

Misogynistic Hate Speech and its Chilling Effect on Women's Free Expression during the 2016 U.S. Presidential Campaign

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ABSTRACT

This essay argues that the proliferation of misogynistic hate speech during the 2016 U.S. presidential campaign had a dangerous chilling effect on women's free expression. The gendered slurs aimed at women candidates and journalists, both online and in-person, created a hostile political environment, which made it more difficult for women to fully participate in the process of Democratic self-governance. To address this issue, I recommend allocating state and federal tax dollars to counter speech efforts, and call for social media organizations, such as Facebook and Twitter, to reevaluate their hate speech and harassment policies.

Keywords: Hate speech, 2016 U.S. presidential campaign, misogyny

INTRODUCTION

At packed rallies held by Republican candidate Donald Trump, enthusiastic attendees yelled in unison to "Lock the bitch up." The "bitch" in this case was former Secretary of State Hillary Rodham Clinton, the first woman to receive a major party's nomination to become President of the United States. Outside the rally, t-shirts and buttons reading, "HRC: Two fat thighs, two small breasts, and a left wing," were for sale. Online, people posted memes featuring her husband Bill Clinton's face with the text, "If you saw Hillary naked, you'd rape women too."

From rape memes to the repeated use of gendered slurs at candidate rallies, misogynistic hate speech permeated several aspects of this campaign. I argue here that the casual use of misogynistic hate speech throughout the 2016 U.S. presidential election cycle worked to silence women's free expression by creating a chilling effect, which impeded women's ability to fully participate in the process of Democratic self-governance. The regular use of gendered slurs throughout the campaign left little room dissenting women's voices. Misogynistic hate speech also worked to limit civic engagement online and prevent what Danielle Citron and Helen Norton (2011) refer to as effective digital citizenship. The emergence of the secret Facebook group, "Pantsuit Nation," is evidence that some women

were uncomfortable sharing certain content on their newsfeeds. The misogynistic hate speech directed at women candidates may also discourage other women from running for office because they fear the objectification and harassment likely to accompany that decision.

In this essay, I begin by defining misogynistic hate speech and identifying the harm it causes. In Part II, I trace the use of misogynistic hate speech throughout the 2016 U.S. presidential campaign. Next, I discuss how the prolific use of misogynistic hate speech during the campaign had a chilling effect on women's free expression. In the final section, I propose solutions for minimizing misogynistic hate speech in future political campaigns.

DEFINING MISOGYNISTIC HATE SPEECH

In the United States, the First Amendment protects almost all hate speech. Unless expression falls into the categories of incitement to illegal advocacy, true threats, or the rarely invoked fighting words, there are essentially no legal prohibitions against hate speech in the United States. As Chief Justice John Roberts wrote in a recent decision involving the Westboro Baptist Church, which is known for picketing military funerals with signs containing racist and homophobic slurs, the reaction to offensive discourse must not be to punish the speaker. Instead, wrote Roberts for the majority, "this nation has chosen to protect even hurtful speech on public issues to ensure that public debate is not stifled" (*Snyder v. Phelps*, 2011, p. 178).

This means there are essentially no legal consequences in the United States for the use of hate speech. However, there are societal consequences. Critical race theorist Mari Matsuda says that the most damaging impact of hate speech is when members of the defamed group internalize the messages and come to believe in their own inferiority (1993). In his book, *The Harm in Hate Speech*, Jeremy Waldron (2012) argues that the lack of prohibitions against hate speech in the United States denies those targeted a sense of basic human dignity in exchange for low-value speech.

