

NOTE

NATION OF MEN: DIAGNOSING MANOSPHERIC MISOGYNY AS VIRULENT ONLINE NATIONALISM

RACHEL GUY*

I. INTRODUCTION	602
II. DEFINING MANOSPHERIC MISOGYNY	603
A. THE MANOSPHERE	603
B. ENACTING STRUCTURAL SEXISM THROUGH MANOSPHERIC MISOGYNY	606
III. MANOSPHERIC MISOGYNY AS NATIONALISM	610
A. A REGRESSIVE CULTURAL NATIONALISM	611
B. AN IMAGINED COMMUNITY IN ANTI-FEMINISM	614
1. Oppositional Identity	615
2. Grievance	616
3. Recruitment	618
C. BEYOND PRINT CAPITALISM	619
IV. CONSEQUENCES OF ONLINE NATIONALISM	621
A. ADVANTAGES OF AN INTERNET-NATIVE NATIONALISM	622
B. SURROGATE NATIONALISM IN THE DIGITAL AGE	624
C. VIOLENT IMPLICATIONS OF MANOSPHERIC MISOGYNY AS A NATION-IN-WAITING	625
D. LEGAL RESPONSES TO THE THREAT OF MANOSPHERIC MISOGYNY	631
1. Recognizing the Motivations of the Manosphere's Extreme Violence	631
a. <i>Misogynistic Hate Crimes</i>	631
b. <i>Misogynistic Terrorism</i>	634
2. Providing Adequate Responses to all Misogyny-Based Harms	636
3. Combatting the Online Greenhouse	637
V. CONCLUSION	639

* Georgetown University Law Center, J.D., 2021. I am endlessly grateful to Professor Naomi Mezey whose teaching and guidance were instrumental to the formulation of this Note, and to the many friends and colleagues who provided insightful feedback. I would also like to thank the *Georgetown Journal of Gender & the Law* editors and staff, who I have had the honor to work alongside for the past two years. Special thanks to Professor Zina Makar for teaching me everything I know about lawyering. © 2021, Rachel Guy.

I. INTRODUCTION

In March of 2021, 21-year-old white male terrorist, Robert Aaron Long, targeted three Asian spas in the Atlanta area.¹ He killed eight people, six of whom were Asian women.² When apprehended on his way to Florida to continue killing, Long told police that he targeted the spas because they were a sexual “temptation . . . that he wanted to eliminate.”³

We do not yet know much about the terrorist’s ideologies or communities beyond this statement. Officially, his motive is still under investigation.⁴ But, we already know what matters: he came to conceptualize Asian women as a sexual temptation—one he felt empowered to eliminate. We do not need to ask exactly where he developed such abhorrent bigotry, because we know where it comes from. It comes from the internet. Or rather, it comes from a culture deeply steeped in sexism and misogyny, which protects the roots of unjust and oppressive systems and simply sweeps the most virulent forms of hate online.

The internet has always been a place for the most outrageous and dangerous ideologies to thrive. In the last few years though, the hate that has long been festering on the internet is increasingly boiling over into “real life.” Targets of online hate face real consequences and emotional harm both online and off, and messengers of online hate are beginning to hold consequential political power.⁵ One of the internet’s most potent breeding grounds for toxic content is a loose network of sites, forums, and online groups known to sociologists, journalists, and itself as the “manosphere.”⁶ The manosphere is so named because of its focus on men’s rights, men’s sexual desires, and bolstering a patriarchal world order around the ideal masculine identities, which capture the attention of its denizens. It is this last concern that is the subject of this Note.

Out of the manosphere, a uniquely vitriolic misogyny has emerged among groups united by a disdain for gender liberalization and the increasing equality of women in Western cultures. This Note argues that built around the existing hierarchies of structural sexism, and with anti-feminism as its rallying cry, the

1. Amir Vera & Jason Hanna, *Here’s What We Know About the Atlanta Spa Shootings That Left 8 Dead*, CNN (Mar. 19, 2020, 10:15 AM), <https://www.cnn.com/2021/03/16/us/metro-atlanta-spa-shootings-what-we-know/index.html>.

2. See David Futrelle, *Robert Aaron Long Apparently Thought He Was the Victim of His Own Desire. He’s Not Alone*, WASH. POST (Mar. 18, 2021, 3:46 PM), <https://www.washingtonpost.com/opinions/2021/03/18/robert-aaron-long-apparently-thought-he-was-victim-his-own-desire-hes-not-alone/>; Vera & Hanna, *supra* note 1. The victim’s names were Delaina Ashley Yaun, Paul Andre Michels, Xiaojie Tan, Daoyou Feng, Soon C. Park, Hyun J. Grant, Suncha Kim, and Yong A. Yue. Futrelle, *supra*. I would prefer not to name the many attackers identified in this Note, but names are included to streamline the discussion (because there are many “white male terrorists”) and because, in some places, they are necessary for a full understanding of the topic.

3. Futrelle, *supra* note 2.

4. Vera & Hanna, *supra* note 1.

5. See *infra* Section IV.C.

6. See Debbie Ging, *Alphas, Betas, and Incels: Theorizing the Masculinities of the Manosphere*, 22 MEN & MASCULINITIES 638, 638–39 (Oct. 2019).

manosphere's misogyny has crystallized into a dangerous online nationalism. As a nationalism, the ideology and its fervent adherents wield a potent form of collective power. While they slowly and disjointedly reach for political power, their cultural power is undeniable—the manosphere draws new men into toxic misogyny and racism every day and subjects women and other targets to barrages of hate and violence. Most significantly, they have shown a proclivity for terrorism.

Part II of this Note defines the manosphere and its relationship to structural sexism. Applying classic theories of nationalism, Part III argues that manospheric misogyny is a fully developed cultural nationalism, utilizing the communication powers of the internet to unite an imagined community in grievance. Finally, Part IV examines the capabilities available to manospheric misogyny as an internet-native nationalism. Employing Thomas Hylland Eriksen's frameworks for online nationalisms, this Note argues that manospheric misogyny should be understood as a dangerous nation-in-waiting that will employ increasing levels of on- and off-line violence in pursuit of a politic that embodies its extreme, misogynist ideal. In light of the epidemic of violence growing out of the manosphere—of which Long is only the latest chapter—this Note briefly addresses three categories of legal reform needed to effectively combat the manosphere and provide redress to its victims. The uniting theme of these solutions is simply to recognize misogyny as a form of hate that requires serious legal responses and societal acknowledgment.

The tragic story of the terrorism perpetrated in Atlanta demonstrates the imperative of this Note: we could have seen this violence coming, and until the legal field responds, we can only expect the violence to continue.

II. DEFINING MANOSPHERIC MISOGYNY

A. THE MANOSPHERE

The concept of an online “manosphere” was first coined in 2009 to describe the existing “network of men’s interest communities” online.⁷ Across platforms such as Facebook, Reddit, 4chan, and others, groups of men with seemingly disparate ideologies—from Traditional Christian Conservatives to Involuntary Celibates and the alt-right⁸—lament societal and interpersonal grievances.⁹ The content is a mix of self-help, conspiracy theories, and increasingly extremist indoctrination traded through manifestos, memes, and insults.¹⁰

The term was quickly adopted by the media and the men themselves.¹¹ With the name came the increased power of a united identity: the manosphere has since

7. *Id.* at 639.

8. *See id.* at 641, 645.

9. *See id.* at 640.

10. *See* Helen Lewis, *To Learn About the Far Right, Start with the ‘Manosphere’*, ATLANTIC (Aug. 7, 2019), <https://www.theatlantic.com/international/archive/2019/08/anti-feminism-gateway-far-right/595642/>.

11. *See* Ging, *supra* note 6, at 639.

become a prominent subject of alarmist journalism and sociological study.¹² Authors attempt to understand where the manosphere “came from” and what drives these men to such extreme hate, while members revel in the power of increased attention and in being treated as a gruesome aberration by the society they rail against.¹³

In her seminal research of extreme online misogyny, Debbie Ging studied five distinct, but associated, communities: Men’s Rights Activists, Men Going Their Own Way, Pick-Up Up Artists, Traditional Christian Conservatives, and gamer geeks.¹⁴ Ging focused on these groups because they captured the diverse ideologies and identities in the manosphere and received the most online traffic.¹⁵ Therefore, this Note adopts these groups as representative of the manosphere. In addition, due to recent events in Western culture, this Note adds Incels and the alt-right, as these groups fit the criteria that Ging identified and align with the frameworks of similar scholarship.¹⁶ An extensive examination of each group is not within the scope of this Note, but for purposes of further analysis, a brief overview of each is instructive:

Men’s Rights Activists (MRA): Men’s Rights Activism emerged during second-wave feminism, in response to the feminist acknowledgment that men were also hurt by existing gender hierarchies. The group has since disowned any common ground with feminism and is as much about reinstating an imagined ideal of white masculinity as it is about anti-feminism.¹⁷

12. See, e.g., Lewis, *supra* note 10; Ging, *supra* note 6, at 640; Manoel Horta Ribeiro et al., *The Evolution of the Manosphere Across the Web*, at 15th International AAAI Conference on Web and Social Media (Aug. 2020).

13. See, e.g., Sophie Bjork-James, *Racializing Misogyny: Sexuality and Gender in the New Online White Nationalism*, 1 FEMINIST ANTHROPOLOGY 176, 176 (Nov. 2020); see also Lewis, *supra* note 10; David Futrelle, *Manosphere, World of Incels Exposed in Laura Bates Book ‘Men Who Hate Women’*, NPR (Mar. 13, 2021, 6:00 AM) <https://www.npr.org/2021/03/13/976379494/manosphere-world-of-incels-exposed-in-laura-bates-book-men-who-hate-women> (citing a post on the manosphere page The Black Pill Club praising Alek Minassian’s Incel-inspired Toronto terrorist attack for being “a middle finger to this hostile society”).

14. See generally Ging, *supra* note 6.

15. *Id.* at 643–45.

16. Ging identified discrete subsets of the manosphere by delineating key categories and trends in the men’s rights rhetoric—taking anti-feminism as a baseline for inclusion. These factions were whittled down to those groups which captured the largest portion of that cross-referencing, effectively denoting them as central pillars of a unified manosphere. See *id.* Anthropologist Sophie Bjork-James notes the important ties of the far-right to the manosphere as defined by Ging—ties which are essential to the vitality of their movement. See Bjork-James, *supra* note 13. A British anti-extremism NGO categorizes the manosphere as part of the far-right and identifies its key subcultures as MRAs, MGTOW, PUAs, and Incels. See Simon Murdoch, *Societal Misogyny and the Manosphere*, in STATE OF HATE 2019: PEOPLE VS. THE ELITE? 38, 38 (Nick Lowles & Gemma Levene eds., 2019).

17. This group is also known as the Men’s Rights Movement. ALICE MARWICK & REBECCA LEWIS, DATA & SOCIETY RSCH. INSTITUTE, MEDIA MANIPULATION AND DISINFORMATION ONLINE, 14–15 (2017), https://datasociety.net/wp-content/uploads/2017/05/DataAndSociety_MediaManipulationAndDisinformationOnline-1.pdf.

Men Going Their Own Way (MGTOW): Men Going Their Own Way seek to minimize interactions with women and reject women's contributions to society.¹⁸ For some, this requires "going monk"—giving up heterosexual intercourse.¹⁹ Others see gay men as the original MGTOW who have succeeded in releasing themselves from "biological chains."²⁰ Economically, adherents attempt to limit taxation so as not to contribute to a society that props up women.²¹

Pick-Up Artists (PUA): The Pick-Up Artists community formed around Neil Strauss' famously misogynist book, *The Game*. As the name suggests, the group was initially focused on "hacking" the processes of courtship that lead to sex, but it has since acquired many of the beliefs of Men's Rights Activists.²² Notably, in the last few years, PUA members have migrated to more extreme groups focused on Men's Rights.²³

Traditional Christian Conservatives (TradCons): Traditional Christian Conservatives desire a return to archetypically gendered domestic lives, in which women are subservient and focused on family. TradCons also seek societal structures dominated by patriarchal, conservative values.²⁴

Gamer Geeks: Gamer geek culture embraces many of the stereotypical "geek" character traits, such as priding intellect over traditional physical masculinity.²⁵ Unlike other groups on this list, only a subset of gamers actively participate in the type of misogyny at issue in this Note. However, their presence on this list is important, as they represent an otherwise ordinary community in which virulent forms of hateful ideology can spread. Consequently, they also happen to be a primary pool from which the other groups recruit.²⁶

Incels: The term Incel was derived from the phrase "involuntarily celibate."²⁷ Incels feel that feminism is depriving them of the sex that they are rightfully owed by women.²⁸ Men who self-identify as Incels have

18. Murdoch, *supra* note 16, at 39.

19. Laura Bates, *Men Going Their Own Way: The Rise of a Toxic Male Separatist Movement*, GUARDIAN (Aug. 26, 2020, 1:00 AM), <https://www.theguardian.com/lifeandstyle/2020/aug/26/men-going-their-own-way-the-toxic-male-separatist-movement-that-is-now-mainstream>.

20. Ging, *supra* note 6, at 15.

21. See Bates, *supra* note 19.

22. Ging, *supra* note 6, at 15–16.

23. See Ribeiro, *supra* note 12, at 8.

24. See MARWICK & LEWIS, *supra* note 17, at 12, 14.

25. See Ging, *supra* note 6, at 642.

26. *Id.* at 642, 644, 650.

27. See Jim Taylor, *The Woman Who Founded the 'Incel' Movement*, BBC NEWS (Aug. 30, 2018), <https://www.bbc.com/news/world-us-canada-45284455>.

28. See Murdoch, *supra* note 16, at 38.

perpetrated a number of terrorist attacks in recent years, making this group one of the most violent factions of the manosphere.²⁹

Alt-right: Like gamer geeks, the alt-right is not a self-contained group, and not all of those who subscribe to alt-right ideology engage with the manosphere. However, their ideology is beset with misogyny, and the groups' online presence overlaps considerably with the manosphere.³⁰ Additionally, like a number of other groups on this list, the alt-right promotes racist, white nationalist ideology.³¹

This list is not meant to be inclusive of all online men's groups that participate in the manosphere. A comprehensive list is impossible given the nature of the internet and the extensive crossover between these groups. Instead, this catalogue merely serves to frame the broad spectrum of ideologies that engage in what ultimately unites the manosphere: misogyny.

