinct challenges and seeks distinct solutions outside of and within mainstream society.

III. GLADYS RICART'S EXPERIENCE OF DOMESTIC ABUSE

The Brides' March was born in the wake of Gladys Ricart's murder by her former boyfriend and abuser, Augustin Garcia. Gladys Ricart emigrated from the Dominican Republic in her early twenties, speaking only Spanish, and endeavored to become the first person in her family to complete college.⁹ She was a single mother with one son, Davis Ricart.¹⁰ In

⁶ Berta Esperanza Hernandez-Truyol, *Borders (En)gendered: Normativities, Latinas, and a Latcrit Paradigm*, 72 N.Y.U. L. Rev. 882, 812 (1997).

⁷ Crenshaw, *supra* note 4, at 1262.

⁸ See New York Latinas Against Domestic Violence, <http://www.NYLatinasagainstDV.org> (last visited Mar. 10, 2004).

⁹ Maria Alvarez et al., *Anguish in Washington Heights: Dominicans Cry for Victim*, N.Y. Post, Sept. 29, 1999, at 7.

the 1990s, Ricart received welfare assistance and later became independent.¹¹ She was employed as a file clerk at a Manhattan travel agency where she was eventually promoted to the position of accounts payable manager.¹² In 1995, she moved from the Bronx and bought her first home in Ridgefield, New Jersey.¹³ In the early 1990s, Ricart met Augustin Garcia and they began a romantic relationship that spanned seven years.¹⁴

The relationship between Ricart and Garcia was very public and ostensibly committed.¹⁵ Garcia was a prominent community leader and businessman in Washington Heights, catering to the economic, educational, and political needs of the Dominican community.¹⁶ He was friendly with mayors and members of Congress and in 1996 was the Grand Marshal of the Dominican Day Parade with Ricart by his side.¹⁷ In their private life, however, Garcia was unfaithful and abusive: Ricart's friend remarked, "Everyone knew that he had other women. She was often upset with him."¹⁸ Mireya Cruz, Director of Nuevo Amancer,¹⁹ opined that Ricart sought the more socially respected status of being Garcia's wife rather than his girlfriend, and his unwillingness to commit to marriage was a source of tension. "For women, especially leaders in [this] community, you want the proper introduction, not girlfriend, but wife. . . . You feel that you deserve it."²⁰ Garcia was explicitly abusive and violent toward Ricart.²¹ Garcia

¹⁰ Paulo Lima, Friend Says Victim Always Thought of Others: New Lover Was Answer To Prayers, The Record (Bergen County, N.J.), Sept. 28, 1999, at A5. [hereinafter Friend Says Victim].

¹¹ Andrew Jacobs, A Success Story Unravels in Gunshots and Death, N.Y. Times, Oct. 5, 1999, at B1.

¹² *Id.*

¹³ Annual Report, *supra* note 3, at 1-2.

¹⁴ Paulo Lima, Bride, Killer Met Night Before: Jury Sees Video of Pair in Grocery Store, The Record (Bergen County, N.J.), Oct. 10, 2001, at 1.

¹⁵ Jacobs, *supra* note 11, at B1.

¹⁶ *Id.*

¹⁷ *Id.*

¹⁸ Bride's Killing is Revisited on Videotape Before a Jury, N.Y. Times, Oct. 5, 2001, at D9 [hereinafter Bride's Killing is Revisited].

¹⁹ In English, this means "New Dawn." Nuevo Amancer is a Washington Heights-based organization providing outreach and advocacy against domestic violence, and its clientele is primarily Latina. Nuevo Amancer is part of the Committee for Justice for Gladys Ricart, a coalition of Latina domestic violence activists and organizations (now called New York Latinas Against Domestic Violence).

²⁰ Interview with Mireya Cruz, Director, Nuevo Amancer in Washington Heights, N.Y. (Nov. 6, 2002).

²¹ Unhappy Ending/Slain Bride Had Called Romance "A Fairy Tale", Newsweek, Sept. 28, 1999, at A8.

pointed a gun at Ricart during arguments on multiple occasions.²² After many years, Ricart terminated the relationship, yet Garcia stalked her and continued to sabotage her home and work life.²³

Ricart struggled to accomplish the separation process until the last moments of her life, and Garcia threatened her until the end. Ricart once told a co-worker, "If one day I don't show up here, he's the one who did it."²⁴ Garcia used such tactics as staging a mock funeral arrangement and strewing dozens of white roses across her lawn.²⁵ He also tried to break into her house and threw rocks at her windows when he knew she was home.²⁶ The police confirm that Ricart called to report the incidents, but state that she declined to press charges or seek protective injunction.²⁷ After the breakup with Garcia, Ricart began a relationship with James Preston.²⁸ Two months after their first meeting, Ricart and Preston were engaged.²⁹

Ricart's experience illustrates the pressures faced by members of an insular minority community not to enforce laws against domestic violence. Utilizing domestic violence protections is often maligned as "airing dirty laundry," especially for those who play a symbolic role as political minority leaders.³⁰ Professor Kimberlé Crenshaw writes that this tension is problematic across various racial minority communities:

People of color often must weigh their interests in avoiding issues that might reinforce distorted public perceptions against the need to acknowledge and address intracommunity problems. Yet the cost of suppression is seldom recognized, in part because the failure to discuss the issue shapes perceptions of how serious the problem is in the first place.³¹

²² Douglas Montero, Grieving Family Defends Victim's Honor, N.Y. Post, Sept. 30, 1999, at 20.

²³ Jacobs, *supra* note 11, at B1.

²⁴ *Id.*

²⁵ Paulo Lima, Bride's Family Saw Trouble Coming: No One Dared To Say Ex-Lover Was Near, The Record (Bergen County, N.J.), Sept. 29, 1999, at A1.

²⁶ Paulo Lima, Witnesses Testify Gunman Stalked Bride: Jurors Hear 911 Tape From Earlier Conversation, The Record (Bergen County, N.J.), Oct. 6, 2001, at A3.

²⁷ *Id.*

²⁸ Jacobs, *supra* note 11, at B1.

²⁹ *Id.*

³⁰ Rivera, *supra* note 5, at 255 ("[The] demands for a community response to [domestic] violence have been met with claims that such issues are private matters that cause division within the community.").

³¹ Crenshaw, *supra* note 4, at 1256.