The United States' permissive approach to hate speech differs greatly from many other Democracies. For example, members of the European Union, Canada, and South Africa all have legal prohibitions against hate speech. In these countries, the use of hate speech is prohibited in person and online. The Council of Europe's Protocol to the Convention on Cybercrime, which governs online content in European Union countries, defines the term "hate speech" as:

All forms of expression that seek to spread, incite, promote or justify

racial hatred, xenophobia, anti-Semitism or other forms of hatred based on intolerance, including intolerance expressed by aggressive nationalism and ethnocentrism, discrimination and hostility against minorities, migrants and people of immigrant origin. (Van Blarcum, 2005, p. 781)

Notably, this definition does not address gender-based hatred specifically. The term misogyny does. Literally, misogyny means hatred of women. More broadly it refers to attitudes and behaviors that demonstrate contempt, dislike, and an ingrained prejudice toward women. This differs from sexism, which refers to discrimination based on gender, most often aimed at women. Sexism is often considered a manifestation of misogyny.

Feminist scholars, such as Kelli Wilz (2016), note that sexism in the political sphere often revolves around women candidates failing to be appropriately “feminine.” Reactions to this failure are often hostile (Wilz, 2016). However, Wilz cautions against conflating valid criticisms of women candidates with those actually rooted in sexism, or misogyny. Thus, it is essential that any definition offered for misogynistic hate speech effectively delineate between sexism and misogyny.

Sexism in the 2016 U.S. Presidential campaign was evident in a variety of contexts. For example, Republican candidate Donald Trump made comments about Democratic candidate Hillary Clinton’s appearance, saying, “I didn’t like what I saw [when she walked in front of me]” (McCaskill, 2016, p. 1). Sexism was also evident in the 2016 U.S. Presidential campaign coverage. Some male journalists focused relentlessly on Secretary Clinton’s voice and appearance. For example, referring to her acceptance speech for the Democratic Party’s nomination, Fox News’ Brit Hume said, “She has a great asset as a public person, which is a radiant smile, but she has a not so attractive voice, and I think for much of her speech tonight, she lapsed into that familiar lecturing tone. And I suspect that there were some people that, even who agreed with her words, found the tone off-putting,” (Fang, 2016, p. 1). Steve Clemons, editor-at-large for *The Atlantic*, also mentioned Clinton’s “lecturing” tone and advised her to “smile,” (Fang, 2016). While troubling, these sexist comments do not constitute misogynistic hate speech.

Instead, misogynistic hate speech encompasses the vitriolic expression directed at women as well as direct threats or harassment. For example, during the 2016 U.S. primary campaign season Bernie Sanders’ supporter, Daniel Kohn, tweeted at veteran NPR reporter Tamara Keith, “Good job lying about the primary you dumb cunt” (Borchers, 2016, para. 3).

Scholar Karla Mantilla (2009) refers to this form of hatred directed at women online as “gendertrolling,” a process marked by the participation of many people, gender-based insults, vicious language, credible threats,

intense/ lengthy attacks, and reactions to women speaking out. Scholar Emma Jane refers to this content simply as “e-bile,” a fitting term for the vitriol leveled at some women online (Jane, 2014).

Drawing on these concepts, as well as the existing definitions of hate speech, I propose the following definition of misogynistic hate speech: “All forms of expression that seek to spread, incite, promote, or justify hatred of women.” This definition encompasses everything from the casual use of gendered slurs to gender-based threats and harassment aimed at women, both in-person and online.

LOCATING MISOGYNISTIC HATE SPEECH IN THE 2016 U.S. PRESIDENTIAL CAMPAIGN

The 2016 U.S. presidential campaign marked the first time a woman received a major party’s nomination in this country. Having a woman candidate for the presidency, arguably the most masculine of U.S. institutions (Katz, 2016), created the conditions for severe backlash. According to a 2010 study by Tyler Okimoto and Victoria Brescoll, this contemptuous reaction to women’s power-seeking is to be expected. The authors found that when women candidates were seen as ambitious, it evoked moral outrage on the part of voters. These severe emotional reactions include contempt, anger, and disgust (Okimoto & Brescoll, 2010).