B. ENACTING STRUCTURAL SEXISM THROUGH MANOSPHERIC MISOGYNY

This Note adopts the term manospheric misogyny to describe the particularly potent misogyny that is discussed and acted out across the manosphere. Of course, misogyny is nothing extraordinary in Western society, which remains staunchly patriarchal and permissive of sexism in nearly every form, despite feminist pressure towards an egalitarian society. Nonetheless, manospheric misogyny is starkly and violently reactive to the slow dismantling of Western patriarchy. What makes the manosphere's misogyny so noteworthy is the depth of its vitriol, the breadth of its cultural and political reach, and its increasingly frequent physical manifestations in the form of terrorist attacks and online violence.³² At its core, manospheric misogyny is concerned with reifying the traditional patriarchal structures that have enabled men to access societal power throughout history. To do so, manospheric misogyny endorses and enacts an exaggerated form of hegemonic masculinity, which the internet facilitates in novel ways.³³

The term Hegemonic Masculinity was first used in the 1980s by scholars attempting to understand the ways in which gender relations interact with larger social structures.³⁴ It has since become a widely-accepted thesis for how patriarchal systems of family, market, and state remain intact and perpetuate gendered subordination across society.³⁵ Like any other hegemony, masculinity in this

29. *Id.*

30. See Ribeiro, *supra* note 12, at 3.

31. MARWICK & LEWIS, *supra* note 17, at 11–12.

32. See Murdoch, *supra* note 16, at 38; Simon Copland, *Reddit Quarantined: Can Changing Platform Affordances Reduce Hateful Material Online?*, 9 INTERNET POL'Y REV. 1, 2 (2020).

33. See Ging, *supra* note 6, at 641.

34. See R. W. Connell & James W. Messerschmidt, *Hegemonic Masculinity: Rethinking the Concept*, 19 GENDER & SOC'Y 829, 830–32 (2005); Mike Donaldson, *What is Hegemonic Masculinity?*, 22 THEORY & SOC'Y (SPECIAL ISSUE: MASCULINITIES) 643, 653, 655 (1993).

35. See, e.g., Connell & Messerschmidt, *supra* note 34, at 829; Donaldson, *supra* note 34, at 645.

model retains power through the propagation of gendered social norms and the stratification of key social groups.³⁶ Thus, hegemonic masculinity has “ideologically legitimated the global subordination of women to men”³⁷ and maintains this control by naturalizing the inferiority of women and non-conforming gender identities.³⁸

Hegemonic masculinity sustains its gendered order by creating an ideal masculinity,³⁹ tying social power to this idealized masculinity, proscribing a set of social relations based on masculine power, and entrenching social and political institutions in structures of male dominance.⁴⁰ In modern parlance, hegemonic masculinity is embedded in Western society as structural sexism that acts as a seemingly natural and invisible organizing force. Therefore, this Note uses the phrase “structural sexism” to describe the systemic product of hegemonic masculinity’s active project of maintaining patriarchal power.

Ironically, hegemonic masculinity maintains this descriptive hold on Western society by the strength of its normative proscription.⁴¹ Western society’s frequent inability to conform to hegemonic masculinity’s mandates (such as when individuals break gender stereotypes) does not break the spell, because a majority of citizens have already been convinced that the sexist structures of hegemonic masculinity are the natural and desirable order of things.⁴² Thus, even in societies deeply imbued with structural sexism—as most Western cultures are—not all men must enact its hierarchy and oppression for it to hold sway.⁴³ Very few men, if any at all, are capable of embodying the idealized traditional masculinity.⁴⁴ Rather than perfect conformity, hegemonic masculinity requires men to “position themselves in relation to” the masculine ideal.⁴⁵ This allows for what sociologist Demetrakis Z. Demetriou coins a “hybrid bloc” of masculinities.⁴⁶ Within the

36. See Donaldson, *supra* note 34, at 645.

37. Connell & Messerschmidt, *supra* note 34, at 832.

38. See Donaldson, *supra* note 34, at 645–46. Crucially, hegemonic masculinity is not only concerned with the control of women. To survive, the system must also control men by seeming to be the only path for social advancement. See *id.* at 655.

39. The ideal masculinity of the group studied here can loosely be described as white, masculine in traditional Western ways, and believing itself superiorly intelligent. Cf. Connell & Messerschmidt, *supra* note 34, at 835 (describing the evolving ideal masculinities of other recent cultures).

40. See *id.* at 832, 852.

41. See *id.* at 832.

42. *Id.*

43. *Id.*

44. See, e.g., Ging, *supra* note 6, at 641–42, 653 (naming various male identities that are not ‘ideal,’ but are instead incorporated into a masculine bloc).

45. Connell & Messerschmidt, *supra* note 34, at 832.

46. Demetrakis Z. Demetriou, *Connell’s Concept of Hegemonic Masculinity: A Critique*, 30 *THEORY & SOC’Y* 337, 343–49 (June 2001). It must be said that Demetriou originally intended his formation of a “masculine bloc” as an adjustment on the theory of hegemonic masculinity. However, the idea of a more mutable—and superficially inclusive—masculinity has since been widely adopted into the theory of hegemonic masculinity. See Connell & Messerschmidt, *supra* note 34, at 845, 848; Ging, *supra* note 6, at 641.

organizing principle of male power, there is room for a variety of masculinities and of men, as long as their behavior affirms the hierarchy.⁴⁷

The dynamism and breadth of the masculinity at issue here makes the hegemonic power structure flexible and able to evolve. Like any other hegemony, structural sexism is not automatically self-reproducing.⁴⁸ Several scholars have argued that the ability for structural sexism to incorporate and ally with otherwise non-traditional masculinities is what has helped it—and, therefore, “ideal” masculine identities—remain dominant in the face of increasing societal change.⁴⁹ For example, some scholars assert that the appropriation of certain styles and attributes from modern gay male culture by historically empowered masculine identities (such as straight cis-gendered white men) has allowed traditional heterosexual patriarchal culture to maintain dominance, in spite of the increasing visibility of gay and non-conforming male identities.⁵⁰

This, of course, does not mean that all men are seen as equal, treated equally, or even given the same power to navigate society. Hierarchy is essential to the maintenance of hegemony, and because male identities remain stratified within structural sexism, “both incorporation and oppression can occur together.”⁵¹ Indeed, though the manosphere is a predominantly white and racist space, racial and ethnic minority men have formed groups within manosphere communities.⁵² For example, Introspective Black Men of Reform (IBMOR) preaches general MGTOW philosophies alongside its goal for racial liberation, in pursuit of a “Black patriarchy.”⁵³

47. Of course, some women also participate in affirming structural sexism. Even the extreme misogyny of the manosphere is no different in this regard. Female YouTube personalities such as Karen Straghan attract praise and millions of views from MRA adherents. See LAURA BATES, MEN WHO HATE WOMEN 120 (Sourcebooks, 2021) (2020). The “tradwife” (a nod to the TradCon community) blog *Thinking Housewife* joins manosphere men by bashing feminists’ “love of power” and affirming that provocative female attire is a form of aggression against men. See *Why Immodest Dress is a Form of Aggression*, THE THINKING HOUSEWIFE (May 23, 2012), <https://www.thinkinghousewife.com/2012/05/why-immodest-dress-is-a-form-of-aggression/>; *Is it Possible to Be a Christian Feminist?*, THE THINKING HOUSEWIFE (June 17, 2011), <https://www.thinkinghousewife.com/2011/06/is-it-possible-to-be-a-christian-feminist/>.

48. Connell & Messerschmidt, *supra* note 34, at 844.

49. See, e.g., DAVID SARVAN, TAKING IT LIKE A MAN: WHITE MASCULINITY, MASOCHISM, AND CONTEMPORARY AMERICAN CULTURE (1998); see also Demetriou, *supra* note 46, at 348.

50. See Demetriou, *supra* note 46, at 353–54.

51. Connell & Messerschmidt, *supra* note 34, at 848.

52. However, even in these spaces, inferiority is explicitly ascribed to non-whiteness—predominantly by white men in the manosphere. Labels such as ‘currycel,’ and ‘ricecel’ have sprung up among the Incel community to describe minority Involuntary Celibates who are believed to face sexual rejection because of their race. Though the term is sometimes adopted by a small number of these minority men themselves (who are thus ‘accepting’ their place in the white masculine hegemony), the labels largely reflect the racist stereotypes prevalent across the manosphere. See BATES, *supra* note 47, at 10. White participants use this casual racism to imbue their masculine hierarchy with racial hierarchy as well.

53. The two groups interact frequently online, using head spinning contradictions of their own ideologies in order to argue the other is wrong. See *id.* at 97–99.

Manospheric misogyny has latched on to this “natural” order and insists on its preservation.⁵⁴ Though the manosphere incorporates numerous groups with divergent dogmas, each ideology revolves around a trait (or traits) of the normative ideal masculinity: for PUAs, this trait is sexual virility, while for TradCons, it is domestic dominion and community esteem. As is expected of a structurally sexist regime, few men in the manosphere embody masculinity’s ideal form.⁵⁵ In fact, many of the manosphere’s participants arrive there precisely because, in one way or another, they feel that they do not meet society’s standards for men and are, therefore, missing out on the power that is their birthright.⁵⁶

Instead, each individual arranges himself within the idealized masculine hierarchy that structural sexism imposes, and the individual positions that members take further entrench this hierarchy in their worldview.⁵⁷ For example, Incels self-describe as “beta” males who do not meet the physical appearance or personality of the “alpha” male ideal (dubbed “chads”), and therefore acknowledge their inherently lower place in society.⁵⁸ PUAs desire to learn “game,” because they see that as an avenue to becoming the powerful masculine ideal.⁵⁹ Conversely, many white men who participate in the alt-right space of the manosphere see themselves as genetically superior and properly at the top of the hierarchy—embodying the ideal masculinity.⁶⁰ These men turn to the manosphere because it offers vehement support for the model of supremacy—their supremacy—which they feel is under attack.⁶¹ Meanwhile, some MRA and MGTOW factions act out the flexibility of the masculine bloc by recognizing homosexuality as a valid and even enviable rejection of female-dominated culture, despite their otherwise right-leaning ideologies.⁶²

Men in the manosphere act out exaggerated misogyny through vitriolic language and ideas. Often, they are purposefully inflammatory as a way to gain esteem among fellow community members and to get a rise out of the feminists that they despise so dearly. Their misogyny is extreme both in ideology—they envision a world of total female submission and availability—and in the ways they behave—they are willing to change their daily behaviors to avoid encounters with women, rape women in order to access the sex they feel they deserve, and

54. In fact, the Twitter account @manospheric goes by the name “The Masculine Ideal” and tweets ‘self-improvement advice’ along the lines of “A man asking for sympathy is an ugly site.” See *The Masculine Ideal* (@manospheric), TWITTER (Nov. 21, 2017, 12:03 AM), <https://twitter.com/manospheric?lang=en>.

55. For example, Incels voluntarily self-identify as lower on the totem pole than the masculine ideal, but because they feel this identity means they cannot access sex from women as easily, they advocate for a more misogynist culture where they would be able to control women, and therefore obtain sex, more easily. See *Ging*, *supra* note 6, at 650.

56. *See id.*

57. *See, e.g.*, *Ging*, *supra* note 6, at 651.

58. *See id.* at 650 (citing an Incel poster resignedly affirming that “every man can’t be the ‘alpha’”).

59. *See* MARWICK & LEWIS, *supra* note 17, at 15.

60. *See id.* at 11–12.

61. *See id.* at 14.

62. *See* *Ging*, *supra* note 6, at 652.

commit mass shootings to assert their presence and power in the world, sometimes knowingly sacrificing their own lives. Thus, feeling their societal power slipping as women earn more agency, the men who embody manospheric misogyny enact hyperbolic masculinities and advocate for extreme forms of structural sexism in order to buttress their own relative place in society.

III. MANOSPHERIC MISOGYNY AS NATIONALISM

Perhaps it should come as no surprise that manospheric misogyny has taken shape as a modern nationalism. Classic nationalism scholarship, which sees the nation as inherently concerned with creating the idea of an “in-group,” reveals that nationalism and chauvinistic bias go hand in hand.⁶³ Moreover, some scholars see nationalism as a historically masculine project: “[n]ationalism has typically sprung from masculinized memory, masculinized humiliation and masculinized hope.”⁶⁴ Nationalism scholar Joane Nagel has gone so far as to argue that hegemonic masculinity and hegemonic nationalism have buttressed each other’s development, as nationalism springs from and feeds into states and their institutions, which, in turn, incorporate the hegemonic masculine ideal and remain, to this day, dominated by men.⁶⁵

Hegemonic masculinity provides the same structure to manospheric misogyny, creating an imagined nation out of thin air. Without a state to latch onto or a central authority to dictate its development, the manosphere crystalized around the organizing hierarchy and narrative of structural sexism’s “natural order.” Working from many angles to reinforce male domination, manospheric misogyny is a nationalism carved out of culture wars and sustained by a rich culture of its own. Section III.A utilizes traditional nationalism theories to argue that manospheric misogyny should be understood as a dynamic cultural nationalism. As Section III.B describes, at the center of this culture is the uniting creed of anti-feminism, which has enabled the manosphere to attract divergent ideologies and continues to ensnare new members. Section III.C then explains how the manosphere harnesses traditionally understood nationalist communication techniques with even more potency.

63. In his seminal book on nationalism, Ernest Gellner argues that nationalist ideology is dependent on the belief that one’s culture is superior. See ERNEST GELLNER, *NATIONS AND NATIONALISM* 56 (1983) (“In a nationalist age, societies worship themselves brazenly and openly.”). Benedict Anderson’s work more explicitly addresses the bias of racism inherent in many nationalist societies. See BENEDICT ANDERSON, *IMAGINED COMMUNITIES* 150 (1983) (citing, for example, the internal and external hierarchy of superiority in English colonial society). Building on the scholarship of Gellner, Benedict and others, Joane Nagel argues that creating a nationalism requires differentiating the nation from others by imaging the nation as superior. See Joane Nagel, *Masculinity and Nationalism: Gender and Sexuality in the Making of Nations*, 21 *ETHNIC AND RACIAL STUDIES* 242, 247–48 (Mar. 1998) (finding that “the project of establishing national identity and cultural boundaries tends to foster nationalist ethnocentrism,” which leads nations to act out intolerance).

