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**Vive La Difference in the workplace: Feminism meets
liberal theory in Las Vegas Casinos**

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ABSTRACT

This paper discusses the broad strokes of liberal theory, feminism and universal rights. It covers opposing conservative arguments in which we review individual and social psychodynamics that we believe form the foundation for the tension between Liberalism and feminism and perhaps, more widely, Liberalism and Conservatism. It is within these discussions that we offer practical application of these posits in the form of our summary of precedent setting legal cases originating in Las Vegas and reported from Las Vegas. The cases are all united by the fact that they not only relate to Nevada, but that all, in one form or another, concern the matter of sexual difference. In our view they are also united in the manner in which they represent a perceived tension that arises in Liberalism as it is espoused in the United States and how it seeks to eradicate sexual difference under the law. We strive to unravel issues of identity as they pertain to the synthesis of Liberalism, feminism and the psychodynamic vantage.

Bright light city gonna set my soul
Gonna set my soul on fire
Got a whole lot of money that's ready
to burn,
So get those stakes up higher
*There's a thousand pretty women
waitin' out there*
And they're all livin' devil may care
And I'm just the devil with love to spare
Viva Las Vegas, Viva Las Vegas

(*Viva Las Vegas*,
Words & Music: Doc Pomus & Mort
Shuman, 1964; italics added)

In 2000, the *Standing Conference for Management and Organization Inquiry* held its annual conference in Las Vegas. At that conference, a number of ideas were put forward including the prospect that Las Vegas was trying to remake itself as a family destination for what was termed “*visual*

consumption” (Carr, 2000, 2001). It was argued that this remake largely relied upon being able to tap into common fantasies given the many ways the 'art', 'arts' and buildings on display were simply amusements to be consumed rather than 'analyzed' or critically appraised. In another idea, it was suggested that the glitz, glitter and newness of the present Las Vegas appears all the more meaningful in light of the archaic. Drawing upon Homer's tale of *The Odyssey* (trans. 1991), the argument was advanced that one can clearly reveal how risk-taking, self-denial, repression and sublimation are archaic constituents in modernity that are noticeably 'played out' in Vegas. Some of that argument was captured in the following paragraph:

The sweet songs of the Sirens may have been replaced by the alluring tones of popular entertainers but, the song of the Sirens has also taken the form of the sound of poker machines and the barrage of aural stimulation associated

with winning and the announcement of jackpot winners. The urge, so akin to an Odyssean approach to temptation, to defy the odds and emerge triumphant with money in hand. Being able to enjoy the entertainment of it ALL is a temptation not to be resisted ["it is impossible to hear the Sirens and not succumb to them" (Adorno & Horkheimer, 1947/1997, p. 59)], but it is a temptation to be mastered through cunning. Earlier we noted that "cunning ... is defiance in a rational form" (Adorno & Horkheimer, 1947/1997, p. 59). One can allow oneself the fun of it all, and even to be mesmerized by the spectacle, but at the same time, still sufficiently aware that this is a spectacle that has the intent to seduce one to spending more money than one had intended. Of course, there are those who cannot resist the 'song' and are fatally drawn to the allurements. (Carr, 2001, pp. 135-136)

It was the juxtaposition of the archaic with modern Las Vegas that afforded us an opportunity to *see ourselves in spite of ourselves*. This also applies to females working in Las Vegas casinos, who also become economically drawn to the allurements of working in these establishments.

In 2007, we return to the 'devil's playpen', where attention is brought to bear upon how this "Bright Light City" *provides us an opportunity to reflect*. This time our sights are set on the manner in which Las Vegas, Nevada and some casinos in particular, have handled employment relations in their workplaces. In this context, we are particularly interested in sexual and gender discrimination and how some of the courts have responded to these disputes. In a number of these cases, the judgments have had important ramifications for employment relations throughout the United States; and they pose some interesting questions and challenges for feminist movements in the context of the broader development of Liberalism, across this and other countries.

Section one of this paper discusses the broad strokes of liberal theory, feminism and universal rights. Section two follows with opposing conservative arguments. In section three, we review individual and social psychodynamics²⁸ that we believe form the foundation for the tension between Liberalism and feminism and perhaps, more widely, Liberalism and Conservatism. It is within these discussions that we offer practical application of these posits in the form of our summary of precedent setting legal cases originating in Las Vegas and reported from Las Vegas. The cases are all united by the fact that they not only relate to Nevada, but that all, in one form or another, concern the matter of sexual difference. In our view they are also united in the manner in which they represent a perceived tension that arises in Liberalism as it is espoused in the United States and how it seeks to eradicate sexual difference under the law. By using this reporting combination, we can see how organisational policy before and after legislative 'fixes' influences those in and outside of our workplaces. Finally, in section four we strive to unravel issues of identity as they pertain to the synthesis of Liberalism, feminism and the psychodynamic vantage.

Feminism, liberal theory and universal rights

In attempt to provide an overview of feminism, we borrow some main precepts:

1. "Woman" exists in an irreducible way as an essence hitherto unrecognized.

2. This feminine essence gives women the potential of a psychic existence which the Occident crushes and hides.

3. This feminine essence of woman can only be discovered outside the oppressive social framework, that is to say, *in the body of the woman*.

²⁸ Like many other scholars, we use the term *psychodynamics* in preference to the term *psychoanalysis*, as *psychodynamics* is a less 'treatment' oriented term that implies the normality and dynamic nature of psychological processes.

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4. The potential existence of woman thus depends on the discovery of her essence, which lies in the specificity of her body (Schor, 1994, p. 6; see Plaza, 1980).

In the first place, *woman* is the representative of feminism who, relative to *man* has and also is an essence of feminism. Second, feminism supports the existence of *woman's* intrinsic knowledge and use of intuition. Third, for others to recognise feminism, this recognition usually occurs through the viewing and then the analysis and or evaluation of the *woman's* body. Finally, in order to find separation between feminine and for example, masculine, it is the *woman's* body, what it looks like, what it does, and what it does not that is its essence of what the "oppressive social framework" is not: feminist. It is our contention that Liberalism, an "oppressive social framework", can be considered to 'own' feminism and the bodies that represent feminism such that sexual difference becomes irreducible under conservative liberal 'rules'.