The proliferation of misogynistic hate speech during the 2016 U.S. presidential election serves as evidence of the anger and contempt Okimoto and Brescoll (2010) predicted. Online, gendered hate speech was directed at women reporters. Internet radio shows, such as Alex Jones’ Infowars, regularly used misogynistic hate speech to describe Democratic candidate Hillary Clinton (Tashman, 2015). In person, misogynistic hate speech was screen-printed onto merchandise and sold at rallies for Republican candidate Donald Trump. The candidate himself was also recorded using misogynistic hate speech to describe his pursuit of a woman in 2005 (McCaskill, 2016). The examples presented below identify the various spaces where misogynistic hate speech proliferated during the 2016 U.S. Presidential campaign season.

To begin, misogynistic hate speech appeared on social media sites like Twitter and was used as a tool to intimidate journalists covering the campaign. Reporter Janell Ross (2016) with the *Washington Post* wrote about the hateful tweets, comments, and email messages she received in response to her coverage of Democratic candidate Bernie Sanders. Despite the progressive stance taken by many Bernie Sanders supporters, Ross said that the messages directed at her told a different story, one that highlights the intersecting issues that women of color must deal with. Ross was subjected to

misogynistic hate speech, as well as race-based insults. The work of legal scholar Kimberlé Crenshaw (1989), who originally identified the concept of intersectionality in anti-discrimination efforts, describes how women of color must deal with both sexism and racism, the combination of which is greater than the sum of its parts. Given these dual barriers, it is necessary to pay close attention to how misogynistic hate speech uniquely burdens women of color. Ross' description of the offensive comments speaks directly to this issue:

They use a variety of curse words and insults typically reserved for women. More than one has suggested that I deserve to become the victim of a sex crime. They critique the “objectivity” of what is clearly political analysis based on polling data and other facts; they insist that black voters are dumb or that I have a personal obligation to help black voters see the error of their Clinton-voting ways. It is vile. (Ross, 2016)

The gender- and race-based hate comments described by Ross highlight the intersectional nature of the hate speech aimed at women of color, which is simultaneously misogynistic and racist.

The use of misogynistic hate speech to intimidate women journalists is particularly problematic because it impedes the functioning of a free press. According to the 2013 report, “Violence and Harassment Against Women in the News Media,” which was commissioned by the International Women’s Media Foundation, almost two-thirds of the 149 women journalists polled had experienced intimidation, threats, or abuse in relation to their work (International Women’s Media Foundation, 2013). More than 25 percent of the “verbal, written and/or physical intimidation, including threats to family or friends,” took place online. Moreover, the study found that digital harassment and threats directed at women differ than those experienced by men because they are misogynistic (International Women’s Media Foundation, 2013).

In addition to messages and emails directed at women journalists, Internet radio programs and websites associated with the Alternative Right or “Alt-Right” also served as a hotbed for misogynistic hate speech during the 2016 U.S. presidential election cycle. The Southern Poverty Law Center (SPLC) defines the “Alt-Right” as “a set of far-right ideologies, groups, and individuals whose core belief is that ‘white identity’ is under attack by multicultural forces using ‘political correctness’ and ‘social justice’ to undermine white people and ‘their’ civilization” (SPLC.com, 2017, para. 1).

Notable among the content produced by and for the Alt-Right is the Internet radio show, Infowars, hosted by Alex Jones. On this program, Jones regularly used terms like “bitch” to describe Democratic nominee Hillary Clinton. For example, after a mass shooting in Virginia, Hillary

Clinton's campaign tweeted her support for the victims. Alex Jones responded with the following tirade on his Internet radio program / podcast: "Statistically, there's less guns than there were. And Hillary knows that full well. She's got bodyguards. Hey Hillary, you got bodyguards. Are their guns bad too? Why can't I have a gun to protect myself, ya bitch" (Tashman, 2015, para. 2)!

Misogynistic hate speech also proliferated in the comment sections of Alt-Right "news" sites like Breitbart. In an August 2016 story about Secretary Clinton being late to a speech to an American Legion group in Cincinnati one poster wrote: "*hillary* is a "maroon"! , well, stupid *bitch* comes to mind as well" (Spiering, 2016, para. 16).

