Unmasking the Nineteenth Amendment Centennial through the Pandemic Lenses of Liberty, Loss, Masculinity, and Leadership [Comments]

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UNMASKING THE NINETEENTH AMENDMENT CENTENNIAL THROUGH THE PANDEMIC LENSES OF LIBERTY, LOSS, MASCULINITY, AND LEADERSHIP

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I. INTRODUCTION ......................................................... 2
II. THE LIBERTY LENS ................................................... 7
   A. “Women’s” Suffrage ............................................. 7
   B. Women’s Political and Civil Rights ...................... 9
III. THE LOSS LENS ...................................................... 14
IV. THE MASCULINITY LENS ......................................... 21
V. THE LEADERSHIP LENS ........................................... 26
VI. CONCLUSION .......................................................... 34
I. INTRODUCTION

Celebrating the Centennial of the Nineteenth Amendment in this political, economic, and social moment was a tale of two extremes. On the one hand, the Centennial occurred contemporaneously with the election of Kamala Harris as the nation’s first woman Vice President offering a tremendous celebratory bookend of political success. On the other hand, we celebrated the Centennial amid a global pandemic that has taken over 740,000 American lives and in a crescendo of searingly painful calls for racial justice. In reflecting on the Centennial in this political, social, and economic moment, this article unmasks the lenses of loss, liberty, masculinity, and leadership in our suffrage narrative.

Organizations began Centennial celebrations starting in 2019. This was before phrases like social distancing, flatten the curve, and uncivil war were in our national vocabulary, and before names like George Floyd and Breonna Taylor were being chanted in our communities. We were all still shaking hands, studying from history books in classrooms filled to capacity, and anticipating a traditional

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1. U.S. Const. amend. XIX (“The right of citizens of the United States to vote shall not be denied or abridged by the United States or by any state on account of sex.”).


ballot box presidential election. My writing on the Centennial would have focused on expanding the story of women’s suffrage to talk about its implications on larger political and social rights—a classic academic paper featuring classic suffragists like Sojourner Truth, Susan B. Anthony, Elizabeth Cady Stanton, Ida B. Wells-Barnett, and Lucretia Mott, and classic quotes such as Abigail Adams’s 1776 letter to John Adams urging him to “remember the ladies” and the famous Suffragette banner outside the White House asking “Mr. President[—]What will you do for woman suffrage[?]” This version of a suffrage article would have been predictable and forgettable.


6. See generally Susan B. Anthony, Nat’l Women’s Hist. Museum (Nancy Hayward ed., 2018), https://www.womenshistory.org/education-resources/biographies/susan-b-anthony [https://perma.cc/PG2V-KCYT]. Susan B. Anthony (1820–1906) was an abolitionist and a key figure in the women’s suffrage movement very closely associated with the Nineteenth Amendment. Id.

7. See generally Elizabeth Cady Stanton, Nat’l Women’s Hist. Museum (Debra Michals ed., 2017), https://www.womenshistory.org/education-resources/biographies/elizabeth-cady-stanton [https://perma.cc/M6LR-SZ7B]. Elizabeth Cady Stanton (1815–1902) was an abolitionist who campaigned for women’s suffrage and the right for married women to own property. Id.


10. Letter from Abigail Adams, First Lady of the United States, to John Adams, Second President of the United States (Mar. 31, 1776) (on file with Mass. Hist. Soc.), https://masshist.org/digitaladams/archive/doc?id=L17760331aa [https://perma.cc/3374-X6QM] (“If [a]rticular care and attention is not paid to the Ladies we are determined to foment a Rebellion, and will not hold ourselves bound by any Laws in which we have no voice, or Representation.”).

11. The First Picket Line—College Day in the Picket Line (photograph), Libr. of Cong. (Feb. 1917), https://www.loc.gov/pictures/resource/cph.3a32338/ [https://perma.cc/H546-7MBM] (showing women protesting outside of the White House with multiple banners with slogans like “Mr. President[—]how long must women wait for liberty[?]” and “Mr. President[—]what will you do for woman suffrage[?]”).
When Spring of 2020 arrived, many of us transitioned into being full-time professors as well as cafeteria workers, I.T. specialists, homework helpers, and screen time monitors for our children. Our law students struggled with finances, COVID-19 diagnoses, and deep professional worries, but we still believed this was all a relative blip in time. I worried that my own children were struggling emotionally, academically, and psychologically, but I smiled, baked bread, shared memes about toilet paper shortages, watched The Tiger King, and seized the moment. I had yet to see a clear connection between what was happening in our communities, schools, and families and my writing about the Nineteenth Amendment Centennial. I saw my private life in one space and my public life in another.

When late Spring and Summer 2020 came around, my family and I marched with our community for racial justice in the wake of the police killings of George Floyd, Breonna Taylor, Ahmaud Arbery, and so many more. I then envisioned using Centennial reflections to celebrate the women of color who worked tirelessly for suffrage, such as Anna J. Cooper, Mary Church Terrell, and Adella Hunt Logan. I thought more heavily about the faults of our

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12. See generally Joyce Lee, Mental Health Effects of School Closures During COVID-19, 4 THE LANCET CHILD AND ADOLESCENT HEALTH 421, 421 (June 2020) (noting that with school closures, many students are unable to access mental health resources and social distancing measures may lead to increased isolation).


16. See generally Rosalyn Terborg-Penn, African American Women in the Struggle for the Vote: 1850–1920 (1998). Anna J. Cooper (1858–1964) was a Black feminist educator who advocated for Black civil rights and women’s rights. Id. Born into slavery, Cooper became the fourth Black woman in the United States to receive her Ph.D. Id.

17. See id. Mary Church Terrell (1863–1954) was a Black educator and activist who advocated for civil rights and Black women’s empowerment. Id. She was instrumental in the creation of the National Association for Colored Women and served as the organization’s first president. Id.

18. See id. Adella Hunt Logan (1863–1915) was a Black educator and administrator who advocated for women’s suffrage and access to education. Id.
oft-celebrated suffrage leaders and how to rewrite narrow conventional narratives.\(^{19}\)

I also thought about abandoning this writing project entirely. My kids had not been in school in months. I had lost months of productivity. What was previously known as the Second Shift,\(^{20}\) a shift that followed a day of work, had become an overlapping shift with the first shift and continuing into the second shift. I then began working my own third shift to produce anything other than teaching and office hours.

Then the 2020 election happened, revealing firsthand suffrage in all its imperfections. We saw voter suppression in full swing.\(^{21}\) We also saw record turnout with expanded mail-in voting and early voting.\(^{22}\) We saw just how fragile suffrage and core democratic principles are and how much ongoing work needs to happen to secure those rights. Then I watched Kamala Harris walk out on the stage in her suffrage white suit.\(^{23}\)

Happy and hopeful tears flowed for the first time in

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19. See, e.g., MIDGE WILSON & KATHY RUSSELL, DIVIDED SISTERS 29–30 (1996). Although Susan B. Anthony advocated suffrage for women and Black people, she did not want Black men to be able to vote before women could vote, stating “I will cut off this right arm of mine before I will ever work or demand the ballot for the Negro and not the woman.” Id. See generally Danielle M. Conway, Black Women’s Suffrage, the 19th Amendment, and the Duality of a Movement, 13.1 ALA. C.R. & C.L. L. REV. 1, 7 (forthcoming 2022), https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3910837 (“Telling herstory by accounting for diverse voices is a narrative device that depends on challenging constructed truths of past events, resurrecting voices omitted from history, and highlighting new knowledge resulting from the inclusion of different perspectives.”).