64. CYNTHIA ENLOE, *BANANAS, BEACHES, AND BASES* 45 (1990). See generally Nagel, *supra* note 63.

65. To prove her point, Nagel points to the concepts of “honor, cowardice, duty, and bravery” to demonstrate that each is inextricably tied to both nationalism and manhood. Nagel, *supra* note 63, at 251–52.

A. A REGRESSIVE CULTURAL NATIONALISM

Manospheric misogyny takes shape as a nationalism when viewed in light of the cultural dynamics that gave rise to it.⁶⁶ Preeminent nationalism scholar Ernest Gellner posited that nationalisms typically form in response to cultural and political shifts that destabilize relied-upon community structures.⁶⁷ This hypothesis is played out by manospheric misogyny, which has formed in response to the feminist cultural shift that is currently pushing Western society towards increasing social equity. As sub-groups of Western men have felt the cultural tides change around them, a new nationalism precipitated in equal and opposite reaction to these dynamics. Sociologist Michael Messner identified three key societal factors giving rise to the anti-feminist sentiment that is central to the manosphere: the institutionalization and professionalization of feminism, the spread of postfeminist cultural sensibility, and the development of a neoliberal economy.⁶⁸ Men who are explicitly opposed to gender equality or vaguely uncomfortable with the new norms of public behavior blame feminism for increasingly infringing on spaces where they expected to go unchallenged.

While feminists would likely argue that their advancement has been a political project, Messner's observations indicate that feminism's effects have been felt much more broadly at the cultural level.⁶⁹ In response, manospheric misogyny has become what nationalism scholar John Hutchinson defines as a cultural, rather than political, nationalism.⁷⁰ For now, manospheric misogyny does not need to be a political nationalism—one concerned with constructing an effective state that can guarantee diverse members “uniform citizenship rights”⁷¹—because the white male power of historic structural sexism is still deeply entrenched. Instead, it is an emotional, “defensive response”⁷² that invokes a national identity on a cultural level to give expression to the manosphere's desire for “moral regeneration.”⁷³

As a cultural nationalism, manospheric misogyny is concerned with the cultural reversion of the nation to an idealized version of the Western world's

66. See ANDERSON, *supra* note 63, at 22.

67. See GELLNER, *supra* note 63, at 40.

68. See Michael Messner, *Forks in the Road of Men's Gender Politics: Men's Rights vs. Feminist Allies*, 5 INT'L J. CRIME, JUST. & SOC. DEMOCRACY 6, 9 (2016).

69. As one example, many of these men feel that their rightful jobs are being given away due to affirmative action, yet in reality, women continue to be underrepresented in every level of government throughout the nation and in the leadership of private sector institutions. See Judith Warner et al., *The Women's Leadership Gap*, CTR. FOR AM. PROGRESS (Nov. 20, 2018, 9:04 AM), <https://www.americanprogress.org/issues/women/reports/2018/11/20/461273/womens-leadership-gap-2/>.

70. See John Hutchinson, *Cultural Nationalism and Moral Regeneration*, in NATIONALISM 122 (John Hutchinson & Anthony D. Smith eds., 1994).

71. See *id.* at 122–24.

72. *Id.* at 128.

73. *Id.* at 123. Hutchinson posited that the intellectuals of cultural nationalisms are concerned with moral regeneration—which is true for the men who see their culture wrecked by feminists—but he acknowledged that ultimately cultural nationalisms are generally a “regressive force” conjuring tradition in the face of impending social advancement. *Id.* at 127.

patriarchal past, embodied in these men's ideation of extreme structural sexism. Although Hutchinson imagined a cultural nationalism born in salons full of artists, thinkers, and other cultural elites,⁷⁴ it would be a mistake to discount the men of the manosphere. In fact, the manosphere is surprisingly flush with "'myth-making' intellectuals who combine a 'romantic' search for meaning with a scientific zeal to establish [a national identity] on authoritative foundations."⁷⁵ The most notable of these manospheric myth makers are the bloggers, vloggers, and authors that perch atop each manospheric subgroup. Many of these men have gained notoriety beyond the manosphere for the extremity of their views. Notable examples include Roosh V (real name: Daryush Valizadeh), who became a public-facing PUA figurehead as a self-described "scoundrel," and Matt Forney, whose ideology skews MRA and who produces purposefully incendiary blog posts proclaiming, for example, that domestic violence is sometimes necessary.⁷⁶ Among the "intellectual class," the creation of literature abounds. There are books such as Neil Strauss' PUA how-to, *The Game*, and Warren Farrell's (who holds a Ph.D. from NYU) *The Myth of Male Power*. Many among the cultural elites are revered as mythic leaders and inspire disciples. Paul Elam, founder of influential manosphere website A Voice For Men, is a self-proclaimed protégé of Farrell.⁷⁷

True to Hutchinson's theory, these men also attempt to bolster their ideology with scientific theories. Neatly packaged pseudo-scientific theories and statistics proliferate across the manosphere and are often referred to in shorthand, representing the entire community's familiarity with and acceptance of such theories.⁷⁸ Incels, for example, have appropriated the Pareto principle to stand for a new 80:20 theory that the top 20% of "alpha" males obtain 80% of the sex in society.⁷⁹ In a different vein of scientific thinking, MRAs rely on the evolutionary history of hunter-gatherer societies as support for traditional gender roles.⁸⁰ While the conspiracy theories and out right racist, sexist argumentation propagated across the manosphere may not meet liberal definitions of cultural, scientific, and

74. *Id.* at 125.

75. *Id.* at 123. The intellectual organizers of the manosphere are distinct from the "weavers of the fabric of hegemony" offline: "priests, journalists . . . politicians, psychiatrists, [artists] . . . and sportsmen," since a much narrower spectrum of culture needs to be created online. See Donaldson, *supra* note 34, at 646. Cultural creators such as authors, talking heads, moderators (who become like community elders), and sainted mass murders suffice to fill out the class of manospheric intellectuals because the manosphere does not span the functionalities of a full, self-sufficient society offline.

76. BATES, *supra* note 47, at 73, 101, 118.

77. *Id.* at 115.

78. Completely baseless statistics on things such as false rape allegations and discriminatory divorce proceedings are cited en masse across the manosphere. See *id.* at 109, 249. The dissemination of misinformation frequently leaks off of the manosphere. See, e.g., Fox News, *Are Fathers' Rights a Factor in Male Suicide?*, FOX NEWS (Jan. 13, 2015), <https://www.foxnews.com/story/are-fathers-rights-a-factor-in-male-suicide>.

79. It is common for users to refer back to this principle in arguments as simply "80:20." See BATES, *supra* note 47, at 9, 23.

80. *Id.* at 121.

intellectual authority, they nonetheless provide believers the same basis for legitimacy and devotion that Hutchinson envisions.

This flourishing of culture is particularly important when a national identity does not have a self-evident origin story to draw upon.⁸¹ Just as historian Eric Hobsbawm saw primary education as the modern replacement for the cultural indoctrination of religion, the mass spread of anti-feminist ideas in the manosphere is the newest form of proselytization.⁸² To facilitate this, manospheric misogyny has already generated a deep and broad set of cultural touchpoints and nationalist symbolism. The vocabulary of “alphas,” “betas,” and “chads,” which originally developed on Incel message boards, has spread across the manosphere as convenient shorthand for the male archetypes by which they position themselves and other men within the hierarchy of masculinities.⁸³ Indeed, new terms proliferate to express the deep hate and extreme misogyny that English simply cannot capture, many of which are appallingly visual in their dehumanization of women.⁸⁴ Meanwhile, a cadre of martyrs has been created out of men who commit mass shootings and other violence under the flags of racism and misogyny.⁸⁵ As discussed in Section IV.C, the acts of many modern terrorists, such as Elliot Rodger and Alek Minassian, are born out of—and then thoroughly incorporated back into—the manosphere, creating a culture of violence, heroism, and terror. The “manifestos” of these men are cited as though they are central texts of a religion, as are books such as *The Great Replacement*.⁸⁶

A uniting national identity is only as strong as each individual’s connection to it. In order to strengthen individual connection, Hobsbawm theorized that local buy-in at a community level is essential to fostering a nationalism that encompasses many dispersed communities.⁸⁷ The reasons behind this understanding make sense: it is easier and more appealing to subscribe to a lofty and theoretical nationhood if those in your immediate community are engaging in the same ideology. Local buy-in thus makes these theoretical beliefs feel real and ensures the sense of community that adherents are looking for in national belonging. The dispersed nature of the manosphere—in which individuals converge around various

81. See generally Eric Hobsbawm, *The Nation as Invented Tradition*, in NATIONALISM 76 (John Hutchinson & Anthony D. Smith eds., 1994) [hereinafter *The Nation as Invented Tradition*].

82. *Id.* at 77.

83. See, e.g., Ging, *supra* note 6, at 641, 645, 649–50.

84. BATES, *supra* note 47, at 15.

85. See Keegan Hanks & Alex Amend, *The Alt-right is Killing People*, S. POVERTY L. CTR. (Feb. 5, 2018), <https://www.splcenter.org/20180205/alt-right-killing-people>. It is common to see Elliot Rodger’s face as the online avatar of manosphere denizens. See David Futrelle, *When a Mass Murderer Has a Cult Following*, CUT (Apr. 27, 2018), <https://www.thecut.com/2018/04/incel-meaning-rebellion-alex-minassian-elliott-rodger-reddit.html>.

86. See Lewis, *supra* note 10; Bjork-James, *supra* note 13, at 176. In fact, *The Game* was designed to look like a bible—released with gold edged pages, a red satin bookmark, and a black leather cover. BATES, *supra* note 47, at 69.

87. His example for this localized participation was the literal buy-in of late-19th century French citizens paying out of their own pockets to erect statues depicting nationalist imagery in their rural towns. *The Nation as Invented Tradition*, *supra* note 81, at 78.

ideologies, rather than a central manospheric control—mimics local physical communities, where each group interacts with national symbols and ideology in a way that best addresses their “local” concerns (in the form of particular grievances and specific masculine ideals), but ultimately affirms the national ideology. Intra-group discussions—for instance on MGTOW message boards or alt-right news sites—about these themes and icons increase local buy-in, which fosters individual allegiance. The division of the manosphere into somewhat distinct ideologies allows each community to discuss the specific issues of most concern to their members, thus enhancing the attachment individuals feel to the community. This strategy is so successful that, among the Incel community, forums for the specific concerns that men believe make them “beta” have organically sprung up, allowing men to delve deeply into tailored iterations of the national concern.⁸⁸ These communities include, among others, heightcels, baldcels, and wristcels.⁸⁹

The men on the manosphere view feminism’s progress as an attack on their traditional values and culture. In response, the communities in the manosphere invoke a defensive cultural nationalism. Replete with icons, theories, and content, manospheric misogyny has created a culture all its own that affirms its members’ beliefs. It is cohesive enough to provide meaning and to enable those within it to view themselves as a community, yet malleable enough to breed allegiance even when spread across often-conflicting local ideologies. Ominously, Hutchinson concluded his analysis with the observation that cultural nationalisms eventually become political movements.⁹⁰ Section IV.C argues that having developed such a rich and expansive culture, the manosphere is well positioned to increasingly angle for more political power.

B. AN IMAGINED COMMUNITY IN ANTI-FEMINISM

Given the cultural origins of manospheric misogyny, it is no surprise that anti-feminism is its central tenet. Despite the disparate ideologies and goals of manosphere denizens, and even though individual factions might not name anti-feminism as their first priority, it is central to each group’s world view. More importantly, anti-feminism unites the groups in the manosphere as the common language and sentiment through which they can communicate. Though myriad forms of hate and “-isms” proliferate among these groups, the manosphere coalesces around anti-feminism. Using anti-feminism to define their imagined community provides manospheric misogyny with three primary benefits that further foster the growth of their nationalism. First, positioning themselves as anti-feminist allows for a larger nation by creating a national identity without strictly defining who is “in.” Second, anti-feminism provides a focal point for the grievance of diverse groups in the manosphere, allowing them to channel the cultural insecurities of individuals into a galvanizing nationalist sentiment. Both of these

88. See BATES, *supra* note 47, at 9.

89. *Id.*

90. See Hutchinson, *supra* note 70, at 131.

advantages magnify a “united” national identity. Finally, because of its place in modern society, anti-feminism functions as a powerful recruiting tool, drawing wide swaths of men on the internet into various factions of manospheric misogyny.

1. Oppositional Identity

Evidenced by even the term “anti-feminism,” manospheric misogyny is united under the banner of what it is not and what it stands against. Indeed, it is common for nations that lack superficial cohesive identifiers to define themselves by what they are not, rather than what they are.⁹¹ Due to the decentralized nature of the manosphere, unity and a cohesive identity are lacking among and even within its various groups. As a loose collective of mostly ungoverned interest groups—which men log on and off of voluntarily and, often, anonymously⁹²—the manosphere cannot attain consolidation through any sort of forced conformance.⁹³ Therefore, they seek unity, which brings validation, belonging, identity, and a sense of power,⁹⁴ through a pronounced anti-feminist ideology.

A stark, but fitting, analogy for this concept is post-World War I Germany. Having just acquired new state boundaries that cut across preexisting communities and affiliations, the new German state was unable to draw on a shared national history, shared language, or shared traditions to create national cohesion.⁹⁵ As historian Eric Hobsbawm illustrated, the country relied instead on the creation⁹⁶ of anti-German enemies (inside and outside the state) to draw “Germans” together and demonstrate what the nation stood for.⁹⁷ The positioning of Jews as German’s internal enemy not only served as a rallying point for Aryan Germans, but it also allowed the political elite to shift blame for post-war societal ills to a clearly defined class of people. Because of Jews’ positions in German society, anti-Semitism could be expanded into a distrust of “capitalist liberalism and proletarian socialism,” which mobilized the lower middle class to support the existing German power structures under the guise of nationalism.⁹⁸

91. See Eric Hobsbawm, *Mass-Producing Traditions: Europe, 1870–1914*, in *THE INVENTION OF TRADITION* 263 (Eric Hobsbawm & Terence Ranger eds., 1983) [hereinafter *Mass-Producing Traditions*].