According to former Breitbart reporter Milo Yiannopoulos, silencing women is precisely his goal. In an article that appeared on the *Breitbart* website in July of 2016 entitled, "The Solution to Online 'Harassment' is Simple: Women Should Log Off," Yiannopoulos wrote:

Here's my suggestion to fix the gender wars online: Women should just log off. Given that men built the internet, along with the rest of modern civilization, I think it's only fair that they get to keep it. And given what a miserable time women are having on the web, surely they would welcome an abrupt exit. They could go back to bridge tournaments, or wellness workshops, or swapping apple crumble recipes, or whatever it is women do in their spare time.

I, Donald Trump and the rest of the alpha males will continue to dominate the internet without feminist whining. It will be fun! Like a big fraternity, with jokes and memes and no more worrying about whether an off-colour but harmless remark will suddenly torpedo your career. (2016, para.7-8)

This story is one example among countless posts, videos, and memes across the Internet and on social media that used misogynistic hate speech. Danielle Keats Citron (2011) argues that in recent years, misogyny has moved largely online, where a unique form of cyber gender harassment has emerged. The anonymity of the online environment emboldens these commenters and posters (Citron, 2011).

In addition to the vitriol directed at women online, merchandise sold at the Republican National Convention (RNC), held in Cleveland in July 2016, also prominently featured misogynistic hate speech. *Atlantic* reporter Peter Beinart covered the RNC convention and chronicled the merchandise being sold outside the hall:

Black pin reading Don't be a pussy. Vote for Trump in 2016. Black-and-red pin reading Trump 2016: finally someone with balls. White T-shirt

reading Trump that bitch. White T-shirt reading Hillary sucks but not like Monica. Red pin reading life's a bitch: don't vote for one. White pin depicting a boy urinating on the word *Hillary*. Black T-shirt depicting Trump as a biker and Clinton falling off the motorcycle's back alongside the words if you can read this, the bitch fell off. Black T-shirt depicting Trump as a boxer having just knocked Clinton to the floor of the ring, where she lies faceup in a clingy tank top. White pin advertising KFC Hillary special. 2 fat thighs. 2 small breasts . . . left wing. (Beinhart, 2016, para. 4)

In addition to merchandise featuring misogynistic hate speech, a recording of Donald Trump using the terms “bitch” and “pussy” to describe his pursuit of a woman to *Entertainment Tonight* presenter Billy Bush also surfaced during the 2016 general election campaign. On the recording, Trump can be heard saying that he didn't wait for women to agree to his sexual advances, he just “moved on them like a bitch.” When you're a star, said Trump, “they let you do it. You can do anything. . . Grab them by the pussy. You can do anything” (Trump, 2016). Trump's statement clearly meets the definition for misogynistic hate speech because he is advocating sexual violence toward women.

Attendees at Trump rallies also used misogynistic hate speech when, on many occasions, they chanted “Lock the bitch up,” which was a call to imprison Hillary Clinton for her alleged mishandling of classified emails. For example, on election night in a “small pen across and down the street from where their candidate . . . was holding his election night gathering,” Trump supporters chanted “lock the bitch up” in celebration of their candidate's victory (Daileida, 2016).

This repeated use of misogynistic hate speech created a political climate that was unfriendly to women. Its proliferation during the 2016 U.S. presidential campaign demonstrates the extent to which this toxic form of expression has become unavoidable, permeating almost all aspects of political discourse. Despite our best efforts, women can no longer “avert their eyes” from this unwanted expression (Cohen v. California, 1971). The current situation is untenable. American women deserve to participate fully in political life by freely engaging in political debate, both online and in person, without fear of hate or harassment.