20. See generally ARLIE HOCHSCHILD WITH ANNE MACHUNG, THE SECOND SHIFT (2003) (describing the reality that in dual career households where women work outside of the home, women are still responsible for the majority of the childcare and housework).


months, and I felt that renewed surge of pride in our Democracy and our ongoing pursuit to form “a more perfect union.”

When I finally sat down to write this article in Winter 2021 for a forthcoming speech, the teary excitement of Kamala Harris’s historic election and the jubilation of celebrating on Black Lives Matter Plaza outside the White House had faded. It had faded in a jolting and sobering way, especially living three miles outside of Washington, D.C., in what had become by then a temporarily militarized city.

Instead, self-described “patriots” dripping in twisted distortions of liberty, masculinity, and losses stormed the United States Capitol. And who were they after specifically? They were after two of our most powerful and impressive women leaders: Speaker of the House, Nancy Pelosi, and New York Congresswoman, Alexandria Ocasio-Cortez. They were also in pursuit of Mike Pence, with toxic masculinity framing this pursuit, as the mob perceived Pence as “weak” and “pathetic.”

A noose erected on the West Lawn of the Capitol painfully reminded Americans that displays of masculinity masquerading as patriotism were also deeply intertwined with white supremacy.

Drawing upon this context, this article unmasks new revelations about the Centennial in light of these profound political, social, and economic transformations. This article explores the centennial through the lens of 2020’s added perspectives on liberty, loss, masculinity, and leadership.

II. THE LIBERTY LENS

A. “Women’s” Suffrage

Women’s suffrage is both narrower and broader than we typically commemorate it. First, on its face, the Nineteenth Amendment does not even affirmatively grant women the right to vote as an affirmative right. Our constitution is a system of negative rights, not positive rights. Rather, the Nineteenth Amendment prohibits discrimination based on sex in voting. Second, nor can the Nineteenth Amendment be celebrated as “women” obtaining the right to vote. We need to strike that phrasing from our history books entirely. The Nineteenth Amendment was ratified in a political, legal, and social moment in which those rights were not actualized for women of color and native women. Black women, particularly in the South, would not fully actualize their fundamental right to vote until the Civil Rights Act of 1964. Rather, in the 1920 U.S. Census—at the time of the ratification—there were 9.9 million Black Americans, of which 85% lived in the South. Southern states imposed extensive formal barriers that compromised the enfranchisement of Black voters, such as poll taxes, literacy tests, and voter intimidation.

30. U.S. CONST. amend. XIX (“The rights of citizens of the United States to vote shall not be denied or abridged by the United States or by any State on account of sex.”).
31. Id.
32. Civil Rights Act of 1964, Pub. L. No. 88-352, 78 Stat. 241 (1964) (codified as 42 U.S.C. § 2000e-2(a)) (ending segregation in public places and banning employment discrimination on the basis of race, color, religion, sex, or national origin). See generally Chinyere Ezie, Not Your Mule? Disrupting the Political Powerlessness of Black Women Voters, 92 COLO. L. REV. 659, 662 (2021) (concluding that Black women are “trapped constituents” in the Democratic Party where their votes are “taken for granted because their political alternatives are limited”). Id. at 663–69 (chronicling a fifty-year fight to secure the right to vote for Black women).
Native American women were not eligible to vote until they obtained citizenship though the 1924 Indian Citizenship Act.\textsuperscript{35} However, they continued to face many barriers and obstacles until the Voting Rights Act of 1965 and a series of legal challenges which actualized the right.\textsuperscript{36} Women of Asian descent also faced barriers until the Immigration and Nationality Act of 1952.\textsuperscript{37} So, the suffrage movement’s successes were undoubtedly narrower than our celebrations suggest. And it is problematic that we celebrate women’s suffrage in this way both because of its inaccuracies and what it obscures about the movement. The major suffrage groups abandoned efforts to gain voter access for women of color in the South to pursue other projects.\textsuperscript{38}

Even today, these struggles continue. Recent Supreme Court cases have gutted the Voting Rights Act of 1965,\textsuperscript{39} creating political


\textsuperscript{38} See Paula Monopoli, The Constitutional Development of the Nineteenth Amendment in the Decade Following Ratification, 11 ConLawNow 61, 65 (2020), https://ideaexchange.uakron.edu/cgi/viewcontent.cgi?article=1105&context=conlawnow [https://perma.cc/2AMW-JZU3] (“Those groups also did not join the efforts of African American suffrage leaders like Ida B. Wells-Barnett and Mary Church Terrell, the National Association of Colored Women’s Clubs (NACWC) and the National Association for the Advancement of Colored People (NAACP) in responding to voter suppression in the South with litigation and legislation. This reluctance to support enforcement legislation and judicial challenges to voter suppression was fueled, in part, by racism. But it was also fueled by the [National Women’s Party’s (NWP’s)] perception that it needed white southern support for its new federal amendment—the Equal Rights Amendment. And that it needed similar support for state legislation that removed the legal disabilities of women.”). See generally Conway, supra note 19, at 2.

By making the sojourn through history using the lens of Black women, an opening is created to understand the perpetuation of racial injustice and oppression through the practices of withholding citizenship and the franchise. It also offers a window into the expertise and resilience of Black women in building and maintaining relationships, alliances, and coalitions to press for the larger vision of universal suffrage, even when their putative partners choose self-interest over the collective.

\textit{Id.}

\textsuperscript{39} Shelby Cnty. v. Holder, 570 U.S. 529 (2013) (holding Section 5 of the Voting Rights Act requires jurisdictions to obtain federal approval before enacting any changes in
conditions for the return of suppressive practices, such as voter purges in Georgia and the disenfranchisement of 700,000 Floridians in Senate Bill 7066.40

B. Women’s Political and Civil Rights

On the other hand, the suffrage victories were also broader than our celebrations eulogize.41 The suffrage movement was about far more than the vote alone.42 This is particularly poignant today as we observe COVID-19’s cruel collateral casualties to women’s social, political, and economic standing.

The Centennial holds modern relevance to women’s liberty and equality more broadly than the vote.43 The entire foundation of our democracy was a family-based system with men as heads of households.44 Because woman’s legal and political identity was subsumed by her husband’s, there was no reason to consider
women’s suffrage at all. Because of coverture, married women were unable to control property, enter contracts, hold legal rights to their children, or control their wages. It was not until the Fourteenth Amendment in 1868 that the word “male” was even used in the constitution describing voting because it was so obvious at our founding that married women would not be enfranchised due to coverture. In fact, opponents of suffrage strategically called women’s suffrage “double suffrage” communicating this idea that married women were already represented vis-à-vis their husbands.

Family and political rights were thus intertwined—women’s “enforced dependency” through marriage justified depriving her political rights. Thus, women could not achieve the public right without transforming the private condition. The liberty at stake in the Nineteenth Amendment was about “democratizing the family so that women could represent themselves in government.” In a sense, Seneca Falls was America’s “first marriage equality movement.”