92. Lewis, *supra* note 10.

93. Group cohesion is typically attained through formalized education, as it has been in the United States through free public education, or through strong centralization, such as is the case of the United States military. See GELLNER, *supra* note 63, at 57.

94. The unity created by the manosphere arguably provides more than just a sense of power. Alice Marwick and Robyn Caplan note that the coordinated large-scale attacks that manosphere members carry out, dubbed “networked harassment” (or, colloquially, “brigading”), carry large real-world effects for their victims. See Alice E. Marwick & Robyn Caplan, *Drinking Male Tears: Language, the Manosphere, and Networked Harassment*, 18 *FEMINIST MEDIA STUD.* 543, 544–45 (2018).

95. *Mass-Producing Traditions*, *supra* note 91, at 278–79.

96. I use the word creation not to imply that Germany drew enemies from thin air—obviously not true of a country that had just taken part in a World War—but to draw attention to the nationalist myth-making that occurs in the trumping up of perceived threats.

97. See *Mass-Producing Traditions*, *supra* note 91, at 278–79.

98. *Id.*

In the same way, manospheric misogyny positions feminists as the ultimate internal enemy, threatening the societies that have traditionally supported these men. Members of the manosphere believe feminists are covertly in control of Western governments and blame them for the increasing liberalization that is “ruining” Western culture.⁹⁹ Thus, the scapegoating of feminists incites a rather diverse group of men to advocate for a hyperbolic hegemonic masculinity, even though some of them are disadvantaged by the current hierarchy in which it places them. Women, particularly feminists, and their allies are not the only enemies—just like Jews were not the only enemies to Nazi Germany—but because nationalism thrives on simple, concentrated messages, complex webs of status and power are often boiled down to one potent personification.¹⁰⁰ Not only does this scapegoating allow the power structures of hegemonic masculinity to evade the critical gaze, but on a personal level, the anti-feminist narrative provides individual men a similar sense of security by enabling the avoidance of introspection and accountability.¹⁰¹

This definition-by-opposition provides an additional advantage to such a loosely defined nation. Like post-war Germany, the manosphere encompasses individuals that lack common roots and shared experiences and who occupy drastically different places in society.¹⁰² Anti-feminism unites the manosphere without having to tightly delineate the included masculinities, thereby enabling a broader spectrum of men to participate in manospheric misogyny. In fact, a recent study of the manosphere’s linguistic corpus found that the masculine gender role is less well-defined and less discussed overall than the feminine gender role.¹⁰³ The men in the manosphere see themselves as individuals, and groups in the manosphere vary widely in their discourse, but they are united in the creation of a myth of “woman.” As “anti-feminism” explicitly announces, that mythic “woman” is the common enemy.

2. Grievance

Anti-feminism is a particularly useful tool of nationalist excitement because it encapsulates a sense of grievance and disturbance that men in the manosphere feel deeply. Gellner hypothesized that the Industrial Revolution spurred nationalist sentiment because it was a time of immense instability and transition.¹⁰⁴ The

99. See Lewis, *supra* note 10.

100. This viral spread of simple, often emotionally coded, cultural units is the same phenomenon that undergirds the proliferation of internet memes. See PIIA VARIS, CONSPIRACY THEORISING ONLINE: MEMES AS A CONSPIRACY THEORY GENRE 19 (2019), https://www.tilburguniversity.edu/sites/default/files/download/TPCS_238-Varis.pdf (“Memes . . . are one very popular genre . . . for the circulation of conspiracy theories nowadays.”). Unsurprisingly, memes—most notably Pepe the frog—are a common form of manosphere communication and recruitment. See Copland, *supra* note 32, at 20.

101. See BATES, *supra* note 47, at 94.

102. See *id.* at 7.

103. Alexandra Krendel, *The Men and Women, Guys and Girls of the ‘Manosphere’: A Corpus-Assisted Discourse Approach*, 31 DISCOURSE & SOC. 607, 616 (2020).

104. See GELLNER, *supra* note 63, at 39–40.

unprecedented rapidity of change caused by the period of social and economic reorganization disturbed “either political boundaries, or cultural ones, or both,” driving societies to solidify around the stability of national identities.¹⁰⁵ The nationalism of manospheric misogyny has also grown out of rapid political and cultural change. Entire populations of people—even some heretofore unrecognized as identities—are now demanding social space and political power. White men, and those traditionally aligned with them due to wealth, education, Christianity and the like, are facing competition for political and moral control in new ways. Under Gellner’s framework, it is unsurprising that this painful sense of loss and denigration would inspire traditionally empowered men to turn to nationalist sentiment in order to restore a “powerful” identity.

With this sense of injustice stoked, feminists are the perfect targets for the manosphere’s ire. By questioning or challenging traditional female ideals, feminists implicitly refuse to position themselves in the hierarchy of structural sexism and, thus, rebuff the societal order that these men hold dear. Feminists are also visible advocates of the precise societal shifts that manospheric misogyny rails against. As PUAs and Incels bemoan, feminism is the reason men can no longer access sex as easily.¹⁰⁶ According to TradCons, feminism is pulling women out of their God-given roles.¹⁰⁷ Thus, though these men experience the loss of their power in different ways, anti-feminism captures all of it.

Anti-feminism is also particularly effective at handily capturing a sense of grievance because the narrative it constructs about the world can be backed up by observable phenomena. Statistics about the falling birth rate among Western, educated, and especially white women are cited frequently across the manosphere as evidence that when women acquire agency in society, Western societies are threatened.¹⁰⁸ The right-wing conspiracy book *The Great Replacement* documents these trends as a warning that Western culture will soon be overrun by “nonwhites,” further stoking the sense that these men are facing unparalleled loss.¹⁰⁹ Men in the manosphere are also able to point to the increasing numbers of women in positions of corporate, governmental, educational, and cultural power, to demonstrate that feminists are overstating the plight of women and that it is actually men who are disadvantaged, due to competition with female affirmative action.¹¹⁰ Selective attention is instrumental in creating these narratives. Pushing credulity, the MGTOW community cites a list of notable male inventors and entrepreneurs who were never married in order to support the proposition that close relations to women is, in fact, what saps men of their natural talent.¹¹¹

105. *Id.* at 40.

106. See Ging, *supra* note 6, at 650.

107. See MARWICK & LEWIS, *supra* note 17, at 7.

108. See Lewis, *supra* note 10.

109. *Id.*

110. See *id.*

111. BATES, *supra* note 47, at 92.

3. Recruitment

Importantly, anti-feminism is not only a common grievance, consolidating subscribers of manospheric misogyny into a nationalist identity, but it is also the key recruiting point for new believers. Author and journalist Helen Lewis cites three reasons that anti-feminism functions so effectively as a path to indoctrination: acceptability, grievance, and its fit with conspiratorial thinking. First, anti-feminism is still not considered all that radical.¹¹² Therefore, it can make its way into public discourse without being completely shut down.¹¹³ This point is highlighted by research by a British anti-extremism group, which found that, at least in Britain, anti-feminism was easier for people to express than racism.¹¹⁴ This means that if white men are disturbed by their changing place in society, it is easier and more acceptable for them to blame women.¹¹⁵ Thus, manospheric misogyny can flourish openly on the internet where men can simply stumble across it, and men trying on this new national identity may parrot the fundamentals of its ideology without facing harsh backlash from society as a whole.

The second recruitment advantage of anti-feminism, according to Lewis, is that it “addresses a genuine sense of grievance.”¹¹⁶ As discussed above, the men most likely to participate in manospheric misogyny feel their society changing and their relative power within it decreasing and, therefore, may be drawn into the manosphere while searching for comfort and validation. Additionally, the increasing relative position of women in their lives and societies is a largely visible phenomenon. Thus, men may engage in anti-feminist resentment independently and then turn to the internet to find like-minded communities.

This in turn leads to the third benefit of anti-feminism: once a man has bought into its narrative, it can easily grow to an all-encompassing conspiracy theory. In fact, the manosphere is beset with conspiratorial ideology. Borrowed from the plot of *The Matrix*,¹¹⁷ the manosphere’s Red Pill embodies the ideology that believers can choose to “take the red pill” and thereby awaken to the ugly reality that feminists control the world.¹¹⁸ Thus enlightened, subscribers to manospheric misogyny are able to see the increasing social power of women as proof that

112. Lewis, *supra* note 10.

113. As Lewis also notes, while anti-feminism remains relatively palatable to society, it is still “edgy” enough to provoke reactions from the feminists and political liberals these young men are looking to bait, thus increasing the allure of engaging in anti-feminist discourse and behavior. *See id.*

114. *See id.*

115. *See id.*

116. *See id.*

117. An astute editor pointed out that *The Matrix* was created by two trans women. The women—the Wachowski sisters—have since stated that the trilogy is actually an allegory for being transgender. *See The Matrix Is a ‘Trans Metaphor’, Lilly Wachowski Says*, BBC NEWS (Aug. 7, 2020), <https://www.bbc.com/news/newsbeat-53692435>.

118. Ging, *supra* note 6, at 639. Some scholars see The Red Pill (TRP) as its own branch of the manosphere, and indeed there have been Reddit pages and other websites dedicated entirely to TRP. *See, e.g.,* Ribeiro, *supra* note 12, at 8. It is not included as a distinct group in this Note because its ideology overlaps so completely with that of many of the other communities.

female oppression is an illusion used by feminists to further disadvantage men.¹¹⁹ This conspiracy is strikingly similar to anti-Semitic narratives present throughout history and adopted by the modern far right.¹²⁰

Central conspiracy theories are essential to many forms of extremism, because they provide simple and self-reinforcing answers about how the world “actually” works, which keep believers steeped in a given ideology.¹²¹ Even for those in the manosphere who engage in additional forms of hate, the Red Pill serves as the central awareness that the world is not as they have been led to believe. In a nationalism built on extremism, as manospheric misogyny is, a central conspiracy theory serves as a foundational national myth, binding members together against outsiders and in support of a noble common cause.

Thus, among the many forms of hate that thrive in the manosphere, anti-feminism is uniquely essential to the coalescence of its nationalism. Anti-feminism provides definition and community. It is the reason these men are “at home” in the manosphere. Moreover, anti-feminism provides the most dangerous aspect of manospheric misogyny: its ability to keep recruiting disaffected new members and to continue spreading unchecked by a society that tolerates “mere sexism.” As the next section explains, nationalisms require robust communication systems to disseminate these unified beliefs and bind members in a national solidarity. Only through the mass expression of antifeminism across the internet was the manosphere able to spawn a nationalism.

C. BEYOND PRINT CAPITALISM

Like any other nationalist ideology, manospheric masculinity has been spread through a robust system of national communication. Traditionally understood, nationalism could only be formed in the presence of nation-wide communication—typically print capitalism. As an internet-native nationalism, manospheric misogyny has not only utilized the internet as the ultimate print capitalism, but the decentralized nature of the manosphere has also enabled it to harness the additional communicative power of collective conversation.

In large, diverse, post-industrial societies, the spread of nationalist sentiment requires a method of transmitting the shared culture—as nationalist scholar Karl W. Deutsch put it, “for communities to become nationalist requires communication.”¹²² In his seminal book, Benedict Anderson developed the theory that print

119. See Ging, *supra* note 6, at 641.

120. See generally ALEXANDER MELEAGROU-HITCHENS ET AL., PROGRAM ON EXTREMISM, THE GEORGE WASHINGTON UNIV., ANTISEMITISM AS AN UNDERLYING PRECURSOR TO VIOLENT EXTREMISM IN AMERICAN FAR-RIGHT AND ISLAMIST CONTEXTS 1, 4–11, (Oct. 2020), <https://extremism.gwu.edu/sites/g/files/zaxdzs2191/f/Antisemitism%20as%20an%20Underlying%20Precursor%20to%20Violent%20Extremism%20in%20American%20Far-Right%20and%20Islamist%20Contexts%20Pdf.pdf>.

121. In her examination of the manosphere’s anti-feminism, Helen Lewis notes that a “[c]ommon feature of online conspiracy theories [is that] genuine problems are attributed to a single cause.” See Lewis, *supra* note 10.

122. Karl W. Deutsch, *Nationalism and Social Communities*, in NATIONALISM 26 (John Hutchinson & Anthony D. Smith eds., 1994).

capitalism is the communication tool that facilitated the creation of nations, which he dubbed “imagined communities.”¹²³ Print capitalism—which is, put simply, the mass distribution of books to a literate public—captured three advantages for the germination of nationalism. First, it provided an efficient means of transmitting a uniting consciousness and “morality.”¹²⁴ Second, the advent of print capitalism forced the coalescence of broad communities around a single printed vernacular, since printing in a multiplicity of spoken dialects was impractical.¹²⁵ Finally, for nationalism to exist, men must be able to conceptualize their membership in a nation.¹²⁶ Books enabled individuals to conceptualize their society—which was too big for them to personally know the bounds of—as a singular, self-evident nation.¹²⁷

The internet enabled the formation of manospheric misogyny by providing the same functions that print capitalism gave to previous nationalisms. To be an effective means of spreading a universal consciousness, a nation’s communication must be capable of storing and recalling ideas and “memories,” transmitting them, and then recombining and reapplying these essential elements across a culture.¹²⁸ As previously described in detail, the internet has enabled groups that make up manospheric misogyny to create and share uniting ideologies and cultural “monuments.”¹²⁹ As Debbie Ging and Sophie Bjork-James have concluded, communication across the manosphere in the form of diatribic manifestos, memes, and mass message boards spreads if not a singular ideology, at least a relatively cohesive one.¹³⁰ Also through this process—notably not in the top-down fashion required at the advent of print capitalism—the manosphere has developed a literal (as well as figurative) shared language of grievance.¹³¹ The intense cross-referencing, cross-linking, and merging of philosophies across these groups’ communications represents a modern equivalent to the consolidation around a singular vernacular.¹³²

To Anderson’s third point, the coherence of communities in the manosphere brought about by the first two advantages of the internet created a community where before none had existed. Just like novels allowed previous nations to conceptualize a vast, imagined community, the internet allows these men—despite sitting alone at computers—to conceptualize a community of like-minded men joined together in the bounds of the manosphere. The groups’ own ready adoption

123. See ANDERSON, *supra* note 63, at 22–36.

124. *Id.* at 41–44.