HOW MISOGYNISTIC HATE SPEECH CREATES A CHILLING EFFECT

According to legal scholar Frederic Schauer (1978), a chilling effect occurs when “individuals seeking to engage in activity protected by the First Amendment are deterred from so doing by governmental regulation not specifically directed at that protected activity” (p. 693). Instead of being

deterred from expression by governmental regulation, I argue here that women of all political parties were dissuaded from certain expressive activities, such as posting on social media or speaking openly with friends about their policy preferences, for fear that the same misogynistic hate speech that was directed at Democratic candidate Hillary Clinton and the reporters covering the campaign would also be used against them.

As legal theorist and activist Catharine MacKinnon (1993) notes in her book, *Only Words*, censorship today occurs less through explicit state policy than through official and unofficial privileging of powerful groups and viewpoints. This is accomplished through silencing in many forms (MacKinnon, 1993). According to MacKinnon (1993), the lack of hate speech regulations in the United States shows insensitivity to the damage done to social equality by hateful expression. It also demonstrates a substantial lack of recognition that some people get a lot more speech than others (MacKinnon, 1993). In the absence of this recognition, the power of those that have speech becomes more exclusive, coercive, violent, and more legally protected (MacKinnon, 1993). The more the speech of the dominant group is protected, the more dominant they become and the less the subordinated are heard from (MacKinnon, 1993).

In the United States, men get “more speech” than women and their voices continue to dominate the public sphere. For example, the Global Media Monitoring Project’s 2015 U.S. National Report found that in the United States, women comprised only 25 percent of sources and subjects in political and government-related news (GMMP, 2015). Overall, women were the sources and subjects of only 38 percent of all stories (GMMP, 2015). Not only are women the subjects of fewer news stories, they also produce less news than their male counterparts. For example, women produced only 37.7 percent of news reports at the nation’s top 20 news outlets, according to the Status of Women in U.S. Media 2017 Report (Women’s Media Center, 2017).

The prevalence of misogynistic hate speech also makes it more difficult for women to participate in the political process. According to Alexander Meiklejohn’s self-governance theory, free expression is an essential component of Democracy (1948). Speech on matters of political and public import must be protected, says Meiklejohn, to ensure that all citizens have access to the information needed to make informed decisions about civic matters (Meiklejohn, 1948). The proliferation of misogynistic hate speech in political discourse makes it difficult, if not impossible, for women to effectively engage in that process because of the cacophony of noise created by this particular form of expression. The “noise” associated with hate speech was recognized by the Supreme Court in the seminal hate speech case, *R.A.V. v. St. Paul, Minn.* (1992). Notably, women of color must deal

with the “noise” created by both racist and misogynistic hate speech. The discrimination that comes with being a member of not one but two protected classes is greater than the sum of its parts (Crenshaw, 1989). Thus, women of color must labor doubly to avoid the vitriol directed at them in order to participate in the political process.

Recognizing the important role online communications plays in the process of self-governance, Danielle Keats Citron and her co-author Helen Norton (2011) developed a theory of digital citizenship. “Digital citizenship” refers to the various ways that online activities deepen civic engagement, political participation, and public conversation. In her 2014 book on the subject, Keats Citron argues that cyber harassment does little to enhance self-governance and instead works to destroy it. Victims cannot participate in their online networks if they are under assault from a barrage of gendered slurs.

Given the important role free expression plays in the process of Democratic self-governance, Owen Fiss argues in *The Irony of Free Speech* (1996) that it is a worthy goal of the state to work to establish the essential preconditions for collective self-government by making sure all sides of an issue are presented to the public. Certain forms of free speech, Fiss argues, violate the equal right to free speech promised by the Fourteenth and First Amendments respectively (Fiss, 1996). Catherine MacKinnon (1993) has noted that unlike the First Amendment, federal statutes for equality have not risen out of the Fourteenth Amendment. Without protections such as these, misogynistic hate speech will continue to limit the public contributions of women and people of color by creating an environment that dissuades them from speaking out.

