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"Go After the Women": Mothers Against Illegal Aliens' Campaign Against Mexican Immigrant Women and Their Children

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"Go After the Women": Mothers Against Illegal Aliens' Campaign Against Mexican Immigrant Women and Their Children

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INTRODUCTION

"Protect Our Children, Secure Our Borders!" is the rallying cry adopted by Mothers Against Illegal Aliens (MAIA), an Arizona-based women's anti-immigration group founded by Michelle Dallacroce in January 2006.[1] Like other race-based nativist groups emerging in the United States, MAIA targets immigrants as the reason for overcrowded and low-achieving schools, increased crime, unemployment, poor access to affordable health care, and the overall drain on public benefits.[2] As mounting anti-immigration legislation, proposals, and campaigns continue, MAIA is certainly not alone in its attacks on Mexican immigrants. However, its strategy to present this anti-immigrant message under a pro-family guise is neatly fashioned within a racist, anti-feminist, and conservative framework. The militant tone established by homeland security discourse and the increasing number of nativist extremist groups[3] sets the

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1. *See* Anti-Defamation League, Immigrants Targeted: Extremist Rhetoric Moves into the Mainstream (2007), http://www.adl.org/civil_rights/anti_immigrant/ maia.asp.

2. *See generally* Christopher J. Walker, *Border Vigilantism and Comprehensive Immigration Reform*, 10 HARV. LATINO L. REV. 135, 141–46 (2007) (presenting an overview of anti-immigrant movements targeting Mexicans).

3. *See* Susy Buchanan & David Holdhouse, *Shoot, Shovel, Shut Up: As the Anti-immigrant Movement Grows Even More Vitriolic, the Intelligence Project Identifies 144 'Nativist Extremist' Groups*, INTELLIGENCE REPORT (Southern Poverty Law Center), 2007, at 44–47.

background for MAIA's framing an anti-immigration campaign within a mothering and care work discourse that defines Mexican immigrant mothers and their children as an economic and security threat to native-born families. This approach is not surprising given the history of nativist reactions to Mexican migration and constructing Mexican immigrants as the source of problems in the United States over the last century.[4]

Strong nativism and anti-immigrant sentiment has steadily been pushing for the total exclusion of immigrants from citizenship rights as well as from participating economically in U.S. society. Over the last two decades, the English Only movement has persistently claimed that Spanish is challenging English as the official language in schools, business, and government. Since its beginning in 1983, U.S. English Inc. has been one of the longest-sustained lobbying organizations to introduce various forms of English Only legislation at the state and federal levels.[5] A closely related organization, U.S. English Foundation, Inc., has worked to advocate the exclusive use of English as a Second Language teaching methods,[6] thus eliminating bilingual education as well as denying the availability of any government documents or resources (such as a driver's license) in any language other than English. Organizations advocating language and immigration restrictions frequently use nativist fears about crime, welfare dependency, and competition for scarce jobs. In 1994 California initiated Proposition 187, an initiative that aimed to deny undocumented immigrants social services, health services, and public education, as well as to require local law enforcement to work closely with immigration officials.[7] Under the banner of "Save Our State," proponents of Proposition 187 successfully campaigned and inspired anti-immigrant groups in other states to use similar nativist strategies and draft initiatives that closed avenues of integration.[8]

The list of state legislative reforms under consideration or already passed includes requiring all official business to be conducted in English, eliminating access to driver's licenses,[9] housing, employment, health care, and education.[10] Initiatives have built on

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4. RODOLFO ACUÑA, OCCUPIED AMERICA: A HISTORY OF CHICANOS 173–76 (2000) (discussing nativist reactions to Mexican Immigration, 1910–1920); *id.* at 211–12 (discussing the scapegoating of Mexican immigrants for the poor economy and high unemployment rates in the 1920s); *id.* at 220–24 (discussing nativist deportations in the 1930s when Mexican immigrants were blamed for economic problems in the 1930s); *id.* at 303–06 (discussing Operation Wetback in the 1950s); *id.* at 422–25 (discussing immigrant scapegoating in the 1980s and 1990s).

5. U.S. English, About U.S. English: History, http://www.us-english.org/inc/about/.

6. *See* U.S. English Foundation, Inc., Welcome to U.S. English Foundation, http://www.usefoundation.org/foundation/default.asp.

7. Kevin R. Johnson, *The New Nativism: Something Old, Something New, Something Borrowed, Something Blue*, *in* IMMIGRANTS OUT! THE NEW NATIVISM AND THE ANTI-IMMIGRANT IMPULSE IN THE UNITED STATES 165 (Juan F. Perea ed., 1997).

8. *Cf.* Paul Feldman, *Group's Funding of Immigration Measure Assailed: Politics: Critics Say Proposition 187 Drive is Getting Money From Foundation That Backs Racial Research. Proponents Counter that Charges are a Smear Tactic*, L.A. TIMES, Sept. 10, 1994, at B3.

9. Kevin R. Johnson, *Pursuing Equal Justice in the West: Driver's Licenses and Undocumented Immigrants: The Future of Civil Rights Law?*, 5 NEV. L.J. 213, 216–20 (2004); María Pabón López, *More Than a License to Drive: State Regulation of Driver's License Use by Non U.S. Citizens*, 29 S. ILL. U. L.J. 91, 95–98 (2004).

10. Julia Preston, *State Proposals on Illegal Immigration Largely Falter*, N.Y. TIMES, May

previous race-based nativist messages of third-world immigrants (namely Mexicans) invading the U.S. and establishing Spanish as the primary language. In addition, immigrants of color are blamed for all social problems, including taking jobs, services, and benefits away from citizens, lowering academic achievement in public schools, and increasing violence and crime in the country.[11]

In Arizona, the home state of MAIA, a number of anti-immigrant initiatives have passed. With the financial assistance of the anti-immigration organization the Federation for American Immigration Reform, Arizona Proposition 200 was placed on the ballot and passed in November 2004.[12] The major provisions included the following requirements:

1. voters must present identification before receiving a ballot and being allowed to vote;
2. persons registering to vote in the state need to show proof of citizenship at the time of registering;
3. a ban on illegal immigrants receiving nonfederally mandated public benefits;
4. government agencies must verify the legal status of applicants and the failure of government employees to report a suspected illegal immigrant is a misdemeanor;
5. state residents are permitted to sue government employees or agencies for failing to carry out provisions.[13]

Although claims that illegal immigrants were voting were used as the rallying point for passing Proposition 200,[14] investigations have yet to uncover deliberate voting of non-citizens. Instead of negatively impacting immigrants in Arizona, the brunt of the new voting restrictions have been endured by citizens who failed to change their address

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9, 2006, at A24.

11. For an example of "factors such as poverty, housing, smog, water, schools, land density, labor, traffic, farmland, and health care and other services" affected by immigration, see FEDERATION FOR AMERICAN IMMIGRANT REPORT (2008), *available at* http://www.fairus.org/site/PageServer?pagename-research_researchlistda29.

12. National Immigration Forum, 2004 Election Analysis: Arizona's Proposition 200, http://immigrationforum.org/documents/TheDebate/Restrictionists/AZProp200Analysis.pdf.

13. Arizona 2004 Ballot Propositions: Proposition 200, 41–43, http://www.azsos.gov/election/2004/info/PubPamphlet/english/prop200.pdf.

14. *E.g.*, American Patrol Feature, Arizona Legislators Support Prop 200 (Sept. 16, 2004), http://www.americanpatrol.com/04-FEATURES/040916-PROP-200-PRESS-CONF/040916_Feature.html. The extent to which some citizens believe that unauthorized persons are voting and impacting the political system is demonstrated in an interview with MAIA media coordinator Stephanie Harris:

> The people in government think they're gonna get votes from illegals by supporting the illegals, but these are people who can't legally vote . . . . And they won't bother to vote once they are American citizens . . . , although they will definitely cheat and lie and steal identities like they do all the time.

Robert L. Pela, *Minutewomen*, PHOENIX NEW TIMES, Apr. 20, 2006, *available at* http://www.phoenixnewtimes.com/2006-04-20/news/minutewomen/full. ACLU.org, Federal Court Halts Arizona's Harmful Voter ID Law (Oct. 5, 2006), http://www.aclu.org/votingrights/gen/27012prs20061005.html.

when moving to Arizona and poor citizens who were unable to afford the approved Arizona identification credentials.[15]

In November 2006, another ballot initiative, Proposition 100, was passed.[16] This law denies suspected immigrants access to bail if they are suspected of having committed a felony and the evidence or presumption of the charge is great. It contains no provision for turning over suspected immigrants to federal immigration authorities for immediate deportation.[17] Governor Janet Napolitano signed a bill imposing employer sanctions that went into affect January 2008.[18] The bill imposes a ten-day suspension of the employer's business license for a first offense and a possible loss of their license for a second offence.[19] Proponents of the employer sanctions predicted that jobs would open and there would be an increase in social services.[20] However, immigrant advocates, business groups, and analysts predicted an increase in the already-tight labor market and a negative impact on the state's economy.[21] Even the governor called the bill flawed and voiced concern that under the law, hospitals and nursing homes could be closed because of hiring one illegal immigrant.[22] She further acknowledged that the bill did not provide adequate funding for investigating complaints made to the state attorney general's office.[23]

A study conducted by the University of Arizona's Udall Center for Studies in Public Policy concluded that "economic output would drop annually by at least $29 billion, or 8.2 percent, if all non-citizens, which include undocumented workers, were removed from Arizona's workforce"[24] The key industries to be hit the hardest are construction, manufacturing, and agriculture. In response to the employer sanction bill, business groups joined in filing a motion for preliminary injunction on the basis that the House Bill 2770 violates the right of substantive due process guaranteed by the U.S. and Arizona Constitutions and violates the separation of powers required under the Arizona Constitution. More specifically, the lawsuit charged that the bill violates immigration/employment laws; deprives plaintiffs of their property interests in business licenses without providing due process; purports to regulate and interferes with interstate commerce; and violates the Fourth Amendment by compelling the purported consent to government searches without a warrant.[25] A similar lawsuit was

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15. *Id.*

16. National Conference of State Legislatures, Ballot Initiatives Affecting Immigrants: Past and Present (Jan. 8, 2006), http://www.ncsl.org/programs/immig/BallotInitiatives.htm#_ftn1#_ftn1.

17. Arizona Secretary of State: Jan Brewer, Arizona Ballot Propositions: Proposition 100 (Sept. 2006), http://www.azsos.gov/election/2006/Info/PubPamphlet/english/Prop100.htm.

18. Daniel González, *Migrants Fleeing as Hiring Law Nears*, ARIZ. REPUBLIC, Aug. 26, 2007, at 1.

19. Daniel González, *Taunts, Threats as Law Nears*, ARIZ. REPUBLIC, Sept. 30, 2007, at 1.

20. *See* Mark K. Matthews, *Arizona Lashes Out at Illegal Immigration*, STATELINE.ORG, Aug. 31, 2005, Stateline.org/live/ViewPage.action?siteNodeId=136&languageID=1&contented= 51473.

21. González, *supra* note 19.

22. Randal C. Archibold, *Arizona Governor Signs Tough Bill on Hiring Illegal Immigrants*, N.Y. TIMES, July 3, 2007, at A10.

23. *Id.*

24. González, *supra* note 19.

25. Ariz. Contractors Ass'n, Inc. v. Napolitano, 526 F. Supp. 2d 968, 976–77 (D. Ariz.

filed by a civil rights coalition,[26] and the two actions were consolidated. Of course, the growing popularly of recent initiatives emerging at the state level must be considered within the federal context of government responses to the 9/11 attacks, which have cemented alien immigrant and criminal as one and the same. Exclusion, detention, and surveillance of noncitizens all became the concern of counterterrorism legislation, which included the USA PATRIOT Act, the Homeland Security Act (HSA) and the Enhanced Border Security and Visa Entry Reform Act (EBSVERA). Distinctions between aliens of different legal status have been blurred, and "[c]riminal aliens (deportable for their post-entry criminal conduct), illegal aliens (deportable for their surreptitious crossing of the U.S. border), and terrorists (deportable for the grave risk they pose to national security) are all deemed dangerous foreigners for whom criminally punitive treatment and removal are uniformly appropriate and urgently necessary."[27] Having depoliticized and delegitimated terrorist attacks, the White House constructed them as criminal acts rather than acts of war. Consequently, connecting the War on Terror and the War on Drugs was a smooth transition to a campaign against narco-terrorism in 2002.

Combining the traditional domain of immigration and criminal law enforcement under the Department of Homeland Security (DHS) has further served to obscure differences between immigrants who are simply working illegally in the United States and immigrants and non-immigrants engaged in murder, human smuggling, money laundering, or child pornography. Prior to the 1996 Anti-Terrorism and Effective Death Penalty Act (AEDPA) and the Illegal Immigration Reform and Immigrant Responsibility Act (IIRIR), "only certain serious felony convictions subjected noncitizens to detention and deportation, such as murder, drug and firearms trafficking."[28] "Terrorism fears also fueled passage of a new summary exclusion procedure in 1996 by which a noncitizen could be barred admission into the country at the port of entry by an INS officer without judicial review" and broadened the definition of "'aggravated felony' which subjects an immigrant to deportation (without judicial review) and mandatory detention."[29] Kati L. Griffith captures the draconian impact on immigrants when she notes that a legal permanent immigrant resident living in the "United States since childhood . . . can be subject to mandatory deportation for almost any criminal conviction—including misdemeanors, such as shoplifting or a bar fight."[30]

2007).