The Nineteenth Amendment also cannot be understood without its connection to the reconstruction amendments. The Fifteenth Amendment enfranchised Black men as the Nineteenth Amendment did for women. The Fifteenth Amendment, though, was ratified

45. William Blackstone, Of the Rights of Persons, in Commentaries on the Laws of England 121, 442 (Philadelphia, Robert Bell 1771). Coverture is a legal doctrine under which a woman’s rights and obligations are transferred to her husband upon marriage and she is considered to be under her husband’s protection and authority. Id.
46. Hunter, supra note 33, at 82.
47. U.S. Const. amend. XIV, § 2 (“[T]he basis of representation therein shall be reduced in the proportion which the number of such male citizens shall bear to the whole number of male citizens twenty-one years of age in such State”); see also Allison Lange, The 14th and 15th Amendments, Nat’l Women’s Hist. Museum (2015), https://www.womenshistory.org/resources/general/14th-and-15th-amendments [https://perma.cc/A7VL-WFTR] (“Elizabeth Cady Stanton wrote, ‘[i]f that word “male” be inserted, it will take us a century at least to get it out’.”).
49. Hunter, supra note 33, at 78.
50. Id. (describing the “demand for the vote” as “inseparable from a challenge to coverture”).
52. Hunter, supra note 33, at 73, 84–85. See Conway, supra note 19, at 17–21.
53. See Siegel, supra note 43, at 482.
54. U.S. Const. amend. XV, § 1 (“The rights of citizens of the United States to vote shall not be denied or abridged by the United States or by any State on account of race, color, or previous condition of servitude.”); id. amend. XIX, § 1 (“The rights of citizens of the United States to vote shall not be denied or abridged by the United States or by any State on the account of sex.”).
along with the Thirteenth and Fourteenth Amendments. The relationship between the Fourteenth and Fifteenth Amendments is deeply relevant because the Fifteenth furnished political rights to vote, whereas the Fourteenth granted all persons equal protection under the law and protected citizens from deprivations of privileges and immunities. The Fourteenth Amendment originated as distinctly framed around civil rights, but separate from political rights (the right to vote, hold office, serve on a jury, and serve in a militia). Adopters of the Fourteenth and Fifteenth Amendments saw political and civil rights together in this package of amendments. While it was not the ‘woman’s hour’ after the Civil War, the Fifteenth Amendment nonetheless became the structural parallel to the Nineteenth Amendment.

After the Nineteenth Amendment, women’s rights advocates had a glimmer of hope that the amendment would carry more considerable equality gains for women replicating the Fifteenth Amendment. The Supreme Court’s 1923 decision in Adkins v. Children’s Hospital was a “flickering moment” when the Court interpreted the Nineteenth Amendment as being about the larger “contractual, political, and civil status of women.” Adkins considered a District of Columbia

55. Id. amend. XV, § 1; id. amend. XIII, § 1 (“Neither slavery nor involuntary servitude, except as a punishment for crime whereof the party shall have been duly convicted, shall exist within the United States, or any place subject to their jurisdiction.”); id. amend. XIV, § 1 (“All persons born or naturalized in the United States and subject to the jurisdiction thereof, are citizens of the United States and the State wherein they reside.”).

56. Id. amend. XIV, § 1 (“No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States . . . nor deny to any person within its jurisdiction the equal protection of the laws.”).

57. See Akhil Reed Amar, America’s Constitution: A Biography 467, 471 (2005) (noting that today when we talk about civil rights we mean voting, but when the Fourteenth Amendment was ratified, it meant to own property, to contract, to sue, to pursue a career, to inherit, to worship, to assemble, etc.).


59. See Reva B. Siegel, Sex and the Family, 115 Harv. L. Rev. 947, 951 (2002); see also Amar, supra note 57, at 425 (2005) (“[H]ere is exactly the identical same amendment applied to the other half of the Negro race. The southern man who votes for the Susan B. Anthony Amendment votes to ratify the fifteenth amendment.”) (citing 58 Cong. Rec. 618 (1919). See generally Marjorie Spruill Wheeler, A Short History of the Woman Suffrage Movement in America, in One Woman, One Vote: Rediscovering the Woman Suffrage Movement (Marjorie Spruill Wheeler ed., 1995).

60. Adkins v. Children’s Hosp., 261 U.S. 525, 553 (1923) (holding a minimum wage law unconstitutional because women no longer need “special protection . . . in her
minimum wage law passed by Congress in 1918 “to protect the women and minors.” The law fixed minimum weekly wages by industry. The District of Columbia Children’s Hospital sued alleging that these minimum wage requirements—a modern day “living wage” movement—violated their freedom to contract. If women were willing to work for less than the prescribed amount, the hospital argued, it should be allowed to pay the market rate.

The Supreme Court held five to three that this law was an unconstitutional violation of the Hospital’s Due Process rights. It argued that citizens were equally free to engage in “private bargaining.” The minimum wage laws, applied to all women without regard to their need, were an “arbitrary interference with the liberty of contract.” The Supreme Court argued that women’s inferior “civil status” to men was at a “vanishing point” after the Nineteenth Amendment. The Court suggested that women had equal bargaining power in the work place because of their right to vote. This case offered hope that the Nineteenth Amendment’s implications were more sweeping on equality grounds than just the

contractual and civil relationships” in light of the “present day trend” that "culminated in the Nineteenth Amendment"), overruled by W. Coast Hotel Co. v. Parrish, 300 U.S. 379 (1937) (recognizing the “earnestness and vigor” of Adkins, but stating the decision was a “departure” and the “public interest” demanded the protection of women from “unservous and overreaching employers”); Siegel, supra note 43, at 466.

61. Adkins, 261 U.S. at 541–42 (explaining that the legal purpose of the law is “[t]o protect the women and minors of the District from conditions detrimental to their health and morals, resulting from wages which are inadequate to maintain decent standards of living”).

62. Id. at 556 (“These orders fix the sum to be paid to a woman employed in a place where food is served or in a mercantile establishment, at $16.50 per week; in a printing establishment, at $15.00 per week; and in a laundry, at $15 per week, with a provision reducing this to $9 in the case of a beginner.”).

63. Id. at 545 (“[T]he right to contract about one’s affairs is part of the liberty of the individual protected by [the Fifth Amendment].”) (citing Lochner v. New York, 198 U.S. 45, 53 (1905)).

64. See id. at 547.

65. See id. at 545.

66. Id. at 545, 554 (“It is simply and exclusively a price-fixing law, confined to adult women . . . who are legally as capable of contracting for themselves as men.”).

67. Id. at 548, 553, 555 (“[W]hile the minimum wage law] has no other basis to support its validity than the assumed necessities of the employee, it takes no account of any independent resources she may have.”).

68. Id. at 553.

69. Id. at 553–55.
vote. Some states began to interpret the Nineteenth Amendment as standing for more than just the right to vote, such as jury service.

It would ultimately be a staggering 103 more years before the Fourteenth Amendment (the Fifteenth Amendment’s structural parallel) was interpreted as a structural parallel with the Nineteenth Amendment to provide women equal protection of the laws. It would take until 1971 and a mother grieving the tragic loss of her son to suicide before notions of women’s equality would be recognized by the Supreme Court.

Emphasizing how the liberty at stake in the Nineteenth Amendment was both broader and narrower than we typically understand in our history books aligns with the modern landscape too. Women have achieved the vote, but the larger interconnected pieces of equality that Seneca Falls represented are not holding. The COVID-19 pandemic struck at the Nineteenth Amendment’s Centennial plummeting women’s employment rates to rates from 1988. This occurred because women disproportionately hold jobs in the service sector, particularly Black women. This occurred because women are still disproportionately engaging in undervalued and unpaid caregiving for elders and children.