Liberalism can be defined as:

... an ideological orientation based on a belief in the importance of the freedom and welfare of the individual and the possibility of social progress and the improvement of the quality of life through change and innovation in social organization. (Theodorson, 1969, p. 230)

Although the term *Liberalism* has had many denotations, it is seldom separated from the Latin word *liber*, to be free. For the purposes of analysis, Liberalism can be seen as being of two separate philosophical traditions: *classical Liberalism*; and, that of *utilitarian tradition*. Classical Liberalism, heavily influenced by Thomas Hobbes (1588-1679) and John Locke (1632-1704), and sometimes referred to as *contract* or *natural rights theory*, has a number of major tenets that can be summarized under four headings:

Individualism: A highly atomistic conception of society based on the absolute autonomy of individual will and worth. Classical Liberalism viewed society as an aggregation of individuals who might choose by individual acts of will to act in concert.

Contract theory: The legitimacy of government rests upon the free consent of the governed. The only legitimate and enduring means of securing domestic tranquility, therefore, is by law based upon reason and representation rather than force.

Liberty: There are certain inalienable rights invested in individual humankind without which the individual would be dehumanized. Often referred to as natural rights, they ought to be protected *by* and *against* government through constitutional guarantees such as a bill of rights. This also led to the belief that the government that governs least, governs best.

Liberal epistemology: A transcendental order exists in the universe, which ordinary mortals can understand without divine revelation. Reason and will, however, are required before an individual can translate this universal order into a practical guide for moral conduct. The choice, therefore, between liberty and license, order and anarchy, is an individual one. (see McCoy & Wolfe, 1972; Scruton, 1982; Szacki, 1979)

By upholding these fundamental tenets, liberals supported such things as: a) freedom of expression; b) abolition of slavery; c) increases in civil liberties; and d) opposition of all but 'essential' government interference in economic activities that supported free competition.

In the 19th century through the influence of utilitarian thought; and particularly that of John Stuart Mills' (1806-1873) ideas on freedom in his essay *On liberty* (1859), liberals came to believe that freeing the individual from autocratic control was not sufficient. Instead, as the collective representation of society (i.e., on behalf of

the State), government must take positive steps to ensure each person's welfare (i.e., setting precedent for each group of similar persons' welfare). Under this influence, 20th century Liberalism supported increases in government regulation that ensured minimum wage clauses, pure food and drug acts, civil rights legislation and the like. Thus, in attempting to ensure the welfare of the individual, Liberalism has come to support certain curtailments on the classical notion of the freedom of the individual, who in this case is *woman* as is depicted below, in the practical legal case:

Case # 1: Jespersen v. Harrah's Casino

Darlene Jespersen, a bartender at the Nevada at Harrah's Casino was dismissed in 2000 for a failure to comply with the following employer's written policy for female bartenders in relation to grooming: "Makeup (face powder, blush and mascara) must be worn and applied neatly in complimentary colors. Lip color must be worn at all times". Males were subject to a policy that did not permit "eye and facial makeup" but required that "hair must not extend below top of shirt collar. Ponytails are prohibited". The requirement for the hair of female staff was that "Hair must be teased, curled, or styled every day you work. Hair must be worn down at all times, no exceptions". Jespersen felt that makeup made her feel "forced to be feminine" and "dolloed up" as some kind of sexual object (see Colb, 2005; *Jespersen v. Harrah's Operating Co., Inc.*, April 14th, 2006).

Jespersen sued her employer on the grounds of sex discrimination; and specifically that the requirement placed unequal burdens on men and women and on the grounds that such differentiation requires employees to conform to specific sex stereotypes and as such, is unlawful. The original panel of judges dismissed Jespersen's case and upheld the employer's right to dismiss the employee for non-

compliance with the policy. The court determined that the policy did not run counter to the federal anti-discrimination law in as much as it placed an equal burden upon both male and female employees. In December 2004, this ruling was upheld in Jespersen's appeal to the U.S. 9th Circuit Court of Appeals in a 2-1 decision of the three-judge panel. Upon further appeal, in May of the following year the court reversed the decision and, without comment, ordered the case to be re-heard by a panel of 11 judges. In April of 2006, in an affirming 7-4 decision in favor of Harrah's Casino on the basis that the plaintiff "failed to create any triable issue of fact that the challenged policy was part of a policy motivated by sex stereotyping" (*Jespersen v. Harrah's Operating Co., Inc.*, April 14th, 2006, p. 4121).

This case shows clearly that liberal support of freedom of expression and 'essential' government interference in economic activities (among others) is transgressed and especially in light of feminism and its 'properties'.

The paradox of freedoms

The handed-down values of Liberalism; and especially the appeal to 'reason', have been the subjects of much critique (see, for example: Crozier, Huntington & Watanuki, 1975; Spragens, 1981; Walzer, 1980), much of which has been inspired by the work of Karl Marx. In the face of the demands of a complex industrial world, often the focus of the more contemporary critique is upon the demonstrable need for Liberalism to "shore-up" its belief in *laissez-faire* as a viable economic theory. The stream of critique on liberty, which is the focus of this paper, arises from Liberalism's championing of 'freedom'.

Liberalism's notion of freedom has a dual trajectory. There is a *freedom to be left alone* and there is a *freedom to be treated equally without any form of discrimination*. In relation to the former, a legal right to be left alone *free* of government control and without

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civic responsibility to others, potentially undermines traditional society and the cohesiveness of its institutions. Michael Walzer (1980) viewed this as a crisis for Liberalism:

For liberalism is above all a doctrine of liberation. It sets individuals loose from religions and ethnic communities, from guilds, parishes, neighborhoods. It abolishes all sorts of controls and agencies of control: ecclesiastical courts, cultural censorship, sumptuary laws, restraints on mobility, group pressures, family bonds. It creates free men and women, tied together only by their contracts -- and ruled, when contracts fail, by a distant and powerful state. It generates a radical individualism and then a radical competition among self-seeking individuals. (pp. 97-98; see also Bates, 1985; West, 1997/1998)

Walzer also suggested that an anarchistic hedonism would result if not for two countervailing forces: a) the continuing restraint that comes through the tradition of family and other institutions; and, b) the manner in which capitalism inevitably forces men and women to seek protection, in the form of the welfare state, from the vicissitudes of the market and "against entrepreneurial risk taking" (Walzer, 1980, p. 99). The aforementioned utilitarian influence on Liberalism can be noted here. Again, and paradoxically, the freedom to be left alone free from surveillance and interference that is accompanied by a plea for protection, requires "the construction of an organizational framework which is committed to bureaucratic surveillance and social control" (Bates, 1985, p. 24). The liberals' logic of legislating for a freedom to be left alone, is demonstrably flawed when one is confronted by the actuality of free market capitalism and the need for the administrative state. Individuals' rights to be left alone may also serve to undermine the interests of others, or come at too high a cost to the welfare of others. In regard to 'body control', some feminists have argued it has

"contributed to a male flight from familial and paternal responsibility for their offspring" (West, 1997/1998, p. 10). Of course, in some of these examples, to embrace the extreme alternative communitarian position would place severe limits on life choices. One of the ironies (i.e., contradictions) from the liberalist inspired legislative framework to protect individual rights is that the legal system still seeks to protect institutions such as marriage and the family unit -- albeit through a 'reorientation' of family law that renders that area of law more as a branch of "private law" and where parenting is seen as a form of consumer choice and marriage is itself "a long term contract for labor, consortium, and sexual services" (West, 1997/1998, p. 11).