Throughout the separation process, Ricart prioritized Garcia's reputation in the community over her own needs and safety. Mireya Cruz remarks:

The first time the police came to her house in New Jersey, the police wanted to arrest him, [but] she wanted to protect him from scandal. This is something very cultural in the Latin community. In [the Dominican Republic], people are proud to never be in court, to never be in prison. People say, "I've never been involved in court, or in prison." If you have trouble, and have to go to police, it puts a question that this is a trouble person. Other people will want to be distanced, maybe that's a trouble-maker for them.³²

The pattern of women who neither disclose their abuse nor trust law enforcement contributes to the silence and denial about the occurrence of domestic violence.

Garcia's public persona thus added a political dimension, and Ricart's separation was further complicated by the premium her community placed on privacy in intimate relationships and in the family.³³ Across all American cultures and ethnicities, the "violence of privacy" has relegated domestic violence to a private shame, despite its destructive reach into the public community.³⁴ However, there is an intra-cultural stereotype that in intimate relations, the Latino's interests must subsume the Latina's as a matter of fidelity.³⁵ To the extent that her male partner and the community as a whole expect her to be domestic, a Latina is responsible for sustaining familial privacy, even to her own detriment.³⁶ This intra-cultural aversion to publicizing domestic abuse is compounded by external factors, such as the cultural prejudice and language barriers many Latina/os have experienced in American legal procedure and police intervention.³⁷

On September 26, 1999, the day of Ricart and Ashton's wedding, Garcia approached her house wearing a suit and carrying a briefcase.³⁸

³² Cruz, *supra* note 20.

³³ Rivera, *supra* note 5, at 255.

³⁴ See generally Elizabeth M. Schneider, *The Violence of Privacy*, 23 Conn. L. Rev. 973, 978 (1991) (stating that the decision about what society protects as "private" is a political decision that always has important "public" ramifications).

³⁵ See *infra* notes 104-109 and accompanying text.

³⁶ Rivera, *supra* note 5, at 241 ("A Latina must serve as a daughter, a wife, and a parent and must prioritize the needs of family members above her own. . . . She is treasured as a self-sacrificing woman who will always look to the needs of others before her own.").

³⁷ *Id.* at 243-56.

³⁸ Jacobs, *supra* note 11, at B1.

Ricart was inside dressed in her wedding attire, posing for a photographer.³⁹ Ricart's brother tried to dissuade Garcia from entering, but he replied, "I just want to congratulate her on her wedding day."⁴⁰ He subsequently entered the house and fired five shots at Ricart, landing three shots and killing her.⁴¹ He attempted to shoot himself, but was restrained by Ricart's family until the police came.⁴² Police arrested and searched Garcia and found five more rounds of ammunition in his pockets.⁴³ When Garcia entered the house, the photographer's video camera was left running on a tripod and Garcia's culpability was captured on videotape.⁴⁴ The story of Ricart's murder was covered widely by local networks and newspapers.⁴⁵

IV. LEGAL, INTRA-COMMUNAL, AND MEDIA REACTIONS TO RICART'S MURDER

While news of Ricart's murder garnered national attention, many Latina/o communities remained silent about the connection between this sensationalist incident and the larger problem of domestic abuse. Josie Ashton learned of the incident while working as a community activist and paralegal in the Domestic Violence unit of the Miami District Attorney's office.⁴⁶ Professionally outraged at the community's apathetic response to Ricart's murder, Ashton conceived of a protest that would raise awareness of domestic violence against Latinas. The Ricart case captured Ashton's social concern because some members of the Latina/o community, including Ashton's own father, blamed Ricart for provoking Garcia with their breakup and her new engagement.⁴⁷ In fact, to enhance Garcia's defense, his counsel announced that "Garcia and Ricart had spent last weekend together . . . and [Garcia] was shocked when he learned she was

³⁹ Lima, *supra* note 25, at A1.

⁴⁰ *Id.*

⁴¹ Jury is Shown Second Videotape In Case of Wedding Day Killing, N.Y. Times, Oct. 10, 2001, at D3.

⁴² Friend Says Victim, *supra* note 10, at A5; *see also* Paulo Lima, Sudden Switch in Strategy: Provocation Defense Abandoned In Wedding Day Slaying, The Record (Bergen County, N.J.), Oct. 17, 2001, at A1.

⁴³ Friend Says Victim, *supra* note 10, at A5.

⁴⁴ Bride's Killing is Revisited, *supra* note 18, at D9.

⁴⁵ Ricart's murder was covered by media outlets such as the Associated Press, The New York Times, The New York Post, and both English- and Spanish-language television news programs.

⁴⁶ Ashton, *supra* note 1.

⁴⁷ *Id.*

marrying someone else.”⁴⁸ The prosecution requested that the family (many of whom would be called as trial witnesses) not interfere with their strategy by responding to the defense’s statements to the press or media inquiries.⁴⁹ First Assistant District Attorney of Bergen County, Fred Schwanwede, explains, “Our policy is always to try cases in court and not the media.”⁵⁰

The pressure to remain silent about Ricart’s experience had an unintentional yet crystallizing effect on the decision for grassroots social activism among Latinas. Despite the prosecution’s strategy, the case for Latina culpability in incidents of domestic violence was being tried in every Washington Heights café, barber shop, and living room. Several community-based Latina activists decided they would publicly advocate for the Ricart family because the prosecution could not. Ricart’s supporters and members of her community voiced themselves as The Committee for Justice for Gladys Ricart, a collective of Latina activists and organizations against domestic violence.⁵¹ The Committee “sought justice for Gladys’ murder, support for her family and also to raise awareness of the issue of domestic violence and its consequences.”⁵² The Committee was an ongoing presence at the courthouse during Garcia’s trial, correcting misinformation and re-establishing the role of domestic violence advocacy in Garcia’s crime, as well as the mainstream and Latina/o agendas.⁵³

Even with the Committee’s efforts, Ashton saw this as a near-lost opportunity to raise awareness of domestic violence among Latina/os:

To me it wasn’t about Gladys—I see these cases every day. [It was that] these reports were on the news in New Jersey, New York, and in Ridgefield, and the potential jurors were watching these reports. If they don’t understand the cycle of domestic violence, they can’t understand the evidence. “You make your bed; you lay in it.” Domestic violence is not that simple. . . . You’re reporting but not educating. That’s why I took it upon myself to educate the community on a larger scale.⁵⁴

Before the Brides’ March, nearly all news media coverage of Ricart’s death portrayed Garcia as the actor and Ricart as his object. The

⁴⁸ Lima, *supra* note 25, at A1.

⁴⁹ Telephone Interview with Fred Schwanwede, First Assistant District Attorney of Bergen County (Nov. 7, 2002).