26. The coalition was comprised of Chicanos Por La Causa and Somos America and was represented by the law firm Altshuler Berzon, the American Civil Liberties Union (ACLU), the ACLU of Arizona, and the Mexican American Legal Defense and Educational Fund (MALDEF). *See* ACLU of Arizona, Civil Rights Coalition to Argue in Court Today that Arizona Employer Sanctions Law is Illegal (Nov. 14, 2007), http://www.acluaz.org/News/PressReleases/ 11_04_07.html.

27. Teresa Miller, *Blurring the Boundaries Between Immigration and Crime Control After September 11th*, 25 B.C. THIRD WORLD L.J. 81, 113 (2005).

28. *Id.* at 84.

29. Kevin R. Johnson, *September 11 and Mexican Immigrants: Collateral Damage Comes Home*, 52 DEPAUL L. REV. 849, 853–54 (2003).

30. Kati L. Griffith, *Perfecting Public Immigration Legislation: Private Immigration Bills and Deportable Lawful Permanent Residents*, 18 GEO. IMMIGR. L.J. 273, 276 (2004).

In 2003, the DHS released a ten-year detention and removal strategy.[31] As a mission slogan, the Office of Detention and Removal (DRO) selected, "Promote the public safety and national security by ensuring the departure from the United States of all removable aliens through the fair and effective enforcement of the nation's immigration laws."[32] In framing the mission solely on the basis of public safety and national security, all unauthorized immigrants were defined as security threats. Traditionally, immigration raids have been conducted at work sites and have impacted immigrants as workers. However, since the beginning of the immigration program Operation Return to Sender, news accounts have reported an unusually high number of immigration raids targeting families.[33] Reports of immigration law enforcement agents entering residences without warrants or unannounced, particularly at predawn,[34] have increased over the last two years.[35] Even armed federal agents with rifles and bulletproof vests were reported to have conducted a raid in a Chicago mall.[36] Concerns about the civil rights violations of family members, particularly children, have emerged.[37] Seven-year-old Kebin Reyes became the poster child for the citizens caught in immigration sweeps and the disregard for breaking up families in immigration enforcement.[38] In this case, ICE officers denied his father's request to call a family member or family friend to care for Kebin. Even though the father showed the officers his son's U.S. passport, he was ordered to wake the child and both were taken

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31. U.S. DEPARTMENT OF HOMELAND SECURITY, BUREAU OF IMMIGRATION AND CUSTOMS ENFORCEMENT, ENDGAME: OFFICE OF DETENTION AND REMOVAL STRATEGIC PLAN, 2003–2012, DETENTION AND REMOVAL STRATEGY FOR A SECURE HOMELAND (2003), *available at* http://cryptogon.com/docs/endgame.pdf.

32. *Id.* at ii.

33. *See* N. C. Aizenman & Spencer S. Hsu, *Activist's Arrest Highlights Key Immigrant Issue*, WASH. POST, Aug. 21, 2007, at A5; Tom Lochner, *Testimonials Illustrate ICE Raids; ACLU Files Request for Information on 'Return to Sender' Operation*, CONTRA COSTA TIMES (Cal.), Mar. 9, 2007, at F4; Rebecca R. Lum, *Churches Aiding Targeted Families*, OAKLAND TRIB., June 25, 2007; Jessie Mangaliman, *P.A. Mother Ends Immigration Fight*, THE MERCURY NEWS (San Jose), Apr. 7, 2007; Michael Martinez, *Deportations Strand Young U.S. Citizens*, CHI. TRIB., Apr. 30, 2007, at C24.

34. Jesse McKinley, *San Francisco Bay Area Reacts Angrily to Series of Immigration Raids*, N.Y. TIMES, Apr. 28, 2007, at A14; Sandra Forester, *Immigration Raids Spark Anger in Sun Valley Area*, IDAHOSTATESMAN.COM, Sept. 21, 2007, http://www.idahostatesman.com/newsupdates/story/164305.html.

35. *Cf.* Nina Bernstein, *Immigration Raids Single Out Hispanics, Lawsuit Says*, N.Y. TIMES, Sept. 21, 2007, at B3.

36. *NBC News Chicago, Feds: Raided Operation Made Up to 100 Fake Ids Daily, Angry Protesters March Though Night After Fake ID Raid* (NBC television broadcast Apr. 24, 2007), *available at* http://www.nbc5.com/news/13020266/detail.html.

37. Tyche Hendricks, *The Human Face of Immigration Raids in Bay Area; Arrests of Parents Can Deeply Traumatize Children Caught in the Fray, Experts Argue*. S.F. CHRON., Apr. 27, 2007, at A1. Complaint of Kebin Reyes, Reyes v. Alcantar, No. 07-02271 (N.D. Cal. Apr. 26, 2007), *available at* http://aclunc.org/cases/open_cases/asset_upload_file318_5387.pdf. The Puerto Rican Legal Defense and Education Fund and the law firm of LeBoeuf, Lamb, Greene & MacRae have also filed a lawsuit. Complaint of Adriana Aguilar, Aguilar v. Myers, No. 07 Civ. 8224 (S.D.N.Y. Sept. 20, 2007), *available at* http://www.prldef.org/Civil/ICE/Aguilar%20v%20ICE%20NY%20complaint-%20Official%209-20.pdf.

38. *See* McKinley, *supra* note 34.

into forced custody. The child was held in a locked room against his will all day and was only given bread and water. Even though family members arrived that afternoon for the child, Kebin was not released until the evening. Along with Kebin's story from the Bay Area, similar accounts have been reported in East Hampton,[39] South Bend,[40] Los Angeles,[41] Chicago,[42] Fresno,[43] Long Island,[44] and Santa Fe.[45]

The move toward harsher restrictions on immigration at the federal and state levels has reinforced the notion that U.S. citizenship is limited to a white-monolingual-moncultural standard. At the same time, proposed legislative reforms against immigration are cutting off former avenues that immigrants had towards integration and assimilation into the dominant culture. Instead, a consistent pattern of policies are being implemented that will assure the complete exclusion of immigrants from mainstream America. The most alarming aspect of the anti-immigration movement has been the attack on birthright citizenship.[46] Supported by nativist and ultra-conservative organizations, the movement is actively working toward legislation to nullify the Fourteenth Amendment's "birthright" provision.[47] This effort is motivated by the belief that immigrant parents are unfit to be citizens because their offspring are current and future burdens on taxpayers.[48] Such beliefs are fueled by the long-held stereotype of pregnant Mexican women crossing the border to give birth in order to gain their child birthright citizenship and access to public services.[49]

My contribution to this symposium examines the targeting of Mexican immigrant women as mothers in the anti-immigration campaigns. To examine specific aspects of racist nativist sentiment toward Mexican immigrant women, I focus on the case of

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39. Bernstein, *supra* note 35.

40. Joseph Dits, *ICE Raid Has Some Held in Limbo; After Janco Raid, Families, Churches Offer Financial Help*, S. BEND TRIB., Mar. 22, 2007, at A1.

41. Connie Llanos, *Immigration Raids Kill Dreams; Families, Friends Torn Apart by Deportation Arrests by Federal Officers*, DAILY NEWS OF L.A., May 6, 2007, at SC1.

42. Martinez, *supra* note 33.

43. Vanessa Colón, *Separated by Their Citizenship; U.S.-Born Twin Girls Struggle to Move on with Their Lives in Fresno, After Their Mother Was Deported to Mexico and Their Father Left to Join Her*, FRESNO BEE, Apr. 20, 2007, at A1.

44. Nina Bernstein, *Citizens Caught Up in Immigration Raid*, N.Y. TIMES, Oct. 4, 2007, at B5.

45. Russell M. Simon & Kate Willson, *Coss Comes Down on Arrests; Crackdown Called 'Hurtful' and 'Divisive,'* ALBUQUERQUE J., Mar. 1, 2007, at 1.

46. *'Birthright Citizenship' Debate Set to Begin: Battle Expected over Bid to Deny Citizenship to U.S.-Born Children of Illegals*, MSNBC, Dec. 26, 2005, http://www.msnbc.msn.com/id/10609068/; *see* Birthright Citizenship Act of 2007, H.R. 1940, 110th Congress (2007). *See generally* PETER H. SCHUCK & ROGERS M. SMITH, CITIZENSHIP WITHOUT CONSENT 90–115 (1985).

47. JUSTIN AKERS CHACON & MIKE DAVIS, NO ONE IS ILLEGAL: FIGHTING RACISM AND STATE VIOLENCE ON THE U.S.-MEXICO BORDER 240 (2006).

48. Dorothy E. Roberts, *Who May Give Birth to Citizens? Reproduction, Eugenics, and Immigration*, *in* IMMIGRANTS OUT! 205 (Juan F. Perea ed., 1997).

49. For example, Governor Pete Wilson's administration implicated the belief issuing directives to health care providers to stop providing prenatal services to undocumented immigrants. *Cf.* Paul Feldman & Amy Pyle, *Wilson Acts to Enforce Parts of Prop. 187*, L.A. TIMES, Nov. 10, 1994, at A1.

MAIA. I analyze the images and metaphors used to characterize Mexican immigrant mothers and their children as economic and security threats. Previous research on anti-immigration sentiment has documented the significance of images and metaphors in fueling nativist fear that an invasion, conquest, and crisis exists.[50] Using qualitative methods, data were collected from MAIA's internet site, newspaper articles, and transcripts of television interviews. Data were coded to determine strategies employed to construct Mexican immigrant women as posing a security threat.

In the first section of this Article, I analyze intersectionality and mothering discourses and provide a background to MAIA's anti-immigrant nativist strategy as mothers protecting their children and families. Tracing the normative basis of motherhood points to the nativist aspects that separate mothers by privileging white-middle-class women as ideal parents to the future community of U.S. citizens. Beginning with the cult of domesticity, I trace the separating of mothers into "good" and "unfit" categories. The role that immigrant women of color in the globalization of care work presents an interesting aspect to mothering discourse. By interrogating the notions of motherhood as shaped by intersectionality and subordination, we can understand how two opposing mothering discourses can coexist. On one hand, mothering discourse is used to demonize Mexican immigrant women as unfit mothers of U.S. citizens, and on the other hand, MAIA uses traditional motherhood norms and values to legitimate their activism as an act of mothering involving action against other mothers.

The next section of this Article analyzes the tactics used by MAIA. Constructing its nativist rhetoric around a threatening image of knaving and unscrupulous immigrant mothers who use their children to insure their position in the United States, MAIA argues that the Fourteenth Amendment has been misinterpreted and does not give birthright citizenship to the children of noncitizens. Uncovering its use of nativism and mothering discourse points to its selection of metaphors to construct immigrant mothers and their children as threats to the health, education, and future of the children of U.S. citizens. Here I explore the nativism embedded in popular and official homeland security discourse, which lends itself to racialized anti-immigrant campaigns and vigilante activity. Embracing aspects of homeland security discourse, MAIA's arguments, slogans, and symbols function to dehumanize immigrant mothers and their children. As indicated by its choice of names, MAIA positions itself as patriotic mothers protecting their children and families. In the present political climate that rejects family unification provisions in immigration policy, MAIA's race-based nativist attack on Mexican immigrant women as unfit mothers of U.S. citizen children is compatible with mainstream anti-immigration sentiment. MAIA shields itself with the armor of motherhood by appropriating traditional images of mothering to conceal its anti-immigrant activism targeting other mothers and their children. In order to attack other women and their children in the name of motherhood and family, MAIA constructs immigrant mothers as unfit mothers and their children as unfit for U.S. citizenship.

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50. *See generally* LEO R. CHAVEZ, COVERING IMMIGRATION: POPULAR IMAGES AND THE POLITICS OF THE NATION (2001); OTTO SANTA ANA, BROWN TIDE RISING, METAPHORS OF LATINOS IN CONTEMPORARY AMERICAN PUBLIC DISCOURSES (2002).

I. INTERSECTIONALITY AND MOTHERING DISCOURSES

A. Domesticity and Motherhood

Critiques of the cult of domesticity point to the white middle-class bias developed early on in constructing family values most accommodating to American capitalism.[51] Technological advances that were intended to lessen the amount of domestic labor ironically created new homemaking activity.[52] The social ideal of women's homemaking activity incorporated the notion of the "proper sphere" of a wife and mother as a full time vocation in private rather than public life.[53] As scientific management reshaped the factories and office work, this entrepreneurial model of supervision and capitalist management principles were used to develop standards of cleanliness and orderly housekeeping routines, as well as norms and expectations of proper child-rearing practices.[54]

Professionalizing homemaking activity was "not merely that of a ministering servant to the physical wants and necessities of her family," but also included being "the enlightened instructor and guide of awakening minds, her husband's counselor, the guardian and purifier of the morals of her household."[55] Feminist historians have traced the professionalization of housework to this ideology and its impact on immigrants and women of color laboring in domestic service.[56] "Domesticity's new view of women's roles, while implicitly assigning the domestic to drudge work, called employers to 'higher' tasks and to supervision."[57] The application of scientific management principles to the home set the stage for unemployed women hiring others to labor in order to elevate their status to supervisors. Consequently, many employers viewed domestic service as an opportunity to socialize immigrant women into the higher middle-class family moral values and teach them the "vocation of womanhood."[58] Catherine Stansell notes that bourgeois standards of housekeeping were equated with "vocations of womanhood," and "the sloppiness of their domestics as something more than notorious idleness and laziness of the poor."[59] Not surprisingly, domestic service became characterized as a bridging occupation that would assimilate immigrant women into American middle-class norms, values, and

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51. *See, e.g.*, GLENNA MATTHEWS "JUST A HOUSEWIFE": THE RISE AND FALL OF DOMESTICITY IN AMERICA (1987).