The Nineteenth Amendment gains were greater for White women while Black women, Indigenous women, and all women of color

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70. See id. at 553 ("In view of the great—not to say revolutionary—changes . . . culminating in the Nineteenth Amendment, it is not unreasonable to say that these differences [between the civil status of men and women] have now come . . . to the vanishing point.").
71. Monopoli, supra note 38, at 67 (noting that “there were widely disparate state court approaches to construction of the Nineteenth”).
73. Id. at 71–72, 77. “By providing dissimilar treatment for men and women who are thus similarly situated, the challenged section violates the Equal Protection Clause.” Id. at 77.
were not given the same protections for decades to come. The movement for women’s suffrage largely ended at ratification, yet the movement could have done so much more through litigation in the South and enabling legislation to see these rights actualized for all women.77

The gains in public spaces dramatically transformed private family life. What were not transformed in an enduring way, however, were the cultural norms in public and private life that leave us just now welcoming our first “Second Gentleman,” and still wrestling with the disproportionate burden on women to provide caregiving.78 Just as the attendees at the Seneca Falls Convention understood keenly in 1848 that women’s political rights were infused with the family and private reforms, so too has COVID-19 exposed the ongoing need for revolutionary changes to gender roles within the family and the workforce.79

III. THE LOSS LENS

Discussions regarding social policies in the wake of the COVID-19 pandemic also reveal new lessons looking at the Nineteenth Amendment Suffrage Centennial through the lens of loss. Women’s political victories, while celebrated, have often come in the wake of loss. Most recently, the United States has elected one woman Vice President, but women’s representation in the Senate is still so dismal that Vice President Kamala Harris’s election removed the only Black woman serving in the Senate.80

77. See generally Paula A. Monopoli, Constitutional Orphan: Gender Equality and the Nineteenth Amendment (2020).
79. See generally Hunter, supra note 33, at 76.
We saw thousands of women of color mobilize entire communities to vote in the 2020 election, but we also saw tens of thousands of women of color die from COVID-19. As of November 2021, over forty-five million Americans have contracted COVID-19 and over 740,000 Americans have died from it. Despite the ubiquity of the virus, COVID-19 has not affected all communities equally. Although men and women contract COVID-19 at similar rates, men have died at higher rates than women. When adjusting for population, African Americans, Indigenous Americans, Latinos, and Pacific Islanders have all died at higher rates than White Americans. There are many factors at play here. Socially, non-White Americans are more likely to live in multigenerational households with children and vulnerable elderly family members. Additionally, African Americans and Latinos are more likely to have chronic health conditions like diabetes and obesity, which put them at risk for serious illness.

https://stateinnovation.org/no-democracy-without-black-women/ [https://perma.cc/ZJT6-GWL6] (last visited Nov. 2, 2021) (concluding that there are “too few Black women in elected office, and especially in state legislatures” where only 4.82% of legislators are Black women).


82. See COVID Data Tracker, supra note 2 (showing cumulative cases and deaths in the United States).


86. See Jeremy A.W. Gold et al., Race, Ethnicity, and Age Trends in Persons Who Died from COVID-19 — United States, May–August 2020, 69 MORTALITY & MORTALITY
These COVID-19 statistics reinforce the interconnectedness of women’s political, social, economic, and civil equality.

Those grim statistics only contemplate loss of life. Loss of housing, employment, and food security are equally worrisome.87 Millions of Americans have lost their jobs, their savings, and their security,88 which have disproportionately hurt women. In March 2020, when many state governments issued stay at home orders to flatten the curve, U.S. unemployment rates for women greatly outpaced male unemployment rates.89 Although the unemployment rate decreased, it has not yet rebounded to pre-pandemic levels for anyone.90 In December 2020, the Bureau of Labor Statistics reported a net loss of 140,000 jobs.91 Broken down by gender, men gained 16,000 jobs in December 2020 and women lost 156,000.92 Additionally, while the December 2020 unemployment rate was 6.3% for all women, it was 8.4% for Black women and 9.1% for Latinas.93

Many American families are either experiencing homelessness and hunger or are teetering on the precipice. Food banks are overwhelmed, and many families are still struggling to meet their needs.94 When schools closed, children struggled initially to access free or subsidized lunches.95 Government moratoriums on evictions protected some families, but even those were threatened with legal
challenges\textsuperscript{96} and timed to phase out. While there was some assistance in the form of stimulus payments, single mothers only received a fraction of the money married couples received.\textsuperscript{97} Undocumented persons and their spouses were barred from receiving financial stimulus help entirely.\textsuperscript{98}

These statistics remind us that the victory of suffrage was far from one-dimensionally celebratory in its journey either. Rather, in celebrating suffrage, we often erase the extent to which both leadership and liberty emerged from loss. Loss plays an integral role in the political story of the Nineteenth Amendment. Personal losses shaped the movement. Elizabeth Cady Stanton became the suffragette that she was after six of her siblings died leaving no sons.\textsuperscript{99} These personal losses motivated her work for equality.\textsuperscript{100}

The first case to strike down a sex-based classification law as unconstitutional under the Equal Protection Clause came from loss as well. Sally Reed, the plaintiff in the case, received a call from her son, Skip, asking to come home from his court-ordered visitation with his father.\textsuperscript{101} Sally convinced Skip to stay at his father’s house, where Skip then shot himself with his father’s hunting rifle in the basement of his dad’s house that day.\textsuperscript{102} In the aftermath of this tremendous loss, Sally petitioned the court to administer Skip’s estate, worth less than $1,000 from mowing lawns, but it was money that Skip was saving for college.\textsuperscript{103} This case was not about women’s rights at all. It was about loss. Idaho law preferred males to females in administering a will.\textsuperscript{104} The Supreme Court struck down this sex-based preference following the legal strategy of Pauli Murray and


\textsuperscript{99} ELLEN CAROL DuBois, SUFFRAGE 16 (2020).

\textsuperscript{100} Id.

\textsuperscript{101} SUPREME COURT DECISIONS AND WOMEN’S RIGHTS: MILESTONES TO EQUALITY 40 (Clare Cushman ed., 2001) (providing historical background to iconic women’s rights cases).

\textsuperscript{102} Id.

\textsuperscript{103} Id. at 40–41.

\textsuperscript{104} IDAHO CODE ANN. §§ 15-312, 15-314 (repealed 1972).
Ruth Bader Ginsburg, finally achieving for women what the Fourteenth Amendment had done with the Fifteenth Amendment for Black men.  

There were also losses to the movement. When Lucretia Mott was banned from joining the American Anti-Slavery Society because she was a woman, she formed her own Philadelphia Female Anti-Slavery Society to carry the work forward along with Black women, such as Charlotte Forten. When the organization held an integrated convention in 1838 at Pennsylvania Hall, a mob burned the building to the ground Ida Wells Barnett had her offices firebombed for writing about lynching. The Triangle Shirtwaist Factory fire yielded tragic losses to working class women that forever changed the suffrage movement in New York.

With a newly sensitized lens to COVID-19 losses, we can see entirely new lessons from the women’s suffrage movement. The Spanish flu struck in 1918 at the peak of the national women’s suffrage movement, disproportionately afflicting young men while many men were already fighting in World War I. The “great influenza,” as it was known, killed more than fifty million people, while World War I killed seventeen million. The wartime conditions of cramped ships, shared living spaces, and weakened

105. Philippa Strum, Pauli Murray’s Indelible Mark on the Fight for Equal Rights, Am. C.L. UNION (June 24, 2020), https://www.aclu.org/issues/womens-rights/pauli-murrays-indelible-mark-fight-equal-rights [https://perma.cc/ENB4-BE9M] (“In 1971, when Ginsburg submitted her first gender equality brief to the U.S. Supreme Court in Reed v. Reed, she put Pauli Murray and Dorothy Kenyon’s names on its cover page. Neither had actually worked on the case, but Ginsburg recognized that their delineation of the connection between race and gender, and of the way to use the equal protection clause to litigate for gender equality, were crucial steps that paved the way.”).