⁵⁰ *Id.*

⁵¹ Annual Report, *supra* note 3, at 2.

⁵² *Id.*

⁵³ Adelita Medina, *Crime of Passion Defense Should Not Be Permitted*, Women’s eNews, Nov. 14, 2001, at <http://www.womenenews.net/article.cfm/dyn/aid/722/context/archive>.

⁵⁴ Ashton, *supra* note 1.

first story from the Associated Press in English and Spanish language papers was titled: Ex-boyfriend Charged with Killing Bride on Wedding Day.⁵⁵ Other news coverage of the incident and the subsequent trial likewise framed the incident as an impassioned love triangle gone too far.⁵⁶ The narrative was one-dimensional: Garcia was "abusive and violent," "nobody liked him," and he was a "bastard [who] should rot in hell."⁵⁷ In contrast, Ricart was a tragic beauty, "radiant in her wedding gown and tiara."⁵⁸ She had been abused for most of seven years, however her family told reporters that "everything changed for Ricart . . . when she met Preston."⁵⁹ The AP reporter wrote that Ricart had said Preston gave "love new meaning."⁶⁰

The media's "love [with] new meaning" narratives erase the psychological basis of domestic abuse and imply that Ricart stayed with Garcia out of ignorance about "love" rather than for her own attempted survival. The article perpetrates a profound misunderstanding of domestic abuse: All it takes is a "good man" to end the cycle of domestic violence. Consequently, the repeated references to Ricart as "the bride" puts the analytical focus more on her anticipated marriage to Preston than on her larger experience as a victim of domestic violence.⁶¹

The media and Garcia's legal defense team portrayed Garcia as a man driven over the edge by passion and jealousy.⁶² Furthermore, Garcia and his legal defense team painted Ricart as duplicitous and sexually promiscuous.⁶³ According to Ashton:

⁵⁵ Associated Press, Ex-boyfriend Charged with Killing Bride on Wedding Day, The Record (Bergen County, N.J.), Sept. 28, 1999, at A16.

⁵⁶ Ashton, *supra* note 1. See *id.* Some of the newspaper headlines include: Bride Shot Dead by Former Lover As Groom Waited, The Scotsman, Sept. 28, 1999, at 13; Friend Says Victim Always Thought of Others: New Lover Was Answer To Prayers, *supra* note 10, at A5; Ex-Lover Kills Bride's Dream, The Daily Telegraph (Sydney, Australia), Oct. 2, 1999, at 35; Spurned Lover Guilty in Slaying, Newsday (N.Y.), Oct. 23, 2001, at A13; Slain Bride Led "Double Life," Says Defense: Suspect's Lawyers Put Victim In Bad Light, The Record (Bergen County, N.J.), Apr. 4, 2001, at A1.

⁵⁷ Associated Press, *supra* note 55, at A16.

⁵⁸ *Id.*

⁵⁹ *Id.*

⁶⁰ *Id.*

⁶¹ Bride Shot Dead by Former Lover As Groom Waited, *supra* note 56, at 13.

⁶² Defense attorney, Edward Jerejian, leaned heavily on the "heat of passion" theme throughout his two hour and twenty minute closing argument in Superior Court in Hackensack. "He sees Gladys Ricart in this wedding dress and he's enraged, he's excited, he's impassioned," Jerejian told jurors. Paulo Lima, Slaying Suspect Called Confused: Lawyers Say Garcia Snapped, The Record (Bergen County, N.J.), Oct. 19, 2001, at 3.

⁶³ Garcia and Ricart met at a Pathmark grocery store late the night before her wedding. Subsequently, Garcia testified that Ricart left the market and went to his home,

[Some] people were blaming her and trying to destroy who she was. The media took the opportunity to show the footage of the murder—that she was in her gown and there was somebody waiting for her at the altar. They took that opportunity to parade [the video footage of] the murder all over town.⁶⁴

Because of the sensationalist nature of the murder and trial, the media's dominant gaze on the Latina/o community intensified, alternately provoking anger about Garcia's brutal acts and outrage about Ricart's alleged role in her own victimization.⁶⁵ The media gaze was largely voyeuristic, and Ashton (in coalition with the Committee for Justice for Gladys Ricart) sought a deeper, sustained discourse on domestic violence.

V. ONE WOMAN'S MARCH

With the first Brides' March, Ashton made an example of herself. Before she marched, however, Ashton felt it was ideologically important to consult with Ricart's family and other Latina activists in an effort to assess Ricart's perspective.⁶⁶ Through the stories of her family and friends, Ashton learned about Ricart, including her efforts to be independent of the abuse. A critical aspect of domestic violence advocacy is providing support to enable an abused woman to express herself and gain control of her life.⁶⁷ By learning the full context of Ricart's history, Ashton legitimized Ricart's attempts to regain her autonomy.

For many legal purposes, total separation is the only way an abused woman can prove her effort at resistance; even then, leaving the relationship is often considered a type of failure.⁶⁸ This construction negates both the

staying in his bedroom with him until 2:30am. Defense counsel used videotape of the encounter to argue that Ricart was dating both Garcia and Preston at the same time. Garcia also told detectives that he had sex with Ricart three or four times the week before her planned wedding. *See generally* Lima, *supra* note 14, at 1.

⁶⁴ Ashton, *supra* note 1.

⁶⁵ Cruz notes how the depiction of Ricart through the defense's strategy and media coverage frustrated the reality of Ricart's experience. "Everywhere I went, people were saying that this happened because Gladys was seeing other men. One guy told me, 'I'm very sorry about Augustin because he destroyed his life.' I said to him, 'Where's Gladys, and where's [Garcia]?' Gladys 'destroyed his life'—which is the one thing she never wanted to do!" Cruz, *supra* note 20.

⁶⁶ Ashton, *supra* note 1.

⁶⁷ *See* Rivera, *supra* note 5, at 257; Elaine Chiu, *Confronting the Agency In Battered Mothers*, 74 S. Cal. L. Rev. 1223, 1257; Christine O'Connor, *Domestic Violence No-Contact Orders and the Autonomy Rights of Victims*, 40 B.C. L. Rev. 937, 961.