The following practical application provides insight into how the 'physicalness' of traditional, paternalistic familial roles plays itself out in the workplace.

Case #2: Costa v Desert Palace.

In 1994, Caesars Palace dismissed Catharina Costa after a verbal and physical altercation with a male co-worker. Costa was dismissed having had a number of disciplinary infractions and suspensions. The male co-worker who had a long period of employment without such a disciplinary record, was given a 5 day suspension. Costa was the only female heavy equipment operator in the employer's warehouse and claimed her long disciplinary record was due to different treatment she received as a woman. Costa filed a gender discrimination lawsuit against Caesars Palace. Costa gave evidence that when male employees came in late they were given overtime in order to make up for the time lost and because "He's a man and has a family to support". Costa, on the other hand, was denied overtime and when she was late by even a minute and this 'lateness' was punished by issuing her a formal reprimand. The court ruled in favor of Costa and, in 1998, awarded her

\$364,000 in damages. The district court had given what is described as a "mixed motive instruction", having instructed the jury that:

If you find that the plaintiff's sex was a motivating factor in the defendant's treatment of the plaintiff, the plaintiff is entitled to your verdict, even if you find that the defendant's conduct was also motivated by a lawful reason. However, if you find that the defendant's treatment of the plaintiff was motivated by both gender and lawful reasons, you must decide whether the plaintiff is entitled to damages. The plaintiff is entitled to damages unless the defendant proves by a preponderance of the evidence that the defendant would have treated plaintiff similarly even if the plaintiff's gender had played no role in the employment decision. (Citation of the District Court by U.S Supreme Court, *Caesars v. Costa*, June 9th, 2003, pp. 384-385)

Caesars Palace appealed the decision to the Supreme Court after the Appeals court, in a 9-0 decision, had upheld the original judgment in favor of Costa, but reduced the damages to \$100,000. It was subsequently argued that the case appeared to shift the burden of proof to the employer to show there was no discrimination: "The Bush administration has sided with Caesars Palace in the case. Irving Gornstein, assistant to the solicitor general, told the court that Congress did not intend for the 1991 law to radically change the burden of proof requirements" (Batt, 2003, p. 2). The Civil Rights Act of 1964 made it unlawful for an employer to discriminate against an employee on the basis of sex. This Act was subsequently amended by Congress in 1991 such that, among other things, it provides that:

(1) an unlawful employment practice is established "when the complaining party demonstrates that ...sex... was a motivating factor for any employment practice, even though other factors also

motivated the practice", ... and (2) if an individual proves a violation under Sec 2000e-2(m), the employer can avail itself of a limited affirmation defense that restricts the available remedies if it demonstrates that it would have taken the same action absent the impermissible motivating factor. (U.S Supreme Court, *Caesars v. Costa*, June 9th, 2003, p. 381)

In another view on the decision, Eric V. Hall, of Rothgerber, Johnson & Lyons LLP, argued that mixed motive cases such as this "are frequently compared to a quagmire because (1) they are seemingly impossible for an employer to escape from, and 2) the law is hopelessly confused" (2003a, p. 1).

In the Civil Rights Act of 1991, the Supreme Court noted that the word "demonstrate" posed an equal burden on both parties and amounted to a new "evidentiary rule" for mixed-motive cases. The Supreme Court unanimously upheld the lower court's direction that mixed-motive cases do not require direct evidence, but can rely upon circumstantial evidence. Others noted that the ruling also provided employers with a limited affirmative defense such that if the employer could demonstrate (i.e., not prove) that they would have taken the same action irrespective of a discriminatory motive "a plaintiff cannot, for example, be given monetary damages, reinstatement, or a sought after promotion. As a result, in such cases, plaintiffs' victories are more form than substance -- they get the satisfaction of knowing the court or jury found that their employer discriminated against them, but they do not get any money or their job back" (Hall, 2003b, pp. 1-2). The decision is seen as a great outcome for plaintiffs' lawyers, who will get paid by the employer being sued, even if the employer is able to sustain a case for an affirmative defense. The decision was also seen as making it "easier for plaintiffs to get their cases before a jury" (Piper Rudnick, June 2003, p. 1). Lawyers were quick to point out that this ruling applies only to "cases falling under the Civil Rights Act of 1991, and

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does not apply to age discrimination claims under the Age Discrimination and Employment Act" (Ison Law Group, 2003). The court's unanimous rejection of the Bush administration argument that the court should only rely upon the higher burden of proof, namely direct evidence, has seen employer groups lobby the administration for a change in the legislation and adherence to the general evidentiary requirement for direct evidence.

The masculine norms, historical sex stereotyping and the closure to subjective particularity is what Liberalism 'overlooks', masks or suppresses, in its notion of equality and its posit of the abstracted individual and especially when tenets of feminism are evidenced.

The *freedom to be treated equally without any form of discrimination* also provides us with some interesting paradoxes and political challenges. As can be noted from the legal judgments presented earlier, Liberalisms' freedom to be treated equally, enshrined within the Civil Rights Act of 1991, is a freedom that has sadly missed its mark in terms of its appreciation of sexual inequality. While it has also missed its target in terms of other groups in society, it is the issue of sexual inequality that we wish to devote our attention and to its critique that comes from feminists.

In respect to an appreciation of sexual inequality in society, the feminist Robin Morgan (1996) charged Liberalism as offering a "piece of the pie as currently and poisonously baked" (p. 5). At first glance this might seem to be a strange source for criticism, since much of feminist goals are concerned with freedom *and* issues surrounding equal treatment under the law. At the centre of feminist critique is the fact that the universalism of freedom and rights invokes an 'abstracted individual', or 'blank-page' individual, which fails to recognize the social milieu and history in which the individual relates to others. As C. Fred Alford (1994, p. 135) remarked, "the individual is always a groupie". The abstracted individual

(i.e., read: disembodied reasoner) is a fantasy, for from birth the individual and the awareness of one's grouped 'nature' are co-constructed (Carr, 1994; Carr & Lapp, 2006). The self is experienced with other(s) as a co-construction and it is this experience that cannot be blanked out or rendered 'neutral'.