111. Id. (noting that this was a “mere third of the fatalities caused by the flu”).
immune systems left a perfect storm of issues. The flu killed 670,000 Americans. The disproportionate number of male deaths, which in 1918 were 175,000 more domestic male deaths than women’s deaths, left grave labor shortages that women were able to fill.

After the war, twenty-five percent more women were in the workforce than before the war. As they began to work in increased numbers and in sectors previously inaccessible to women, they demanded better wages, better working conditions, and voting rights. While the Spanish flu was devastating on a level we understand all too well, its losses also “helped elevate women in American society socially and financially, providing them more freedom, independence and a louder voice in the political arena.”

In the case of World War I, losses led to political opportunities. In other movements, women’s losses as women and as mothers led to their political engagement. Moms Demand Action, for example, is a highly impactful movement for gun-sense legislation. Shannon Watts founded the movement the day after the Sandy Hook tragedy in pursuit of gun-sense legislation. While its membership is not limited to moms, its advocacy brand draws on the narratives of moms protecting their families from the staggering losses of gun violence. Likewise, Mothers Against Drunk Driving (MADD) was perhaps one of women’s most successful political advocacy initiatives. It was founded in 1980 by a housewife and a mother who tragically lost her thirteen-year-old daughter to a drunk driver with several prior convictions. She carried her daughter’s photograph as she advocated for changes to California’s drunk driving laws and was quickly joined by other grieving mothers. MADD has since changed the narrative about drunk driving from a

112. Id. (noting that some contracted the flu on the ship over to Europe).
113. Id.
114. Id.
115. Id. (entering fields like manufacturing and textiles).
116. Id.
117. Id.
119. Id.
120. Id.
122. Id.
123. See id.
collection of statistics to a powerful and emotive reform movement.124 Within just a couple of years, MADD enacted stringent laws in dozens of states.125 MADD’s reforms have endured and changed our culture surrounding drunk driving.126 Mothers of the Movement is likewise a political movement among mothers who have lost their children to violence, including police killings.127 Native American communities, troubled by an uptick in Indigenous women going missing and being murdered, channeled their losses into advocacy for reforms to the Violence Against Women Act and other forms of political action.128 These organizations have each channeled the pain of loss into progress, both formally through legislation and culturally through changed attitudes and views. COVID-19 reminds us that loss of all sorts can be channeled toward progress. Today, women’s COVID-19 losses likewise compel both legal reform and cultural transformation. Many of those reforms are exactly the same as Seneca Falls in 1848. The idea that we have come so far and yet have so much more to do reflects that women’s political engagement and advocacy is hitting more substantial cultural and structural barriers. One of those barriers is the way in which the very definition of citizenship remains infused with problematic performances of masculinity.

124. See About Our Story, supra note 118.
125. See Saving Lives, Serving People, supra note 121.
II. THE MASCULINITY LENS

Celebrating the Centennial after watching thousands of mostly White men storm the United States Capitol revealed a particularly powerful truth about the state of women’s rights. As we think about losses and liberty, masculinity is a vital part of the narrative. Over 740,000 Americans have died from COVID-19 in part because of masculinized leadership. In this case, mask-ulinized, as leaders—both male and female—portrayed masks as weak. The U.S. Capitol insurrection occurred following former-President Trump’s masculinized proclamations of so-called “weak Republican [leaders].” These masculinized framings are not new. In fact, their roots are firmly planted in the suffrage story. Our conceptions of citizenship itself have always been deeply infused with a dominant masculinity and no constitutional amendments have cured this. From our nation’s founding, we fused masculinity and citizenship within our republican government tradition. Suffrage victories have been won exclusively through “bullets for ballots” approaches. Sarah Livingston Jay famously toasted revelers in 1789: “May all our Citizens be Soldiers, and all


our Soldiers Citizens." This toast conveyed "a foundational fusion" within our republican government tradition—coupling military service, citizenship, and masculinities.

Our republican government structure historically fused military service and citizenship together. While the republic would not be protected by the king's men; the republic's men would still protect it. The clause positioned self-governance and self-defense as symbiotic. The word republic itself derives from Latin res publica, and publica comes from the word pubic, which means manhood or maturity. While the founding model abandoned English monarchies and professional armies, it left untouched men's governance over women in the home. Reflecting the republican government tradition in the home, men bore the privileges of governance and the responsibilities of it. The irony that male founders freed themselves of tyranny while retaining their own domestic tyranny at home is exactly what the Declaration of Sentiments drew upon.

In this republican government framework, women had to carve out forms of civic participation that carefully navigated masculinized conceptions of citizenship. They defined roles such as mothers of citizens of the republic. In the republican mother tradition, women leveraged indirect principles of service, such as allegiance and loyalty. Gradually republican mothers moved into public reforms that cultivated the health of the republic through advocating for aid to widows, orphans, health care, and other social reforms, positioning

134. See Abrams, supra note 132, at 166–75.
136. Abrams, supra note 132, at 171.
138. Abrams, supra note 132, at 176 n.73 (citing LINDA K. KERBER, NO CONSTITUTIONAL RIGHT TO BE LADIES: WOMEN AND THE OBLIGATIONS OF CITIZENSHIP 14 (1998)).
140. Id.
women to support the survival, longevity, and health of the republic.\textsuperscript{142}

The Civil War presented dire shortages in manpower that forever changed military service and citizenship. When President Lincoln could no longer adequately man the union army with volunteers,\textsuperscript{143} and when the first effort at a draft proved largely unsuccessful,\textsuperscript{144} he deployed his Commander in Chief power by issuing the Emancipation Proclamation as a war measure freeing slaves and investing them in a Union victory.\textsuperscript{145} Over 700,000 men responded to Lincoln’s call for arms, undermining Southern power and tipping demographics to the North.\textsuperscript{146}

The Fifteenth Amendment confirmed the success of the “bullets for ballots” strategy awarding Black men the right to vote.\textsuperscript{147} Scholars have thoroughly written about Elizabeth Cady Stanton and others’ efforts to leverage women’s war efforts in pursuit of women’s suffrage.\textsuperscript{148} Stanton tried to show how women too were inspired by

\begin{itemize}
  \item \textsuperscript{142} DENNIS W. JOHNSON, THE LAWS THAT SHAPED AMERICA: FIFTEEN ACTS OF CONGRESS AND THEIR LASTING IMPACT 108 (2009).
  \item \textsuperscript{143} After the 1861 battle at Fort Sumter some 700,000 men answered President Lincoln’s call and enlisted voluntarily. EUGENE CONVERSE MURDOCK, PATRIOTISM LIMITED 1862-1865: THE CIVIL WAR DRAFT AND THE BOUNTY SYSTEM, 4, 4-5 (1967). Indeed, the initial volunteer surge was so sizeable that the Secretary of War closed up its recruiting offices. Id. at 5.
  \item \textsuperscript{144} See Militia Act of 1862, ch. 201, 12 Stat. 597. See also MURDOCK, supra note 143, at 5 (explaining that this extraordinary step came just two weeks after meager numbers of volunteers responded to Lincoln’s renewed call for enlistment). The first compulsory national draft authorized the President to call able-bodied men between eighteen to forty-five into service for nine months on a state quota system. See Militia Act of 1862 (“[H]e may specify in his call the period for which such service will be required, not exceeding nine months . . . and the enrollment of the militia shall in all cases include all able-bodied male citizens between the ages of eighteen and forty-five, and shall be apportioned among the States according to representative population.”). Implementation troubles, protest, and fraud quickly dominated the draft. MURDOCK, supra note 143, at 10–11.
  \item \textsuperscript{145} Emancipation Proclamation, 12 Stat. 1268 (1863).
  \item \textsuperscript{146} MURDOCK, supra note 143, at 5.
  \item \textsuperscript{147} U.S. Const. amend. XV, § 1 (“The right of the citizens of the United States to vote shall not be denied or abridged by the United States or by any State on account of race, color, or previous condition of servitude.”).
\end{itemize}
true patriotism and working under the national flag, but the “woman question” was deferred for another day, another war.149