⁶⁸ *See generally* Martha R. Mahoney, *Victimization or Oppression? Women's Lives, Violence, and Agency*, in *The Public Nature of Private Violence* (Martha Albertson Fineman & Roxanne Mykitiuk eds., 1994); *see also* Martha R. Mahoney, *Legal Images of Battered Women: Redefining the Issue of Separation*, 90 Mich. L. Rev. 1, 64 (1991) (stating

difficulty of separation and the woman's attempts at self-articulation. Ashton proposed the idea of the Brides' March to Ricart's family before proceeding in order to acknowledge that they and their community were victims of this crime as well:

I went looking for their blessing and approval to start the march. I wasn't going to just throw myself out there without letting them know. . . . I shared my vision with Grace [Perez of the Victim Intervention Program] and she immediately saw it. I told her I would be in New York next week, I met with the committee, the family was there, and the rest is history.⁶⁹

Ashton says that Ricart's family felt so compelled by her idea that "the first day that I walked they were there with me at all times, and I walked that day ten hours."⁷⁰

Ashton's March was a lesson in individual empowerment, the progressive revision of gender narratives, and intergenerational education. In order to conceive of the March, Ashton first had to redefine her role in her own family—she had to resolve with her husband the parental and financial logistics of leaving her job and children.⁷¹ She also had to explain to her children the importance of domestic violence advocacy. The entire family became involved in Ashton's pursuit:

The name Gladys became a friendly name in my house and they knew that Gladys was the woman who was shot, so they felt like they knew her. I told them I had to do this for Gladys, and I put on my wedding gown. My eight-year-old daughter said, "Does that mean you're going to do this thing and there wasn't going to be anymore domestic violence?" . . . I said, "Even if there was one person I could save, educate, or inform . . . it was all worth it." Even though there were thousands of people affected by it. She's nine now and she's all excited about it now that it's becoming a national movement.⁷²

Ashton's March was a pedagogic endeavor not only because of its political and social aspirations, but also because it modeled for her family

that dominant legal and social perspectives on domestic abuse are patriarchal; victims often sustain cycles of domestic violence because from a patriarchal standpoint, an attempt at "leaving a violent relationship is widely perceived as an admission of defeat rather than victory").

⁶⁹ Ashton, *supra* note 1.

⁷⁰ *Id.*

⁷¹ *Id.*

⁷² *Id.*

and colleagues the breadth of new possibilities for effective individual activism.

Ashton recognized apathy as the most formidable obstacle in raising awareness about domestic violence, so she structured her march to engage communities in a practical way that could be sustained in the long-term.⁷³ In every community she encountered during the march, Ashton stayed overnight at the local women's shelter.⁷⁴ Her presence often attracted local news coverage.⁷⁵ In each interview, Ashton discussed her reasons for marching and what she had learned about the town's resources for abused women and drew attention to the name of the shelter at which she was staying.⁷⁶ "My strategy was walk [and] while I'm in town . . . let [women] know that the local services are available."⁷⁷ Ashton localized the March in order to make the issue more personal for communities that may have already heard Ricart's story, but failed to connect her situation to their own because of ethnic and cultural differences.⁷⁸ This strategy was effective to the extent that Ashton raised awareness in close-knit communities where protecting privacy may likewise be an obstacle in reaching abused women. By contextualizing the story of domestic abuse in each community, Ashton's media interviews reflected more accurate local pictures and promoted localized sources of recourse. "[If I stop] in Beuford, I'm staying at CODA, at the same time, I'm telling them about the positive programs that are in their hometowns."⁷⁹ Ashton's strategy acknowledges stereotypes of domestic abuse and aims to defy them. This strategy could be improved by also addressing why domestic violence, when framed as a "minority problem," has been dismissed by dominant society.⁸⁰

Until the Brides' March, the only recourse highlighted in Ricart's case was the prosecution against Garcia, which did little more than provide her family and society some peace of mind and resolution. Ricart had spoken with her sister, friends, and co-workers about her attempts to separate from the violence. However, these conversations were private, often ending with judgment or misunderstanding of the domestic violence cycle. Cruz explains:

⁷³ *Id.*

⁷⁴ *Id.*

⁷⁵ *Id.*

⁷⁶ *Id.*

⁷⁷ *Id.*

⁷⁸ *Id.*

⁷⁹ *Id.*

⁸⁰ See Crenshaw, *supra* note 4.

"[H]er sister Yolanda said in court she feels very bad because when Gladys said to her in her house that Garcia has two faces, she never thought this is a domestic violence situation. She said, 'why you don't leave him.' [Yolanda said], 'I never get to her the support to leave the relationship.' That happens frequently when the women try to disclose the abuse: most people don't understand and say 'why you don't leave him, why you stay?'"⁸¹

Because Ricart's efforts ended in her death, the prosecution and eventual conviction of Garcia inevitably falls short of achieving justice for Ricart and her family. Yet Ashton's protest takes up the pursuit of justice for Ricart and other Latinas surviving domestic abuse by bearing public witness to her struggle to separate from violence. Ashton did justice to Latina activism by fueling public conversations that treat domestic violence with pragmatic urgency.

The Brides' March has become an annual event in which hundreds of Latinas and other domestic violence advocates wear wedding gowns and march across their cities.⁸² As the memory of Gladys Ricart fades in the dominant social memory, the March will arguably lose its sensational quality in the mainstream media. In 2002, its third year, Ashton says the March "didn't make the cover of the Herald. Not even the local paper."⁸³ However, the participant base is growing. In past years, the March has bloomed in New York, Washington, D.C., Miami, and even Spain.⁸⁴ The first March in Washington, D.C. was led by Mexican-American film actress, Salma Hayek, and both the Washington and New York Marches had corporate sponsorship.⁸⁵ The NYLADV aspires to bring the Brides' March to New Mexico and, eventually, the Dominican Republic (significantly, the nation of origin for many of the leaders of the NYLADV).

VI. THE MEANINGS OF THE WEDDING GOWN

The wedding gown is important for the March because of what it symbolizes. Traditionally, white women (with the broad exception of many working-class and low-income women) have been valued in dominant society to the extent that they make "delicate" and "feminine" wives.⁸⁶ The

⁸¹ Cruz, *supra* note 20.

⁸² Annual Report, *supra* note 3, at 7.

⁸³ Ashton, *supra* note 1.

⁸⁴ Cruz, *supra* note 20.

⁸⁵ *Id.*; Annual Report, *supra* note 3, at 1 (listing corporate sponsors).