The *neutrality* that Liberalism claims is that it insists upon each individual being treated similarly under the law. The gender bias on insisting that all are to be treated *the same*, under the law, comes from abstracting the 'individual' from the social experiences that contribute to their being. Prominent feminist Catharine MacKinnon underlined this conceptual problem when she noted:

Socially, one tells a woman from a man by their difference from each other, but a woman is legally recognized to be discriminated against on the basis of sex only when she can first be said to be the same as a man. ... Sex equality becomes a contradiction in terms, something of an oxymoron. (MacKinnon, 1989, p. 216; see also Schaeffer, 2001).

Robin West (1997/1998), Professor of Law at Georgetown University, chided liberals and liberal feminists for "insisting on the shared universality of male and female nature" to the degree that they:

... have also felt compelled to deny or diminish important differences, such as woman's different biological role in reproduction and the scores of differentiating needs that difference in turn entails: women's different and greater vulnerability to rape, harassment, and sexual assault; women's differential embrace of stereotypically "feminine" rather than masculine ways of self-presentation; women's different perception of and reactions to sex and violence; women's different degree of interdependency and involvement with infants and small children; and, arguably, women's

different ways of thinking, feeling, and caring for others. (p. 5)

West also noted that the liberal conception of equality seems to undermine the "logic of affirmative action" (Ibid).

The conservative side

The premise of 'sameness' and the downplaying of sexual difference are liberal-legalistic issues not only criticized by some feminists, but also by conservative commentators. Somewhat ironically, the conservative critique marks out the same territory when it comes to recognizing the underlying matrix in which sexual inequality is embedded. Specifically, conservatives dismiss feminist arguments of gender bias in Liberalism's notion of freedom to be treated equally -- a notion enshrined within the *Civil Rights Act of 1991*. Yet, in this denial, the very basis of the feminist critique makes a conspicuous appearance. For example, Professor of Government at Harvard University, Harvey C. Mansfield (1995) argued:

Feminism is now the greatest blight on our national prospect and the greatest threat to moral responsibility. In its opposition to the principle of the division of labor, in its desire to construct an undivided society never before seen in human history, feminism is a form of Marxism. But it is hardly recognizable as such because it begins from the right of equal pay for women -- and who can object to that? Equal pay, however, includes equal right to a job, thus disregarding *the male status of protector and provider*. Although feminism speaks of equality, it is in practice more interested in independence. For protection the liberated woman will turn away from the husband who loves her to the government whose very impersonality allows her to think she is free (Feminism's love of Big Government is neo-Marxist). Children may not be so dispensable as a husband -- witness

Murphy Brown -- but they will grow up without a father. (p. 85, bracketed comments are those in the original text. Italics is added emphasis)

In the case, *Costa v Desert Palace*, we see that "conservative women who do not follow feminism to the end are nevertheless caught up in its inherent radicalism, of which they are often unconscious" (Mansfield, 1995, p. 85).

The irreducibility of sexual difference is clearly an issue for Liberalism. Susan Varney (2000) summarized part of the significance of this situation, when she argued:

From almost its inception, liberal theory has been plagued by a feminist critique that charges it with failing to recognize the sexual inequality inherent in its own conception of universal rights. As has been repeatedly noted, liberal theory gave women the grounds upon which to demand rights for themselves, to ask that this "universalist" conception of rights apply to them as well. On the other hand, by asserting that women deserved access to these rights as much as men, feminists contested the very logic upon which this system of "universal rights" had been conceived -- namely, the concept of the "abstract individual". By asking for rights on behalf of women, feminists unavoidably made sex a political issue. ... Feminism thus put sex on the political table and, in so doing, introduced the problem of particularity into a political discourse seemingly founded on its potential eradicability. (p. 72)

This issue of the ineradicability of sexual difference -- and as we have shown through the previous legal cases that have set the constitutive function of sexual difference -- is a matter that we would like to suggest paradoxically holds considerable

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significance to both feminists and Liberalism in rearticulating their own aims. In order to sustain such an argument and to reveal some of its broader implications, it is instructive to consider the work of Sigmund Freud.

Betting on the psychodynamic house: Freud, feminism and sexual difference

Arguably, Sigmund Freud's greatest discovery has been that the realm of the mind called the "unconscious" is a source of motivation and a 'place' where certain thoughts and desires are hidden from the awareness of the individual. This conception of the unconscious stood in stark contrast to his contemporaries who, in the main, considered the unconscious a messy collection of ideas, desires, mental residue and or impulses that were beyond analysis and largely inconsequential to 'normal' human behaviour (see for example, Hewett, 1889, pp 32-33). Some of his contemporaries thought the unconscious might be some kind of paranormal or spiritual repository or entity. In an early work, Freud (1916/ 1991) wrote:

'Unconscious' is no longer the name of what is latent at the moment; the unconscious is a particular realm of the mind with its own wishful impulses, its own mode of expression and its peculiar mental mechanisms which are not in force elsewhere. (p. 249)

Freud was to discover that, like the proverbial iceberg, much of mental activity responsible for human interaction lay below the "surface", hidden from our conscious awareness. In the now familiar typography, Freud (1923/1984; 1933/1988a) suggested the mind consisted of three hypothetical mental provinces: a) the *id* -- various biological urges, drives or instincts; b) the *ego* -- the part of the mind that uses logic, memory and judgment in its endeavor to satisfy the demands of the *id*; and, c) the *super-ego* -- the province of the mind whose concern is

for obeying society's 'rules of conduct', (i.e., morality and social norms) and reminds the ego of these social realities. Freud argued that the *id* operated entirely hidden from our conscious awareness and that also, in the realm of the unconscious, were aspects of the ego and super-ego. Freud called particular attention to the manner in which certain ideas, feelings, desires and urges emanating from the *id* were held back by the ego and repressed from conscious thought. In processes that operated at an unconscious level, the ego employed a variety of defence mechanisms, including the aforementioned repression, in an effort to protect the integrity of the psyche from what the ego recognizes as potentially, a reoccurrence of aspects of previous painful experiences or anxiety producing situations. These defences are also used by the ego, often in response to reminders from the super-ego about social realities and constraints, to delay or postpone desires of the *id* to a time and location that is deemed more appropriate. It was through a variety of techniques such as 'free association', the analysis of dreams, jokes, 'accidental' behaviours, slips of the tongue, and the use of language that Freud believed he could gain access to 'contents' of the unconscious.

