

# WHERE SEXISM AND RACISM MEET: THE DANGER OF EXISTING AS AN ASIAN AMERICAN WOMAN

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## I. Introduction

The targeted mass shooting of Asian women in Atlanta, GA in March 2021 highlights the dangers present at the intersection of racism, sexism, and misogyny.<sup>1</sup> For Asian American women, the experiences of discrimination based on race and gender are both inseparable and unique. Harmful stereotypes about Asian women have roots in xenophobic legislation passed in the 1800s, United States military involvement in Asia, and television and film portrayals. This article will explain how the fetishization and stereotyping of Asian women came about, the role it plays in present-day discrimination, and the recent legal developments aiming to protect Asian Americans.

## II. Historical Analysis of Anti-Asian Racism in the United States a. Discriminatory Government Action Against Asian Americans

There is a long history of Asian immigration and, in turn, Asian discrimination in the United States. In 1765, Filipino sailors working aboard Spanish ships jumped ship in the Gulf of Mexico and established the first recorded Asian communities in the United States in present-day Louisiana.<sup>2</sup> Asian immigration increased rapidly when, in 1949, news of gold being discovered in California reached Hong Kong.<sup>3</sup> By 1951, 25,000 Chinese immigrants had relocated to California.<sup>4</sup> The hostility faced by these immigrants is illustrated by the 1854 California Supreme Court decision in *People v. Hall* where the court held that the testimony of Chinese people was inadmissible against white defendants.<sup>5</sup> The court interpreted a statute that excluded “Black or Mulatto persons, or Indians” from giving evidence in the trial of a white man to necessarily exclude Chinese people.<sup>6</sup> The court reasoned that “the word ‘white’ has a distinct significance, which *ex vi termini*, excludes black, yellow, and all other colors.”<sup>7</sup>

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<sup>1</sup> See Phil Helsel & Rachel Elbaum, *8 dead in Atlanta-area spa shootings, suspect arrested*, NBC (Mar. 16, 2021), <https://www.nbcnews.com/news/us-news/3-dead-shooting-georgia-massage-parlor-suspect-loose-n1261262>.

<sup>2</sup> See Olivia Waxman & Paulina Cachero, *11 Moments From Asian American History That You Should Know*, TIME (April 30, 2021), <https://time.com/5956943/aapi-history-milestones/>.

<sup>3</sup> See *Immigration and Relocation in U.S. History: Searching for the Gold Mountain*, LIB. OF CONGRESS, <https://www.loc.gov/classroom-materials/immigration/chinese/searching-for-the-gold-mountain/>.

<sup>4</sup> *Id.*

<sup>5</sup> *People v. Hall*, 4 Cal. 399 (Cal. 1854).

<sup>6</sup> *Id.* at 404.

<sup>7</sup> *Id.* at 404.

In 1875, Congress passed the Page Act, the first federal restrictive immigration statute and one of the earliest and most impactful roots of harmful stereotypes about Asian women.<sup>8</sup> The Page Act forbid “the importation of [Asian] women for the purposes of prostitution.”<sup>9</sup> In practice, the Page Act was used to prevent Chinese women from migrating to America, regardless of whether or not they were sex workers. Asian women were profiled as prostitutes and a danger to the moral integrity of the United States.<sup>10</sup>

The Page Act was enacted in part because of the threat that Chinese women posed because of their ability to have children. Because the Fourteenth Amendment requires that “all persons born or naturalized in the United States” are citizens of the United States, American-born Chinese children were, therefore, American citizens.<sup>11</sup> The resulting exclusion of Asian women from immigrating to the United States prevented Chinese couples from starting families.<sup>12</sup> State anti-miscegenation laws prevented Chinese men from marrying white women,<sup>13</sup> but these laws did not prevent Chinese women, specifically prostitutes, from having children by their white customers.<sup>14</sup> By excluding virtually all Chinese women, the Page Act prevented the birth of Chinese babies who would have otherwise received American citizenship.<sup>15</sup>

In 1882, Congress passed the Chinese Exclusion Act in response to the growing concern about the number of Chinese immigrants moving to the United States.<sup>16</sup> The Chinese Exclusion Act is the only major federal statute ever enacted to

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<sup>8</sup> Page Act, ch. 141, 18 Statute. 477 (1875) (repealed 1943).