Noelle-Nueman’s (1974) spiral of silence theory helps explain how misogynistic hate speech silences women through self-censorship. According to this theory, individuals feel substantial pressure to conceal their views when they believe those viewpoints are in the minority. This is because of a fear of isolation. Rather than being perceived as out of sync with public opinion, those whose view their position as less popular will adopt a more reserved attitude and will be less likely to assert their opinion. Conversely, those who believe that their position on an issue is the dominant one will confidently voice their opinion in public (Noelle-Nueman, 1974). Given people’s unwillingness to share what they believe are non-dominant opinions, it is no surprise that the “secret” Facebook group Pantsuit Nation emerged in the final months of the 2016 general election. What started as a small group of friends planning to wear pantsuits on Election Day, quickly exploded into a group with three million members. The group’s emphasis, according to its website, is on “going high” and creating

a troll-free space in which Clinton supporters could enthusiastically support their candidate (Pantsuit Nation, 2017).

In addition to making it more difficult for women from all political parties to openly discuss important issues, misogynistic hate speech and cyber harassment directed at women candidates could also discourage qualified women from running for office. Today, only one-fifth of U.S. Congresspeople are women. That number is unlikely to increase if running for office continues to come with the various forms of misogynistic hate speech and cyber harassments that candidates, and the journalists covering them, must currently endure.

SOLUTIONS FOR MINIMIZING MISOGYNISTIC HATE SPEECH

Catharine MacKinnon (2017) coined the term “Butterfly Politics” to describe the impact small attempts to change inequality can have on a political system. According to MacKinnon (2017), the right small human intervention in an unstable political system can sooner or later have large complex reverberations. Small interventions to minimize the amount of misogynistic hate speech in the public sphere include counter speech, in the form of education and outreach efforts by governments and NGOs both, as well as expanding current social media hate speech policies.

Perhaps the greatest tool we have in combatting the silencing effect of misogynistic hate speech is more speech. The casual use of misogynistic hate speech online and in person seeks to intimidate and ultimately silence the women targeted. Counter speech that challenges the social acceptance of that language and all that it implies should be one of the primary solutions for addressing the problem of misogynistic hate speech.

In the United States, several NGOs, such as the Southern Poverty Law Center and the Anti-Defamation League have been working to address the problem of hate speech through outreach and education. Globally, there are many more substantial, state-funded, efforts in place to combat hate speech. For example, in Canada, the University of Alberta’s Institute for Sexual Minority Studies created the website “Nohomophobes.com,” which tracks the daily use of words such as “faggot” and terms such as “so gay” on Twitter. The site was produced to “address the prevalence of homophobic and transphobic language in our society” (No Homophobes, 2017, para. 1). A similar effort to draw attention to the casual use of terms like “bitch” and “cunt” could help those terms become less socially acceptable.

In Europe, the Youth Department of the Council of Europe has funded a two-year campaign aimed at minimizing the use of hate speech worldwide (No Hate Speech Movement, 2017). As part of the effort, 45 countries inside and outside of Europe have launched their own anti-hate speech or

anti-discrimination campaigns. From Belgium to Mexico to Azerbaijan, countries around the world have undertaken efforts to raise awareness about the negative impacts of hate speech, particularly on young people (No Hate Speech Movement, 2017). Notably, the United States is not a participant in this effort. Allocating government funds to public information campaigns aimed at minimizing the use of hate speech online or in person is one way the United States could avoid the negative impacts of misogynistic hate speech, including curtailing the free expression of those targeted. In addition to funding public outreach efforts, the United States could also support research into the issue of misogynistic hate speech and its impact on the Democratic process. For example, Sweden and Lithuania both recently contributed funds to support the 2016 study of online harassment of women journalists, entitled “New Challenges to Freedom of Expression- Countering Online Abuse of Female Journalists” (OSCE, 2016).

Hopefully, minimizing the amount of misogynistic hate speech aimed at women political candidates will create an environment in the United States that is more conducive to women candidates running for office. Women are grossly underrepresented at all levels of U.S. government. The continued use of misogynistic hate speech to describe and even harass women candidates may discourage women from running for office, which further limits participation and representation in the Democratic process.