⁸⁶ Ana M. Novoa, *American Family Law: History-Whostory*, 19 Chicano-Latino L. Rev. 265, 274 (1998).

symbol of the white wedding gown captures notions of objectification, desirability, and sexual virtue that were traditionally valued in white women and which made them "delicate" and "feminine" wives. In contrast, women of color in America share a long history of relegation to domestic labor, sex work, forced labor, and even the legal denial of the liberty to marry as a means of racial denigration.⁸⁷ Although white women and women of color are held to many of the same patriarchal social standards, the racial and ethnic dimensions of their experiences shape their respective needs in radically different ways.⁸⁸ Historic, racial, and cultural context is as necessary to a full understanding of the implications of wearing the wedding gown as are traditional notions of gender, marriage, and family.

The civil rights and feminist movements overlap ideologically, yet historically, both have failed to include women of color in their critical social vision.⁸⁹ Since the 1950s, civil rights law has de-legitimized racial discrimination in education, the workplace, and marital relations.⁹⁰ Subsequently, racial progress laid the normative groundwork for the feminist movement of the 1970s, which used similar fairness and equality arguments to win legal and political gains for women.⁹¹ Early versions of feminism, however, undermined or ignored the distinct concerns faced by women of color.⁹² Similarly, civil rights rhetoric failed to incorporate sexism as part of the antiracist stance.⁹³ Problematically, Black and Chicano nationalist movements of this period tried to appropriate patriarchal stereotypes of a hyper-masculine man of color and a subservient, family-oriented woman of color.⁹⁴ Other nationalist movements, in the Puerto Rican community for example, sought to respond to disproportionate

⁸⁷ See Twila L. Perry, Family Values, Race, Feminism and Public Policy, 36 Santa Clara L. Rev. 345, 347-48 (1996) ("During slavery, the government condoned and/or promoted a system in which marriage and family among slaves had no legal status); Dorothy Roberts, Spiritual and Menial Housework, 9 Yale J.L. & Feminism 51, 60 (1997) (stating that historically, Black women and Latinas have composed a large segment of the population of domestic laborers).

⁸⁸ See generally Crenshaw, *supra* note 4 (discussing the failure of contemporary feminist and antiracist discourses to pursue the intersectional situation of women of color); Angela Harris, Race and Essentialism in Feminist Legal Theory, 42 Stan. L. Rev. 581 (1990) (discussing the failure of mainstream feminism to substantively incorporate racial identity).

⁸⁹ See generally Crenshaw, *supra* note 4.

⁹⁰ Griggs v. Duke Power Co., 401 U.S. 424 (1971); Loving v. Virginia, 388 U.S. 1 (1967); Brown v. Bd. of Educ., 347 U.S. 483 (1954).

⁹¹ Owen M. Fiss, What is Feminism?, 26 Ariz. St. L.J. 413, 416 (1994).

⁹² See generally Harris, *supra* note 88.

⁹³ See generally Alma M. Garcia, The Development of Chicana Feminist Discourse, 1970-1980, in The Social Construction of Gender 269 (Judith Lorber & Susan A. Farrell eds., 1991).

⁹⁴ Novoa, *supra* note 86, at 276.

poverty and crime among people of color and the effects of historic discriminatory regulations of the family.⁹⁵ However, proponents of the Puerto Rican nationalist movement mislabeled forms of Latina feminism as an "Americanized" high-brow theory meant to advance assimilation and subvert pan-Latino solidarity.⁹⁶ Likewise, Latina feminists were rejected as extremists or traitors, airing the intra-cultural laundry before white feminists and dominant society.⁹⁷

Contemporary feminist and antiracist discourse is authored by scholars writing on a much greater variety of experiences. Nevertheless, outside of politics and academia, the discourse on racial and gender equality remains fractured. For many Latinas, feminism's past failures to address their experiences have spurred a cynicism about the potential for any useful critique. Ashton labels mainstream feminism as "radical" and therefore does not label herself a feminist.⁹⁸

The leadership of the Brides' March has appropriated the wedding gown because they believe that it plays a distinctive role in Latina identity that is unappreciated in mainstream feminism. By way of explanation, Cruz relays her experience as a bride as a moment that heightened her esteem in the eyes of her family and her Latina/o community:

For a Latina, getting married is a very important day. This is the dream for most Latinas: get married in white. In the Dominican Republic, if your daughter gets married in white in the church, you say "Oh no, my daughter is different, she got married in white." My mother was very proud to say that her daughter had a white wedding in the church.⁹⁹

Cruz thus describes the wearing of the gown as a transformative personal and public experience.

⁹⁵ Rivera, *supra* note 5, at 249.

⁹⁶ *Id.*

⁹⁷ *Id.*

⁹⁸ On being a feminist, Ashton remarks:

We as women confuse the beginnings of domestic violence with love. We say, "my man would never let me out of the house wearing that, my man is crazy about me." Or he says, "You don't have to work, you can stay home." . . . This community thinks that everybody [who] is trying to protect women's rights is a radical feminist or a lesbian. My own opinion is I fight for what I believe. It's not good to beat your grandparents, your children, or your wife. But the label is there.

Ashton, *supra* note 1.

⁹⁹ Cruz, *supra* note 20.

Cruz's narration of being married in the white gown implicates several meaningful assumptions about her culture. Cruz, like a considerable percentage of Latina/os, is of Catholic heritage.¹⁰⁰ The Catholic Church promotes abstinence, considering premarital sex a sin. Wearing a white wedding gown is a demonstration that goes beyond virginity and references her expectations of the role she will play in her marriage, family, and community.¹⁰¹

Cruz focuses on the issue of familial pride and status within the community. She implies that wearing white offers the opportunity to raise a woman's esteem within her community. From Cruz's account, the essential significance of a Latina wearing a white wedding gown is the enhancement of her familial and communal reputation. Wearing the white gown speaks not only to internal community values, but also to external pressures. A Latina's motivation to enhance her reputation within her community should also be read in the context of values imposed by the dominant society. For Catholic Latinas, stereotypes of Latina/os as hypersexual are not only a form of gender and ethnic discrimination, but also an assault on their religious practice. Therefore, the Latina who wears a white wedding gown performs an act of cultural and religious resistance against social discrimination.

Though the image of the Latina in a white wedding gown is a source of communal pride, the practice is problematic to the extent that the woman wearing the dress is objectified. The ritual of wearing the white wedding dress silences the bride's expression of individuality and reframes her as an object of community and religious resistance rather than an agent.¹⁰² In comparison with other obstacles that Latinas face, many Latinas would argue that the choice to wear a white wedding gown has an insignificant impact on a woman's experience. If one considers a wedding as a once-in-a-lifetime experience, one could argue that merely wearing the white gown on one's wedding day is not tantamount to a lasting acceptance of the strict gender stereotypes and values the dress represents. Cruz, Ashton, and countless other Latinas are constantly working to better Latinas' opportunities for self-determination in their communities. I argue that the impact of the white wedding gown looms larger than critics would

¹⁰⁰ Laura M. Padilla, Piercing Webs of Power: Identity, Resistance, and Hope in Latcrit Theory and Praxis: Latinas and Religion: Subordination or State of Grace?, 33 U.C. Davis L. Rev. 973, 974 (stating that at least 65 percent of Latina/os self-identify as Catholic).