The most significant post-Civil War setback for women’s suffrage was the word male inserted in the Fourteenth Amendment.150 Such word choice reinforced principles of male governance, supporting the entrenched masculinities thesis over broader equality principles. The word male revealed the changing political paradigm regarding citizenship and sex. While the implied disenfranchisement of women was sufficient in the Founding Era, increased agitation for suffrage necessitated careful drafting to avoid enfranchising women after the Civil War. The Fourteenth and Fifteenth Amendments worked together to do this.151

Suffragists ultimately secured the women’s vote by successfully leveraging their loyalty and military service within the “bullets for ballots” framework and prevailing masculinities of the time. From 1913 to 1920, the suffrage movement shifted from state to national strategies.152 Suffragists challenged male protectionist ideologies of national leaders. For example, Alice Paul strategically challenged the protectionist assumptions in the aftermath of the suffrage parade to upstage President Wilson’s inauguration.153 The parade was a near-riot as police stood idly by as hostile onlookers antagonized and attacked marchers, doing nothing to restore order.154 The suffrage parade, like the January 6, 2021 insurrection, led to a Congressional investigation because it was such a profound breakdown in state action.155 It challenged the question of who was protecting who from


152. CHRISTINE LUNARDI, FROM EQUAL SUFFRAGE TO EQUAL RIGHTS xiii (1986).

153. Id. at 9, 29 (crediting Alice Paul with critical tactical shifts in the suffrage movement as she brought a dynamic force that “propelled American suffragism to its successful end”). Paul sought to hold the political leaders directly “responsible for the fate of a federal suffrage amendment.” Id. at 20.

154. Id. at 29.

155. See S. REP NO. 63-53 (1913).
what and who was serving who. Was the government protecting women in their oppression or protecting male power? Harriot Stanton Blanch captured this contradiction when she wrote to Wilson: “[T]he Government, which is supposed to exist for the good of all, left women, while passing in peaceful procession in their demand for political freedom, at the mercy of a howling mob on the very streets which are at this moment so efficiently officered for the protection of men.”

Suffragists used these contradictions to stir national support for a federal amendment. Alice Paul and others continued this campaign by widely publicizing their later arrests and the brutality of their confinements. They protested in Lafayette Park just as the Black Lives Matter (BLM) movement did in the summer of 2020. Suffragist tactics successfully challenged protectionist assumptions that romanticized state oppression of women just as BLM protests challenged the role of law enforcement in communities. The suffrage movement challenged hegemonic masculinity just as the modern racial justice movement challenges the hierarchies embedded in state power structures and systems.

President Wilson, like Lincoln, invoked his Commander in Chief power to declare suffrage a vital war measure. Wilson’s 1918 State of the Union Address emphasized that women were important in the war effort and that “[t]he least tribute we can pay them is to make them the equals of men in political rights, as they have proved themselves their equals in every field of practical work they have entered, whether for themselves or for their country.”

Wilson declared the amendment vital to the winning of the war.

Seneca Falls was the first chapter in women’s larger challenge to presumptive male leadership in the home, in the statehouse, and in the economy. We have made tremendous strides, but the larger project of disentangling citizenship and masculinity continues in the

156. Abrams, supra note 132, at 194 (quoting Johnson, supra note 142, at 106–07).
157. Id. (citing Lunnardi, supra note 152, at 30–31).
161. Lunnardi, supra note 152, at 145; Johnson, supra note 142, at 132.
present. This 1920 quote by Crystal Eastman, head of the National Women’s Party, still resonates today:

It must be womanly as well as manly to earn your own living, to stand on your own feet. And it must be manly as well as womanly to know how to cook and sew and clean and take care of yourself in the ordinary exigencies of life . . . [B]read-winning wives have not yet developed home-making husbands . . . [W]e must bring up feminist sons.162

Even today, women are disproportionately contributing to this pandemic and their communities through caregiving.163 In that sense, Doug Emhoff’s rise to Second Gentleman is perhaps as important as Kamala’s in changing gendered norms.164 Bold new ideas, like the “Marshall Plan for Moms,” bear our consideration to change gendered caregiving norms.165

The Trump Presidency broadly and the Capitol insurrection particularly reveal the implications of masculinized citizenship today. This is a serious ongoing challenge for feminists. The COVID-19 era reminds us that many performances of masculinities are harmful. Women’s equal political participation cannot just be about women leaders, it must also examine masculinized conceptions of citizenship and leadership itself.

V. THE LEADERSHIP LENS

Studying the Centennial through the lens of 2020’s unparalleled tests in leadership reveals many important insights to women’s rights
2020 was a year of immense leadership challenges for leaders running school districts, Congress, the postal service, sports programs, colleges, law enforcement agencies, classrooms, voting precincts, health departments, hospitals, and even families. These challenges reveal insights to the women’s rights movement.

We should reflect on the distortions created when we discuss historic leaders by their resulting accomplishments without also studying their failures, abandoned approaches, and resilient adaptations to adversity. When we look back in the rearview mirror of history in a eulogistic way to celebrate and commemorate, the leaders appear to march down an already illuminated path, obscuring the dead ends and stalled efforts. Authentic leadership—transformative leadership—includes more defeat, setbacks, contentiousness, resilience, adaptation, pivoting, and persevering than we package up in our history books and centennial celebrations.

When we look in our rearview mirror of history, we celebrate the finish line and the cheering crowds, not the starting line, not the apathetic or even hostile crowds, not the stumbles, nor the breaking points. The Seneca Falls Convention, for example, is celebrated as the birthplace of women’s political and civil rights. It set out a bold agenda for women’s freedoms in education, the family, and political life, seeing women’s oppression as deeply interconnected to civic, political, legal, and social reforms. Scholars study Seneca Falls as the first chapter of the suffrage story leading to the Nineteenth Amendment as the closing chapter.

During that time, however, the demand for woman’s suffrage was the most contentious piece of the larger declaration of rights. It was not the tidy sound byte of Seneca Falls that we make it out to be today. Rather, what made Seneca Falls so revolutionary was the

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167. The Seneca Falls Convention occurred on July 19, 1848. The Seneca Falls Convention, Today in History – July 19, Lib. of Cong., https://www.loc.gov/item/today-in-history/july-19/ [https://perma.cc/6QJL-D2ZD] (last visited Aug. 5, 2021) (“Heralded as the first American women’s rights convention, the two-day event was held in the Wesleyan Chapel in Seneca Falls, New York. The convention had been advertised on July 11, 1848, in the Seneca County Courier. Despite the minimal amount of publicity, there were an estimated 300 attendees at the inaugural meeting.”). See generally Thomas, supra note 41, at 109–10.