In his description of the topography of the mind, Freud linked the development of those realms or mental agencies with stages of sexual development. Freud (1905/1986) identified five different discontinuous stages of sexual development that were psychosexual in character. These psychosexual stages were characteristically related to different parts of the body, or the individual's contemplation of different parts of the body, and these stages can be described as: 1) oral (-18 months); 2) anal (18 months - 3 years); 3) phallic (3-5 years); 4) latency (5-puberty); and, 5) genital (puberty). The particular stage that has greatest relevance to this paper is the third, the phallic stage, as it is firmly linked to the development of the super-ego.

It is in the phallic stage that the individual comes to ponder the origin of babies and genital differences. Freud (1905/1986) suggested that boys assume all human beings have the same male form of genitals and initially may deny that girls are different, preferring to “recognize the female clitoris as a true substitute for the penis” (Freud, 1905/1986, p. 114). Boys subsequently reach “the emotionally significant conclusion that after all the penis had at least been there before and had been taken away afterwards. This lack of a penis is regarded as a result of castration, and so now the child is faced with the task of coming to terms with castration in relation to himself” (Freud, 1923/1986, p. 310). It is at this time that feelings related to what Freud called the “Oedipus complex” become significant. In the Greek myth of the male *Oedipus*, it was foretold by the oracle at Delphi that *Oedipus* would kill his father and marry his mother. Freud used the theme of this story to highlight the manner in which a boy enters a phase in which “he begins to manipulate his penis and simultaneously has phantasies of carrying out some sort of activity with it in relation to his mother” (Freud, 1940/1986, p. 386). At this same time, the father is considered to be a dangerous rival by the boy child. Freud argued that a real danger arises for the child in relation to these fantasies of “being in love with his mother. The danger is the punishment of being castrated, of losing his genital organ” (Freud, 1933/1988b, p. 119). Also at this time, the male child *identifies* with the father and wishes to be like him -- even the fantasy of taking the father's place with the mother. Indeed, by identifying with their fathers the possibility arises of a vicarious experience of achieving gratification with the mother. The male child, nonetheless simultaneously represses both the desire to kill the father and to be united with the mother. Identification with the father has the child introject the patriarch's values and ideals that come to constitute aspects of the super-ego. It is through this process of *identification* that the super-ego gains its initial script (Freud, 1921/1985, pp. 134-140).

For infant girls, Freud believed the Oedipus complex²⁹ is more complicated and “obscure” (Freud, 1924/1986, p. 320) as the absence of a penis means the fear of castration is not a motivating issue. However, Freud, somewhat controversially, suggested the lack of a penis leads to envy of what the father possesses and the subsequent blaming of her mother “who sent her into the world insufficiently equipped” (Freud, 1925/1986, p. 338). This latter disappointment with the mother is such that the girl “gives up her wish for a penis and puts in place of it a wish for a child; and *with that purpose in view* she takes her father as a love-object. Her mother becomes the object of her jealousy” (Freud, 1925/1986, p. 340). The castration fear does not arise, but it is the fantasy of having been castrated that brings girls into the Oedipal situation. It is this same thought that encourages a partial identification with the mother who is in the same position of *lacking* a penis, perhaps giving rise to feelings of inferiority with their male counterparts. The super-ego is not developed in the same manner as that of boys due to the different circumstances in which the idea of castration is encountered. Freud (1925/1986) argued that as a result, a girl's super-ego has developed *differently*: “their super-ego is never so inexorable, so impersonal, so independent of its emotional origins as we require it to be in men” (p. 342). As such, women “show less sense of justice than men ... are less ready to submit to the great exigencies of life ... are more often influenced in their judgements by feelings of affection or hostility” (Freud, 1925/1986, p. 342). This is not to say, as one writer correctly stated, that Freud thought “women's moral judgement is *inferior* to men's” (Jacobs, 1992, p. 55), but that men and women have

²⁹ It was Jung who used the term “Electra complex” in an attempt to create a synonym for the manner in which the Oedipus complex takes its form in women. Freud rejected the term as being unhelpful and too reductionist of a more complex and larger psychodynamic (Freud, 1924/1986; see also Laplanche & Pontalis, 1967/1988, p. 152), which is why Jung's beliefs are not applicable for this paper.

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different notions of morality -- “Men focus on issues of justice, fairness, rules and rights, whereas women emphasize people's wants, needs, interests and aspirations” (Jacobs, 1992, p. 55; see also Chodorow, 1978; Gilligan, 1982).

Freud determined the major repercussions of the manner in which the Oedipus complex is encountered are that:

The female sex, too, develops an Oedipus complex, a super-ego and a latency period. May we also attribute a phallic organization and a castration complex to it? The answer is in the affirmative; but these things cannot be the same as they are in boys. Here the *feminist demand for equal rights for the sexes does not take us far, for the morphological distinction is bound to find expression in differences of psychical development.* (Freud, 1924/1986, p. 320; emphasis added, see also Freud, 1925/1986)

As if to underline this argument and further reinforce the issue of the different manner in which the super-ego develops, another writer surmised:

Because girls do not fear castration as boys do, says Freud, girls never internalize father's authority in the form of general principles of morality, the origin of the superego. Consequently, women never learn to govern their actions by principles and rules to the same degree as men. They remain enemies of civilization, guiding their conduct by particular attachments, rather than universal ideals. (Alford, 1994, p. 141)

While “morphological distinction” finds expression in different psychical development, at the same time Freud warned that some assumed character differences between men and women are nothing more than “social convention”. For example, in his discussion of femininity, Freud (1933/1988c)

specifically rejected the common assumption that feminine meant being “passive” while masculine was shorthand for being “active”. In Freud's words (1933/1988c, p. 149): “But we must beware in this of underestimating the influence of social customs which ... force women into passive situations”.

Get those stakes up higher: Marcuse and surplus repression

In the discussion of the realms of the psyche, it was noted that the process of engagement with the challenges that the Oedipus complex presents also gives rise to the psychodynamics of repression and identification with the parent of the same sex. It is in the identification with the parent that the values and attitudes that the super-ego obtains much of its 'script'. Earlier, we described the super-ego as that province of the mind whose concern is for obeying society's 'rules of conduct' (i.e. morality and social norms, and reminds the ego of these social realities). The acquisition of these rules and codes principally come from the identification with authority figures such as the parent and can be crudely described as a process of socialization. The struggle for gratification and need for forms of repression was a struggle for the developing individual. The critical social theorist Herbert Marcuse (1955) was of the view that these same psychodynamic processes could be applied to the understanding the antagonistic character of society.