¹⁰¹ Rivera, *supra* note 5, at 241. "The influence of Catholicism throughout Latin America solidifies this image [of the self-sacrificing woman] within the community, where Latinas are expected to follow dogma and to be religious, conservative, and traditional in their beliefs." *Id.*

¹⁰² *Id.* "Within the Latino community, Latinas' identities are defined on the basis of their roles as mothers and wives. By encouraging definitions of Latinas as interconnected with and dependent upon status within a family unit structure, the Latino patriarchy denies Latina individuality on the basis of gender." *Id.*

suggest. The dress is meant to be worn once, but as Cruz states, the wearing of the dress is a lifelong "dream," tied to everyday gender stereotypes and implying a more enduring significance. Furthermore, now that Latinas have appropriated the dress for the purposes of the Brides' March, its symbolism merits even more diligent analysis.

The white wedding gown implicates interdependent, stereotypical marital roles for both Latinas and Latinos.¹⁰³ In her study on the role of Latino culture in mediating family disputes, Berta Esperanza Hernandez-Truyol uses the term *marianismo*¹⁰⁴ to describe the community's expectations for a Latina bride and wife: "*Marianismo* is about sacred duty, self-sacrifice, and chastity. About dispensing care and pleasure, not receiving them. About living in the shadows, literally and figuratively, of your men—father, boyfriend, husband, son—your kids, and your family."¹⁰⁵

To the extent that a Latina self-identifies with *marianismo*, being a Latina bride brings the pressure of preserving one's family, often a priority placed above self-preservation. Whether this commitment is fair or respectful of the Latina's personhood is debatable, and each woman must negotiate this choice independently. The extent to which a Latina subscribes to the pressures of *marianismo* will likely bear on her ability to be critical of abuse and separate from her abuser.

The cultural narratives told by Cruz and Hernandez-Truyol naturally invoke the stereotypic pressures for Latinos to be macho. The stereotypes of the domineering Latino and the domineered Latina must be understood in relationship to each other.¹⁰⁶ *Machismo* is a term used to express that a Latino's strength and capability as a partner and father are demonstrated by an external appearance of control over his family and his display of sexual virility.¹⁰⁷ Under this paradigm, the Latino controls the family's public reputation, and the Latina serves the family's private reputation by singly managing all practical responsibilities of the family and

¹⁰³ *Id.* (concluding in part that, "for Latinas, cultural norms and myths of national origin intersect with these patriarchal notions of a woman's role and identity. The result is an internal community-defined role, modified by external male-centered paradigms").

¹⁰⁴ See generally Rosa Maria Gil & Carmen Inoa Vazquez, *Maria Paradox: How Latinas Can Merge Old World Traditions with New World Self-esteem* (1996) (describing how aspects of *marianismo* shape the self-image of Latinas); see also Hernandez-Truyol, *supra* note 6, at 915.

¹⁰⁵ See Hernandez-Truyol, *supra* note 6, at 915.

¹⁰⁶ Gil & Vazquez, *supra* note 104, at 464. "[An] important area of inquiry should be the extent to which Chicanas, without engaging in 'blaming the victim,' participate, either directly or inadvertently, in instilling and reinforcing mainstay principles of *machismo*." *Id.*

¹⁰⁷ Rivera, *supra* note 5, at 241 ("The standard [dominant] description of Latino males as hot-blooded, passionate, and prone to emotional outbursts is legendary. 'Macho' is the accepted—and expected—single word description synonymous with Latino men and male culture."); see also Reynaldo Anaya Valencia, *On Being an "Out" Catholic Contextualizing the Role of Religion at LatCrit II*, 19 Chicano-Latino L. Rev. 449 (1998).

home. Cruz's childhood experiences illustrate these interdependent pressures:

The first priority of the Latina woman is her family, taking care of her family, beyond taking care of herself. . . . When I was growing up, my father told me my priority was to take care of the house, not go to school and get a degree. He told me my priorities: Get a husband. At that time, I liked to read a lot of books. I had to put them behind the bed. Can you imagine that? That was in my generation. Now I see [a] different . . . generation, same situation.¹⁰⁸

The ideological legacy of the Latina/o cultural perspective fosters the continued marginalization of domestic violence and advocacy in community life. Families that enforce these gendered stereotypes, even those free of domestic violence, do harm by perpetuating gender and racial subordination.¹⁰⁹ To the extent that Latina/o communities privilege these false traditions over enforcement against abuse, an abused Latina may forgo advocacy in the interest of protecting her family from judgment or criticism. Marital stereotypes both shame the community's everyday witnesses into silence and undermine the work of career advocates against domestic violence.¹¹⁰

VII. THE MESSAGE OF THE MARCH

NYLADV states that "because Gladys' wedding dress, a symbol of happiness and everlasting love, has been forever tainted in the Latino community by her murder, the wedding dress is now a powerful and provocative symbol" for the organization.¹¹¹ The Brides' March raises broad awareness, yet sends a mixed ideological message. The leadership of NYLADV characterizes wearing the gown as both a re-commitment to marital roles and an ironic critique of Latina stereotypes.¹¹² These goals are

¹⁰⁸ Cruz, *supra* note 20.

¹⁰⁹ Valencia, *supra* note 107, at 465 ("Talking about being *macho* also means talking about the role of women in our lives. . . . In my own experience, for instance, certainly none of the Chicanas in my life ever suggested that beating, demeaning or otherwise subordinating women is appropriate behavior for Chicano men. Nonetheless, these same women were among the fiercest protectors and enforcers of gendered roles and mores, continually insisting on my strict compliance with certain facets of male *machismo*.").

¹¹⁰ See Devon Carbado, *The Ties That Bind*, 19 Chicano-Latino L. Rev. 283, 291 (1998).

¹¹¹ Annual Report, *supra* note 3, at 3.