168. STANTON, supra note 139.

169. See Thomas, supra note 42, at 349–50, 353 (explaining that Elizabeth Cady Stanton uniquely understood the importance of the vote to women’s political participation).
way in which it connected the personal, political, moral, and social concerns of women together in a comprehensive platform of which the vote was only one piece.\footnote{Id. at 359.} If anything, the economic condition of women was the more robust dominant theme, which is notable as we look back 100 years later and see how quickly this pandemic has cost women their economic and labor footing.

Elizabeth Cady Stanton was a leader who distinctly saw the right to vote as a path to unlocking other interconnected rights.\footnote{Id. at 349, 359.} Many movement members instead thought that political participation was corrupt, and their moral views opposed it.\footnote{Id. at 349-50.} Elizabeth Cady Stanton’s own husband called women’s suffrage a “farce” and refused to attend Seneca Falls after suffrage was added to the platform.\footnote{Id. at 350.}

Voting in 1848 did not look like voting today with the patriotic stickers and endless barrage of signs in front of polling places at schools and community centers. Rather, voting occurred in private locations like stables, warehouses, and even saloons—the exact places that “respectable women” did not frequent.\footnote{Susan Ware, \textit{Why They Marched} 15-16 (2019).} Voting was rowdy and often involved excessive drinking, and sometimes it turned violent.\footnote{Id. at 16.}

Today we tend to \textit{background} the other rights discussed at the Convention and \textit{foreground} its role in suffrage, but it took extraordinary leadership, courage, and commitment to keep suffrage in the discussion. It would ultimately take a seventy-two-year commitment to achieve this goal. Imagine if someone recruited you for a cause today that would not be achieved until 2093 when most of us would not even be alive to see victory. In the case of Native American women and African American women, of course, they waited seventy-two years to see a right achieved \textit{on paper} but not in practice. Black women would not fully realize their right to vote for another forty-five years.\footnote{See Civil Rights Act of 1964, Pub. L. No. 88-353, 78 Stat. 241 (1964). See generally Ezie, supra note 32, at 662 (“The problem facing Black women voters is not abstract. Rather, as Black women’s political participation grows, their political power is shrinking, as is their share of American prosperity by all available metrics.”).} This is the original “[n]evertheless, [she]
persisted. Looking at leadership from the windshield, instead of the rearview mirror, in which the path is not yet illuminated or clear, is the vision of leadership we need to embrace over the celebratory, perfunctory history book excerpts.

Consider all of the suffrage pivots and detours. From 1848 to 1920, suffragists began with a broad strategy pursuing women's property, economic, and political rights. After the civil war, suffragists focused on the targeted goal of national suffrage within the Fifteenth Amendment. When the Fifteenth Amendment passed only enfranchising Black men, suffragists focused on the Privileges and Immunities Clause of the Fourteenth Amendment, arguing that this clause already gave women the right to vote as leaders like Susan B. Anthony and Sojourner Truth attempted to vote. They then pursued the right to vote through the putative Sixteenth Amendment mirroring the Fifteenth. They then pivoted to a state strategy, securing many victories, particularly in the West. They then returned to a national campaign while also pursuing state suffrage. Congress ultimately passed the Nineteenth Amendment in 1919.

Then suffragists worked for a year to secure the three-quarters of the state ratifications, which happened in a squeaker famously thanks to Henry Burns of Tennessee's mother. Then, with suffrage achieved, suffragists had to begin the tedious local work of registering female voters throughout the country. Once registered, they had to keep women engaged and voting to actualize their political power. This course reflects many twists, turns, adaptations, and pivots, all led by resilient leaders adapting to dead ends and obstructions.

Seneca Falls involved leaders who truly imagined turning the world upside down. Suffrage was not pre-ordained or even well-

178. Ware, supra note 174, at 14, 18–19, 30. The Supreme Court ultimately rejected this approach. See Minor v. Happersett, 88 U.S. 162, 165, 178 (1874) (holding that voting was not a right of federal citizenship subject to the protection under the Fourteenth Amendment’s Privileges & Immunities Clause).
179. Ware, supra note 174, at 266.
180. See Ellen Carol DuBois, Woman Suffrage: The Afterstory, 11 CONLAWNOW 53, 53–54 (2019–2020) (stating that suffrage was considered a “failure” by some after ratification and explaining that women’s voter turnout was particularly low in the South—for example, it was 6% in Virginia).
181. See generally Thomas, supra note 41.
182. Ware, supra note 174, at 13, 15–16.
supported. For example, two-thirds more people attended the Seneca Falls Convention in 1848 than signed it.\textsuperscript{183} Approximately 300 people attended, but only a handful dared to speak.\textsuperscript{184}

Likewise, looking in the rearview mirror at Stacey Abrams’ vision for Georgia, we see the success in mobilizing voters. We see a headline-worthy leadership story wrapped up in a victory. Stacey Abrams endured a political loss. She ‘rose up’ from it to mobilize voters and volunteers to turn out the Georgia vote.\textsuperscript{185} The idea of blue Georgia seemed implausible until it happened. However, it did not just happen overnight. Stacey Abrams worked for ten years to achieve this goal, first through her New Georgia Project and then through Fair Fight.\textsuperscript{186} She fought actively against powerful forces. The systemic forces came from active opponents, such as then-Secretary of State Brian Kemp’s purging of more than 100,000 voters from the voter rolls,\textsuperscript{187} seventy percent of whom were Black.\textsuperscript{188} The systemic oppositional forces to her leadership also came from leaders in Abrams’ own party who believed her strategy was “just crazy.”\textsuperscript{189}

It is vitally deserving to celebrate Abrams and the many other Black women who worked tirelessly to flip Georgia and ultimately the Presidency. Abrams should be celebrated not just for what she achieved but how she did it—registering hundreds of thousands of voters one by one.\textsuperscript{190} Just like the birth of the women’s suffrage movement back in 1848, Abrams had to create organizations that did not yet exist.\textsuperscript{191} We need to study with whom she did it—thousands

\begin{footnotesize}
\begin{enumerate}
\item DuBois, supra note 99, at 10; see Conway, supra note 19, at 31.
\item See DuBois, supra note 99, at 10–12.
\item King, supra note 185.
\item Id. (explaining that Stacey Abrams registered 200,000 voters before her 2018 Gubernatorial election and 800,000 before the 2020 presidential election).
\end{enumerate}
\end{footnotesize}
of other volunteers, particularly Black women and community organizations.\textsuperscript{192} We need to study why she did it—in response to voter suppression campaigns.\textsuperscript{193} We need to study where she did it—in local communities.\textsuperscript{194}

We also need to reflect on what it is that Abrams did because it is powerfully revealing of the suffrage work left to do. She had to persuade voters not to agree with any position or policy, but to persuade voters, predominantly Black voters and young voters, that their individual votes mattered.\textsuperscript{195} Her leadership reveals just how much work must be done. Black communities are particularly and systemically plagued with understaffed voting facilities, broken machines, long lines, and complications in mail-in voting.\textsuperscript{196}