Marcuse (1955) suggested that the societal norms and rules were not only reproduced *within* the individual in the form of the super-ego, but that also society superimposes restraint *over* the individual through other agencies, which have a system of ideals and rewards that become sources of gratification. The super-ego is the 'conscience' that informs the ego of what is prohibited and thus must be repressed, but in absorbing the values and attitudes of the parent it also acts to an ideal to be achieved - - specifying what Freud (1933/1988a) originally called an ego-ideal. For Marcuse, if

the ego-ideal is itself repressive, one can quickly appreciate the manner in which social action is constrained by both an ego-ideal and as a censor. It was the psychodynamics of repression understood in terms of the Oedipus complex that pointed Marcuse toward the instrumentality of the societal administrative apparatus, which comes to assume such a powerful position in the individual psyche. Using a male child in his example, Marcuse argued:

The revolt against the primal father eliminated an individual person who could be (and was) replaced by other persons; but when the domination of the father had expanded into the domination of society, no such replacement seemed possible, and the guilt becomes fatal ... The father, restrained in the family and in his individual biological authority, is resurrected, far more powerful, in the administration which preserves the life of society, and in the laws which preserve the administration ... there is no freedom from administration and its laws because they appear as the ultimate guarantors of liberty. (Marcuse, 1955, pp. 91-92; See also Carr, 1989; Carr & Lapp, 2006)

Marcuse ultimately traced the individual's sources of repression and compliance to the social structure and the prevailing economic interests in the society. Like Freud, Marcuse (1955) suggested that a certain amount of repression is necessary "for civilized human association" (p. 37). However, some institutions in society have enacted additional "controls" to those which are socially useful and necessary, which Marcuse (1955, p. 38) called "surplus repression". Marcuse argued that the workplace was one institution that contained an ethos and social practices that placed additional controls over human beings. Case 3 below, provides examples of these additional controls:

Case 3. Dr Jeff Crouse v. Bishop Gorman High School (Pending).

Dr Jeff Crouse a former seminarian, was dismissed on May 12, 2006 from his employment as a teacher at Bishop Gorman High School for violating church doctrine in declaring his sexuality on the popular blogging website MySpace.com. Dr Crouse posted on the website that he was a gay Catholic man, looking for "straight-acting single men ... Defying political correctness (sorry!), please no bisexuals, those with HIV, or effeminate men". The posting somehow came to the attention of the school principal who then sacked Dr Crouse for being in breach of his employment contract. Specifically, Crouse was sacked for "maintaining, by word or action, a position contrary to the ordinary teaching of the Catholic Church". It appears religious organizations can hire and fire on matters related to upholding religious doctrine, whereas non-religious organizations fall under the Civil Rights Act of 1991 that prohibits discrimination on such grounds. In the local newspaper -- the *Las Vegas Sun* -- Richmond and Littlefield (May 24th, 2006) noted that:

There are various examples of Catholic teachers being fired for violating church doctrine. A Milwaukee teacher is appealing her 2004 firing for getting pregnant through in-vitro fertilization. A football coach at a Massachusetts school was fired for getting his girlfriend pregnant. In November, a young Brooklyn, N.Y., teacher was fired for getting pregnant out of wedlock. And in October, a Sacramento teacher was fired after officials learned she had previously volunteered at an abortion clinic. (p. 2)

A question worthy of consideration that arises from these arguments is: to what degree is the field of organization studies

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complicit in helping to legitimize or justify surplus repression? (see Carr & Lapp, 2006, p. 105). It is certainly the case that through many MBA programs and alike, there is an un-reflexive appreciation of enacting controls over workers as well as trying to create cultures where the organization ideal to be aspired is both exploitative and repressive. These courses often feed a fantasy of control in as much as social relations and technical aspects of the enterprise are all viewed as 'technical issues' that are fixable as long as one has the right tool at one's disposal. By inspiring a faith in technical fixes, there is a tendency to abstract the organization from its environment and to be un-reflexive as to how generic 'tools' have embedded forms of control that are unnecessarily repressive for all and may be differentially repressive for particular groups in our society.

While much of the foregoing may be familiar to some, in the context of this paper, there are a number of aspects of these psychodynamic processes that need to be emphasized. First, in Liberalism there is an emphasis and assumptive basis of the individual in society being rational and making choices on that basis, whereas psychodynamics emphasizes the unconscious and that it is not logical in the manner we normally think about logic (and is thus able to carry contradictions -- see Carr & Hancock, 2006). Second, notwithstanding the fact that some feminists have criticized the work of Freud, and psychodynamic theory more generally, on the basis that it is a paternalistic and patriarchal reading of human development, the firm conclusion is that the morphological differences between the sexes does lead to a *different* (i.e., not inferior) psychical development. It is for this reason that it is widely observed "psychoanalysis is founded on the irreducibility of sexual difference" (Varney, 2000, p. 72).

Critical paradoxes:

Psychodynamics, feminism and identity

The insistence on the irreducibility of sexual difference places psychoanalytic

theory squarely at odds with the Liberal notion of the abstract individual. Put simply, if somewhat crudely, Liberalism insists on treating all as though they are in some way essentially the same. The 'equality' of rights logically follows from this universalist assumption. Contrary to this position, psychoanalytic theory argues that the individual is neither simply a product of nature, nor that of nurture, but a

... subject understood to retain the traces of its own difficult transition into a formally conceived social and symbolic order. ... The body does not exist as the domain of nature but as a site of sensation and perceptions and, more specifically, *the place where these various perceptions are organized into a narrative of experience that is replete with its own internal logic*. And it is within this discursive terrain that Freud reveals sexual difference as the first and most fundamental symptom of the subject. (Varney, 2000, p. 73)

The inner history of an individual is a history that is punctuated by experiences and challenges that are clearly psychosexual in character. Thus, as it has been expressed in terms of developing our identities:

Of course, identities are dynamic -- they change throughout life. But, like trees whose development may be affected by different conditions of nature and nurture but may not re-root themselves in different spots or grow branches where none exist, people's identities cannot discard or disregard early experiences (happy or painful), including experiences related to their gender, position in siblings order and so forth. In this sense, then, their histories follow them throughout life. (Gabriel & Carr, 2002, p. 354).