<sup>9</sup> Jessica Pearce Rotondi, *Before the Chinese Exclusionary Act, this Anti-Immigration Law Targeted Asian Women*, HISTORY (Mar. 19. 2021), <https://www.history.com/news/chinese-immigration-page-act-women>.

<sup>10</sup> See Stewart Chang, *Feminism in Yellowface*, 38 HARV. J. L. & GENDER 235, 240 (2015) (“While Chinese male laborers were ostracized as threats to white labor, Chinese prostitutes were demonized as immoral and menacing figures that threatened the racial and moral integrity of the American family and thus required increasing scrutiny, surveillance, and ultimately regulation.”).

<sup>11</sup> U.S. Const. amend. XIV, § 1. See Kerry Abrams, *Polygamy, Prostitution, and the Federalization of Immigration Law*, 105 COLUM. L. REV. 641, 662 (2005).

<sup>12</sup> See Abrams, *supra* note 11, at 647 ([T]he Page Law and its Californian antecedents demonstrate the use of marriage and sexuality as means for achieving regulatory ends that are otherwise prohibited. In both instances, legislators used rhetoric about protecting the institution of marriage and the sexual purity of the community to pass exclusionary legislation. The strategy of playing on deep-seated values about the role of the family and the centrality of marriage in society made these laws far more popular than they otherwise would have been.”).

<sup>13</sup> California passed an anti-miscegenation law in 1850, 1850 Cal. Stat. 424, which was amended in 1880 to prohibit clerks from issuing “a license authorizing the marriage of a white person with a negro, mulatto, or Mongolian.” See, e.g., Or. Rev. Statute. Ann. § 23-1010 (190) (amended 1959) (barring whites from marrying “any person having one-fourth or more negro, Chinese, or Kanaka blood”); Ariz. Sess. Laws 58 (“All marriages of white persons with negroes, mulattoes, Indians, or mongolians are declared illegal and void.”).

<sup>14</sup> Abrams, *supra* note 11, at 663.

<sup>15</sup> See Chang, *supra* note 10, at 240.

<sup>16</sup> See, e.g., Waxman & Cachero, *supra* note 2.

prevent immigration and naturalization exclusively on the basis of race.<sup>17</sup> In one of the most egregious racially motivated actions by the United States government, President Franklin Roosevelt signed Executive Order 9066 following the Japanese attack on Pearl Harbor.<sup>18</sup> Executive Order 9066 led to the incarceration<sup>19</sup> of more than 120,000 Japanese Americans on the West Coast.<sup>20</sup> More than 70,000 of these people were American citizens, yet no charges were filed against any of the incarcerated Japanese Americans for involvement in the planning of the attack on Pearl Harbor.<sup>21</sup>

b. *The Role of the United States Military in Creating and Perpetuating Harmful Stereotypes about Asian Women*

The identity of the American “Military Man” is a result of the culture of the military which has perpetuated hypersexual stereotypes about Asian women.<sup>22</sup> The “Military Man” is a white man because men of color have historically been excluded from service or confined to menial positions.<sup>23</sup> The “Military Man” is “macho,” where masculinity is defined by what is considered not feminine.<sup>24</sup> Soldiers were, and continue to be, degraded by being called “ladies” or “girls.”<sup>25</sup> Finally, the “Military Man” is purely heterosexual, as the idea of being a gay soldier is seen as deeply connected to the undesirability of being a woman soldier.<sup>26</sup>

Asian women have been stereotyped to be the antithesis to the “Military Man,” the ultra-male versus the ultra-female. This perception of the Asian women’s identity is completely male-centered, as Julie Yuki Ralston explains: “whether she

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<sup>17</sup> See Asia Society, *Asian Americans Then and Now*, CTR. FOR GLOB. EDUC., <https://asiasociety.org/education/asian-americans-then-and-now>.