As sobering as it is to absorb, we must also process the reality that just as so many see inspiration and hope in leaders like Stacey Abrams, many Americans are and were equally inspired by the leaders who organized, orchestrated, and executed the U.S. Capitol insurrection.\textsuperscript{197} Likewise, just as inspirational leaders and organizations led the suffrage movement, groups also worked just as hard to oppose women’s suffrage.\textsuperscript{198} Just as Stacey Abrams understood that entire communities of Black and young voters felt explicitly or implicitly disenfranchised from our political system, so too do those who stormed the U.S. Capitol. No matter how they came to that position, whether it was built on conspiracy theories or facts, they too felt disenfranchised from the political system, and their

\begin{itemize}
\item \textsuperscript{192} Stacey Abrams (@staceyabrams), \textsc{Twitter} (Jan. 22, 2021, 8:24 PM), https://twitter.com/staceyabrams/status/1352789148873101312 [https://perma.cc/2Y8U-SX6G]. See generally Conway \textit{supra} note 19, at 38 (“Black women are indispensable to the telling of America’s attempts to build a nation; as well, these women are equally important in measuring the success of social and political movements for universal suffrage and the achievements of democratic ideals.”); id. at 44–45 (describing the importance of relationship-building).
\item \textsuperscript{195} King, \textit{supra} note 185 (“Only the message is not trying to persuade them to share Democratic values. Your message is to persuade them that voting can actually yield change.”).
\item \textsuperscript{196} \textsc{Brennan Ctr. for Just.}, \textit{supra} note 21.
\item \textsuperscript{197} Poniewozik, \textit{supra} note 26; Leive, \textit{supra} note 78; Epstein & Herndon, \textit{supra} note 186.
\item \textsuperscript{198} WARE, \textit{supra} note 174, at 112–13 (profiling two sisters who led on opposite sides of the suffrage movement).
\end{itemize}
leaders found ways to mobilize that disenfranchisement. Our leaders reflect the larger social, political, and economic conditions in place that allow them to lead.

This is why a more honest account of leadership is important. Our understanding of leadership is still so narrow, so gendered, so racialized, and so dishonest. We do our modern leaders a tremendous disservice by glorifying and revering select historic leaders, without honestly considering their faults, failures, and missteps.\textsuperscript{199}

Instead of rewriting our historical accounts one person at a time, we need to rewrite our national understanding of leadership. No Women’s History Month or Black History Month changes the dominant composition, color, and tenor of our country’s leadership. Our public squares, parks, courthouses, churches, banks, presidency, and government buildings are filled with what Dr. Lyra Monteiro calls the power structures of: “White Columns, White Marble, and White Supremacy.”\textsuperscript{200} Twenty-seven amendments to the Constitution later, our country is still adorned with “white men, collectively advancing an argument that is impervious to the social movements of the past several decades.”\textsuperscript{201} Our nation is draped in white marble and in the strong imposing columns of white supremacy.\textsuperscript{202}

We have etched in stone the iconic names of select leaders of the suffrage movement and we continue to pay homage to them. We need to expand beyond these white statues and etched names and teach school children and modern feminists about the tremendous work of Black, Indigenous, and other women of color’s contributions to suffrage. We need to expand beyond our Euro-centric understanding of women’s rights.\textsuperscript{203} Brittany Cooper writes in her book, \textit{Beyond Respectability: The Intellectual Thought of Race Women}, that it is time to stop just memorizing names like Ida B. Wells and Mary Church Terrell out of respect and using them in

\textsuperscript{199} See generally Conway, supra note 19, at 41–43.


\textsuperscript{201} Id.

\textsuperscript{202} Id.

\textsuperscript{203} See, e.g., Katherine M. Marino, \textit{Feminism for the Americas: The Making of an International Human Rights Movement} 6 (Thadious M. Davis & Mary Kelley eds., The University of North Carolina Press 2019) (explaining how many historical narratives position U.S. and European narratives as the “apex of global ‘progress’” in ways that “fail to recognize how transformative the international sphere was for feminist thought and activism in the interwar years . . .”)}
conversation just to acknowledge their existence. Rather, we need to deeply engage with their intellectual contributions to the movement.

Consider, for example, the legacy of Ida B. Wells Barnett. Most modern accounts remember her for her role in joining the D.C. Suffrage Parade after leaders like Alice Paul had segregated the parade. This contribution remembers Wells Barnett in her relationship with white, female, suffrage leaders. However, Ida Wells Barnett contributed to the movement in many more ways. She was a writer who exposed the harms of lynching. She studied individual lynching cases, the role of the state, and the role of White women particularly. In fact, she was posthumously awarded the Pulitzer Prize in 2020 for her substantive writings exposing lynching. Just months after Wells’ recognition, a noose would be erect on the lawn of the U.S. Capitol, reminding us that the work she was doing, shedding light on the depths of violence against Black Americans, remains some of the most important work yet to be achieved.

We also need to move beyond just signature leaders and look at Latina suffrage leaders like Adelina Otero-Warren, Maria De Lopez, and Aurora Lucero. We need to study Native Americans’ contributions to the suffrage movement like Zitkála-Šá.


206. Id.


and Inshata Theumba. Our entire understanding of suffrage is Euro-centric and largely ignores the work happening in Asia, South America, and Africa in what has been called “First World arrogance.”

At the Presidential Inauguration, Amanda Gorman powerfully called upon us to remember that “there is always light, if only we’re brave enough to see it. If only we’re brave enough to be it.” The problem with only lifting up Susan B. Anthony or Stacey Abrams or Ida Wells Barnett for their courage in casting a ballot, running for office, or integrating a suffrage parade, is that we cast a few powerful lights that seem unattainable and unachievable to most. It makes us look only to these revered lighthouses that we perceive as distant and larger than life. Notably, Stacey Abrams succeeded not by shining her light brighter than others, but by convincing thousands of volunteers and 800,000 individual voters in Georgia that they were the light.

VI. CONCLUSION

While organizations nationwide spent years planning to celebrate the Nineteenth Amendment Centennial with packed academic conferences, an illuminated Mount Rushmore, and festive local events, 2020 took a dramatic turn, the pains of which we continue to endure. While 2020 powerfully ushered in one grand moment of celebration in our first woman Vice President, the global pandemic cost millions of women their jobs. COVID-19 has ended the lives of hundreds of thousands, disproportionately persons of color, the medically vulnerable, and the elderly. The pandemic has called upon women to collapse the public-private divide and blur the “first” and “second shift,” stretching human capacity at a moment of our least human connections. The Suffrage movement was flawed and visited July 30, 2021) (“[Zitkala-Ša’s] autobiographical and Lakota stories presented her people as generous and loving instead of the common racist stereotypes that portrayed Native Americans as ignorant savages.”).


213. Ware, supra note 174.

fragmented, but it was also an extraordinary moment of community-building and sisterhood even for women activists. We hit its Centennial perhaps at a moment of women’s greatest isolation.

Perhaps the most disturbing metaphor for the state of our country is that after a mob of largely White men desecrated our United States Capitol, it was Black custodial workers who cleaned the Capitol so that the country could get back to the work of transitioning power. That is a symbolic and a literal statement on our country.

This article unmaskes some new suffrage lenses as we shift from the celebratory banners and sashes to the complex lenses of loss, liberty, masculinity, and leadership. This article has explored how searing losses shaped vital moments in women’s political advocacy, how our distorted stories of historic leaders skew our engagement with modern leaders, and how our suffrage story remains dripping in militarized masculinity masquerading as leadership. This project seeks to rewrite the romanticized eulogy to the Nineteenth Amendment to inspire the important work that remains in building our “more perfect union” for all.

Masks cover our mouths to stop the spread of COVID-19 through tiny particles. As we move forward to consider women’s rights, more figurative masks are restraining our progress. Unmasking the lessons of the suffrage movement teaches us that we need to channel the losses that COVID-19 has exposed to achieve greater progress, cultivate new leaders, and transform our political culture.