The legal cases we have outlined in this paper, bring to the foreground the difficulties of the law in recognizing equal

rights and how these difficulties stem from Liberalism's conception of universal rights. The work of Freud and psychodynamic theory points the way to the irreducibility and ineradicability of sexual difference. Thus, the legal cases while being practical applications of these posits work in theory but paradoxically not in practice because all concern the matter of sexual difference that is really based on the irreducibility of sexual difference. In terms of identity, the ineradicability of sexual difference means that individuals have both masculine and feminine elements. The degree to which one uses 'masculine' or 'feminine' behavior is based on the extent the ego has absorbed and or the manner is treated by its super-ego, which leads to the creation and or sanctions of norms.

These circumstances pose some interesting paradoxes for feminists in relation to articulating a view of equal rights that does not undermine itself by a rejection of Liberalism and the political support that it brings. In the context of describing the legal system's embrace of a legal standard based on a norm of *reasonableness* that is related to masculine and feminine norms, West (1997/1998) argued that such legal standards will be difficult in their development because:

1. While committed to liberalism there is at the same time evidence that equal respect for sexes (i.e. read also sexual orientation) does not exist. Concomitantly, these issues cannot be heard because of liberals' unwavering denials of difference: "Equality -- understood as the equal treatment of human beings that are the same -- will not be sufficient to imply the conclusion that a "reasonable woman" standard should be the norm against which conduct is measured in the area of sexual harassment law..." (West, 1997/1998, p. 8)

2. Feminists, at the same time, stand in solidarity of their differences to men while simultaneously stating their shared essential nature with men. As Case Study 3 illustrates, to eliminate differences is to create a less healthy, less tolerant and a poorly functioning

society. Equality and a universalist position do nothing to imply anything opposite. "The false conviction that it does involves nothing more than mistaking a shared trait -- even an essential one -- with a shared identity, or even more fundamentally mistaking a part for the whole (West, 1997/1998, p. 8).

The argument by West reveals a paradox for feminists in relation to Liberal theory, at one and the same time however, one can also note *other paradoxes* that stem from what would seem to be the impasse posed by Liberalism's universalist conception of rights and the invoked abstracted individual. One such paradox that we have in mind is that Liberalism, in its declaration of universal rights, makes such a statement only through noting implied differences -- of which sexual difference is most prominent. Another paradox is that Liberalism's universalist conception of rights is that it is repressive as well as enabling. The denial of subjective particularity and sexual difference specifically, provides the very space in which groups of feminists are afforded the opportunity to draw the distinction between feminine/masculine, female/male. In this articulation, sexual difference is affirmed. Varney (2000) came to a similar conclusion when she argued:

The mark of sex serves the ends of justice in so far as it sustains a disjunction between the individual subject of the law and the Law itself, insofar as it sustains a distance wherein the debate over the legitimacy or illegitimacy of the law can continue to be debated. Sexual difference is thus not simply a problem, a discontent that liberalism should endeavor to transcend; on the contrary, we might want to consider the possibility that sexual difference functions as *its* paradoxical *cause* as well. Which is as much to say that the riddle of femininity, and the problem of sexual difference, function as internal critiques *and thus also supports* of a liberal political tradition. Sexuation is thus a shorthand for the

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site wherein subjects continue to question, and thus rearticulate, the "cause" of their own freedom. (p. 76)

Clearly, the "discontent" needs to be recognized "as constitutive of the liberal State, as an ineradicable remainder" (Varney, 2000, p. 76) and as part of the guarantee of the freedom that Liberalism seeks to uphold. This guarantee of freedom also applies to the workplaces in Las Vegas as we have provided with the inclusion of practical application in the form of Cases. While Nevada and in some decisions, the United States, seeks to eradicate differences, we can see how organisational policy before and after legislative 'fixes' influences those in and outside of our workplaces. These 'fixes' are part of our superegos and perhaps even ego-ideals such that many paradoxes are found to impact and perhaps 'inflict' female identity onto men and male identity onto women. On the one hand liberal dictates in Las Vegas casinos and in other Nevada legal decisions mean that "what happens in Vegas should be happening to you". On the other hand we can say Vive Las Vegas: Vive la difference.

References

- Adorno, T., & Horkheimer, M. (1997). *Dialectic of enlightenment* (J. Cumming, Trans.). London: Verso. (Original work published 1947)
- Alford, C. F. (1994). *Group psychology and political theory*. New Haven, CT: Yale University
- Bates, R. (1985). *Liberalism, Marxism and the struggle for the state: Prolegomena to the study of public administration*. Geelong, Victoria, Australia: Deakin University.
- Batt, T. (2003). Supreme Court considers gender bias lawsuit. *Las Vegas Review-Journal*, April 22, 1-2. Retrieved September 1st, 2006, from http://reviewjournal.com/lvrj_home/2003/Apr-22-Tue-2003/business/21158166.html
- Caesars v. Costa, (No. 02-679) (Supreme Court of the United States, June 9th, 2003). Judgment reported in *Gaming Law Review*, 7(5), 2003, 381-388.
- Carr, A. N. (1989). *Organisational psychology: Its origins, assumptions and implications for educational administration*. Geelong, Victoria: Deakin University.
- Carr, A. N. (1994). For self or others?: - The quest for narcissism and the ego-ideal in work organisations. *Administrative Theory & Praxis*, 16(2), 208-222.
- Carr, A. N. (2000). The parable of the oarsmen: Adding to Homer in the quest to understand the 'imago' Las Vegas. In J. Biberian & A. Alkhafaji (Eds.), *Business research yearbook: Global business perspectives* (Vol. 7, pp. 697-701). Michigan: McNaughton & Gunn Inc.
- Carr, A. N. (2001). Understanding the 'imago' Las Vegas: Taking our lead from Homer's parable of the oarsmen. *M@n@gement*, 4(3), 121-140. Retrieved July 18, 2001, from <http://www.dmsp.dauphine.fr/management/PapersMgmt/43Carr.html>
- Carr, A. N., & Hancock, P. (2006). Space and time in organizational change management. *Journal of Organizational Change Management*, 19(5), 545-557.
- Carr, A. N., & Lapp, C. A. (2006). *Leadership is a matter of life and death: The psychodynamics of Eros and Thanatos working in organisations*. Hampshire, England: Palgrave.
- Chodorow, N. (1978). *The reproduction of mothering*. London: Yale University.
- Colb, S. F. (2005, Jan. 11th). Makeup requirements for female employees violate anti-discrimination law: Why a federal appeals court erred in ruling to the contrary. Retrieved September 1st,