52. RUTH S. COWAN, MORE WORK FOR MOTHER: THE IRONIES OF HOUSEHOLD TECHNOLOGY FROM THE OPEN HEARTH TO THE MICROWAVE (1983).

53. *See* Barbara Welter, *The Cult of True Womanhood, 1820–1860*, 18 AM. Q. 151, 153 (1966).

54. *See generally* KATHRYN K. SKLAR, CATHERINE BEECHER: A STUDY OF AMERICAN DOMESTICITY (1973).

55. FAYE E. DUDDEN, SERVING WOMEN: HOUSEHOLD SERVICE IN NINETEENTH-CENTURY AMERICA 155 (1983).

56. *Id.*; *see also, e.g.*, DAVID M. KATZMAN, SEVEN DAYS A WEEK: WOMEN AND DOMESTIC SERVICE IN INDUSTRIALIZING AMERICA (1978); PHYLLIS PALMER, DOMESTICITY AND DIRT: HOUSEWIVES AND DOMESTIC SERVANTS IN THE UNITED STATES, 1920–1945 (1989).

57. DUDDEN, *supra* note 55, at 155.

58. MARY ROMERO, MAID IN THE USA 84 (2002); *see also* CATHERINE STANSELL, CITY OF WOMEN: SEX AND CLASS IN NEW YORK, 1798–1860 163 (1986).

59. STANSELL, *supra* note 58, at 163.

lifestyle.[60] Although European immigrant women frequently quit outside employment upon commencing a life of marriage and procreation, the experience in domestic service was assumed to give them important experience toward Americanization.

The next major shift in homemaking activity was the transformation from production to consumption, which made homemakers responsible for purchasing items necessary to fulfill their families' rising expectations.[61] Commodities once believed to be luxury items, such as air conditioners, clothes dryers, electric mixers, dishwashers, telephones, and television, became necessities.[62] Consumerism became central to maintaining high living standards. While early standards required stay-at-home moms as the ideal, the enormous pressures to consume products and services in order to raise a competitive and healthy child demanded that more middle-class women enter the labor force. While the stigma of working outside the home has not entirely been eliminated, more emphasis has been placed on the notion of "quality" time rather than "quantity" time.

In her analysis of the prevailing ideology of motherhood advocated by child experts, Sharon Hays found that child-centered, emotionally demanding, labor-intensive, and financially draining methods were the norm. This contemporary standard of motherhood is frequently referred to as intensive and competitive mothering.[63] To fulfill these norms, women must engage in daily practices of immense emotional involvement, constant self-sacrificing, exclusivity, and a completely child-centered environment. Women with disposable income are able to use commodities and the paid services of others to fulfill many of these requirements. More recently, Annette Lareau has identified distinctions between class, race, and family life by describing the middle-class parenting practices of concerted cultivation: "Parents actively fostered and assessed their children's talents, opinions, and skills. They scheduled their children for activities. They reasoned with them. They hovered over them and outside the home they did not hesitate to intervene on the children's behalf."[64] In contrast, "working class and poor parents viewed children's development as unfolding spontaneously, as long as they were provided with comfort, food, shelter, and other basic support."[65]

Again, ideal motherhood is defined by class and race privileges and the norm is set by white-middle-class heterosexual mothers. Of course, preference is given to full-time mothers, while women employed outside the home continue to be suspect regardless of class background.[66] With less disposable income, there are few opportunities to

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60. KATZMAN, *supra* note 56, at 171.

61. GLENNA MATTHEWS, "JUST A HOUSEWIFE" THE RISE AND FALL OF DOMESTICITY IN AMERICA 187–89 (1987); *see* JULIET B. SCHOR, THE OVERSPENT AMERICAN: UPSCALING, DOWNSHIFTING, AND THE NEW CONSUMER (1998); *cf.* JULIET B. SCHOR, BORN TO BUY: THE COMMERCIALIZED CHILD AND THE NEW CONSUMER CULTURE (2004). *See generally* CONSUMING MOTHERHOOD (Janelle S. Taylor, Linda. Layne & Danielle F. Wozniak eds., 2004).

62. ROMERO, *supra* note 58, at 94. Today, this list has expanded to several cars, televisions, individual computers, and cell phones for family members. *Id.*

63. SHARON HAYS, THE CULTURAL CONTRADICTIONS OF MOTHERHOOD 97–130 (1996).

64. ANNETTE LAREAU, UNEQUAL CHILDHOOD: CLASS, RACE AND FAMILY LIFE 238 (2003).

65. *Id.*

66. JOAN WILLIAMS, UNBENDING GENDER: WHY FAMILIES AND WORK CONFLICT AND WHAT TO DO ABOUT IT 15–24 (2000). *See generally* SUSAN J. DOUGLAS & MEREDITH W. MICHAELS,

purchase commodities or the services of others to provide the tasks required in intensive and competitive mothering. Working more hours outside the home also eliminates the necessary time required in this type of mothering. Analyzing the intersectionality of mothers' experiences by taking class, ethnic, race, and citizenship into consideration also exposes the other hardships, such as obtaining higher paying positions and benefits without U.S. citizenship, the absence of inherited wealth, the accessibility and availability of cultural goods and services, and the quality of public resources in lower income communities.[67]

B. Latina Immigrants and Domesticity

Unlike other Latino immigrants, Mexicans have a long history marked by their experiences of racism and anti-immigration backlash.[68] Concern over immigration in the United States is inseparable from stereotyping Mexicans as "illegal aliens," socially constructing Mexicans as criminal, foreign, and the other.[69] In the case of Mexican women, their sexuality as well as their culture and language have been suspect and considered alien since the early days of the U.S. invasion into northern Mexico.[70] Even though a century of U.S. occupation has passed, poor and working-class women of Mexican ancestry are still perceived through the binary lens of traditional versus modern family roles. Using cultural deterministic models, family practices and relationships are frequently attributed to cultural norms rather than economic or political structures. Traditional roles used to characterize Mexican mothers and wives are overwhelming attributed to culture, and any data contrary to the existence of these roles is systematically attributed to assimilation to U.S. cultural values rather than economic, political, or cultural changes. The significance of American patriotism and domesticity is noted in Barbara Ehrenreich and Deirdre English's *For Her Own Good: 150 Years of the Experts' Advice to Women*:

> The converse idea, that civilization was the product of decent home life, was held to be axiomatic. At the time of the Spanish-American War, Demolins' widely quoted book *Anglo-Saxon Superiority* traced the imperial success of the Anglo-Saxon 'race' to an inherent Anglo-Saxon love of home. Home, with a capital "H," was by this time a word which patriotic Americans could hardly breathe without feeling a rush of maudlin sentiment.[71]

While Americanization programs did not immediately focus on women and children, the shift to the family was eventually perceived a more comprehensive strategy.

THE MOMMY MYTH: THE IDEALIZATION OF MOTHERHOOD AND HOW IT HAS UNDERMINED WOMEN 203–35 (2004). However, unemployed poor women are still constructed as lazy and undeserving of welfare. *Id.*

67. *See* GWENDOLYN MINK, THE WAGES OF MOTHERHOOD 3-26 (1995).

68. KEVIN R. JOHNSON, THE "HUDDLED MASSES" MYTH: IMMIGRATION AND CIVIL RIGHTS 27-39 (2003).

69. *Id.*

70. ALFREDO MIRANDE & EVANGELINA ENRIQUEZ 75–78 (1979) (discussing cultural stereotypes and attitudes Americans held towards Mexican American women in the 1800s).

71. BARBARA EHRENREICH & DEIRDRE ENGLISH, FOR HER OWN GOOD: 150 YEARS OF THE EXPERTS' ADVICE TO WOMEN 131–32 (1978).

> The Americanization of the women is as important a part as that of the men. They are harder to reach but are more easily educated. They can realize in a moment that they are getting the best end of the bargain by the change in relationships between men and women which takes place under the new American order. . . . "Go after the women" should become a slogan among Americanization workers, for after all the greatest good is to be obtained by starting the home off right. The children of these foreigners are the advantages to America, not the naturalized foreigners. These are never 100% Americans, but the second generation may be. "Go after the women" and you may save the second generation for America.[72]

Americanization programs are frequently credited with giving Mexican women the domestic and mothering skills needed to meet white-middle-class standards.[73] Sarah Deutsch captured the dominant ideology in her question, "[W]hat better way to train Chicanas in 'American' mothering than by encouraging them to meet the demand for domestic servants?"[74] Vocational training for Mexican girls was geared towards Americanization through teaching homemaking. Grace Farrell's 1929 article, "Homemaking with the "Other Half" Along Our International Border," identifies "any part of homemaking from morals and manners to cleaning and cooking" as preparing them to raise families in the United States.[75] Several books and teaching manuals advocating Americanization programs to adopt training in domestic service in the curriculum were published, including Kimball Young's book, *Mental Differences in Certain Immigrant Groups*, Merton Hill's *The Development of an Americanization Program*, and Pearl Ellis's *Americanization Through Homemaking.*[76] Programs offered in the Southwest during the New Deal followed a similar strategy of offering household training projects.[77] "Americanization-through-homemaking" movement reflected strong anti-Mexican sentiment that viewed Mexican American and Mexican immigrant women as lacking moral and culture refinement and thus, unfit to mother U.S. citizens.[78]

Since ideal womanhood and motherhood is based on white-middle-class women, Latina immigrant women have been socially constructed as possessing the natural qualities for low wage employment in domestic service (including house cleaners, nannies, and maids) and yet, fail to meet the norms of womanhood and motherhood. Replacing African American women's subordination in this occupation, they share some similarities in images constructed to present them as ideal care workers. Latina immigrant women employed as domestics and care givers straddle the mammy and Jezebel stereotypes. In some cases they share the "mammy" portrayal of African American domestic workers; that is, as asexual, maternal, deeply religious, loyal,

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72. GEORGE J. SÁNCHEZ, BECOMING MEXICAN AMERICAN: ETHNICITY, CULTURE AND IDENTITY IN CHICANO LOS ANGELES, 1900-1945 98 (1993).

73. ROMERO, *supra* note 58, at 110–11.

74. SARAH DEUTSCH, NO SEPARATE REFUGE 149 (1985).

75. ROMERO, *supra* note 58, at 94.

76. *Id.* at 114.

77. *Id.* at 115.

78. *Id.* at 109–25 (reviewing educators and employers beliefs towards Mexicans and the use of domestic service in Americanization programs offered to mother girls and women).

faithful, contented, efficient, and "an ideal symbol of the patriarchal tradition."[79] The Jezebel image is apparent in the image of the "hot-blooded Latina" and perceptions of Latina immigrant women as breeders rather than mothers. When these stereotypes are selectively constructed and perpetuated in the media among employers and social scientists, Latina immigrant women are assumed to be naturally skilled to do carework, placing more emphasis upon psychological gratification of mothering as an act of love rather than compensated as skilled labor. "Constructing emotional and domestic labor as love and caring also rationalizes the preference for immigrant women based on their traditional, ethnic cultures. This essentializes racialized gendered characteristics."[80]

C. Race, Ethnicity, Class, Citizenship, and Unfit Mothers

There is a long history in the United States of denying women of color the basic right to choose motherhood, as well as attacking marginalized mothers as inadequate and failing in their parental duties. American mothering discourse established impossible standards for mothers who do not share the same class, ethnic, race, citizenship, and sexual privileges as white, heterosexual, upper and middle-class women who reap the benefits of patriarchy. Rather than acknowledging the differences in privilege and subordination between women's fulfillment of popularized standards of mothering, personal and cultural failures have traditionally been identified as the source of the problem.

Defining marginalized women as inadequate mothers due to their personal and cultural shortcomings has led to a variety of solutions ranging from secular, religious, and government assimilation and eugenic programs to imprisonment and the removal of children from their care. Americanization programs aimed at immigrant mothers have included courses on cooking, hygiene, and child rearing practices that centered on child-centered, as well as religious propaganda.[81]

> Limiting the growth of the immigrant population was a longstanding concern of both Progressives and nativists . . . . When this fear rose in relation to the Mexican immigrant, both nativists and proponents of Americanization became alarmed: nativists wished to stave off an "invasion," while Americanization advocates viewed all unrestricted

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79. Regina Austin, *Sapphire Bound!*, *in* CRITICAL RACE FEMINISM 301, 305 (Adrien K. Wing ed., 2003); *see* MIMI ABRAMOVITZ, REGULATING THE LIVES OF WOMEN, SOCIAL WELFARE POLICY FROM COLONIAL TIMES TO THE PRESENT (1996) (providing a history of social services to women in the United States, particularly emphasis on meeting the normative standard of woman and family); DOROTHY ROBERTS, SHATTERED BONDS: THE COLOR OF CHILD WELFARE (2002) (arguing that public policy separates low-income Black parents from children as unfit rather than addressing issues of poverty); DOROTHY ROBERTS, KILLING THE BLACK BODY: RACE, REPRODUCTION AND THE MEANING OF LIBERTY (1998) (documenting the history of social and government control of African American women's fertility); LUANA ROSS, INVENTING THE SAVAGE: THE SOCIAL CONSTRUCTION OF NATIVE AMERICAN CRIMINALITY (1998) (providing in chapter three a profile of women in prison, which includes social scientists attempts to explain the over representation of women of color in prisons).