125. *Id.* at 24–25.

126. *Id.*

127. *Id.*

128. See Deutsch, *supra* note 122, at 26.

129. See *supra* Section III.A.

130. See generally Ging, *supra* note 6; Bjork-James, *supra* note 13.

131. See *supra* Sections III.A, III.B.3 (describing the universally understood language of alphas and betas and “the Red Pill”).

132. See Ging, *supra* note 6, at 645.

of the moniker “manosphere” is, itself, evidence of their eagerness to perceive this community.¹³³

A decade after Anderson first expounded upon the benefits of print capitalism, Deutsch expanded the notion of a nation’s communication beyond one-way mass media, stressing the importance of a people’s collective conversation.¹³⁴ As the manosphere proves, the internet enables collective conversation on a scale not previously accessible to nations. Members of manospheric misogyny are able to converse with thousands of their compatriots easily and in real-time across the manosphere, through message boards and Twitter threads, on Facebook and Discord, and in individual chats.¹³⁵ Therefore, for each benefit of print capitalism that the manosphere is able to capture, its nation-making power is multiplied by a mass conversation that is constantly strengthening the national fabric.¹³⁶

Taken together, these one-way publications and two-way conversations are the manosphere. They actively and continually unite these men in the community in which they want to exist and create the culture off of which the community feeds. The modalities of the internet enable the spread of the anti-feminist philosophy that captures the aforementioned powers for the manosphere. As the next part explores, exploitation of the internet puts the manosphere on a threatening trajectory.

IV. CONSEQUENCES OF ONLINE NATIONALISM

Manospheric misogyny represents a virulent threat to the progress that Western society has made with regard to social equity. This threat is all the more pronounced because of the troubling capabilities available to manospheric misogyny as an online nationalism. Besides merely super-charging the communication advantages of print capitalism, the functionalities of the internet provide manospheric misogyny with capabilities not yet realizable in other forms of nationalism. Section IV.A describes these abilities and the impacts they have on the increasing growth of manospheric misogyny. Section IV.B diagnoses manospheric misogyny as a dangerous online form of nationalism and argues that the framework portends further violence and an increasing struggle for political power. In order to demonstrate the urgency of the issue, Section IV.C showcases the extent of the violence already precipitated by manospheric misogyny. Finally, Section IV.D briefly outlines basic but imperative legal responses to the many types of violence perpetrated by the men of the manosphere, demonstrating the power in simply taking the manospheric threat seriously.

133. *Id.* at 639–40.

134. *See* Deutsch, *supra* note 122, at 28.

135. It is also worth noting that these same modalities allow any individual in the manosphere to publish their own print-capitalism-like content in the form of long manifestos and live-streamed monologues, further expanding the power of Anderson’s framework.

136. *Cf.* Donaldson, *supra* note 34, at 646 (arguing that it is the individual members of society acting out hegemonic masculinity who are ultimately the “weavers of the fabric of hegemony”).

A. ADVANTAGES OF AN INTERNET-NATIVE NATIONALISM

In addition to the dexterity with which the internet captures the modalities of classic nationalism communication, it provides some previously unrealized advantages for nationalism. Because manospheric misogyny is both entirely internet-native and an incredibly dangerous form of nationalism, it is important to note the additional ways the internet enhances the ideology's power. These benefits not only enable the rapid growth of manospheric misogyny, but also make it more difficult to combat the hate speech and violence that the manosphere produces, as government regulators and technology companies are quickly learning. The first three capabilities of the internet—uniting dispersed groups, utilizing powerful algorithms, and enabling anonymity—make it an incredible tool for building national identity. This third capability, anonymity, along with the final advantage, immeasurable flexibility, render the manosphere's hate incredibly difficult to quash. This section explores each capability in turn.

First, the internet vastly improves the capability of a nationalism to unite dispersed peoples.¹³⁷ As elaborated in the next section, this has been especially true in the geographical sense: those far apart from their home nation or from other citizens can connect online and therefore remain part of a community.¹³⁸ With the manosphere acting as a digital home nation, participants in manospheric misogyny are similarly able to access the manosphere from anywhere on the globe. Without that advantage, the manosphere would never have been able to form, since most of these men would not be able to engage in this nationalist sentiment with their neighbors. Moreover, the manosphere, with its unique networking of disparate sites and groups, has enabled manospheric misogyny to unite “psychographically dispersed” groups. Without the ease of the internet, individual groups such as TradCons, PUAs and MRAs would each remain self-contained. It is only through the manosphere's networking capability that manospheric misogyny can accumulate the traits and scale of a nationalism.

Second, the immense power of the algorithms used by search engines and social media sites provides an additional advantage to manospheric misogyny. The manosphere has experienced breathtaking expansion in the past two decades.¹³⁹ While the changing social climate described in Section III.A at least partially primes men to be drawn to manospheric misogyny, the sites of the manosphere themselves drive the increasing number of men who discover and engage in the manosphere. Algorithms put manospheric content (in progressing extremism) in front of those most likely to buy in: young, disaffected white men.¹⁴⁰ Algorithms of sites like YouTube, Reddit, Twitter, and Facebook, along

137. Thomas Hylland Eriksen, UNI. OSLO, ASEN/Nations and Nationalism Ernest Gellner Nationalism Lecture: Nationalism and the Internet (Mar. 27, 2006), in 13 NATIONS AND NATIONALISM 1, 7 (Jan. 2007).

138. See *infra* Section IV.B.

139. See Bjork-James, *supra* note 13, at 179.

140. Ging, *supra* note 6, at 643.

with Google's search function, prompt users through the increasingly extreme layers of the manosphere,¹⁴¹ effectively guiding men through their own nationalistic education. The same algorithms also make it appear as though the presence of hegemonic masculinity online is greater than it is, further facilitating these men's self-conception as a nation.¹⁴²

Third, the ability of participants in the manosphere to adopt relative anonymity or fictional personas both enables more men to participate in manospheric misogyny and makes it harder to address misogynistic offenders who act in harmful or illegal ways. Many of the sites that the manosphere exists across, like Reddit and 4chan, allow users to log on and interact practically anonymously.¹⁴³ Men are thus freed from the consequences of their speech and actions and can participate in hateful, chauvinistic rhetoric with more impunity than when they engage in the real world.¹⁴⁴ Similarly, this type of mass-anonymity also fosters more extreme ideology, because it encourages the shedding of self and the donning of group identity.¹⁴⁵ This ability to shed self and adopt a fictional avatar has also driven men to act out artificial hyper-masculinization, which is another way that they may reinforce structural sexism.¹⁴⁶

Finally, the expansive flexibility of the internet to host manospheric misogyny gives this nationalism a particular form of resilience. As Western society and its corporations begin to clumsily regulate hate speech and violence on the internet, the manosphere sees its virtual spaces more and more imperiled. However, the infinite space on the internet and the number of service providers willing to host vile content turn current efforts to combat manospheric hate into a losing game of whack-a-mole. For example, in 2019, when the service provider Cloudflare stopped supporting 8chan, one of the most heinous platforms of the manosphere, Gab.com seamlessly collected thousands of new users a day, presumably from 8chan.¹⁴⁷ And, 8chan was back up and running on another domain just days later, under the moniker 8kun.¹⁴⁸

141. *Id.*; see also Bjork-James, *supra* note 13, at 179–80.

142. See Ging, *supra* note 6, at 643.

143. See *id.* at 642.

144. See *id.* at 642. The tendency for people to become more hostile under the cloak of internet anonymity is known as the online disinhibition effect. CARRIE GOLDBERG, *NOBODY'S VICTIM: FIGHTING PSYCHOS, STALKERS, PERVS, AND TROLLS* 144 (2019). In addition to stoking the extremist rhetoric of the manosphere, this quality of online nationalism also lowers the barriers to entry for participants in manospheric misogyny—unlike traditional nationalisms, these men do not need to indicate their allegiances offline or feel consequences in their daily lives. In effect, the internet enables engagement with group identities to take on many of the positives, but almost none of the negatives that adopting a nationalist identity could have provoked in the “real” world.

145. This can occur either as playing down characteristics that do not conform to masculine ideals or merely as more easily becoming an indistinguishable soldier among an army of trolls. See *id.* at 638.

146. *Id.* at 642.

147. See Bjork-James, *supra* note 13, at 1; see also Joe Mulhall, “The People” Versus: Populism on the Streets of London, in *STATE OF HATE 2019: PEOPLE VS. THE ELITE?* 29, 35 (Nick Lowles & Gemma Levene eds., 2019).

148. Oscar Gonzalez, *8chan, 8kun, 4chan, Endchan: What You Need to Know*, CNET (Nov. 7, 2019, 5:45 PM), <https://www.cnet.com/news/8chan-8kun-4chan-endchan-what-you-need-to-know-internet-forums/>. The site remains active at: <https://8kun.top/index.html>.

B. SURROGATE NATIONALISM IN THE DIGITAL AGE

In 2006, drawing on case studies from around the world, nationalism scholar Thomas Hylland Eriksen posited new models for the internet's use in creating and perpetuating nationalisms.¹⁴⁹ The new paradigms of nationalism he identified are not merely incidentally freed from geographic boundaries; rather, this disassociation is essential to their character.¹⁵⁰ A few of these models focus on the dislocation of a traditional national citizenry: for example, a Kurdish nationality living online while Kurds have no formal territory,¹⁵¹ or a diaspora of Chilean citizens who remain invested in their home country via the internet.¹⁵² However, Eriksen also recognized the possibility of citizens still geographically "at home" taking their national identities online.¹⁵³

This category includes what Eriksen called Surrogate Nationhood.¹⁵⁴ In this model, those still living in their home state, but who feel they are being deprived of their rightful political power and civil rights, take to the internet to preserve a sense of supremacy through community glorification and to advocate for a return to power.¹⁵⁵ His model for this form of online nationalism was the internet presence of Afrikaners in modern South Africa.¹⁵⁶ He argued that since their displacement from political control and social power within South Africa, discontented Afrikaners have taken their unifying identity, and their claims to a nation state, online.¹⁵⁷ In this way, Afrikaners have created a virtual nation and—most ominous of Eriksen's rhetoric—a nation-in-waiting.¹⁵⁸

The comparison of manospheric misogyny to disenfranchised Afrikaners is surprisingly, and unsettlingly, apt. Like the post-apartheid Afrikaners, the men in the manosphere are reacting to "new political realities" in which their relative power and security is no longer the central goal of the state.¹⁵⁹

At first blush, there appears to be a glaring difference between the two. Afrikaners can more literally be a nation-in-waiting, because they were only recently removed from power and according to their rhetoric online, hope to return to power soon. As they see it, their displacement is only temporary.¹⁶⁰ For centuries, their nationalism had a nation-state to which it attached.¹⁶¹ In contrast, while patriarchy is certainly ensconced in almost all of the nations on the globe,

149. See generally Eriksen, *supra* note 137.

150. See *id.* at 5–8.

151. *Id.* at 8–9.

152. *Id.* at 13–14.

153. See *id.* at 12.

154. See *id.* at 11.

155. See *id.* at 12.

156. See *id.* 11–12.

157. See *id.* at 12.

158. *Id.*

159. See *id.*

160. *Id.*

161. Afrikaners, or white South Africans descended from predominantly Western European colonizers, were practically in control of the South African state from its conception until the end of

no Western state is coextensive with the extreme misogyny of the manosphere.¹⁶² However, closer examination proves more troubling parallels. The hegemonic masculinity that provides the baseline for manospheric misogyny has been sufficiently at home in Western patriarchal states. With that hegemony now facing slow expulsion, like nationalist Afrikaners, manospheric misogyny feels a profound sense of displacement.¹⁶³ As with the nationalism of post-war Germany and others, the nationalist sentiment of manospheric masculinity is solidifying and intensifying under perceived threat.¹⁶⁴ Losing ground in the popular discourse, culture, and politics of their territorial home states, these men, like the Afrikaners, have funneled their nationalist sentiments online.

C. VIOLENT IMPLICATIONS OF MANOSPHERIC MISOGYNY AS A NATION-IN-WAITING

Eriksen's wording is provocative: a nation in waiting *for what?* Of course, the very concept of hegemonic masculinity vaguely suggests the answer: their project is ultimately to restore complete white male patriarchy within Western governments and social order.¹⁶⁵ However, it is not enough to assume that merely because many of these groups are dubbed "far right," that the manosphere will be appeased by political shifts to the right in Western states. In their ongoing period of "waiting," manospheric misogyny has become more and more extreme; their ideology is now far more misogynistic, overtly racist, and violent than the vast majority of current Western conservative politics.¹⁶⁶ While their brand of anti-feminism may be gaining ground in these states' politics,¹⁶⁷ the full extremism of

apartheid in the early 1990s. *Apartheid*, HISTORY.COM (Mar. 3, 2020), <https://www.history.com/topics/africa/apartheid>.

162. See GELLNER, *supra* note 63, at 1 (arguing nationalisms seek congruence with the boundaries of their nation-state).

163. In fact, Eriksen himself describes Afrikaners' creation of an online nation as a response to "the end of white political hegemony" in South Africa. Eriksen, *supra* note 137, at 11.

164. See *supra* Section III.B.1.

165. See Donaldson, *supra* note 34, at 645.

166. See Tanya Basu, *The "Manosphere" is Getting More Toxic as Angry Men Join the Incels*, MIT TECH. REV. (Feb. 7, 2020), <https://www.technologyreview.com/2020/02/07/349052/the-manosphere-is-getting-more-toxic-as-angry-men-join-the-incels/>.