<sup>18</sup> Exec. Order No. 9066 (Feb. 19, 1942). See *Japanese-American Internment During WWII*, NAT’L ARCHIVES (Jan. 14, 2022), <https://www.archives.gov/education/lessons/japanese-relocation#background>.

<sup>19</sup> The term “internment” has been used to describe the mass, race-based, forced removal and incarceration of Japanese Americans. Yet, the term “internment” is a term of art in the international law of war to describe the legally permissible scheme under which a country at war may incarcerate enemy soldiers and selected civilian subjects of an enemy power. The term “incarceration” accurately describes the forced confinement of Japanese Americans during World War II. See *Terminology and the Mass Incarceration of Japanese Americans during World War II*, NAT’L PARK SERV. (2021), <https://www.nps.gov/articles/000/terminology-and-the-mass-incarceration-of-japanese-americans-during-world-war-ii.htm#:~:text=Many%20Americans%20have%20used%20the,mof%20them%20American%20citizens;Densho, Terminology>, <https://densho.org/terminology/#incarceration>.

<sup>20</sup> Exec. Order No. 9066.

<sup>21</sup> *Id.*

<sup>22</sup> Julie Yuki Ralston, *Geishas, Gays and Grunts: What the Exploitation of Asian Pacific Women Reveals about Military Culture and the Legal Ban on Lesbian, Gay and Bisexual Service Members*, 16 L. & INEQ. 661, 672 (1998).

<sup>23</sup> *Id.* at 672.

<sup>24</sup> *Id.* at 677.

<sup>25</sup> *Id.* at 678.

<sup>26</sup> *Id.* at 680.

is serving him, seducing him, loving him or simply part of the context in which he acts, the key ingredient is the man, especially a white, Western man.”<sup>27</sup> This stereotype was perpetuated, in large part, by the United States military’s involvement with prostitution during wars in Asia.<sup>28</sup>

The United States military has long allowed, encouraged, and promoted an active sex industry for American soldiers abroad.<sup>29</sup> Enlisted soldiers were given short periods of time off for “Rest and Recreation” (R&R), often referred to as “Intoxication and Intercourse” by members of the military.<sup>30</sup> During the Vietnam War, the United States signed agreements with Thailand, Hong Kong, and the Philippines to establish R&R centers.<sup>31</sup> These centers brought a huge influx of dollars to the local economy. Seeing few other options, working-class and poor women would sell sexual labor in bars and massage parlors, where they were referred to as “hospitality women.”<sup>32</sup> In the Philippines, the hospitality women were required to register with the Social Hygiene Clinic, where they received medical assistance from the American military to ensure they were healthy enough to engage in sex work.<sup>33</sup> In 1902, every military post in the Philippines had brothels that were regulated by the United States military.<sup>34</sup> The sex workers in the brothels were required to undergo weekly vernacular disease inspections conducted by military doctors.<sup>35</sup> Additionally, the Korean women who were forced into prostitution by the Japanese government, termed “comfort women,” were the same women supplied by the Japanese government for the United States R&R centers in Okinawa during World War II.<sup>36</sup>

*c. Stereotypes About Asian Women Perpetuated by Hollywood*

By limiting Asian women to roles depicting stereotypes, Hollywood has perpetuated the unique form of discrimination these women face at the intersection of racism and sexism.<sup>37</sup> The two prevailing stereotypes—the Lotus

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<sup>27</sup> *Id.* at 688.

<sup>28</sup> See Norga Firstenberg, *Marriage and Morality: Examining the International Marriage Broker Regulation Act*, 18 ASIAN AM. L.J. 83, 99-100 (2011) (“[I]t is primarily the attention given to prostitution in U.S. military bases in Asia that created a further association between Asian female bodies and sex work.”).

<sup>29</sup> See Emily Nygen Chang, Article, *Engagement Abroad: Enlightened Men, U.S. Military Policy and the Sex Industry Policy and the Sex Industry*, 15 NOTRE DAME J.L. ETHICS & PUB. POL’Y 621 (2012).