80. Mary Romero, *Conceptualizing the Latina Experience in Care Work*, *in* BLACKWELL COMPANION TO LATINO STUDIES 264–75 (2007).

81. *See id.* at 74.

> population growth as vestige of Old World ways that must be abandoned in a modern industrial setting.[82]

The eugenics movement in the United States incorporated state-sanctioned sterilization programs against women deemed as biologically and socially unfit to reproduce. Eugenics movement included similar beliefs and values as those fueling anti-miscegenation laws and immigration restrictions against immigrants classified as inferior.

Beginning with slavery, the state has honed its treatment of poor, immigrant, and women of color as irresponsible breeders who neglected and abused their children. Building on the belief of their inferiority, the state-sanctioned and funded programs denied reproductive rights. The legacy is still evident in the practice of involuntary sterilization in American Indian, Mexican American, Puerto Rican, and other women of color documented over the fifty years. Prescribing contraceptives not yet approved by the FDA in poor communities of color was supported by Medicaid policy and numerous state legislatures in an effort to reduce welfare population.[83] *Madrigal v. Quilligan* involves a case of involuntary and uninformed consent for sterilization following childbirth at the Los Angeles County—University of Southern California Medical Center.[84] In the 1980s, "crack babies" become the rallying cry behind using the criminal justice, the social welfare, and the public health system to punish women suspected of prenatal drug exposure.[85] The nonconsensual drug testing of selected pregnant patients, which resulted in arrests for child abuse and the distribution of drugs to a minor, was shaped by similar views of poor women of color.[86] Perceiving the welfare system as promoting dependency and illegitimacy, as well as deterring work incentives and motivation, has been fundamental in fueling welfare reform movements.[87] Again, the major target has been on poor women failing to meet the standards of motherhood.

Anti-immigration discourse aimed at Mexicans over the last few decades have frequently based their campaign on the argument that immigrants take social services away from citizens.[88] Immigration legislation continue to narrow eligibility

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82. *Id.*

83. *See generally* DOROTHY ROBERTS, KILLING THE BLACK BODY: RACE, REPRODUCTION, AND THE MEANING OF LIBERTY (1997).

84. Madrigal v.Quilligan, 639 F.2d 789 (C.D. Cal. 1981); *see also* Carlos G. Velez-Ibañez, *The Nonconsenting Sterilization of Mexican Women in Los Angeles, in* TWICE A MINORITY: MEXICAN AMERICAN WOMEN 235–248 (1980).

85. ASSARA RAE & RAE BANKS, DEHUMANIZING DISCOURSE, ANTI-DRUG LAW, AND POLICY IN AMERICA: A "CRACK MOTHER'S" NIGHTMARE 56–7 (2002); *see also* DREW HUMPHRIES, CRACK MOTHERS: PREGNANCY, DRUGS, AND THE MEDIA 70–1 (1999).

86. *See generally* LAURA GOMEZ, MISCONCEIVING MOTHERS: LEGISLATORS, PROSECUTORS, AND THE POLITICS OF PRENATAL DRUG EXPOSURE (1997).

87. KAREN SECCOMBE, SO YOU THINK I DRIVE A CADILLAC? WELFARE RECIPIENTS' PERSPECTIVES ON THE SYSTEM AND ITS REFORM 50–9 (1999).

88. For instance, George J. Sánchez notes that in 1927, the Commission of Immigration and Housing called for limited immigration from Mexico and blamed them for social problems related to charities, schools, and health departments. GEORGE J. SÁNCHEZ, BECOMING MEXICAN AMERICAN: ETHNICITY, CULTURE, AND IDENTITY IN CHICANO LOS ANGELES, 1900–1945 105 (1993).

requirements to include perceived characteristics that may result in persons becoming public charges after entry.[89] Not only is "public charge exclusion" engraved into immigration legislation, but the Immigration and Nationality Act (INA) further allows the deportation of persons who are identified as a public charge within a five year period after entry leaving immigrants extremely vulnerable to swing in the economy and unemployment rates.[90] Immigration restrictionists have actively campaigned for the elimination of all federal and state cutbacks by portraying Mexican women as hyperfertile breeders entering the United States with the explicit intention of giving birth to a U.S. born child in order to claim citizenship privileges. Recent anti-immigration legislation aimed at denying services to families and children have been directed at mothers constructed as breeders and their children.[91]

Attention to the feminization of immigration by restrictionists has generated in numerous immigration legislation impacting women differently than men. Federal legislation restricting family unification increased the difficulty legal immigrants have in sponsoring their spouses most frequently restricting women's migration to the United States.[92] In her analysis of the impact of the Immigration Reform and Control Act (IRCA) on immigrant women, Grace Chang called attention to the parallel Aid to Dependant Children (ADC) and Aid to Families with Dependent Children (AFDC) "employable mother" rules, which restricted Black mothers access to benefits and forced them into low-wage dead end jobs in domestic service.[93] IRCA's exclusionary provisions of persons who might become a "public charge" targeted immigrant women, the recipients of AFDC.[94] Her critique points to the construction of immigrant women as "welfare queens" and "baby machines."

Anti-immigration campaigns have successfully used the images of Mexican immigrant women with the metaphor of an invasion to create fear towards their fertility and reproduction, as well as the hinting at the resources required for prenatal care,

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89. However, the construction of welfare and work as mutually exclusive is disputed. In their study of immigrant women in Los Angeles, Alejandra Marchevsky and Jeanne Theoharis found that neither provides a living wage and most women survived with a combination of both. *See* Alejandra Marchevsky & Jeanne Theoharis, *The Myth of Welfare Dependency, Caught Between Welfare and Work*, *in* NOT WORKING: LATINA IMMIGRANTS, LOW-WAGE JOBS, AND THE FAILURE OF WELFARE REFORM 140–68 (2006).

90. Johnson, *supra* note 29, at 853–54.

91. GRACE CHANG, DISPOSABLE DOMESTICS: IMMIGRANT WOMEN WORKERS IN THE GLOBAL ECONOMY 28–39, 75–77 (2000).

92. Kevin R. Johnson, *Public Benefits and Immigration: The Intersection of Immigration Status, Ethnicity, Gender, and Class*, 42 UCLA L. REV. 1552 (2003); *see* Syd Lindsley, *The Gendered Assault on Immigrants*, *in* POLICING THE NATIONAL BODY: RACE, GENDER AND CRIMINALIZATION 175–98 (Jael Siliman & Ananya Bhattacharjee eds., 2002) (discussing the impact that The Immigration Marriage Fraud Amendment of 1990 and the Immigration and National Act had on immigrant women).

93. CHANG, *supra* note 91, at 75–77.

94. *Id.* at 61–65. This follows the consistent pattern in U.S. welfare policy that distinguishes between the "deserving" and "undeserving." *See* MIMI ABRAMOWITZ, REGULATING THE LIVES OF WOMEN: SOCIAL WELFARE POLICY FROM COLONIAL TIMES TO THE PRESENT (1988); GWENDOLYN MINK, THE WAGES OF MOTHERHOOD: INEQUALITY IN THE WELFARE STATE, 1917–1942 (1995); CHANG, *supra* note 91, at 13.

education, and other services.[95] Nativist discourse against Mexican immigrant women that began in the 1990s has targeted immigrant women's reproduction and role as mothers. Mexican women and children do not represent the transient image of temporary male laborers and memories of the Bracero program. Instead, they represent families, stability, and an increasing presence of future citizens of color. Embedded in the anti-immigration legislation passed over the last two decades is the implication "that illegal immigrants are coming to the United States intending to exploit the availability of public benefits. The implied (or sometimes explicit) characterization of undocumented immigrants is that they are lazy, sneaky, greedy, and wiling to travel great distances in order to avoid work and get on welfare."[96]

II. CONSTRUCTING ANTI-IMMIGRANT CAMPAIGN AGAINST IMMIGRANT MOTHERS

Like many past vigilante women's groups, this organization positions itself as mothers rather than workers, employers, or citizens.[97] By naming itself Mothers Against Illegal Aliens, MAIA's mission fits into the strong pro-family rhetoric usually presented with the slogan "family values." This representation is reinforced by its choice of images, metaphors, and political language. Unlike its counterparts, the Minutemen,[98] MAIA began its anti-immigrant propaganda linked to mainstream anti-immigration conservative research and politics and has thus avoided being labeled as a vigilante group rule but rather constructed itself as a group of "responsible" citizens.[99] However, as the anti-immigration sentiment has increased over the last few years and more discriminatory legislation appears, nativist and racist messages appear to be gaining legitimacy. Consequently, MAIA has made fewer attempts to conceal its connections to other vigilante groups while keeping close allies with politicians advocating nativist anti-immigration legislation. The following analysis is based on

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95. Leo R. Chavez, *Spectacle in the Desert: The Minute Man Project on the U.S.-Mexico Border*, *in* GLOBAL VIGILANTES: ANTHROPOLOGICAL PERSPECTIVES ON JUSTICE AND VIOLENCE 25-46 (2008).

96. Lindsley, *supra* note 92, at 189–90.

97. Joann Rogers and Jacquelyn S. Litt note that "[i]t is not surprising that women in the movement use motherhood or 'maternalism' as a point of departure for activism, as this has been a strategy employed by women, progressive and reactionary, for centuries in the United States and across the globe." Joann Rogers & Jacquelyn S. Litt, *Normalizing Racism: A Case Study of Motherhood in White Supremacy*, *in* HOME-GROWN HATE: GENDER AND ORGANIZED RACISM (2004) (discussing the meaning of gender and motherhood in the right-wing white-separatist group, the World Church of the Creator, and notes the function of framing their activity as motherhood).

98. MAIA founder Michelle Dallacroce supports and works with the Minutemen. *See* MAIA Activist Groups, http://mothersagainstillegalaliens.org/site/index.php?option=com_weblinks&catid=13&Itemid=63. Peter Yoxall, *The Minuteman Project, Gone in a Minute or Here to Stay? The Origin, History and Future of Citizen Activism in the United States-Mexico Border*, 37 U. MIAMI INTER-AM. L. REV., 517, 532–51 (2006) (providing a detailed history of the Minutemen). *See generally* Christopher J. Walker, *Border Vigilantism and Comprehensive Immigration Reform*, 10 HARV. LATINO L. REV. 135 (2007).

99. RAY ABRAHAMS, VIGILANT CITIZENS: VIGILANTISM AND THE STATE 1–23 (1998) (discussing the different characterizations of vigilante activity groups).

data collected from its website over a twelve-month period between November 2006 and 2007.

A. Nativism and Mothering Discourse

"The Mission of Mothers Against Illegal Aliens—(MAIA) is to bring awareness to and educate the LEGAL American families whose children are the silent victims of this Invasion of Illegal Aliens."[100] Positioning itself as mothers, its statement further asserts that "it is up to a mother to protect her family."[101] In an interview in May 2006, a Los Angeles reporter summarized Michelle Dallacroce's motive for starting the organization as follows, "she feared for the future of her two young children, who could be ignored in a United States dominated by Mexican-born people. She described the possibility of Mexicans taking over the country as 'genocide' and said migrants were 'raping' the country by demanding social services."[102] MAIA's nativist stance is also evident in its invitation to The Million Mother March: "The winds of a new American patriotism, resolve, energy and national purpose are blowing and they are blowing strong! By the millions, American mothers are persuading friends, compatriots and family members to join in demonstrations to restore our country to sanity and respect for our sovereignty while launching a veritable renaissance of American exceptionalism."[103] Like other anti-immigrant discourses, MAIA relies on the ideology of white injury to cast white middle-class citizens as the real victims.[104]

MAIA's website does not invoke images of motherhood or feminism. Photographs appearing on the web do not represent family members or family activities but depict white adult women and men protesting for stronger enforcement of immigration regulation.[105] All posed photographs posted on the earlier version of the website are photos of Dallacroce posing with white males (Gilchrist, Pat Boone, J.D. Hayward,

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100. Former MAIA Mission Statement, http://www.cafepress.com/maiaus. The most recently revised mission statement now reads: "The members and volunteers of MAIA have made a commitment to continue to educate and inform all legal citizens of America, since our government and the media are side-stepping the real issues: that our children and our country are at risk of being eliminated!" Revised MAIA Mission Statement, http://www.mothersagainstillegalaliens.org/site/index.php?option=com_content&task=view&id=26&Itemid=46.

101. MAIA Mission, http://mothersagainstillegalaliens.org/site/index.php?option=com_content&task=view&id=26&Itemid=46

102. Nicholas Riccardi, *Anti-Illegal Immigration Forces Share a Wide Tent; Activists for Tighter Border Controls Aren't Unified but Say They Reflect Public Sentiment.* L.A. TIMES, May 4, 2006, at A1.