¹¹² Ashton, *supra* note 1 ("It's very symbolic—you're pure, starting a new marriage and stuff. But basically the reason I chose to do it is because I knew the media was going to go crazy about it. . . . The way that it's being interpreted and people are receiving it

in tension with each other, as is typical of many activist endeavors: "feminists everywhere confront the joint tasks of selectively appropriating and selectively rejecting various facets of their complex national, cultural and political legacies, a critical engagement that can alone transform one's inheritances into a 'culture' of one's own."¹¹³ In many respects, the March movement has succeeded at becoming a culture of its own, especially through Ashton's individual work and the structural activism that has been established and maintained by the NYLADV in conjunction with the March. The movement also has allowed women to reclaim power while wearing their gowns. Nonetheless, the stereotype of the bride in the white wedding gown is problematic as the symbol of the March because it undermines the March as a means of social critique and a source of discourse.

A. Appropriation of the Wedding Dress as a Re-commitment to the Marital Roles

To Cruz and Ashton, Gladys Ricart inspired the March not because of her notorious death but because her aspirations are so common among Latinas.¹¹⁴ Several rationales explain why the symbol of the white wedding gown has resonated powerfully in Latina communities. First, both Ashton's March and the Brides' March reify the marital commitment. Traditionally, a bride wore the gown for the first and last time on her wedding day, when the couple exchanged scripted vows of mutual support, appreciation, and love, ideally for the first and last time. When Ashton returned to her wedding gown, however, she appropriated it by wearing it for a stretch of three months, reinforcing a reminder of the marital vows for her and her followers. The annual Brides' March can also be viewed as a unilateral renewal of the vows, where the woman sets the rules. Alternatively, dressing the part of a bride unaccompanied by a groom may encourage participants to look inward and make a commitment to love, respect, and protect themselves as they establish personal autonomy from their abusers.

The Brides' March also provides Latinas a temporary free space in which to reflect on their domestic situations and to question settled marital roles. Mothers and wives who march remove themselves from their familial responsibilities to meet other women who struggle with the same challenges. The March disrupts the status quo and provokes discussion among Latinas and within the entire community. Furthermore, the Brides'

is: 'I'll marry you, give my life to you in terms of community but not in terms of dying.' That is the reason that is being received and being sent.").

¹¹³ Uma Narayan, "Westernization," *Respect for Cultures, and Third-World Feminists*, in *Dislocating Cultures: Identities, Traditions, and Third-World Feminism* 33 (1997).

¹¹⁴ Ashton, *supra* note 1; Cruz, *supra* note 20.

March leaves no one behind because the platform is not overtly judgmental. In this respect, the March is a moment in which a Latina bears witness to the fact that she has unfairly judged herself and other Latinas against the stereotypes the gown represents or has too often failed to show herself the same quality of protection and love she once promised to give her partner. Though the uniform of a white gown visually homogenizes the individuals in the marching crowd, the March is a collective acknowledgment of the difficult process of self-definition, especially in the context of a marital relationship. Moreover, the March has created a more public community of women, a coalition of mutual support, where Latinas promise to respect and protect each other.

Ashton is concerned that the media will grow desensitized to the gown-wearing, and eventually lose interest in covering the issues behind the March.¹¹⁵ The attention span of the mainstream media may prove to be short-lived because it is driven by commerce rather than social justice. The March, however, has spread to Latina/o communities in new cities each year.¹¹⁶ The growing number of participants illustrates that Latinas may have forged a space for this event within their communities as an annual event.¹¹⁷ What the March has lost in breadth of public interest, it seems to have gained in targeted Latina/o community-based awareness.

B. Problems Posed by Appropriation of the Wedding Dress

Primarily, the March utilizes a combination of society's familiarity with the wedding dress and its shock at its new application as an instrument of provocative protest. In order to bolster the content of the March, which focuses on substantive treatment, the NYLADV offers a network of resources that systemically target domestic abuse, such as personal counseling, a domestic violence hotline, and cooperative partnerships with other local organizations that serve abused women in order to expand its outreach.¹¹⁸ Still, the use of the wedding gown and the ideological values it underscores create an environment that precludes many issues related to domestic violence from being addressed by the March itself. For this reason, the March's use of the wedding gown as a tool of activism creates both new awareness and lost opportunities to sustain that knowledge.

First, the use of the gown minimizes the involvement of men, and the March could be stronger if its leadership found ways to incorporate Latinos into the ritual. Although many of the participants share their lives with men, the Brides' March does not focus on how men are responsible or

¹¹⁵ Ashton, *supra* note 1.

¹¹⁶ Cruz, *supra* note 20.

¹¹⁷ Annual Report, *supra* note 3, at 7.

¹¹⁸ *Id.* at 8.

can be held accountable for domestic violence. Cruz says that a few men have worn plain clothes to march alongside the women, but the fact remains that most participants will be women because of the wearing of the gown.¹¹⁹ Undoubtedly, one of the March's strengths is that it provides abused women a supportive community of women and offers spatial distance from men in general and abusers in particular. However, men could also play a role in the March without marching; for example, a man or woman could read a male testimony on the impact of domestic violence on his and his family's lives. Without this change, the March reinforces the common misconception that domestic violence activism is primarily a woman's social responsibility.

To illustrate the necessity of incorporating men into the issue of domestic violence, it is instructive to discuss ongoing, community-based advocacy. For example, several NYLADV organizations have incorporated the counseling of abusers as part of their office practice.¹²⁰ Yet this has been challenging for the advocates, some of whom are formerly abused women.¹²¹ Cruz explained: "Two years ago, I didn't agree to work with men, the abusers. Now I hear it's necessary to do it. Now I feel that the women love the men. . . . Sometimes, the first question out of clients is, 'Do you know a program for my husband?' This is reality."¹²²

Although it is essential to put the abused woman's individual needs first, a Latina's interest in protecting her family may be a very close second. For women who have dedicated their lives to raising their children, motherhood and the well-being of their children is a paramount consideration. Maintaining a relationship with the father of her children may be an important consideration for an abused Latina deciding whether or not to seek help. Independent of the issue of children, many Latinas will have decided that they want to try to rehabilitate their relationship with their abusive partner for a variety of reasons. Additionally, outreach to men is important to the extent that male children will model the abusive behavior of their fathers; some women may hope that treatment can break familial legacies of abuse.¹²³ Therefore, the March could be improved to convey

¹¹⁹ Cruz, *supra* note 20.