<sup>30</sup> Rita Nakashima Brock, *Casting Stones: Prostitution and Liberation in Asia and the United States* 6 (1996).

<sup>31</sup> Ralston, *supra* note 22, at 695.

<sup>32</sup> Ralston, *supra* note 22, at 694.

<sup>33</sup> Ralston, *supra* note 22, at 694.

<sup>34</sup> Ralston, *supra* note 22, at 691.

<sup>35</sup> *Id.*

<sup>36</sup> George L. Hicks, *The Comfort Women: Japan’s Brutal Regime of Enforced Prostitution in the Second World War* 160 (1995).

<sup>37</sup> See Elyse Pham, *Here’s how pop culture has perpetuated harmful stereotypes of Asian women*, TODAY (Apr. 1, 2021), <https://www.today.com/popculture/here-s-how-pop-culture-has-perpetuated-harmful-stereotypes-asian-t213676>.

Flower trope and the Dragon Lady trope—center around the perceived inherent hypersexual nature of East Asian women, creating one-dimensional characters that are defined by their relationship to men.<sup>38</sup> The Lotus Flower trope depicts (typically East) Asian women as subservient, sexually submissive, and docile objects for the taking.<sup>39</sup>

One of the most infamous depictions of the Lotus Flower trope appears in the 1987 film *Full Metal Jacket* when a Vietnamese prostitute solicits two American soldiers using the line: “Me so horny. Me love you long time.”<sup>40</sup> The line has since been referenced in songs such as Sir Mix-a-Lot’s “Baby Got Back,” Fergie’s “London Bridge,” and Nelly Furtado’s “Maneater.”<sup>41</sup> The line has also been referenced in television shows such as *South Park*, *The Office*, and the movie *The 40-Year-Old Virgin*.<sup>42</sup> Similarly, the musical *Miss Saigon* depicts a seventeen-year-old Vietnamese girl working in a brothel, who is impregnated and abandoned by her US marine lover.<sup>43</sup> Her character is sexually available, helpless, and completely centered around her love for a white man, the classic hallmarks of the Lotus Flower trope.<sup>44</sup>

The Dragon Lady trope similarly centers around a hypersexual stereotype of Asian women, but one who is villainous and uses her sexual prowess in a cunning, deceitful, and manipulative manner.<sup>45</sup> The stereotype originated in the 1934 comic strip *Terry and the Pirates*, which depicts an Asian woman named “Dragon Lady” who is seductive and evil.<sup>46</sup> Groundbreaking actress Anna May Wong, considered the first Asian American movie star, is Hollywood’s blueprint of the Dragon Lady, playing a murderous, yet beautifully irresistible princess in *Daughter of the Dragon* and a murderous, yet beautifully irresistible prostitute in *Shanghai Express*.<sup>47</sup> Actress Lucy Liu spent much of her early career playing Dragon Lady characters, or as the New York Times described in 2003, “the icy

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<sup>38</sup> See Geena Davis Institute on Gender in Media, Coalition of Asian Pacifics in Entertainment, and Gold House, *I Am Not a Fetish or Model Minority: Redefining What it Means to Be API in the Entertainment Industry* (Aug. 3, 2021); Sakshi Venkatraman, *Almost half of all Asian roles serve as a punchline, study finds*, NBC (Aug. 5, 2021), <https://www.nbcnews.com/news/asian-america/almost-half-all-asian-roles-serve-punchline-study-finds-n1276103>.

<sup>39</sup> See Peggy Li, *Hitting the Ceiling: An Examination of Barriers to Success for Asian American Women*, 29 BERKELEY J. GENDER L. & JUST. 140, 154 (2014).

<sup>40</sup> FULL METAL JACKET (Warner Bros. 1987).

<sup>41</sup> SIR MIX-A-LOT, BABY GOT BACK (Def American Recordings 1992); FERGIE, LONDON BRIDGE (A&M 2006); NELLY FURTADO, MANEATER (Geffen Records 2006).