103. Family Security Matters, http://www.familysecuritymatters.org/index.php?id=947843/. The march was scheduled to be in Washington, D.C. on June 14–16, 2007.

104. *See generally* Lisa Marie Cacho, *The People of California are Suffering: The Ideology of White Injury in Discourses of Immigration*, 4 CULTURAL VALUES 4 (2000).

105. Phoenix Section, http://mothersagainstillegalaliens.org/site/index.php?option=com_content&task=view&id=24&Itemid=42. An earlier version of the MAIA's website included photos of Michelle Dallacroce with the conservative talk show host Sean Hannity and John David Hayworth, former Republican member of the United States House of Representatives who was defeated in 2006. "A bill passed in June 2005 by Represnetative J. D. Hayworth (R-AZ) probhits distribution of Social Security funds to the undocumented." JUSTIN AKERS CHACON & MIKE DAVIS, NO ONE IS ILLEGAL 166 (2006).

and Sean Hannity).[106] All of the links of related organizations are with groups using white male nativist images, including American Freedom Riders,[107] American Patrol,[108] Save Our State,[109] Colorado Minutemen,[110] and California Coalition for Immigration Reform.[111] Dallacroce confirmed a strong connection to these groups in a newspaper interview, "By us supporting the Minutemen, our Border Patrol and every other group that's out there, we are working together to protect our families."[112]

Representing ideal motherhood is established by using a Madonna logo. The patriotic image is a mother looking lovingly down upon a baby, which is blended into the U.S. flag that also serves as a background that is framed by its name on each of the four sides of the square. Below the logo is its slogan, "Protect Our Children. Secure Our Borders!" While the image of the Madonna and child might suggest religious aspects closely tied to Catholicism, given the strong anti-Catholic and cultural bias against all Mexicans, the image is a symbol used to valorize women's traditional roles of mothers. The Madonna logo links the group to respected activist groups, and serves to normalize racist activity.[113] This logo appears on all the items available at the online "MAIA Rally Gear" store.[114] Supporters are urged to purchase apparel and merchandise with the following ad, "The MAIA Rally Gear is the ultimate in promoting Mothers Against Illegal Aliens (MAIA), wear it with pride. We're dedicated to protecting the future of our children."[115] Unlike other anti-immigrant organization's online stores, MAIA does not carry bumper stickers or propaganda videos[116] but rather everyday items that any family might use or give as gifts, including posters, ball caps, messenger bags, t-shirts (for people and dogs), golf shirts, tank tops, coffee mugs, magnets, BBQ aprons, coasters, mousepads, journals, and white teddy bears. The only difference between these products and those found in tourist gift shops is the MAIA logo. Almost all of the items are simply described in the advertisement in terms of features, such as the size, material, and price. However, a few of the advertisements include anti-immigrant and nativist messages. Two examples are the ads for dog t-shirts and teddy bears:

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106. MAIA Articles Archive, http://www.mothersagainstillegalaliens.org/blog/?cat=7.

107. American Freedom Riders, http://americanfreedomriders.com/.

108. American Patrol, http://www.americanpatrol.com/.

109. Save Our State, http://saveourstate.org/index.php.

110. Colorado Minutement, http://www.sovereigntycolorado.com/. In November 2006 the website included links to the Minuteman Civil Defense Corp and the Minutemen Project. Both of these have been dropped in the revisions posted on September 30, 2007.

111. California Coalition for Immigration Reform, http://ccir.net/.

112. Brady McCombs, *Group Says Entrants Adversely Affect Kids*, ARIZONA DAILY STAR, Feb. 19, 2006, *available at* http://www.azstarnet.com. In its early days of formation, MAIA's relationship to the Minutemen was so closely related that one reporter referred to the organization as Minutewomen. Robert L. Pela, *Minutewomen*, PHOENIX NEW TIMES, Apr. 20, 2006, *available at* http://www.phoenixnewtimes.com/2006-04-20/news/minutewomen/full.

113. *See* Rogers & Litt, *supra* note 97, at 101 (discussing the meaning of gender and motherhood in the right-wing white-separatist group, the World Church of the Creator, and noting the function of framing their activity as motherhood).

114. MAIA Rally Gear, http://www.cafepress.com/maiaus/1129129

115. *Id.*

116. *See, e.g.*, California Coalition for Immigration Reform's Online Products, http://ccir.net/products.html.

> Put your pooch in his own cool doggie t-shirt from American Apparel. He'll be the envy of all the pups in the park. Let him wear a doggie-cool design so he can express what he'd like to bark out loud. Do it up in doggie style![117]
>
> Our plush bear is a cutie in his own message-bearing t-shirt and festive red ribbon. He's a great gift for Valentine's Day, baby showers, birthdays, get well-wishes, a pair of wedding bears, or any reason you dream up. Put a smile on someone's face. Just grin and bear it![118]

The selection of products serves to normalize their anti-immigrant campaign as a family activity. The strategy to market to families reinforces the image of "family values" and conceals the racist anti-family ideology embedded in their attack on immigrant mothers, children, and their families.

In addition to MAIA's logo, several of the revised website pages now include the logo for the American Freedom Riders,[119] speakenglishorgetout.net,[120] and links to donate to Nacho Ramos.[121] In terms of symbols used, the logo is the sole image or representation of motherhood used in the MAIA campaign. MAIA uses the symbol of motherhood to shield its racist anti-immigrant campaign, which is evident throughout its speeches: "As mothers, we fight to protect our children, and we will fight to protect our country," Dallacroce says, "We don't want to send our children into an America that has been mutated beyond recognition by massive illegal immigration."[122] Embracing the image of patriotic mothers fighting for their families and children, MAIA includes an editorial by Frosty Wooldridge that compares Michelle Dallacroce to Rose the Riveter, "Like Rosie who rolled up her sleeves in WWII, it's your honor and privilege to serve your country in this time of foreign invasion."[123] Positioning

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117. MAIA Dog Shirt, http://www.cafepress.com/maiaus.44348274.

118. MAIA Teddy Bear, http://www.cafepress.com/maiaus.44348282.

119. American Freedom Riders, *supra* note 107. In addition, Michelle Dallacroce now identifies herself as a USAF Veteran in all her correspondence.

120. Speak English or Get Out, http://speakenglishorgetout.net/.

121. However, a few of the revised pages include a link to donate money for Ignacio "Nacho" Ramos, one of the Border Patrol Agents recently serving prison terms for assault with a deadly weapon and violating Aldrete-Davila's civil rights. Pauline Arillaga, *What Really Happened in Border Shooting and Agents' Convictions?* SEATTLE TIMES, Feb. 17, 2007, *available at* http://seattletimes.nwsource.com/cgi-bin; Chris Bagley, *Family Seeks Support for Border Agent; Ignacio Ramos Serving 11-Year Sentence After Wounding Smuggler*, NORTH COUNTY TIMES, Aug. 1, 2007, *available at* http://nctimes.com/articles/2007/08/02/news/californian/; Sara A. Carter, *Border Patrol Agents Start Sentence*, SAN BERNARDINO SUN, Jan. 18, 2007, *available at* http://www.sbsun.com/news.ci_5035488#top; Darryl Fears, *Support Swells for Agents Who Shot Drug Smuggler*, WASH. POST, Feb. 17, 2007, at A02.

122. Mike Littwin, *Tancredo's Wall Power*, ROCKY MOUNTAIN NEWS, Jan. 31, 2006, *available at* http://www.rockymountainnews.com/drmn/cda/article. In response to the Anti-Defamation League (ADL) including MAIA in its report in October 2007, *Immigrants Targeted: Extremist Rhetoric Moves Into the Mainstream*, Dallacroce told reporters that the report "defamed her by comparing her to hate groups and took remarks out of context." Susan Ferriss, *Groups cite Hate in Immigration Debate*, SEATTLE TIMES, Nov. 23, 2007, at A7.

123. Wooldridge writes, "Help Dallacroce help you modern day 'Rosie' mothers do a little a** kicking across America for all our kids." Frosty Wooldridge, *Rosie the Riveter Kicked A**!*,

themselves as patriotic mothers furthers contrasts MAIA mothers from immigrant mothers and their children.

Framing a race-based nativist message in motherhood discourse distracts attention away from the activists and vigilante-type anti-immigrant campaign against other mothers and their children.[124] A motherhood platform is used primarily to construct immigrant mothers as distinctively different from mothers who are citizens of the United States.[125] MAIA's anti-immigration discourse socially constructs unauthorized mothers, namely Mexican immigrants as the unfit mothers who are morally and legally unable to have children who are U.S. citizens. Their proclamation specifically identifies immigrant women as the focus: "The biological fact that a woman can birth a child is the instrument by which the illegal alien women utilizes to demand citizenship and residence in the United States."[126] Both their literature and sound bites use carefully selected words and metaphors to highlight the "alien," "foreign," and "inferior" characteristics of non-citizens.[127]

There is a consistent pattern of referring to immigrant mothers as "illegal alien females" on their website[128] and in speeches.[129] An article posted by Michelle Dallacroce entitled, "IAI Illegal Alien Infants!" illustrates MAIA's dehumanizing construction of immigrant women as unworthy mothers.[130] Mexican immigrant women

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NEWSWITHVIEWS.COM, Jan. 19, 2006, http://www.mothersagainstillegalaliens.org/blog/?page_id=29. However, local press does not hesitate to compare MAIA to vigilante groups like the Minutemen. *See* Robert L. Pela, *Minutewomen, The Feathered Fiend Unloads on Mothers Against Illegal Aliens*, PHOENIX NEWS TIMES, Apr. 20, 2006, *available at* http://www.phoenixnewtimes.com/2006-04-20/news/minutewomen/full.

124. *See generally* Rajani Bhatia, *Greening the Swastika, Nativism and Anti-Semitism in the Population and Environment Debate*, *in* POLICING THE NATIONAL BODY: RACE, GENDER AND CRIMINALIZATION, *supra* note 92, at 291–324 ((discussing early history of racist nativist interest in population control).

125. In her research on white nativist environmental movements, Rajani Bhatia notes this growing concern over immigrant women's fertility rates. Rajani Bhatia, *Green or Brown? White Nativist Environmental Movements*, *in* HOME-GROWN HATE: GENDER AND ORGANIZED RACISM 205–25 (2004).

126. MAIA, http://www.motheragainstillegaliens.org/blog/p?page_id=92.

127. *See generally* MURRAY EDELMAN, CONSTRUCTING THE POLITICAL SPECTACLE (1988) (analyzing the significance of metaphors and labels in defining political issues).

128. MAIA Homepage, http://mothersagainstillegalaliens.org/site/index.php?option=com_frontpage&Itemid=1.

129. This pattern is audible in the videos found on MAIA's website. MAIA Interviews/Appearances (Sep. 29, 2007), http://mothersagainstillegalaliens.org/site/index.php?option=com_content&task=view&id=21&Itemid=36.

130. Michelle Dallacroce, MAIA, IAI—Illegal Alien Infants! (Mar. 15, 2007), http://mothersagainstillegalaliens.org/site/index.php?option=com_content&task=view&id=19&Itemid=31. A further example of dehumanization is Dallacroce's following internet posting, "We have a prime example of what kind of children are being born and what they are being taught by their illegal alien parents to disobey and disrespect American citizens. This 9 year old boy [reference to the child she was screaming at through a bull horn at the Labor Day rally at the Arizona State Capitol] is being taught to be a violent and hostile child. If this was my child I would have washed his mouth out with soap or better yet, I would have put a lot of tabasco [sic] sauce in his mouth." Immigrants Targeted: Extremist Rhetoric Moves into the Mainstream, Groups: Mothers Against Illegal Aliens—Arizona, http://www.adl.org/Civil_Rights/anti_immigrant/maia.asp.

are characterized as "crossing our border to 'steal' the American Dream by giving birth." The website further insinuates the predator nature of these immigrant women by imagining a purposeful strategy to steal the American Dream away from the children of U.S. citizens:

1. You sneak over the border.
2. You get pregnant ***as fast as*** possible, ***as many times as*** possible.
3. Use your child as your **weapon of choice** to **"blackmail"** the USA to let you stay.
4. Call every USA citizen a racist and home wrecker who wants you and your child to leave and return to your country.[131]

By outlining an assumed strategy, MAIA does not so much highlight the illegality of entering the United States without authorization, but rather the ways that immigrant women are immoral, sneaky, and contriving and do not deserve to embrace "motherhood."[132]

Immigrant women are characterized as self-promoting breeders instead of mothers: "Illegal alien women are producing and utilizing children as hostages until demands for citizenship are met in the United States of America."[133] This characterization is most evident in MAIA's protest against Elvira Arellano.[134] Their primary posting is entitled, "MAIA exposes the myths surrounding Elvira Arellano":

> No one is breaking up families other than Arellano. In fact, she in no way shape or form has produced a biological father for this so called American citizen—and instead, places this child on the footsteps of the USA to become the surrogate father to himself and surrogate husband to his mother—when indeed, he is nothing more than another Illegal Alien welfare child being used by his mother to further her claim that she is somehow entitled to remain in the USA in opposition to laws which she claims are inhumane. . . . MAIA refuses to allow women like Elvira Arellano to transport their children over the borders, or by deliberate and wanton impregnations—to steal public services and lay claim to U.S. Citizenship—by birthing them in the USA in order to further their demand that they should be allowed to remain in the USA regardless of their illegal immigration status or the lawful deportation and removal actions levied against them. . . . she is seeking, not DEMANDING preferential treatment.[135]

Immigrant women are characterized as having children only to assure their ability to stay in the United States. And images are constructed of Mexican immigrant women who procreate like animals. These images appear frequently as they are treated as

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131. Dallacroce, *supra* note 130 (emphasis added).