167. Unsurprisingly, manospheric misogyny has seeped into mainstream politics. New Hampshire state representative Robert Fisher was forced to resign after it was discovered that he was the moderator of manosphere subreddit "r/TheRedPill." Former President Trump frequently used language common on the manosphere. See BATES, *supra* note 47, at 133–34, 195, 202, 204–05. The "Mike Pence Rule" is now manosphere gospel, after then-Vice President Pence told reporters he would never eat a meal alone with a woman, due to fear of false accusations of sexual impropriety. See BATES, *supra* note 47 at 104–07. The British political party Justice for Men and Boys has gained alarming mainstream notoriety, with British conservative MP Philip Davies speaking at one of its conferences. See BATES, *supra* note 47 at 128, 207. Davies also spoke at a conference in the United States affiliated with manosphere group "A Voice For Men." BATES, *supra* note 47, at 207. See also Ishaan Tharoor, *How Anti-feminism is Shaping World Politics*, WASH. POST (Jan. 30, 2018, 12:59 AM), <https://www.washingtonpost.com/news/worldviews/wp/2018/01/30/how-anti-feminism-is-shaping-world-politics/>; Lewis, *supra* note 10.

manospheric masculinity will likely never be accommodated by majoritarian politics.¹⁶⁸

Instead, the factions of extremism in the manosphere have shown a willingness, and even a proclivity, for violence. Unsurprisingly, given manosphere's ideology, violence stands in as a surrogate for masculine political power. White male terrorism, euphemistically dubbed "domestic terrorism," is engaged in by men across the manosphere. Incels represent the most prominent faction of the manosphere engaged in this type of deadly terrorism. In 2014, Elliot Rodger killed six people and injured fourteen others in an attack motivated by Incel ideology.¹⁶⁹ In what is an alarming paradigm for manospheric misogyny, his attack served as a motivation for subsequent attacks, and he holds a place of "sainthood."¹⁷⁰ To "go ER" (Rodger's initials)—to commit mass violence against women and the society that spurns you—is a heroic act and the pinnacle of devotion to a war-like cause.¹⁷¹ A year later, having killed nine fellow students and himself, school-shooter Chris Harper-Mercer left behind a manifesto praising Rodger and calling more men to action.¹⁷² The school shooters at Aztec High School in New Mexico and Marjorie Stoneman Douglas High School in Florida had both praised Rodger online before committing their attacks.¹⁷³ In 2016, Canadian security guard Sheldon Bentley killed a homeless man by stomping on his chest.¹⁷⁴ His lawyers attempted to argue he was distressed from living for years without sex.¹⁷⁵ There are simply too many Incel-motivated extremists to name here.¹⁷⁶

However, these types of attacks are not limited to the Incels among the manosphere. In 2009, forty-eight-year-old George Sodini targeted women in an aerobics class, using two guns to kill three women and injure nine more.¹⁷⁷ Sodini was associated with PUAs and had an online presence spewing misogyny and white supremacy.¹⁷⁸ In the summer of 2020, self-described anti-feminist lawyer and supporter of Men's Rights, Roy Den Hollander, disguised himself as a delivery person in order to attack the home of Judge Salas.¹⁷⁹ Armed with a gun and

168. Recognizing this, some groups in the manosphere preach political abstinence. See Krendel, *supra* note 103, at 609; see also Ging, *supra* note 6, at 11.

169. Notably, Incels discourage any political action besides violence. See Murdoch, *supra* note 16, at 38.

170. See *id.*

171. BATES, *supra* note 47, at 44.

172. *Id.* at 34–35.

173. *Id.* at 35–36.

174. Allison Tierney, *Edmonton Man Uses 'Involuntary Celibacy' as Excuse in Stomping Death*, VICE (Aug. 30, 2018, 3:10 PM), <https://www.vice.com/en/article/ev8ekp/edmonton-man-uses-involuntary-celibacy-as-excuse-in-stomping-death>.

175. BATES, *supra* note 47, at 35.

176. See, e.g., Justin Ling, *Incels Are Radicalized and Dangerous. But Are They Terrorists?*, FOREIGN POL'Y (June 2, 2020, 3:08 PM), <https://foreignpolicy.com/2020/06/02/incels-toronto-attack-terrorism-ideological-violence/>; BATES, *supra* note 47, at 34–39.

177. BATES, *supra* note 47, at 33.

178. *Id.*

179. Den Hollander was a legal proponent of anti-male discrimination cases. *Id.* at 134–35.

intent on committing violence, Den Hollander killed Judge Salas' son and injured her husband.¹⁸⁰

Additionally, though the prejudice and motivation for violence of the alt-right extends beyond manospheric misogyny, the ideology inextricably contains intense strains of misogyny and anti-feminism.¹⁸¹ Paralleling the discussion of hegemonic masculinity in Section II.A, in the alt-right, sexism and racism are mutually enforcing ideologies of supremacy.¹⁸² Proof of their ideological partnership is embedded in the extensive overlap of their online spaces¹⁸³ and the documented path from the broader manosphere to the most extreme alt-right groups.¹⁸⁴ Yet, because sexism is often viewed as a less threatening and objectionable form of prejudice, the violent misogyny at the heart of many instances of white male terrorism is often overlooked.¹⁸⁵ A true accounting of the violence of manospheric misogyny requires including these heinous instances of violence.

The alt-right has produced both a number of terrorist attacks and highly-organized demonstrations of violence.¹⁸⁶ In April 2019, nineteen-year-old John Earnest walked into a synagogue during Passover with an AR-15.¹⁸⁷ He had just released a manifesto on 8chan referencing the manosphere's Red Pill movement.¹⁸⁸ He killed one woman and injured three others.¹⁸⁹ A month prior, white supremacist Brenton Tarrant killed fifty-one people at a mosque and Islamic center in what became known as New Zealand's Christchurch massacre.¹⁹⁰ Unsurprisingly,

180. *Id.*

181. Alt-right narratives pushed by cultural celebrities such as Steve Bannon, Ami Horowitz, and numerous bloggers intimately weave together white supremacy and the misogyny of the manosphere, via claims about immigrants from Middle Eastern and African countries being rapists who threaten white, European women—not because they are concerned with these women's bodily autonomy, but because they view white women as their own sexual territory. See Rachel Johnson, *From the Alt-Right to the White House, White Nationalism and Misogyny Go Hand in Hand*, THESE TIMES (Mar. 20, 2017), <https://inthesetimes.com/article/alt-right-sexism-white-nationalism-trump-bannon-breitbart>. Notice the exact parallel to claims made by former President Trump about Mexican immigrants. See Cindy Casares, *Trump's Repeated Use of the Mexican Rapist Trope Is as Old (and as Racist) as Colonialism*, THINK NBC (Apr. 7, 2018, 4:39 AM), <https://www.nbcnews.com/think/opinion/trump-s-repeated-use-mexican-rapist-trope-old-racist-colonialism-ncna863451>. Appeals to the implicit sexual territory of white men in order to stoke anger and nationalist sentiment are hallmarks of both ideologies.

182. See Johnson, *supra* note 181; see also Bjork-James *supra* note 13.

183. For example, the Pittsburgh synagogue attack in which eleven people were killed was carried out by a far-right extremist who was radicalized in part on Gab.com, a site considered by many scholars to be a manosphere hub. See Joe Mulhall, *"The People" Versus: Populism on the Streets of London*, in HOPE NOT A STATE OF HATE 2019: PEOPLE VS. THE ELITE? 32 (Nick Lowles & Jemma Levene eds., 2019).

184. See Lewis, *supra* note 10 (citing a "gateway" from the manosphere's anti-feminist rhetoric to white nationalism and the far right).

185. See BATES, *supra* note 47, at 161; see, e.g., BATES, *supra* note 47, at 41, 173.

186. See Murdoch, *supra* note 16, at 38.

187. BATES, *supra* note 47, at 172–73.

188. *Id.*

189. *Id.*

190. *Id.* at 168.

Tarrant also posted on 8chan and released a manifesto shortly before the attack.¹⁹¹ Among the manospheric ideology woven throughout his manifesto is concern with the racist replacement theory and the failing of strong white men to stop it.¹⁹² As with the Incel pattern, the Christchurch shooter cited his inspiration in another mass murderer: Anders Behring Breivik.¹⁹³ Breivik killed seventy-seven people in Norway.¹⁹⁴ His manifesto mirrored sentiments of almost every major group in the manosphere—his self-labeled attack on political correctness and Muslim immigration was inextricably tied to manospheric concerns of white male emasculation, women’s “erotic capital,” and feminist political control.¹⁹⁵ Closer to home, while the alt-right descended on Charlottesville, Virginia at the 2017 Unite the Right rally—an act of white supremacist violence itself—a man chanting “white sharia now” drove his car into counter-protesters (a tactic adopted by Incel attackers), killing one person and injuring nineteen others.¹⁹⁶ The misappropriated allusion to Sharia is at once racist, Islamophobic, and misogynistic.¹⁹⁷

Equally of concern, but garnering much less attention in a society so inured to sexism, is the widespread violence enacted by manospheric misogyny daily.¹⁹⁸ Unsurprisingly, given the manosphere’s focus on sexual control, much of this violence takes the form of rape. In her reporting on misogynistic hate groups, feminist advocate Laura Bates cites examples of men on PUA forums reporting an inclination to rape, encouraging others to rape, and even reporting back the rapes they have committed—to the praise of the community.¹⁹⁹ Conservative economics professor, Robin Hanson, blogged in explicit support of the Incel theory of sex redistribution that “those with much less access to sex . . . might . . . at least implicitly threaten violence if their demands are not met.”²⁰⁰ Though individual instances of rape are not typically conceptualized as terrorist acts, the way they are carried out en masse, egged on by the manospheric nation, and in many cases intended to send the message of domination, squarely qualifies them as part of a

191. *See id.* at 169. He also live-streamed the attack, lodging the seventeen-minute video on the internet forever. *Id.*

192. *Id.* at 171.

193. BATES, *supra* note 47, at 172.

194. *Id.*

195. *Id.*

196. *See* Ari Weil, *Protestors Hit by Cars Recently Highlight a Dangerous Far-Right Trend in America*, NBC NEWS (July 12, 2020, 11:25 AM), <https://www.nbcnews.com/think/opinion/seattle-protester-hit-car-latest-casualty-dangerous-far-right-trend-ncna1233525>; BATES, *supra* note 47, at 13.

197. *See* BATES, *supra* note 47, at 13.

198. Here, I borrow from the enlightened definition of violence promoted by Latin American feminists, which broadens the perception of violence beyond the physical to encompass actions that cause mental, emotional, economic, and other forms of harm. *See, e.g.*, Mona Lena Krook & Juliana Restrepo Sanín, *Gender and Political Violence in Latin America: Concepts, Debates and Solutions*, 23 *POLÍTICA Y GOBIERNO* 125, 125 (2016).

199. BATES, *supra* note 47, at 74–75.

200. Robin Hanson, *Two Types of Envy*, OVERCOMING BIAS (Apr. 26, 2018, 11:30 AM), <https://www.overcomingbias.com/2018/04/two-types-of-envy.html>.

strategy of terror. Other offline behaviors are also intended to inflict terror.²⁰¹ In one forum, a manosphere member described how he enjoys trailing women who are alone in a parking garage just to cause “sheer terror.”²⁰²

Even solely in the realm of the internet, these men are able to enact horrific violence against women and other “enemies.” In fact, far from the harm being less real online, the harm attackers are able to inflict using the internet is virtually unparalleled offline. Individuals are capable of huge volumes of violence, given the capabilities of the internet. In 2020, the FBI arrested an Incel member on cyberstalking charges after he reportedly sent hundreds of harassing messages threatening rape and murder to women and teenage girls over the course of four years.²⁰³ And trolls from the manosphere gather together to perpetrate numerous sexist online crimes, such as stalking, doxing, and non-consensual distribution of intimate images (colloquially known as “revenge porn”).²⁰⁴ Collectively, these men are able to make entire spaces on the internet hostile to women.²⁰⁵ A prime example is the now-infamous Gamergate in which thousands of men online, incited by a sexist conspiracy, barraged a female game creator with insults, threats, and her own stolen intimate photographs.²⁰⁶ Soon after, a prominent feminist blogger became another victim of Gamergate after the gamer contingent of the manosphere accused her of attempting to feminize the industry.²⁰⁷ Using a tactic known as “brigading,” manosphere denizens flooded her online platforms with thousands of violent and disparaging messages in an explicit attempt to silence her.²⁰⁸

These online acts have devastating real world consequences, on par with physical violence.²⁰⁹ Harassment and stalking have the same mental and emotional impact online or off, and revenge porn can ruin victim’s lives, losing them

201. Laura Bates makes a convincing argument—as have other scholars—that domestic violence is a type of quotidian terrorism designed, like any other terrorism, to instill certain power dynamics through the use of fear and control. *See* BATES, *supra* note 47, at 180–81. *See generally* Jay Sloan-Lynch, *Domestic Abuse as Terrorism*, 27 *HYPATIA* 774, 774–90.

202. BATES, *supra* note 47, at 52.

203. Press Release 20-069, U.S. Dep’t of Justice, Covina Man Arrested on Federal Charge Alleging He Cyberstalked and Threatened Violence Against Teenage Girls via Social Media (April 21, 2020), <https://www.justice.gov/usao-cdca/pr/covina-man-arrested-federal-charge-alleging-he-cyberstalked-and-threatened-violence>.

204. *See generally* GOLDBERG, *supra* note 144; *see also* BATES, *supra* note 47, at 141 (describing the purpose of doxing as making female targets fear for their physical safety, especially at home).

205. *See* Ging, *supra* note 6, at 646; Chloé Nurik, “Men Are Scum”: *Self-Regulation, Hate Speech, and Gender-Based Censorship on Facebook*, 13 *INT’L J. COMM’N* 2878, 2889–91 (2019); *see also* BATES, *supra* note 47, at 145–47.

206. BATES, *supra* note 47, at 141–42.

207. *Id.* at 142–43.