<sup>42</sup> *South Park: Cow Days* (Comedy Central broadcasted Feb. 16, 2010); *The Office: Traveling Salesman* (NBC broadcasted Jan. 11, 2007); *The 40-Year-Old Virgin* (Apatow Productions 2005).

<sup>43</sup> Claude-Michael Schonberg, *Miss Saigon* (1989).

<sup>44</sup> *Id.*

<sup>45</sup> See Li, *supra* note 39, at 154.

<sup>46</sup> Milton Caniff, *Terry and the Pirates*, Chicago Tribune (1934).

<sup>47</sup> *Daughter of the Dragon* (Paramount Pictures 1931); *Shanghai Express* (Paramount Pictures 1932). See Hanying Wang, *Portrayals of Chinese Women’s Images in Hollywood Mainstream Films -- An Analysis of Four Representative Films of Different Periods*, 9 CHINA MEDIA RSCH. 75, 78 (2013).

sex kitten.”<sup>48</sup> She portrayed Ling Woo, the sexually manipulative, villainous lawyer in the television show *Ally McBeal*, saying things like “sex is a weapon,” and “[t]here’s nothing I enjoy more than seeing a happy couple and coming between them.”<sup>49</sup> Common among all of these Dragon Lady characters is that their cold, manipulative, and sexual tendencies presents a danger for the other, usually white, characters.

### III. *COVID-19 and the Sharp Increase in Hate Against Asian Americans* a. *Violence and Hate Incidents*

The COVID-19 pandemic has intensified harmful anti-Asian rhetoric, leading to a sharp increase in violence and hate incidents against Asian Americans. Hate crimes against Asian Americans increased by 339% in some of the largest American cities between 2020 and 2021.<sup>50</sup> The blame placed on Asian Americans for the COVID-19 pandemic is no coincidence. Then President Donald Trump used the terms “China Virus” and “Kung Flu” to describe coronavirus on countless occasions.<sup>51</sup> Of the Asian hate incidents reported between March 2020 and May 2020, more than 25% of assailants invoked the terms “China” or “Chinese,” despite more than half of the incidents being directed towards people who are not Chinese.<sup>52</sup>

Asian American women are particularly vulnerable because they experience the hate faced by the entire Asian American community, coupled with the harmful stereotypes about Asian women specifically. Of the 4,000 hate incidents documented by Stop AAPI Hate,<sup>53</sup> Asian women were targeted 2.3 more times than Asian men.<sup>54</sup>

In March of 2021, Robert Long shot and killed eight people, including six Asian women, in spas and massage parlors around Atlanta.<sup>55</sup> Long, who is said to have frequented Asian-run spas and massage parlors, told police the establishments

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<sup>48</sup> Lola Ogunnaiké, *The Perks and Pitfalls of a Ruthless-Killer Role; Lucy Liu Boosts the Body Count in New Film*, N.Y.T. (Oct. 13, 2003), <https://www.nytimes.com/2003/10/13/movies/perks-pitfalls-ruthless-killer-role-lucy-liu-boosts-body-count-new-film.html>.

<sup>49</sup> *Ally McBeal* (Fox broadcasted 1997-2002).

<sup>50</sup> Kimmy Yam, *Anti-Asian hate crimes increased 339 percent nationwide last year, report says*, NBC (Feb. 14, 2022), <https://www.nbcnews.com/news/asian-america/anti-asian-hate-crimes-increased-339-percent-nationwide-last-year-repo-rcna14282>.

<sup>51</sup> Kimmy Yam, *Trump Can’t Claim ‘Kung Flu’ Doesn’t Affect Asian Americans in this Climate, Experts Say*, NBC (Jun. 22, 2020), <https://www.nbcnews.com/news/asian-america/trump-can-t-claim-kung-flu-doesn-t-affect-asian-n1231812>.

<sup>52</sup> *Id.*

<sup>53</sup> Stop AAPI Hate is a coalition of community-based organizations and the Asian American Studies department of San Francisco State University.