132. Here, the message is targeted at Latino immigrants generally, and Mexican immigrants specifically.

133. Proclamation of MAIA, http://www.mothersagainstillegalaliens.org/blog?page_id=92.

134. *See generally* Randal C. Archibold, *Illegal Immigrant Advocate for Families Is Deported*, N.Y. TIMES, Aug. 21, 2007, at A14.

135. MAIA exposes the myths surrounding Elvira Arellano (Aug. 19, 2007), http://mothersagainstillegalaliens.org/site/index.php?option=com_content&task=view&id=25&Itemid=43 (emphasis in original).

"breeders" rather than as women engaged in the lofty activity of "motherhood." The fear of the increasing number of people of color in the United States can be found in links to their website. For instance, one of the most inflammatory documents posted is "Stop the Invasion Now!" Among the claims of crime and increasing costs of social benefits, the call for action against immigration includes concerns for the change in ethnic demographics and the number of Mexicans in the United States.[136]

Having already been introduced to these images in previous anti-immigrant campaigns, MAIA relies on its audience's familiarity with these stereotypes rather than evidence or civil discourse. The public's ability to read coded messages that equate immigrants with animals assures MAIA's success in dehumanizing immigrant women and their children. Reference to Mexican immigrant women's children is a consistent theme in Michelle Dalacroce's public statements. For example, when speaking at a Minutemen rally in Washington, D.C., she claimed Mexicans were "outbreeding our mothers" and thus taking over the United States.[137] MAIA media coordinator Stephanie Harris has been quite up-front about her nativist racist view of Mexican immigrant women:

> When the government told Americans we had to go to zero population, we obeyed—let's don't talk about Mormons or Catholics—and now educated white people have maybe two kids, . . . [B]ut these illegals come here with their **Catholic culture**, and they have a bunch of babies and they can't afford them. **They're breeding like rabbits!** Then they go on food stamps and welfare, and Americans have to pay for that."[138]

MAIA reinforces the image of immigrant women and their children as less than human by communicating the slogan "isupportpeople" throughout their articles and blog statements.[139] To further distance itself from immigrant mothers MAIA draws on two racial stereotypes based on crime and the affirmative action. One tactic MAIA uses to separate the activity of its mothers from immigrant mothers, is to suggest that a double standard regarding public benefits exists: "If a legal woman in the USA tried to pull off this scam to get ahead of the line it's called a 'GOLD DIGGER.' Wanting something for nothing! These women make the choice to have a baby."[140] As in similar attacks against immigrant mothers, MAIA constantly argues that immigrant women and their families are receiving benefits and rights not available to U.S. citizens.[141] MAIA's characterization of the immigration debate links the issue of

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136. Stop the Invasion Now!!, http://www.mothersagainstillegalaliens.org/stopthe invasion.pdf.

137. David Holthouse, Free Radicals: The First Amendment Gets a Workout as Anti-Immigrant Zealots, Neo-Nazis, Anarchists, Black Nationalists and Marine Cadets Collide (2006), http://www.splcenter.org/intel/intelreport/article.jsp?aid=626.

138. Robert L. Pela, Minutewomen (April 20, 2006), http://www.phoenixnewtimes.com/2006-04-20/news/minutewomen/ (emphasis in original).

139. The use of this phrase has been deleted in the updated version of the website; however, the phrase is prevalent in the unrevised version of the website. Press Release, MAIA, 14th Amendment (Aug. 19, 2006), *available at* http://www.mothersagainstillegalaliens.org/blog/?p=155; *see also* Dallacroce, *supra* note 130.

140. Dallacroce, *supra* note 130.

141. *See generally* María Pabón López, *A Tale of Two Systems: The Differing Treatment of*

immigration to anti-affirmative action discourse.[142] Again, MAIA depends on white nativists to understand the coded reference to affirmative action and frame immigration as another case of people of color receiving unearned benefits at their expense.[143] As whites feel threatened by the appearance of people of color in political and professional positions, immigrant women of color become representative of another incident of "reverse discrimination" as noted in the statement against Elvira Arellano "DEMAND preferential treatment." Consistent with this argument that immigrants are receiving benefits and privileges not available to white citizens, is MAIA's claim that politicians pander for Latino votes. An example is MAIA's press release concerning the death of a police officer by an undocumented immigrant:

> The times that these meetings are scheduled by the Phoenix police demonstrate a lack of consideration for the families and homeowners in the City of Phoenix. However, when the Baseline Rapist and Shooter was an issue, the Phoenix police department had meetings during evening hours and in locations which were accommodating to the general public. They even held them in Spanish. Notice of these meetings were on the local news channels, the radio and by flyers. Mayor Gordon had no problem attending these meetings. These actions definitely give our neighborhoods and its citizens the strong impression that our mayor, city council and police department do not care about our family's safety and our security. Does this reflect our local government's attempt to appease the illegals for their money and votes?[144]

Here is the claim that immigrants are gaining advantages and resources unavailable to white U.S. citizens. This reference to anti-affirmation discourse reinforces the link between immigration and claims of reverse discrimination.

Another tactic employed in its campaign is to characterize immigrant women as criminals not worthy of "motherhood." MAIA suggests that immigrant mothers raising their children are committing child abuse against the children of U.S. citizens:

> A child is the responsiblity (sic) of the parents not a country to raise. A child being used by a mother to "steal" from the mouths of "legal children" in the USA should be charged with child abuse for attempting to benefit from their crime and profiting from additional actions while within the interior of the USA.[145]

Noncitizen Families in State Family Law Systems and Under the Immigration Law System, 11 HARV. LATINO L. REV. (forthcoming 2008) (discussing the hardships families undergo under immigration law and state family law systems).

142. These messages are conveyed and distributed through images and metaphors, which link the larger anti-immigration discourse with anti-affirmative action discourse. This larger anti-immigration discourse includes blaming immigrant populations for an increase of crime, terrorism, and the growing cut-backs in government funded services.

143. *See generally* CHARLES R. LAWRENCE III & MARI J. MATSUDA, WE WON'T GO BACK: MAKING THE CASE FOR AFFIRMATIVE ACTION (1997); Stephen Steinberg, *Affirmative Action and Liberal Capitulation*, *in* TURNING BACK: THE RETREAT FROM RACIAL JUSTICE IN AMERICAN THOUGHT AND POLICY (1995).

144. Press Release, MAIA, Immigration Policy (Sep. 30, 2007), *available at* http://mothersagainstillegalaliens.org/site/index.php?option=com_content&task=view&id=24&Itemid=42.

145. This quote was obtained from the unrevised website on November 5, 2006. The revised version has made the correction. *See* Dallacroce, *supra* note 130.

Previously, immigrant women were portrayed as acting immorally towards their own children by using them for their own personal gains. MAIA argues that immigrant women's reproduction and mothering results in child abuse against the children of U.S. citizens.[146] This claim of child abuse is reinforced by linking immigration as the cause of government cut-backs in public education.

All children, regardless of birthright citizenship, are treated as criminal and inferior to the children of non-immigrant U.S. citizens. In MAIA's original website, immigrant children were demonized alongside their mothers:

> Our beautiful Nation has been turned into a jungle by the mass invasion of illegal aliens—the streets of America; the neighborhoods and communities where we live; the malls and stores where we shop. The schools where our LEGAL children attend—and yes, even the churches where we worship—are now the Citadels of fear, bigotry, racism, physical danger and hate! The LEGAL children of America's 21st century have become the scapegoats and victims of this invasion of illegal aliens. . . As evidenced by Spanish homework being sent with our American children.[147]

The updated version of MAIA's website cites editorials that use the term anchor babies[148] and the Federation for American Immigration Reform's commentary, "Anchor Babies: The Children of Illegal Aliens."[149] MAIA's reference to U.S. born children of unauthorized immigrant women as "illegal alien anchor babies" or as "illegal alien infants"[150] serves to remove these children from the category of American children in need of protection. MAIA has focused most of its protest against extending birthright citizenship and access to public education to the children of undocumented immigrant parents.[151]

The major goal in MAIA's attack on immigrant mothers and their children is to abolish birthright citizenship.[152] Through speeches and their website, it claims to be

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146. *See* Proclamation of MAIA, http://www.mothersagainstillegalaliens.org/blog/?page_id=92. The Proclamation removed in the most recent update to the website stated: "Mothers Against Illegal Aliens (MAIA) a forefront leader in the efforts to expose 'Child abuse and child endangerment' being perpetuated in the United States of America by illegal alien women who are giving birth while under the jurisdiction of another country." *Id.*

147. Immigrants Targeted: Extremist Rhetoric Moves into the Mainstream, MAIA, http://www.adl.org/Civil_Rights/anti_immigrant/maia.asp (emphasis in original).

148. *See* Al Knight, *Track 'Anchor Babies'*, DENVER POST, Sept. 11, 2002, at B7; Al Knight, *Change U.S. Law on Anchor Babies*, DENVER POST, June 22, 2005, at B7.

149. *See generally* Anchor Babies: The Children of Illegal Aliens, http://www.fairus.org/site/PageServer?pagename=iic_immigrationissuecenters4608.

150. Dallacroce, *supra* note 130.

151. *See* Bill Hess, *Angry Mothers Protest to Target Effects of Illegal Immigration*, THE BISBEE DAILY REVIEW, Feb. 18, 2006, *available at* http://www.svherald.com/articles/2006/02/18/local_news/ news3.txt (reporting on MAIA's protest in Cochise County).

152. Of course, MAIA is not alone in calling for the elimination of birthright citizenship. *E.g.*, *Dual Citizenship, Birthright Citizenship, and the Meaning of Sovereignty: Hearing Before the Subcomm. on Immigration, Border Security, and Claims of the H. Comm. on the Judiciary*, 109th Cong. (2005). *See generally* PETER H. SCHUCK & ROGERS M. SMITH, CITIZENSHIP WITHOUT CONSENT (1985).

engaged in an educational campaign about the misinterpretation of the Fourteenth Amendment.[153] MAIA's argument is that only the children born of U.S. citizens can be U.S. citizens. This position is advocated in the slogan, "it takes a citizen to make a citizen." In the first version of the MAIA website, Dallacroce claimed to have uncovered evidence that the Fourteenth Amendment has been misinterpreted to grant citizenship to the babies born in the United States to immigrant mothers.[154] Although her evidence only cites the exclusion of children born to diplomatic representatives of a foreign state or children born of alien enemies in hostile occupation, she claims:

> *It is CLEAR, the 14th Amendment and the language used explicitly excluded "aliens" and their offspring, not legally within the United States—from citizenship. Our founding fathers did not have crystal ball to predict that 30 million illegal aliens from Mexico, China, Ireland and every other country would be using the birth of a child to violate the laws of the United States for sympathy and as a means to remain in the USA—**and by intent and design**—change the face of our nation by strong arming the American people in the name of family and child.*
>
> *There can be no argument that Illegal Aliens fall in the "alien" category which is specified in the documents pertaining to the 14th amendment—held in trust for the American people in the Library of Congress in our Nation's Capital. The fact that our forefathers **did not** explicitly state that the Infants of Illegal Alien Female's were included in this sentence, **DOES NOT MEAN THAT THEY ARE NOT EXCLUDED**.*[155]

MAIA cites supporting documents that use the argument that the *Wong Kim Ark* case did not involve parents who were illegal immigrants but who resided in the United States legally.[156] And thus, the Fourteenth Amendment cannot be extended to protect birthright citizenship for children born to parents residing in the United States without authorization. The *Slaughter-House Cases* are cited as evidence that persons not "subject to its jurisdiction" are denied citizenship birthright and the phrase, "children of ministers, consuls, and citizens of foreign states born within the United States," is

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153. "Mothers Against Illegal Aliens intent is to define the 14th Amendment's misinterpretation of citizenship to children of illegal alien women." Proclamation of MAIA, http://www.mothersagainstillegalaliens.org/blog/?m=200701.

154. However, the Supreme Court's Decision in favor of Wong Kim Ark found birthright citizenship established in the nation's history, protected by the Fourteenth Amendment and affirmed the sovereign power of the United States. United States v. Wong Kim Ark, 169 U.S. 649 (1898); *see* Lucy E. Salyer, *Wong Kim Ark: The Context Over Birthright Citizenship, in* IMMIGRATION STORIES 49–85 (2005).

155. Michelle Dallacroce, Alien Born Infants Are Illegal TOO!!!! (Apr. 27, 2007), http://mothersagainstillegalaliens.org/site/index.php?option=com_content&task=view&id=16&Itemid=29 (emphasis in original).