208. *Id.*

209. *See* GOLDBERG, *supra* note 144, at 142, 152 (describing victims being advised to move out of their homes, hire private security, avoid being outside alone, and take measures to safeguard their children in the face of threats from online trolls).

schooling or careers and causing the same sort of emotional distress.²¹⁰ The Gamergate victims above were both forced to leave their homes to seek shelter elsewhere when their addresses and other identifying information were shared online.²¹¹ Stories like theirs are not uncommon.²¹² Moreover, with the capabilities of the internet, online perpetrators can multiply their impact by contacting those in their victim's network, accessing their victim's personal information, and impersonating the victim online.²¹³ Whether through individual instances of harassment or coordinated campaigns, manospheric misogyny is already making the internet and the physical world less safe for women.²¹⁴

In light of the analogy to Afrikaners, the violence of a nation-in-waiting is not surprising. Eriksen notes that those engaged in Afrikaners' online nation are simultaneously using the platform to advocate for another home state and "engag[ing] in terrorist attacks aiming to destabili[z]e the State."²¹⁵ As Gellner observed in the wake of the Industrial Revolution, the period of transition in which nationalist sentiment is stoked is likely to be violent and chaotic.²¹⁶ If all nationalisms aspire to become nations²¹⁷—and even cultural nationalisms are essentially a political project²¹⁸—then we only have yet more violence ahead as manospheric misogyny progresses toward reinstatement of its cultural ideal.²¹⁹ To be clear, manospheric misogyny does not aspire to a Manosphere nation state, but as a cultural nationalism, it does aspire to the regeneration of Western states in the historic heteropatriarchal model—possibly at new levels of extreme sexism. The goal of retrenching the full structural sexism that gave white men unquestioned political power and allowed them to perform male privilege unfettered is, in the end, an inherently political project. This type of reclamation requires that these men recapture power, and currently they are attempting to capture political power through violence. Thus, the manosphere is not merely a cesspool of locker-room talk or a collection of boys gaming from their basements. The manosphere will increasingly become a "rallying-point[] for future political action,"²²⁰ and all signs indicate that action will continue to be random, but well-organized, acts of violence.

210. *See id.* at 63, 124 (describing the mental and emotional toll of acts of online misogyny, including mental health effects similar to those of surviving sexual assault and escalating to the point of suicide); *id.* at 64, 141 (describing damaging repercussions of online harassment such as loss of housing, jobs, access to education, or having to curtail use of online platforms like Twitter).

211. BATES, *supra* note 47, at 141–43.

212. *See, e.g.*, GOLDBERG, *supra* note 144, at 139–42.

213. *See, e.g., id.* at 149–50 (describing a stalker who used the internet to charge his female victim's bank accounts, harass her mother, contact her clients, and create accounts in her name that shared her location with strangers and invited them to rape her).

214. *See id.*; Nurik, *supra* note 205, at 2881.

215. Eriksen, *supra* note 137, at 12.

216. *See* GELLNER, *supra* note 63, at 40.

217. *See id.* at 1.

218. *See* Hutchinson, *supra* note 70, at 131.

219. *See id.*

220. Eriksen, *supra* note 137, at 12.

D. LEGAL RESPONSES TO THE THREAT OF MANOSPHERIC MISOGYNY

Though many of the harms that manosphere denizens commit are already considered crimes, our legal response to manospheric misogyny and its violence has been negligently lacking. Because sexism is still so embedded in our culture, even the most extreme manifestations of it do not seem *extreme enough* to warrant our keen attention and resources. We may prosecute mass shootings when they occur, but we haven't yet devoted the resources to understanding and preventing misogynistic terror.²²¹ Nor is our legal system—criminal, administrative, and civil—particularly interested in cracking down on other forms of sexist violence and harms. This Note argues that having recognized manospheric misogyny as a growing and dangerous nationalism, our legal systems must meaningfully respond, both to stem the spread of the dangerous ideology and to provide victims with adequate remedies. While the qualitative efficacy of legal responses is important, the societal signal of a robust legal crackdown on manospheric misogyny would be equally significant. First, this requires legal recognition of the seriousness of the manosphere's most extreme violence, by applying our existing legal frameworks for hate crimes and terrorism. Second, we must recognize the same patterns of motivation and harm in the daily violence carried out by manosphere citizens in order to meaningfully dismantle structural sexism. Finally, the real-world horror perpetrated by the manosphere will never fully be addressed if we don't meet it at its source, and so this Note argues that internet regulation is vital to the fight against manospheric misogyny.

1. Recognizing the Motivations of the Manosphere's Extreme Violence

The first crucial step in creating a meaningful legal response to manospheric misogyny is to recognize the motivations that lead these men to violence. These motivations are twofold. First, misogyny is a form of hate, and we therefore need to treat violence motivated by it—all the violence that emanates from the manosphere—as hate crimes. Second, as examined above, manospheric men commit violence as a way to gain and wield power. As discussed, many of these forms of violence, from murder to rape to intimidation, are intended to create new power dynamics by terrorizing a class of people. Thus, we also must recognize the manosphere's extreme forms of violence as acts of terror. In both instances, the crimes of the manosphere fit within existing legal frameworks, it's just a matter of treating them as such.

a. Misogynistic Hate Crimes. In order to convey that our society takes sexist hate seriously, violence motivated by misogyny must be recognized as hate crimes. The response from Asian American communities and advocates in the wake of the Atlanta spa shooting is an instructive analogy for what is needed to

221. Though the FBI tracks extremism from alt-right to animal rights groups, as of 2019—many years after the rise of Incel violence—the agency still has no official records on misogynistic extremism. See BATES, *supra* note 47, at 302.

respond to all types of misogynistic violence. Since the shooting, many advocates have been vocal about the need to label the attack a hate crime, both in common parlance and in the coming legal prosecution.²²² They argue that, because society minimizes the daily discrimination and oppressions that Asian Americans feel, even overt acts of racism against Asian Americans do not garner the attention and magnitude they deserve.²²³ Because we are so willing to believe that we have eliminated anti-Asian bias in our society, we have rendered the prejudices that still exist invisible to the larger public, and we are hesitant to see attacks on Asian Americans as what they are: motivated by race.

The same formulation applies to attacks motivated by gender. As Bates deftly points out, misogynistic acts of violence never seem like hate crimes because the hate at the root of misogyny is “just sexism.”²²⁴ And what could be less extreme and more commonplace than that? This rings true, despite the fact that the federal Hate Crimes Act, 18 U.S.C. § 249, itself includes gender as a protected class.²²⁵ Notwithstanding clear statutory language encompassing crimes motivated by gender, gender-based violence is too normalized to seem to merit the weighty connotation that hate crimes hold. Notably, gender is heeded as a protected class in areas of the law such as constitutional equal protection and Title VII²²⁶—likely because in these contexts, the protections are framed as special affordances for historic or genetic “shortcomings,” which are seen as naturally occurring. In contrast, recognizing women as victims of gender-based hate crimes more pointedly acknowledges men as a class as aggressors and guilty culprits. Thus, it’s no wonder a patriarchal regime flinches away from acknowledging male hate, but until we insist on recognizing the gendered patterns that exist, we have no hope of curbing gender-based violence.

So, while federal law and a majority of states already embrace gender-based hate crimes,²²⁷ the desire to ignore misogynist hate means we vastly underutilize these laws. For instance, in 2019, the FBI recorded over 7,000 instances of hate crimes.²²⁸ A vanishing 0.9% of those (sixty-nine to be exact) were listed as motivated by gender.²²⁹ This differential is not because these crimes are not happening. As the previous section demonstrated, misogyny is motivating an

222. See David Nakamura, *Atlanta Shootings Present Test for Biden Administration as Pressure Mounts to Pursue Hate Crime Charges*, WASH. POST (Mar. 23, 2021, 11:43 AM), https://www.washingtonpost.com/national-security/atlanta-shootings-hate-crime/2021/03/23/77a3783a-8b78-11eb-a6bd-0eb91c03305a_story.html; see also Euny Hong, *How Are the Atlanta Spa Shootings NOT a Hate-Crime?*, CNN (Mar. 21, 2021, 2:23 PM), <https://www.cnn.com/2021/03/20/opinions/atlanta-spa-shootings-a-hate-crime-hong/index.html>.

223. See Hong, *supra* note 222.

224. BATES, *supra* note 47, at 161.

225. 18 U.S.C. § 249(a)(2)(A) (defining hate crimes to include “caus[ing] . . . or . . . attempt[ing] to cause bodily injury to any person, because of the actual or perceived . . . gender”).

226. See, e.g., *Reed v. Reed*, 404 U.S. 71 (1971); 42 U.S.C.A. § 2000e-2(a)(1).

227. See *State-by-State Hate Crime Laws*, NAACP, <https://www.naacp.org/wp-content/uploads/2017/09/Hate-Crimes-laws-by-state.pdf> (last visited May 3, 2021).

228. See *2019 Hate Crimes Statistics-Table 1*, FBI, <https://ucr.fbi.gov/hate-crime/2019/topic-pages/tables/table-1.xls> (last visited Apr. 22, 2021).

229. *Id.*

alarming number and variety of acts that qualify as hate crimes. Rather, we are failing to account for—and therefore properly respond to—a huge volume of hate crimes because we do not see misogyny as hate. Indeed, the Department of Justice classified Charlottesville’s “white sharia now” attack as a hate crime motivated by race, national origin, and religion—but ignored the misogyny deeply embedded in the ideology.²³⁰ The report provided no further details on crimes motivated by gender.²³¹

This shortcoming is part of why some critics believe that a more vigorous application of hate crime statutes will not be an effective remedy. As professor and author Saida Grundy argues, the historic discounting of sexual violence renders the category of hate crimes ill-equipped to account for the full scope of hate that motivates this violence.²³² This is particularly true when the attacker was motivated by intersecting prejudices; gender (and other historically ignored components) will often be shortchanged, as demonstrated by the Charlottesville attack.²³³ Grundy also argues that the barrier of establishing hate as the motivation—an onerous burden required by hate crime legislation—further trips up a society that is not adept at recognizing insidious, implicit biases when an attacker does not express explicit hatred for a particular class.²³⁴ This phenomenon can be seen in the insistence on investigating Long’s motive, despite the fact that he targeted and killed Asian women and claimed to have done so to eliminate a sexual temptation (a “rationale” related to a well-documented and pernicious stereotype of Asian women in American society²³⁵). Thus, Professor Grundy rightly critiques that hate crime legislation is more apt to “hyper-punish” obvious perpetrators than to accommodate an expanded understanding of who is being targeted on the basis of hate and the overlapping identities that may be implicated.²³⁶

However, our failures in application of the existing law do not warrant throwing out the tool of hate crime prosecution altogether. In 2013, while Britain considered including gender protections in its hate crime legislation, an empirical study demonstrated that although most stakeholders recognized similar problems to those illuminated by Grundy, they nevertheless believed that the values signaled by recognizing gender-based hate crimes would outweigh practical limitations of the

230. See *Hate Crimes Case Examples*, U.S. DEP’T JUST., <https://www.justice.gov/hatecrimes/hate-crimes-case-examples> (last visited Apr. 22, 2021).

231. See *2019 Hate Crimes Statistics-Table 1*, *supra* note 228.

232. Saida Grundy, *Calling the Atlanta Shootings a Hate Crime Isn’t Nearly Enough*, ATLANTIC (Mar. 25, 2021), <https://www.theatlantic.com/culture/archive/2021/03/calling-the-atlanta-shootings-a-hate-crime-isnt-enough/618385/>.

233. *Id.*; see also BATES, *supra* note 47, at 173 (describing media coverage of the 2019 Synagogue attack that acknowledged the racist components of the crime but ignored the clear compounding misogynist motivations).

234. See Grundy, *supra* note 232.

235. See Shaila Dewan, *How Racism and Sexism Intertwine to Torment Asian-American Women*, N.Y. TIMES (Mar. 18, 2021), <https://www.nytimes.com/2021/03/18/us/racism-sexism-atlanta-spa-shooting.html>.

236. See Grundy, *supra* note 232.

law.²³⁷ Put plainly, the real advantage of recognizing gender-based hate crimes may lie in forcing society to admit that men are committing violence due to extreme misogynist ideologies.

Though the current hate crime framework may not be robust or agile enough to fully combat the crimes born of manospheric misogyny, hate crime prosecutions can be an important component of the treatment, because they signal that society will take this bigotry seriously. The alternative, continuing to ignore existing statutory sanctions on misogynistic hate, tells the manosphere that its misogynist violence will remain unchallenged. Feminism may have culturally “wounded” these men, but it certainly has not impacted them legally or provided women much protection against them. If the law is to play any part in combating manospheric extremism, it must at a minimum actively recognize gendered violence where already given authority to do so.

b. Misogynistic Terrorism. In many ways, the same argument may be applied when understanding misogynist violence as terrorism—recognizing gender-based terrorism represents that, legally and politically, we are ready to seriously combat sexism. Terrorism, as a designation of subnational extreme violence with political ends, has rightly been granted significant gravity. Crimes that fit the same bill but are motivated by misogyny deserve to be recognized as such. Additionally, applying the terrorism framework has the benefit of providing additional governmental resources for tracking and disabling terrorist threats.

For many of the same reasons that we have failed to understand the violence of manospheric extremism as hate crimes, we have failed to see even what is squarely terrorism as such. However, understanding manospheric misogyny as a nationalism allows existing law to better recognize this violence as concerted terrorism. Federal law defines domestic terrorism as criminal acts carried out in the United States, that are dangerous to human life and “appear to be intended (i) to intimidate or coerce a civilian population; (ii) to influence the policy of a government by intimidation or coercion; or (iii) to affect the conduct of a government by mass destruction, assassination, or kidnapping.”²³⁸ As a nationalism, manospheric misogyny manifests the political aims of a concerted backlash against an increasingly hostile state—one that no longer centers their identity and buttresses their power. In their backlash against changing political systems and societal power arrangements, manospheric violence is intended to intimidate those responsible: feminists.

237. See Aisha K. Gill & Hannah Mason-Bish, *Addressing Violence Against Women as a Form of Hate Crime: Limitations and Possibilities*, 105 FEMINIST REV. 1, 2 (2013).

238. 18 U.S.C. § 2331(5). The definition of international terrorism is the same except for the jurisdictional requirement. See 18 U.S.C. § 2331(1). Notably, in Title 22 (governing foreign relations), terrorism for the purpose of international monitoring is defined as “premeditated, politically motivated violence perpetrated against noncombatant targets by subnational groups or clandestine agents.” 22 U.S.C. § 2656f(d)(2).

As such, current law grants the federal government authority and funding to investigate manospheric misogyny. This investigative power, which should both provide a better picture of the current state of misogynistic terrorism and help prevent future misogyny-motivated mass shootings, is a crucial step and a worthy accomplishment in its own right. But, in line with the historic discounting of gender-based violence, the federal government does not currently track misogyny-motivated terror threats.²³⁹ Instead, the FBI continues to track and prosecute eco-terrorism and “extremist” animal rights groups despite the fact that followers of these ideologies have not killed anyone in more than a decade.²⁴⁰ The messages about what our country values could not be more clear. Therefore, even within the existing legal regime, progress can be made by simply recognizing misogyny as a threat. Not only would such acknowledgement provide real resources to combat the manosphere, here too, recognition would signal that misogyny will no longer be treated as invisible and inevitable.