<sup>54</sup> Russell Jeung, Aggie Yellow Horse, Tara Popovic, Richard Lim, *Stop AAPI Hate National Report*, STOP AAPI HATE (Feb. 28, 2021), <https://secureservercdn.net/104.238.69.231/a1w.90d.myftpupload.com/wp-content/uploads/2021/03/210312-Stop-AAPI-Hate-National-Report-.pdf>.

<sup>55</sup> *See 8 Dead in Atlanta Spa Shootings, With Fear of Anti-Asian Bias*, N.Y. TIMES (Mar. 26, 2021), <https://www.nytimes.com/live/2021/03/17/us/shooting-atlanta-acworth>.

were “temptation for him that he wanted to eliminate.”<sup>56</sup> Long reportedly told police he has a sex addiction.<sup>57</sup> Long’s justification for his actions—that Asian women are too tempting and innately sexual beings—aligns with the longstanding, harmful stereotypes about Asian women.<sup>58</sup>

*b. COVID-19 Hate Crimes Act*

In response to growing pressure to take action to combat hate crimes against Asian Americans, the COVID-19 Hate Crimes Act was passed by Congress and signed into law on May 20, 2021.<sup>59</sup> The Act authorizes grants to state and local governments to improve data collection on hate crimes, create State-run hate crime reporting hotlines, and expand access to reporting resources for non-English speakers.<sup>60</sup> It also provides for funding to increase law enforcement activities, including crime reduction programs.<sup>61</sup> The Act also allows courts to require educational classes or community service related to the community harmed by a defendant charged with a hate crime offense.<sup>62</sup> Additionally, the Act directs the Department of Justice to expedite the review of hate crimes related to COVID-19.<sup>63</sup>

Although the Act received bipartisan support in both chambers, community-based organizations have criticized the emphasis on criminal law enforcement solutions.<sup>64</sup> According to Stop AAPI Hate, which serves as the leading aggregator of anti-Asian and Pacific Islander hate incidents, the Act will not address the “overwhelming majority of incidents reported to our site which are not hate crimes, but serious hate incidents.”<sup>65</sup> The Act applies to hate crimes, as described

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<sup>56</sup> Bill Chappell, Vanessa Romo, & Jaclyn Dias, *Official Who said Atlanta Shooting Suspect was having a ‘Bad Day’ Faces Criticism*, N.P.R. (Mar. 18, 2021), <https://www.npr.org/2021/03/17/978141138/atlanta-shooting-suspect-is-believed-to-have-visited-spas-he-targeted>.

<sup>57</sup> *Id.*

<sup>58</sup> See generally Julie Yuki Ralston, *Geishas, Gays and Grunts: What the Exploitation of Asian Pacific Women Reveals about Military Culture and the Legal Ban on Lesbian, Gay and Bisexual Service Members*, 16 LAW & INEQ. 661, 672 (1998).

<sup>59</sup> S.937 - 117th Congress (2021-2022): COVID-19 Hate Crimes Act, S.937, 117th Cong. (2021), <https://www.congress.gov/bill/117th-congress/senate-bill/937>; See Barbra Sprunt, *Here’s What the New Hate Crimes Law Aims to Do As Attacks on Asian Americans Rise*, NPR (May 20, 2021), <https://www.npr.org/2021/05/20/998599775/biden-to-sign-the-covid-19-hate-crimes-bill-as-anti-asian-american-attacks-rise>.

<sup>60</sup> COVID-19 Hate Crimes Act, *supra* note 58.

<sup>61</sup> *Id.*

<sup>62</sup> *Id.* at 135.

<sup>63</sup> *Id.*

<sup>64</sup> See Sara Braun, *Stop AAPI Hate: Statement on the House Passage of the COVID-19 Hate Crimes Act*, STOP AAPI HATE (May 18, 2021), <https://stopaapihate.org/statement-on-house-passage-of-the-covid-19-hate-crimes-act/>; Kimmy Yam, *Why over 85 Asian America, LGBTQ groups opposed the anti-Asian hate crimes bill*, NBC (May 14, 2021), <https://www.nbcnews.com/news/asian-america/why-over-85-asian-american-lgbtq-groups-opposed-anti-asian-n1267421>.