156. *See* Fred Elbel, Original Intent of the 14th Amendment (Oct. 14, 2007), http://www.14thamendment.us/birthright_citizenship/original_intent.html; *Dual Citizenship, Birthright Citizenship, and the Meaning of Sovereignty: Hearing Before the Subcomm. on Immigration, Border Security, and Claims of the H. Comm. on the Judiciary*, 109th Cong. (2005) (statement of John C. Eastman, Professor of Law, Chapman University School of Law), *available at* http://mothersagainstillegalaliens.org/pdf/Born_in_the_USA.pdf.

inclusive of illegal immigrants. However, all documentation cited ignores the fact that the government considered the *Slaughter-House Cases*[157] of 1873 and *Elk v. Wilkins* of 1884[158] in deciding *Wong Kim Ark*.[159]

The venomous position that MAIA takes against granting birthright citizenship is demonstrated in a recent web posting:

> Children born of Illegal Alien parents are about the worse form of Illegal Immigration we will face. Why did Rome fall and whatever became of those great Republics that ignored the same undermining problems that we seem to ignore as well? These children, and there are many now eligible . . . are voting and are seeking public office. Their votes and their elected positions will serve to dilute and undermine the importance of our own legal child's vote and political intentions, and will further serve to pollute the social, cultural and political environment that once embraced Americans of all faiths, traditions, races, ethnicities, languages and values. **Anchor baby citizenship is a "coup" in the making** and lending to this conspiracy is the fact that millions upon millions of parents, brothers, sisters, uncles, aunts, et al, have been, are and will continue to be sponsored (chain migration) by anchor babies . . . that is . . . foreign national children born of Illegal Alien parents on United States soil.[160]

This quote points to the nativist construction of citizenship that aims to exclude the political participation of non-white citizens. MAIA demonstrates that its fear of birthright citizenship is the fear of losing white supremacy in the United States. The fear of Mexican Americans gaining political representation is conflated with the belief that these citizens and their parents pose an economic and security threat to white families.

B. Establishing Economic and Security Threats

Although MAIA does participate in protesting day labor centers,[161] its major focus is not on immigrants as workers but rather as mothers (or potential mothers) and their children (regardless of citizenship status). In MAIA's imagined strategy of immigrant women crossing the border to give birth, it constructs immigrant mothers and their children as both an economic and security threat. While MAIA argues that U.S. citizens are in competition (as well as receive preferential treatment) for public services with immigrants, its primary focus is education. As procreators of children,

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157. 83 U.S. 36 (1873).

158. 112 U.S. 94 (1884).

159. *See generally* James C. Ho, *Defining "American": Birthright Citizenship and the Original Understanding of the 14th Amendment*, 9 GREEN BAG 2d 367 (2006).

160. Michelle Dallacroce, Is Lou Dobbs the Thanksgiving Turkey or the Christmas Goose? (Nov. 21, 2007), http://www.mothersagainstillegalaliens.org/site/index.php?option=com_wrapper&Itemid=68. This article was posted in response to Lou Dobbs' statement that as the Court and legal decisions currently exist, U.S. born children of illegal immigrants are U.S. citizens.

161. *See generally* Frosty Wooldridge, Rosie the Riveter Kicked A** (Jan. 19, 2006), http://www.mothersagainstillegalaliens.org/blog/?page_id=29. This link was available in an earlier version of the website.

Mexican immigrant women are also implicated in the right-wing conspiracy theory that Mexico is engaged in a reconquest of the southwestern United States. As a solution, MAIA not only advocates closing borders but also the elimination of birthright citizenship. The following section discusses each of these aspects of MAIA's anti-immigration campaign.

Reinforcing the notion that unauthorized immigrant women pose a criminal threat to children, MAIA's homepage includes a link to "Family Watchdog."[162] "Family Watchdog" is an internet site that offers information about the location of sexual offenders released from prison. Their link provides a search engine that identities registered sexual offenders by zip code. Under the watchdog logo appears the question "Want to see if there are any child predators in your area??" Underneath the bulldog logo of Family Watchdog, is the link to "Who to call to report Illegals." Linking the fear of sexual predators to anti-immigration discourse reinforces the idea that immigrant mothers and their children pose a physical threat to "our" children and equate them to sexual predators. However, no empirical evidence is provided that supports the claim that immigrants commit more sexual crimes than U.S. citizens.[163]

The use of racist stereotypes of immigrants as a security threat to citizens is most transparent in MAIA's response to Mothers Against Drunk Driving's (MADD) request that it stop using the name "Mothers Against."[164] MADD claimed to own the name and expressed concern that the use of "Mothers Against" implied association between the two groups.[165]

Instead of focusing their argument on the numerous organizations using the title "Mothers Against", MAIA responded by attacking MADD's diversity policy and its failure to join the anti-immigration campaign by reporting statistics on drunken drivers

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162. Family Watchdog, http://www.mothersagainstillegalaliens.org/blog/?page_id=89. This link appeared on the website prior to the revision in September 2007.

163. *See* RUBEN G RAMBAUT & WALTER A. EWING, THE MYTH OF IMMIGRANT CRIMINALITY AND THE PARADOX OF ASSIMILATION: INCARCERATION RATES AMONG NATIVE AND FOREIGN-BORN MEN (2007), *available at* http://www.ailf.org/ipc/special_report/sr_022107.pdf (providing empirical evidence regarding a link between immigrants and crime).

164. Valerie Richardson, *MADD Warns Off Foe of Illegal Aliens*, WASH. TIMES, Oct. 27, 2007, *available at* http://www.washingtontimes.com/article/20071027/NATION/110270052. An editorial in the Phoenix New Times states that MADD attorney Anisha Taherzadeh "informed Dallacroce she had 10 days to comply, or be torted. Dallacroce, who's as feisty as she is comely, told those mothers where they could stick it. She fired back a press release to her supporters alleging that MADD has aligned itself with pro-illegals." Stephen Lemons, *Do Svidanya, Joe*, PHOENIX NEW TIMES, Oct. 18, 2007, *available at* http://search.phoenixnewtimes.com/2007-10-18/news/do-svidanya-joe/. The following account appears on MAIA's website: MADD's attorney, Anisha M. Taherzadeh, stated "we cannot permit the term 'Mothers Against' to be used in such a manner since it creates a likelihood of confusion to the public as to any affiliation with Mothers Against Drunk Driving. MADD cannot be associated with your organization and the use of 'Mothers Against' gives a strong implication of a relationship with MADD." Time to Get Mad at MADD, http://mothersagainstillegalaliens.org/site/index.php?option=com_content&task=view&id=38&Itemid=57.

165. MAIA claims to have posted the letter on its website. MADD Letter to MAIA (Oct. 11, 2007), http://mothersagainstillegalaliens.org/site/index.php?option=com_content&task=view&id=36&Itemid=55.

who were illegal immigrants.[166] First, MAIA posted a response that noted that MADD had updated its website and no longer had a link to "diversity," and pointed its readers to the archived link. MAIA's major criticism of MADD's diversity policy was its outreach to Spanish-speaking immigrants. This outreach was the limited evidence of a pro-immigrant stance. Secondly, MAIA further accused MADD of not taking a stand against drunken immigrant drivers.

> MADD, a **not-for-profit**, continues to collect millions of dollars each and every year in FEDERAL GRANTS and private donations . . . and yet, MADD was, is and remains **conspicuously SILENT** regarding the dangers and the heartbreak foisted upon our Nation and communities when it comes to providing statistics, relative to illegal alien drivers. Drivers who **drink, drive, injure, maim and kill our fellow citizens and our innocent children and whose illegal actions and Illegal presence in the United States instantaneously made and continues to make . . . thousands of innocent American families . . . rieving victims for life!!**[167]

Although there are numerous accusations concerning the threat that immigrants pose as drunken drivers, there is only one case involving a driver identified as an illegal drunken driver. No other documentation or evidence is given to support MAIA's claims:

> ILLEGAL ALIEN DRUNK DRIVERS—TAKE INNOCENT AMERICAN LIFE!!
> ILLEGAL ALIEN DRUNK DRIVERS—INJURE INNOCENT AMERICANS FOR LIFE!!
> ILLEGAL ALIEN DRUNK DRIVERS—MAIM INNOCENT AMERICANS FOR LIFE!!
> ILLEGAL ALIEN DRUNK DRIVERS—DESTROY INNOCENT AMERICAN FAMILIES FOR LIFE!![168]

This rhetoric implies that the citizenship status of the driver is the problem, not the lack of sobriety of the driver. Nevertheless, antidotal evidence appears to have success under the current anti-immigration sentiment in the country.[169]

MAIA identifies public education as the major area that immigration threatens U.S. families and children. A popular rallying mantra used by Dallacroce is "Our children

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166. MAIA added a link to their revised website devoted to the controversy. *See* Mad at MADD, http://www.mothersagainstillegalaliens.org/site/index.php?option=com_content&task=view&id=38&Itemid=57.

167. *Id.* (emphasis in original).

168. *Id.* (emphasis in original).

169. However, MAIA's argument that MADD supports illegal immigration and immigration advocacy groups may have had a negative impact. In an article published in the *Washington Times*, Virginia Faircloth, the president and founder of MADD's York County, South Carolina chapter is cited to have resigned over MADD not taking issue with "the problem of drunken driving by illegal aliens." Valerie Richardson, *MADD Warns Off Foe of Illegal Aliens*, WASH. TIMES, Oct. 27, 2007, *available at* http://www.washingtontimes.com/article/20071027/NATION/110270052.

are the silent victims." In a protest in Cochise County in February 2006, reporters summarized her message as follows:

> The influx of illegal immigrants is having an impact on many parts of the nation's society, much of which is harming children of legal citizens. . . . The children of illegal immigrants are overcrowding schools to the detriment of providing an education to legal students . . . . For Arizonans, the requirement to find a way to teach English to students is an example of federal interference made even more onerous because of daily fines that are piling up . . . .[170]

Here again, MAIA relies on the white reader to recognize the coded anti-affirmative action language. In the original mission statement, MAIA claimed that the children of U.S. citizens "have become—the get behind, the left behind, the back of the class, the back of the bus, the get off the playground, the get out of my way—pawns and victims of peer abuse and societal indifference."[171] The level of hostility towards the children of immigrant parents is evident throughout MAIA's public discourse. In an immigration panel discussion on Fox News' *Your World with Neil Cavuto*, Dallacroce claimed, "What jobs do the women and the children do that we have to have them here other than their children's job is to dumb down the American Children and overpopulate our schools?"[172] Blaming the children of immigrants for low academic achievement in schools is a common theme in Dallacroce's interviews—"[m]y children, as well as my grandchildren and everyone's legal citizen children in our schools, are being affected, dumbed down."[173] On ABC's *Good Morning America*, she was quoted with a similar complaint that also included an objection to allowing students to learn in more than one language, "[T]hey want to come here illegally and then put their children into our schools so that we pay for their children's education and that needs to stop. . . . My taxes pay for the education for my children to go to that school. My children should be learning the education in the public schools in English, not in two separate languages."[174] While Dallacroce uses more coded racist language in the updated version of the website, MAIA's media coordinator, Stephanie C. Harris, has been more forthcoming with her hatred towards Mexican immigrants and her racist nativism. When asked by a local reporter what "exactly was wrong with Mexicans," she linked children into the immigration debate in the following manner:

> They come in and take our jobs away from us. And so **American can't feed their kids** because people are hiring illegals to do all the work. . . .

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170. Bill Hess, *Angry Mothers Protest to Target Effects of Illegal Immigration*, SIERRA VISTA HERALD, Feb. 18, 2006, *available at* http://www.svherald.com/articles/2006/02/18/local_news3/txt.

171. MAIA Mission Statement, http://www.mothersagainstillegalaliens.org/blog/?page_id=7.

172. Immigration Panel Discussion with Neil Cavuto (May 19, 2006), http://media matters.org/items/200605190012.

173. Immigrants Targeted: Extremist Rhetoric Moves into the Mainstream, http://www.adl.org/civil_rights/anti_immigrant/maia.asp (providing a telling excerpt of a Nancy Grace interview).

174. Rallies Called to Make Illegals Legal (Apr. 10, 2006), http://abcnews.go.com/GMA/story?id=1825363&page=1.

> The blond-haired, blue-eyed American kid has to wear baggy clothes and dye his hair brown because otherwise the Mexicans will beat him up, . . . [a]nd these kids are all getting free lunches when the American kids *don't*. Our kids have no future. . . .[175]

The only support that MAIA has posted on their website for its claims against the children of immigrant parents is a link to the Federation for American Immigration Reform's 2002 report, "No Room to Learn: Immigration and School Overcrowding."[176] This document associates immigration with overcrowding as well as high drop-out rates, lower test scores, and the increase of school violence.[177] Again, the ideology of white injury serves to situate white middle-class citizens as the victims of immigration from Mexico.

Mexican immigration is also portrayed as a security threat to the United States by arguing that an actual invasion is occurring.[178] While previous nativist rhetoric claimed there is a cultural "invasion" represented by Spanish language usage, MAIA takes this further by manufacturing an actual war. Their mission statement ends with the following claim:

> We are not only at war with Iraq, but we ARE at WAR with MEXICO; a silent war with Aztlanders and a war with President Fox who said he will take over the United States with sheer numbers without ever firing a shot. We now have 20-25 million illegal's in the United States, and the count rises by a minimum of 10,000 every day.[179]

Mexican immigrants are equated to an alien enemy in hostile occupation of the United States:

> [W]e find that the United States of America is being willfully and deliberately populated to facilitate the hostile occupation—and the Colonization of our Country by a large number of ILLEGAL ALIENS—males, females and infants and anchor babies who have - unlawfully INVADED OUR NATION.[180]

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175. Robert L. Pela, Minutewomen (April 20, 2006), http://www.phoenixnewtimes.com/2006-04-20/news/minutewomen/full (emphasis in original).