However, application of domestic terrorism law will not provide full redress until we address failings in the current law. First and foremost, current law must be amended to create a chargeable offense of domestic terrorism, which is now conspicuously absent.²⁴¹ Spurred by the January 6, 2021 attack on the Capitol, this deficit may be remedied soon. Legislation has been introduced in both the House and Senate that would authorize the prosecution of domestic terrorism at the federal level.²⁴² Notably, this would be accomplished through a new dedicated Domestic Terrorism Office within the Department of Justice.²⁴³ The circumstances of the bills’ introductions and the creation of a dedicated office may signal an increased willingness to take domestic terrorism—white male terrorism—more seriously. What remains to be seen is whether misogynistic terrorism will be recognized among the newly acknowledged threats.

Addressing another issue in the current law would help ensure that acts of misogynistic extremism qualify as terrorism. The current definition of domestic terrorism, that comprehends only “acts dangerous to human life,” is far too narrow to adequately address the myriad harms described in Section IV.C.²⁴⁴ As demonstrated above, the manosphere utilizes a broad array of harms to intimidate its enemies; failure to recognize them as terrorism continues to discount the impact

239. BATES, *supra* note 47, at 302–03.

240. BATES, *supra* note 47 at 303; *see also* Alleen Brown, *The Green Scare: How a Movement That Never Killed Anyone Became the FBI’s No. 1 Domestic Terror Threat*, INTERCEPT (March 23, 2019, 8:32 AM), <https://theintercept.com/2019/03/23/ecoterrorism-fbi-animal-rights/> (describing recent Department of Justice and FBI efforts to track and prosecute those accused of environmental extremism).

241. *See* Richard Zabel, *Domestic Terrorism Is a National Problem. It Should Also Be a Federal Crime*, WASH. POST (Feb. 2, 2021, 9:16 AM), <https://www.washingtonpost.com/opinions/2021/02/02/domestic-terrorism-federal-crime/>.

242. *See* HR 350, 117th Cong. (2021); S. 963, 117th Cong. (2021).

243. *Id.*

244. 18 U.S.C. § 2331(5) (amend. 2018).

that gender-based harms have on women.²⁴⁵ This expansion must include coverage of sexual terrorism, which is increasingly being recognized in global contexts.²⁴⁶ Failure to include sexual harms in a definition of domestic terror implicitly perpetuates the misogynistic narrative that American women are the property of white American men, by only acknowledging a sexual harm when women are violated by “other” men.

In addition to the recent legislative attention, there are other reasons to be hopeful we are on the right track. Canada, which has a similar terrorism law to the US, is currently prosecuting what appear to be the first terrorism charges brought against any act of Incel violence for the murder of a teenage girl.²⁴⁷ Perhaps more significantly, Texas recently classified misogynistic terrorism as a threat.²⁴⁸ As with hate crimes, recognizing misogynistic extremism as a form of terrorism is a momentous first step. The application of these frameworks to manspheric violence may be messy and inadequate, but it is nonetheless crucial to demonstrating that the law will finally take gender-based harms seriously.

2. Providing Adequate Responses to all Misogyny-Based Harms

The same pattern plays out in “lesser” criminal contexts and in administrative and civil cases. There are laws on the books that can address these crimes and provide victims with redress, but our legal system either refuses to take proactive steps or shies away when a gender-based violence case is placed in its lap. Many of the gender-based harms perpetrated by manspheric misogyny have both criminal and civil components, and it is crucial that all parts of the legal system step up to take women’s full civil rights seriously. As with more violent crimes, the most important part is that the law be made to recognize the many forms that gender-based crimes can take and the very real impacts of these harms on the lives of women.

To accomplish this, legal reform in this area can take many forms: changing burdens of proof, eliminating statutes of limitations, and redefining violations on the books to encompass the modern harms that women experience, like cyberstalking and revenge porn. It also necessarily involves changing the attitudes of legal actors, such as prosecutors, attorneys, judges and legislators, in order to make the entire system more understanding of the real harms at play. This will

245. See Zabel, *supra* note 241 (arguing there are numerous crimes that do not threaten human life but that inflict terror through other violence and intent to intimidate).

246. S.C. Res. 2331, 2 (Dec. 20, 2016), <https://documents-dds-ny.un.org/doc/UNDOC/GEN/N16/451/58/PDF/N1645158.pdf?OpenElement> (“[A]cts of sexual and gender-based violence, including when associated to human trafficking, are known to be part of the strategic objectives and ideology of certain terrorist groups, used as a tactic of terrorism and an instrument to increase their finances and their power through recruitment and the destruction of communities.”).

247. See *Teenage Boy Charged in Canada’s First ‘Incel’ Terror Case*, BBC NEWS (May 20, 2020), <https://www.bbc.com/news/world-us-canada-52733060>.

248. See TEXAS DEP’T OF PUBLIC SAFETY, TEXAS DOMESTIC TERRORISM THREAT ASSESSMENT (2020), https://www.dps.texas.gov/sites/default/files/documents/director_staff/media_and_communications/2020/txterrorthreatassessment.pdf.

require encouraging legal actors to accept gender-based claims, eliminating reporting stigma for victims, and educating the judiciary on the technical aspects of online harm. Judges who do not understand the immense scope of damage done by online harm, like revenge porn or brigading, and who tell women to simply “get off Twitter” can no longer be tolerated.

In each of these instances, one thing is clear. Part of taking manospheric acts of violence more seriously requires seeing them as part of a pattern and system. We have often gone to great lengths to minimize these acts (like saying Robert Long was having a “bad day”²⁴⁹), and in an attempt to disown our own structural culpability, we have also gone to great lengths to view each man as an individual aberration. As author Jonathan Katz put it, “somehow the individual perpetrator is some monster who just crawled out of the swamp.”²⁵⁰ But with structural sexism just barely contested and manospheric misogyny on the rise, our whole culture is a swamp, and there are far too many monsters around us. Under the vise of structural sexism, we afford these men the same individuality they grant themselves in the manosphere,²⁵¹ and in so doing we fail to perceive that these men are harbingers of massive societal issues. Responding to the manosphere requires recognizing that these men and their actions are a product of a society that continues to tolerate misogyny in all its forms. Only if we understand manospheric men not as “lone wolves” but as monsters we have created, can we meaningfully apply existing legal frameworks and create responsive policy.

3. Combatting the Online Greenhouse

There is no question that the internet created a space for manospheric misogyny to germinate and continues to amplify its harm. As a surrogate nation, the manosphere still requires its technological host. Therefore, to combat the off-line and online violence perpetrated by the manosphere—and to curb the spread of its hate—legal solutions must address the role of the internet. Internet regulation, as a complex and hotly debated issue, is largely outside the scope of this Note. However, curbing online hate is possible only if the internet is no longer treated as a novelty that must be allowed to grow freely but, rather, is viewed as the incredibly complicated social tool it is.

Therefore, it is useful to briefly note some of the characteristics that internet regulation must adopt to effectively combat a threat like manospheric misogyny. One of the biggest hurdles facing regulators is the ability for users and content to circumvent bans. Elliot Rodger’s misogynist diatribe, originally posted on YouTube, was taken down after his attack.²⁵² However, what has been put on the

249. Meryl Kornfield & Hannah Knowles, *Captain Who Said Spa Shootings Suspect Had ‘Bad Day’ No Longer a Spokesman on Case, Official Says*, WASH. POST (Mar. 18, 2021, 8:33PM), <https://www.washingtonpost.com/nation/2021/03/17/jay-baker-bad-day/>.

250. Alisha Haridasani Gupta, *Misogyny Fuels Violence Against Women. Should It Be a Hate Crime?*, N.Y. TIMES (Mar. 25, 2021), <https://www.nytimes.com/2021/03/25/us/misogyny-violence-against-women-hate-crime.html>.

251. See Section III.B.1; see also BATES, *supra* note 47, at 308.

252. BATES, *supra* note 47, at 31.

internet never completely disappears. Currently, there are numerous copies of the video available on YouTube alone,²⁵³ one of which had 1.5 million views five years after the attack.²⁵⁴ Moreover, Rodger's manifesto, as well as many others, have been copied and excerpted across so many platforms that strains of his twisted call to action still reach new believers to this day. This problem is echoed in the ability of users to regroup on other sites, almost seamlessly, when a favorite platform or thread is shut down. The Gab.com migration mentioned in Section IV.A is a perfect example. Internet regulation must take into account the above-mentioned benefits of the internet in order to be effective in combating the manosphere.

There is evidence that these problems, if not totally prevented, can at least be well-managed. Reddit's recent foray into quarantining the worst manosphere subreddits suggests that it can be an effective strategy against the forums hosting the most offensive content.²⁵⁵ Deplatforming individuals can also have an effect.²⁵⁶ Similarly, although removing hateful and abhorrent content from social media sites is a fraught issue,²⁵⁷ YouTube's performance removing content violating copyright law demonstrates that offensive content can be effectively and efficiently taken down.²⁵⁸

YouTube's experience also highlights the importance of the law in creating the conditions in which adequate content management will happen. YouTube removes copyrighted material more quickly than it removes videos portraying real violence, because copyright laws impose harsher penalties on the platform.²⁵⁹ The current proliferation of hateful and violent content is due, in large part, to the failure of platforms to self-police.²⁶⁰ That failure is to be expected in the face of the perverse incentives which platforms are facing, namely profit and political backlash. Legal regimes that promote, rather than potentially punish, self-

253. Elliot Rodger's Retribution, YOUTUBE (last visited June 4, 2021), https://www.youtube.com/results?search_query=elliott+rodger%27s+retribution (search "Elliot Rodger's Retribution").

254. BATES, *supra* note 47, at 31.

255. See Copland, *supra* note 32, at 1.

256. See, e.g., Elizabeth Dvoskin & Craig Timberg, *Misinformation Dropped Dramatically the Week After Twitter Banned Trump and Some Allies*, WASH. POST (Jan. 16, 2021, 12:38 PM), <https://www.washingtonpost.com/technology/2021/01/16/misinformation-trump-twitter/>.

257. Sara Harrison, *No One's Happy with YouTube's Content Moderation Policies*, WIRED (Aug. 28, 2019, 7:00 AM), <https://www.wired.com/story/no-ones-happy-youtubes-content-moderation/>.

258. See, e.g., Hadley Freeman, *Sandy Hook Father Leonard Pozner on Death Threats: 'I Never Imagined I'd Have to Fight for My Child's Legacy'*, GUARDIAN (May 2, 2017, 11:05 AM), <https://www.theguardian.com/us-news/2017/may/02/sandy-hook-school-hoax-massacre-conspiracists-victim-father> (describing Lenny Pozner's need to copyright photos of his slain son in order to have YouTube remove them from the platform).

259. Mason Sands, *Why Copyright Will Be the Biggest Issue for YouTube in 2019 (Updated)*, FORBES (Dec. 30, 2018, 11:55 AM), <https://www.forbes.com/sites/masonsands/2018/12/30/why-copyright-will-be-the-biggest-issue-for-youtube-in-2019/?sh=623f68b41c12>.

260. Louise Matsakis, *YouTube Doesn't Know Where Its Own Line Is*, WIRED (Mar. 2, 2018, 11:41 AM), <https://www.wired.com/story/youtube-content-moderation-inconsistent/>.

regulation (as Section 230 was intended to²⁶¹) are necessary to change these dynamics, as are laws that create penalties for hosting extremely misogynistic content.

Ultimately, the individual legal remedies that are implemented to regulate the proliferation of hate on the internet can take a number of forms and will need to be democratically debated. The solutions will not be politically easy. But, throwing up our hands or claiming that tech companies are best left to their own devices—effectively leaving the manosphere be—is no longer on the table. Just as with physical violence, what is most important is that we, as a society, decide to take misogynistic extremism as a serious threat in all of its forms. The law is a crucial place to begin that work.

V. CONCLUSION

Manospheric misogyny is a nationalism that has imagined itself into existence. From a diffuse sense of grievance, the internet has enabled geographically and psychographically diverse men to unite under the banner of the manosphere. Thus united, they quickly acquired the hallmarks of a nationalism: a rich, self-worshipping culture and a robust system of communication, which enable the sense of a collective self. As a nationalism, their strain of hate not only becomes increasingly extreme, it gains the power of collective force and cultural movement. Now, as it increasingly jockeys for political power, we must finally take it seriously.

Understanding the extreme misogyny of the manosphere as a nationalism, and the men in the manosphere as its loyal citizens, enables us to appreciate the full scope of the issue and its trajectory. As manospheric misogyny demonstrates, the internet has enabled entirely new forms of nationalism capable of building diverse and mobilized coalitions at unprecedented speeds. Moreover, the particular advantages furnished by the internet make it more likely that the nationalist sentiments it hosts are increasingly extreme. Its adherents have demonstrated a proclivity for acts of terrorism, both physical and online, that should concern all of us, especially if we hope to continue making meaningful strides for gender equality. Put simply, the on- and off-line violence carried out by adherents to manospheric misogyny make clear that the manosphere must transition from being an interesting case study to a subject of serious legal and regulatory concern.

We know how nationalisms play out. It has taken this country too long to confront the modern wave of white nationalism that has terrorized communities and amassed considerable political power. Manospheric misogyny is not only poised to follow in the footsteps of white nationalism, but their rises are deeply related. There is no more poignant example of the lengths to which we have gone to ignore and downplay misogynistic extremism than the officer's words that the

261. See Danielle Keats Citron & Mary Anne Franks, *The Internet as a Speech Machine and Other Myths Confounding Section 230 Reform*, 2020 U. CHI. LEGAL F. 45, 49 (2020).

Atlanta spa shooting resulted from a white man's "bad day"²⁶² and the refusal to state a motive for his attack.²⁶³ The longer we continue to downplay the threat, both in popular culture and in our legal response, the more we can be assured of many more Longs and Rodgers. As this Note demonstrates, the virulent anti-feminism of manspheric misogyny is not only a catalyst for violence but a conduit to compounding hate. We will never kill the many-headed hydra of white male supremacy, with all the chauvinisms it encompasses, unless we also attack the misogyny at its roots.

262. Kornfield & Knowles, *supra* note 249.

263. Vera & Hanna, *supra* note 1.