<sup>65</sup> Braun, *supra* note 63.

in 18 U.S.C. 245, 247, or 249 and the Civil Rights Act of 1968; crimes for which you can be arrested and where bias was observed.<sup>66</sup> Limiting the Act to only hate crimes as statutorily defined ignores the fact that verbal harassment and shunning—the deliberate avoidance of Asian Americans and Pacific Islanders—constitutes 79.2% of hate incidents reported.<sup>67</sup>

Activists have identified alternative solutions that attempt to target the root cause of hate incidents. One of the suggestions is to increase education of Asian American history in schools.<sup>68</sup> California, Ohio, and Illinois have all recently mandated Asian American history as part of their public school curriculum.<sup>69</sup> Additionally, California lawmakers have proposed legislation to combat harassment and violence using a public health approach, rather than a criminal one.<sup>70</sup> The proposed legislation would require large-scale studies on the types of harassment experienced on public transit and develop data-driven initiatives in response.<sup>71</sup> Activists have also emphasized the importance of access to social services, such as housing assistance and substance abuse resources.<sup>72</sup> Access to resources is particularly important to reduce tension between Asian Americans and other minority groups, which has historically been caused by competition over limited resources in low-income neighborhoods.<sup>73</sup> All of these proposed solutions have a shared goal: creating safer communities for Asian Americans (and other minority groups) without relying solely on law enforcement solutions.

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<sup>66</sup> COVID-19 Hate Crimes Act, *supra* note 58; *Frequently Asked Question*, STOP AAPI HATE, <https://stopaapihate.org/frequently-asked-questions/> (“A hate crime is narrowly defined as a crime for which you can be arrested and where bias was observed. We use the term hate incidents because not all occurrences are legally defined as a crime. For example: someone yelling racist slurs, while wrong and hateful, is not a crime.”).

<sup>67</sup> *Stop AAPI Hate National Report (Through September 2021)*, STOP AAPI HATE (Nov. 11, 2021), <https://stopaapihate.org/national-report-through-september-2021/>.

<sup>68</sup> Tat Bellamy-Walker, *Schools are starting to mandate Asian American studies. More could follow suit*, NBC (Jan. 7, 2022), <https://www.nbcnews.com/news/asian-america/schools-are-starting-mandate-asian-american-studies-follow-suit-rcna11118>.

<sup>69</sup> *Id.*

<sup>70</sup> Claire Wang, *California bill aims to curb anti-Asian attacks against women, vulnerable groups*, NBC (Feb. 18, 2022), <https://www.nbcnews.com/news/asian-america/california-bills-aim-curb-anti-asian-attacks-women-vulnerable-groups-rcna16571>.

<sup>71</sup> *Id.*

<sup>72</sup> See Li Zhou, *Hate crime laws won't actually prevent anti-Asian hate crimes*, VOX (Jun. 15, 2021), <https://www.vox.com/2021/6/15/22480152/hate-crime-law-congress-prevent-anti-asian-hate-crimes>.

<sup>73</sup> See Jerusalem Demas & Rachel Ramirez, *The history of tensions- and solidarity-between Black and Asian communities, explained*, VOX (Mar. 16, 2021), <https://www.vox.com/22321234/black-asian-american-tensions-solidarity-history> (“What supremacy is what created segregation, policing, and scarcity of resources in low-income neighborhoods, as well as the creation of the “model minority” myth - all of which has driven a wedge between Black and Asian communities”).



#### *IV. Conclusion*

Asian American women face unique discrimination as a result of anti-Asian xenophobic rhetoric and hypersexualized stereotyping. The dangerous reality that Asian American women face today has been shaped by government-sponsored discrimination, military involvement with prostitution, and Hollywood's portrayal of one-dimensional stereotypes. Because of the unique form of discrimination Asian American women face, no single solution can solve the problem, but continued research is necessary to develop comprehensive solutions that center the needs of Asian American women.