176. The report is not based on a study conducted but rather cites newspaper articles and findings from empirical studies that fit MAIA's thesis against the children of immigrant parents. FAIR Immigration and School Overcrowding Report, http://www.fairus.org/site/PageServer?pagename=research_researcha89f.

177. The link demonstrating this appeared in the website prior to the update in September 2007.

178. Leo Chavez points to the significance of the invasion metaphor, which "evokes a sense of crisis related to an attack on the sovereign territory of the nation." Leo R. Chavez, *Spectacle in the Desert: The Minuteman Project on the U.S.-Mexico Border*, *in* GLOBAL VIGILANTES: ANTHROPOLOGICAL PERSPECTIVES ON JUSTICE AND VIOLENCE (David Pratten & Atreyee Sen eds.) (forthcoming 2007) (unpublished manuscript on file with author).

179. MAIA Mission, http://mothersagainstillegalaliens.org/site/index.php?option=com_content&task=view&id=26&Itemid=46 (emphasis in original).

180. Michelle Dallacroce, Alien Born Infants Are Illegal TOO!!!! (Apr. 27, 2007), http://mothersagainstillegalaliens.org/site/index.php?option=com_content&task=view&id=16&Itemid=29 (emphasis in original).

Dallacroce claims that Fox's plan involves providing "a path to citizenship of another country and provid[ing] a safe haven to return once admitted into citizenship of dual country number two. Then, allow all women and children to migrate to country number two in order to gain voting rights, to wit, you will gain political unrest and political power of country two."[181] In an interview, Dallacroce was unable to provide a source for her claim about the former Mexican President.[182]

Further analysis of MAIA's construction of Mexico's invasion reveals that U.S. citizens of Mexican ancestry are the primary target of its campaign and immigrants from Mexico are a secondary one. MAIA's mission statement identifies several nationally recognized organizations that have strong roots in the Mexican American community: "Discover the real threat to America by reading about radical and well-organized 'Hispanic' organizations whose goal is the reconquering of the Southwest. These groups are known as Aztlan, La Raza, LULAC, LaMecha [sic], MALDEF, and others not as well-known."[183] In order to blur the difference between civil rights and advocacy organizations, and the racist nationalist group, The Nation of Aztlan, the mission statement continues by referring readers to a site that provides evidence that white citizens are hated by Mexican Americans: "Find out what a 'gringo' is. Visit sites such as 'wehategringos.com,' [WHG] and you will begin to understand what is really happening in America and how this threat has been below the radar for the last 30-40 years."[184] In the section About WHG, the claim is made that the website is in response (or counterpoint) to the League of United Latin American Citizens' (LULAC) site's inclusion of the Minutemen (WHG's friends) as a racist group. WHG's website identifies the Southern Poverty Law Center, MEChA, LULAC, National Council of La Raza (always referred to as La Raza), and MALDEF as anti-American radical organizations spreading hate and racism. Having identified these civil rights groups as undermining the country by supporting an illegal invasion, WHG's website proceeds to identify elected officials who speak at these organization's events as evidence of the successful invasion. Corporations that donate funding to these civil rights projects are characterized as keeping "their warchests [sic] filled to the brim."[185]

MAIA picks up on WHG's attack of Latino organizations in a statement entitled, "This is President Fox's attack on America! His-panic attack on America!!!!"[186] The majority of the statement is devoted to identifying the corporate sponsors of the National Council of La Raza (NCLR). Dallacroce identifies NCLR as:

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181. Michelle Dallacroce, This is President Fox's Attack on America! (June 17, 2006), http://www.mothersagainstillegalaliens.org/blog/?page_id=62.

182. Susan Ferris, *Studies: Immigration Rehetoric Hateful*, ARIZ. DAILY STAR, Nov. 23, 2007, *available at* http://www.azstarnet.com/sn/printDS/213009.

183. MAIA Mission, http://mothersagainstillegalaliens.org/site/index.php?option=com_content&task=view&id=26&Itemid=46. I was unable to find any reference to an organization named Aztlan. I assume that this is in reference to a small racist nationalist group, The Nation of Aztlan, that appears to have ties with La Voz de Aztlan. *See generally* Ethnic Nationalism, http://www.splcenter.org/intel/intelreport/article.jsp?aid=186.

184. MAIA Mission, http://mothersagainstillegalaliens.org/site/index.php?option=com_content&task=view&id=26&Itemid=46.

185. Radical Mexican Lobby, WeHateGringos.com, http://wehategringos.com/whg/?page_id=137.

186. Michelle Dallacroce, This is President Fox's Attack on America! (June 17, 2006), http://www.mothersagainstillegalaliens.org/blog/?page_id=62.

> A politically active organization which sole purpose is for the advancement of one nationality should not be funded by tax dollars from departments of the U.S. government and given ear marks of $4 million dollars by our government to better the way of life, i.e. politically monopolize the U.S.A. by the number of illegal occupants of the U.S.A. and their offspring in order to shift the balance of legal immigrants and citizens of the U.S.A. This is fraud and it is a misuse of funds and justice against the people of the United States of America. The abuse of funds and power from all levels of government and businesses throughout the U.S.A. is being flexed and out reached in order to ignore current laws and protections granted by the Constitution of the United States of America.[187]

No evidence of government funding or of fraud is offered, but rather the reader is given the following as proof that NCLR is similar to white supremacy groups.

> When you look at the supporters and contributors of the monopolization of the American dream to allow illegal aliens the opportunity to put the American tax payer and legal citizens in the shadows, you must question the motives of organizations such as our own U.S. Department of Commerce and Department of Labor who are contributors to the National Council of the Race (LaRaza). Would our government, i.e. the U.S. Commerce or Department of Education contribute to the KKK? Would NASA contribute to the KKK?[188]

This argument is constructed by placing NCLR and KKK at the margins and MAIA, the Minutemen, and the other anti-immigrant groups in the mainstream.

This attack against Mexican Americans also emerges in MAIA's attack against MADD, particularly in the tone of criticism voiced against MADD's diversity policy:

> After researching MADD's website and quoting numerous statements regarding their position on 'Diversity' in their message toward their growing impact in the Hispanic community, MAIA exposed MADD's present direction which runs parallel to that of their former Advisory Board member and former President of La Raza, Raul Yzaguirre. What does this tell you about MADD's marketing policy?[189]

The conspiracy theory implied in the opening statement is elaborated upon under the section entitled, "It is Time to Get Mad at MADD":

> MADD began as a front store group against Drunk Drivers and for victims of drunk drivers. They have morphed into a National and International Organization which now, unbelievably, supports La Raza and LULAC members who have served and still serve on their Board of Directors and who are also members of the Trilateral Commission and Council of Foreign Relations.
>
> In the fall of 2001, MADD had the following article in their "Cultural Impact" Driven Magazine: . . .

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187. *Id.*

188. *Id.*

189. It's Time to Get Mad at MADD, http://www.mothersagainstillegalaliens.org/site/index.php?option=com_content&task=view&id=38&Itemid=57.

> Raul Yzaguirre, president of the National Council of La Raza, and actor Edward James Olmos have both agreed to serve on MADD's National Advisory Board, which will recommend ways that the MADD organization, can more effectively achieve its mission. Also, the League of United Latin American Citizens (LULAC), at its recent national convention, passed a resolution to join MADD's efforts to prevent underage drinking.
>
> Each facet of MADD's Hispanic/Latino outreach initiative is designed with emphasis on family and outreach in a culturally relevant way. Financial support from organizations such as Mitsubishi Motors and NHTSA as well as MADD supporters make it possible for MADD to begin integrating its lifesaving message into the Hispanic/Latino society.
>
> La Raza and LULAC are prominent in the new face of MADD....which answers our question as to why they find it necessary to make threats and attempt to intimidate Mothers Against Illegal Aliens.[190]

Like most of MAIA's website, this statement is misleading because MADD's major focus in its diversity section is similar to its other links—to provide educational materials that are inclusive to helping victims and to assist parents in addressing drinking with their children.[191] However, as the quote indicates, MAIA links MADD to the Latino organizations that racist nativist groups have identified as part of an effort to take over the country.[192]

MAIA includes video-tapes and editorials[193] from various racist nativist websites to further construct the impression that there is a Mexican invasion and the presence of Mexican Americans and Mexican immigrants is evidence that the country is under siege. In an interview on the Hannity & Colmes Fox News, Dallacroce made public claims of a secret Mexican invasion:

> We have flyers like this: 'Whites get out,' This is Aztlan. They want to take over the Southwest. And just yesterday, we had "Prensa Hispana"—its our local

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190. *Id.*

191. *See* MADD Diversity Section, http://www.mothersagainstdrunkdriving.org/aboutus/1126_2.

192. *See* Valerie Richardson, *MADD Warns Off Foe of Illegal Aliens*, WASH. TIMES, Oct. 27, 2007, *available at* http://www.washingtontimes.com/article/20071027/NATION/110270052. The MAIA website makes the following accusations against MADD:

> In the interest of being fair and balanced, you are hereby informed that as of last night, October 22, 2007, MADD has made creative changes to its website and redacted countless statistics, Press Releases', their "Diversity" button and their diversity section. . . . which even had words in Spanish, along with their entire feel of the website which now shows no sign of that diversity which they had maintained for many years. It is clear that MADD is attempting to appear to any new viewers to their site as if they are the original wholesome group which did and does not favor one particular drunk driver over another, however, the proof is in their Archives and the obvious influence of La Raza is hiding in plain sight!!

It's Time to Get Mad at MADD, *supra* note 189.

193. *See generally* Tom DeWeese, The Mexican Fifth Column (Jan. 27, 2003), http://www.newswithviews.com/your_govt/your_government50.htm.

> newspaper—saying, "Everyone to the streets" in Spanish. The American people who get our newspapers here, they don't understand Spanish, and we have got La Raza, MEChA, and LULAC, and the Catholic Church, among other Catholic or—religious institutions, helping the illegal aliens, only because of monetary reasons.[194]

Anti-Catholic sentiment has historically been a part of nativist rhetoric against Mexican immigration and closely ties anti-immigration groups with white nationalist groups in the United States.[195]

An earlier version of MAIA's website included the YouTube video, Aztlan Rising, as evidence to its readers that this invasion is currently underway.[196] The illusion of an inflammatory YouTube-video, *Aztlan Rising*,[197] assists in creating this image and fear that the United States is being invaded by Mexicans. In order to support the illusion that Mexican citizens have already gained access to significant political and social positions, the video includes speeches from Mexican American professors, the mayor of Los Angeles, two California state assemblymen, and a representative of the California Democratic Party.[198]

The extremist tone MAIA takes towards Mexican American political participation and the existence of civil rights organizations points to the links between nativist anti-immigration groups and white supremacy.

CONCLUSION

Placing the Department of Immigration under the Department of Homeland Security, as well as framing immigration detention and removal programs as promoters of public safety and national security, legitimates nativist anti-immigration groups' characterization of immigrants as terrorists and criminals. Consequently, any incident involving an unauthorized immigrant is cast as an immigration problem rather than an issue involving drugs, crime, drunken driving, or poorly funded educational and health systems. Treating terrorists and immigrants as synonymous in immigration raids and federal legislation manufactures a homeland security discourse that is a perfect stage for the requiring extensive militarization at United States-Mexican border. Thus, vigilante groups are able to define themselves as engaging in citizenship activity rather than acting outside the law. Extensive militarization and calls for patrolling the border has also become a stage for perpetuating the conspiracy theory about Mexico's reconquest of the U.S. Homeland security discourse narrows the public debate over immigration to narratives of white injury and the need for emergency measures in addressing immigration.

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194. Dallacroce went one step further by linking politicians to this conspiracy, "And our politicians are behind this, because, if you think about it, in Washington, I saw, what was it, Senator Kennedy. He is there talking to the crowd." Hannity & Colmes Interview (April 10, 2006), http://media.pfaw.org/Right/HannityColmes4-10-06.txt.

195. *See generally* JOHN HIGHAM, STRANGERS IN THE LAND, PATTERNS OF AMERICAN NATIVSIM 1860–1925 77–87 (1975).

196. Aztlan Rising Video, http://www.mothersagainstillegalaliens.org/blog/?m=200702.

197. *Id.*

198. *See id.*

MAIA's appropriation of motherhood in the immigrant debate serves to conceal the racist-nativist anti-immigration campaign against Mexican immigrants and the presence of U.S. citizens of Mexican ancestry. Manipulating the classic Madonna symbol of mothers in a logo not only normalizes the nativist attacks but also assists in characterizing Mexican immigrant women's relationship to their children as self-serving rather than self-sacrificing. Manipulating motherhood with the slogan, "it takes a citizen to make a citizen," furthers MAIA's efforts by reproducing a narrow definition of national identity—one that is mono-lingual English, white, and middle-class. Using popular anti-immigration metaphors perpetuates images of immigrants as less-than-human and having no likeness to U.S. citizens. This fuels public acceptance of draconian immigration legislation and vigilante activity towards Mexican immigrants. By casting women as illegal females, rather than immigrant mothers, the pain and suffering encountered by separating parents and children is diminished. Instead, the focus turns to white injury, and U.S. children being denied public education, health care, and the rights to full citizenship.