¹²⁰ *Id.*

¹²¹ *Id.*

¹²² *Id.*

¹²³ *Id.*

Now I see different situation and generation, same situation. Most of the time that's what the children see, and that's what they repeat. I have very young clients. I have a client—every time he sees his father beat [his mother], his father call her very bad words—he is still very traumatized. And sometimes the [young abuser] takes this as an excuse: he is an

some expectation of male accountability. Though the March currently engages men, it does so primarily on the level of sentimentality. Beyond the honeymoon, the wedding gown has virtually nothing to do with an abuser's perspective of married life. Although the interest of male accountability is critical, the March's use of the gown primarily evokes paternalistic pity or nostalgia.

The group-based nature of the March has both helped and hurt the effort to make the issue of domestic violence a public, yet personally relevant, concern for members of the community. Unlike other social causes, domestic violence was not previously a topic that attracted celebrity endorsement or spawned charity gala fundraisers. Ashton remarks that in her experience as an activist, public events to raise awareness about medical health, for example, are considered less taboo (i.e., there is no societal blame directed at cancer victims), whereas many people assume separation from violence is as easy as filing for a restraining order or obtaining a divorce.¹²⁴ In contrast, the Brides' March has broken ground by bringing domestic violence to a national, corporate—and celebrity-endorsed—platform. Yet, the very feature that has made the March most famous—the parade of Latinas in white—hinders it as a vehicle for the realistic, public portrayal of a Latina's experience. To a great extent, the individual stories and identities are obscured by the symbolic white gown, as the Latina community is reduced to a blur of lace and crinoline. The visual obfuscation of hundreds or thousands of Latinas in bridal gowns may fail to challenge people to pursue substantive women's testimony on domestic violence unless they are already invested in these issues. In other words, the impact on the public may be to desensitize them to the issue in general. More importantly, while the March creates the opportunity for Latinas to be public, it is still not constructive enough. More effective activism would address how women can be more "public" in an individualized and realistic context, e.g., when they are alone, with men and family, and in their everyday resistance.

VIII. CONCLUSION: ENCOURAGING SYSTEMIC ACTIVISM BY THE NYLADV

The long-term effects of the symbolic use of the wedding dress in the Brides' March may eventually undermine the countless gains in community-building achieved by the leadership of the NYLADV. It is unclear what effect the problems posed by the wedding gown will have on

adolescent. The difference is that [the young man] had the opportunity to get counselor and to see another view.

Id.

¹²⁴ Ashton, *supra* note 1.

other highly-effective systems set in place by the leadership of the NYLADV and March activists. Yet understanding these other systems of activism is as much a part of the story of the March movement and its future as the discussion of the gown is an indicator of the history of the March. New coalitions resulting from the Ricart murder and the Brides' March have instituted experience-based resources for abused Latinas.

The NYLADV provides support resources tailored to meet the needs of abused Latinas.¹²⁵ Like other organizations, the member advocacy groups pursue strategies that include improving community/police relations, meeting all needs in shelter placement, and providing daycare facilities and support groups, as well as one-on-one advocacy.¹²⁶ It goes without saying that all shelters, social service offices, and police stations must have bilingual resources to service Latinas. But understanding Spanish is just one part of effectively serving abused Latinas in a meaningful way. Many undocumented women do not make it as far as the police station for want of basic Spanish-language information, or concern about losing what little they have saved and spent to immigrate to the United States.

The advocates of the various NYLADV organizations take these process failures into account when offering personal client counseling and are working to promote police sensitivity training.¹²⁷ In light of a long history of tensions between police and Latina/os, among other poor, immigrant, and racial minority communities, police sensitivity education is essential. Cruz notes that often sensitivity-trained officers are not present around the clock, and an officer temporarily covering these needs will use "general" police procedure.¹²⁸ When used in the domestic violence context, otherwise proper officer demeanor seems abrasive and inquisitive,¹²⁹ which can intimidate abused women who are traumatized by verbal interrogation from their abusers. "Everything is very much systematic, in the box, and the Latin community doesn't work that way."¹³⁰ Cruz and her colleagues endeavor to offer a comfortable discourse and environment. Multiple visits for counseling are encouraged so that the client can develop the trust in confidentiality to fully explain her situation.

They often talk for a long time about the good man they have; I let them talk for a long time. By the second or third session, [the client] talks about the experience. It took two sessions [before one client revealed that her abuser] threw her from a flight of

¹²⁵ Annual Report, *supra* note 3, at 8.

¹²⁶ Cruz, *supra* note 20.

¹²⁷ *Id.*

¹²⁸ *Id.*

¹²⁹ *Id.*

¹³⁰ *Id.*

stairs. In the third session she [showed me] five police reports and said she had to go have an abortion because of the stairs.¹³¹

Privacy is another problem in social services offices and police stations. Logically, a person in distress wants to seek the closest refuge possible, however this often means encountering people she or her abuser knows while sitting in a waiting room or going to the ladies' room.

There will always be occasions where abuse protection personnel do not have adequate formal training on some aspect of providing victim service, or where formal training is nonetheless functionally inadequate. The leadership of the Brides' March recognizes that continually working with these agencies to foster empathy and a greater willingness to listen and take cues from the abused women will often fill gaps where there is a shortage of skills or resources, or where language or cultural misunderstandings arise. Ashton underscores the importance of respect and compassion in providing effective support:

Your tone of voice, your willingness to help me can change my life, save my life. You may not have a bed, but you may know one in the next county. You will not trust in a society and leave an abuser and risk your life and your children without that trust.¹³²

The Gladys Ricart case illustrates some of the difficulties individuals face in the Latina/o domestic violence context as well as the powerful role of Latina/o cultural stereotypes in perpetuating the social prevalence of domestic violence. Ashton and other activist leaders were compelled to mitigate the possibilities and limitations of appropriating a problematic "tradition" as they conceived the Brides' March. The leadership of the March was forced to contend with a challenge of resistance similar to Ricart's—the need to make radical changes to the status quo without alienating oneself from one's community. Ashton's one-woman March presented a new and courageous strategy to empower Latinas and bring victims of domestic violence closer to the communities that want to help them. Specifically, the emphasis on localized domestic violence advocacy planted the seed for the burgeoning activist systems adopted and expanded upon by the NYLADV.¹³³

Many current and past participants would argue that a Brides' March that does not feature the wedding gown and incorporates men and children of the community would not be the Brides' March at all. Furthermore, the Brides' March is clearly embraced by Latinas as it is.

¹³¹ *Id.*

¹³² Ashton, *supra* note 1.

¹³³ Annual Report, *supra* note 3, at 1.

Nonetheless, its ideological and structural strategies do not fully address how individual women can be more “public” in their everyday resistance, leaving in doubt the March’s long-term potential to contribute to the broader anti-violence movement.