In addition to allocating government funding for public information and outreach efforts, pressure could also be placed on social media organizations to take a more aggressive approach to restricting hate speech on their sites. As private virtual spaces, social media platforms are not required to offer First Amendment protection to users. In fact, the terms of service users must agree to before accessing a particular platform allow these companies to set whatever rules of engagement they like. Commercial ISPs and Social Media Organizations may voluntarily agree to prohibit users from sending racist or bigoted messages over their services (Foxman & Wolf, 2013). Such prohibitions “do not implicate First Amendment rights because they are entered into through private contracts and do not involve government action in some way” (Foxman & Wolf, 2013, p.187). Therefore, these companies can decide how, when, and why they will remove content and can simply update the terms of service accordingly. This suggests that it may be possible to incentivize these companies to do more to regulate hate speech on their platforms.

In countries with laws against hate speech, social media organizations such as Facebook are facing legal challenges calling for them to do more to censor all hate speech, particularly when it is aimed at politicians. For example, an Austrian Appeals Court recently ruled that Facebook must remove posts against Austria’s Green Party leader Eva Glawischnig, which

have been deemed hate speech under the country's laws (Wamsley, 2017). Merely blocking the content in Austria was insufficient, the Appeals Court said. Instead, Facebook was forced to delete the content from all versions of its platform (Wamsley, 2017). Along those lines, Germany recently began imposing fines on social media organizations that fail to remove hate speech quickly (Kottasova, & Schmidt, 2017). In the face of this mounting pressure from foreign governments, Facebook, Twitter, YouTube, and other social media platforms could choose to take more substantial steps to minimize the amount of hate speech on their sites.

Public opinion data suggests that there is an appetite among users to censor hate speech in the name of civility. A recent Pew Research Center survey about online harassment showed that 40 percent of millennials reported that they supported efforts to limit hate speech online (Duggan, 2014). In the United States, pressure from users and advertisers can move social media organizations to act. In response to public pressure and declining user numbers, Twitter suspended the accounts of several high-profile members of the Alt-Right movement in November 2016. Twitter removed the verified account of Richard Spencer (@RichardBSpencer), his think tank, the National Policy Institute (@npiamerica), and his online magazine (@radixjournal) (Guynn, 2016). The accounts of Paul Town, Pax Dickinson, Ricky Vaughn, and John River were also suspended for violating Twitter's rules against targeted abuse and harassment (Guynn, 2016). This is the kind of specific action social media organizations can take to better protect the expression of all users.

Whether it is through greater restrictions on content when and where appropriate or additional public outreach, action must be taken to ensure that the vitriolic misogynistic hate speech does not continue to drown out the voices of women in the public sphere. At a state level, at an organizational level, and even at a personal level, intervening against misogynistic hate speech is essential to let the victims and bystanders know that hatred toward women, particularly in the political arena, will not be tolerated.

CONCLUSION

The vitriol directed at Democratic candidate Hillary Clinton during the 2016 U.S. presidential campaign represented a different kind phenomenon, one based primarily on people's contempt for women in positions of power (Okimoto & Brescoll, 2010). As the first woman to be nominated by a major party, Clinton's bid for the nation's highest office was met with misogynistic hate speech directed at her, her supporters, and the women journalists covering her opponents.

The barrage of gendered insults aimed at these women has a dangerous

chilling effect on all women's ability to participate in public debates about matters of political import. The cacophony of noise created by misogynistic hate speech impedes the process of Democratic self-governance originally outlined by Meiklejohn (1948) and the process of digital citizenship described by Citron and Norton (2011). The current situation is unacceptable and untenable. Therefore, immediate solutions must be explored. From allocating federal dollars to public information campaigns to advocating private social media organizations to change their rules, there are several viable ways to address this problem. Regardless of the approach taken, the time to act is now. Otherwise, women candidates, journalists, and voters will continue to remain at a disadvantage.

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