- 2006, from
<http://writ.news.findlaw.com.colb/20050111.html>
- Crozier, M., Huntington, S. P., & Watanuki, J. (1975). *The crisis of democracy*. New York: New York University.
- Freud, S. (1984). The ego and the id. In J. Strachey (Ed. and Trans.), *On metapsychology: The theory of psychoanalysis* (Vol. 11, pp. 339-408). Pelican Freud Library, Harmondsworth, England: Pelican. (Original work published 1923)
- Freud, S. (1985). Group psychology and the analysis of the ego. In J. Strachey (Ed. and Trans.), *Civilization, society and religion* (Vol. 12, pp. 91-178). Pelican Freud Library, Harmondsworth, England: Pelican. (Original work published 1921)
- Freud, S. (1985). Civilization and its discontents. In J. Strachey (Ed. and Trans.), *Civilization, society and religion* (Vol. 12, pp. 245-340). Pelican Freud Library, Harmondsworth, England: Pelican. (Original work published 1930)
- Freud, S. (1986). Three essays on the theory of sexuality. In A. Richards (Ed.) and J. Strachey (Trans), *On sexuality: Three essays on sexuality and other works* (Vol. 7, pp. 33-170). Pelican Freud Library, Harmondsworth, England: Pelican. (Original work published 1905)
- Freud, S. (1986). The infantile genital organization. In A. Richards (Ed.) and J. Strachey (Trans), *On sexuality: Three essays on sexuality and other works* (Vol. 7, pp. 303-312). Pelican Freud Library, Harmondsworth, England: Pelican. (Original work published 1923)
- Freud, S. (1986). The dissolution of the Oedipus complex. In A. Richards (Ed.) and J. Strachey (Trans), *On sexuality: Three essays on sexuality and other works* (Vol. 7, pp. 313-322). Pelican Freud Library, Harmondsworth, England: Pelican. (Original work published 1924)
- Freud, S. (1986). Some psychical consequences of the anatomical distinction between the sexes. In A. Richards (Ed.) and J. Strachey (Trans), *On sexuality: Three essays on sexuality and other works* (Vol. 7, pp. 323-344). Pelican Freud Library, Harmondsworth, England: Pelican. (Original work published 1925)
- Freud, S. (1986). An outline of psychoanalysis. In J. Strachey (Ed. and Trans.), *Historical and expository works on psychoanalysis* (Vol. 15, pp. 371-444). Pelican Freud Library, Harmondsworth, England: Pelican. (Original work published 1940)
- Freud, S. (1988a). Dissection of personality. In J. Strachey (Ed. and Trans.), *New introductory lectures* (Vol. 2, pp. 88-112). Pelican Freud Library, Harmondsworth, England: Pelican. (Original work published 1933)
- Freud, S. (1988b). Anxiety and instinctual life. In J. Strachey (Ed. and Trans.), *New introductory lectures* (Vol. 2, pp. 113-144). Pelican Freud Library, Harmondsworth, England: Pelican. (Original work published 1933)
- Freud, S. (1988c). Femininity. In J. Strachey (Ed. and Trans.), *New introductory lectures* (Vol. 2, pp. 145-169). Pelican Freud Library, Harmondsworth, England: Pelican. (Original work published 1933)
- Freud, S. (1991). The archaic features of infantilism of dreams. In J. Strachey (Ed. and Trans.), *Introductory lectures on psychoanalysis* (Vol. 1, pp. 235-249). Pelican Freud Library, Harmondsworth, England: Pelican. (Original work published 1916)
- Gabriel, Y., & Carr, A. N. (2002). Organizations, management and

Carr & Lapp

- psychoanalysis: An overview. *Journal of Managerial Psychology*, 17(5), 348-365.
- Gilligan, C. (1982). *In a different voice*. Cambridge, Mass: Harvard.
- Groninger, A. (2004). Desert Palace v. Costa and Hill v. Lockheed Martin: One step forward, one step back. *Trial Briefs*, December 2004, 18-22.
- Hall, E. V. (2003a). Supreme court set to drain the "mixed-motive" quagmire. *Rothgerber, Johnson & Lyons LLP, Newsletter and Articles*, 1-2. Retrieved September 1st, 2006, from <http://www.rothgerber.com/newslettersarticles/le0013.asp>
- Hall, E. V. (2003b). Supreme court makes "mixed-motive" suits easier for plaintiffs. *Rothgerber, Johnson & Lyons LLP, Newsletter and Articles*, 1-2. Retrieved September 1st, 2006, from <http://www.rothgerber.com/newslettersarticles/le0018.asp>
- Hewett, E. (1889). *Elements of psychology*. Cincinnati, OH: Eclectic.
- Homer. *The Odyssey* (E. Vieu, Trans. 1991). Great Britain: Penguin.
- Ison, Law Group, (2003). Supreme court eases burden on plaintiffs in discrimination cases. *Ison Law Group - Workplace Law Newsletters*, 1-3. Retrieved September 1st, 2006, from <http://www.theisonlawgroup.com/?News%7C1020>
- Jacobs, M. (1992). *Sigmund Freud*. London: Sage.
- Jespersen v. Harrah's Operating Co., Inc.* (No. 03-15045) (9th Cir. April 14th, 2006), 4115-4143.
- Laplanche, J., & Pontalis, J. (1988). *The Language of psycho-analysis* (D. Nicholson-Smith, Trans.). London: Karnac. (Original work published 1967)
- Marcuse, H. (1955). *Eros and civilization*. Boston, MA: Beacon.
- Mansfield, H. C. (1995). Effects of liberalism and feminism on society. *The National Prospect, Commentary*, 100 (5), p. 85.
- McCoy, C., & Wolfe, A. (1972). *Political analysis: An unorthodox approach*. New York: Crowell.
- MacKinnon, C. (1989). *Towards a feminist theory of the state*. Cambridge: Harvard University.
- Morgan, R. (1996). Light bulbs, radishes, and the politics of the 21st century. In D. Bell & R. Klien (Eds.), *Radically speaking: Feminism reclaimed* (pp. 5-8). North Melbourne, Australia: Spinifex.
- Piper Rudnick, (2003, June). The supreme court hands discrimination plaintiffs a victory. *Piper Rudnick - Client Alert*, 1-2.
- Plaza, M. (1980). 'Phallic Power' and the psychology of 'Woman': A patriarchal vicious circle. *Feminist Issues*, 1(1), 73.
- Richmond, E., & Littlefield, C. (2006, May 24th). Gorman fires gay teacher: Instructor revealed preference on Web site. *Las Vegas Sun*, 1-3. Retrieved September 1st, 2006, from <http://www.lasvegassun.com/sunbin/stories/sun/2006/may/24/566614609.html>
- Schaeffer, D. (2001). Feminism and liberalism reconsidered: The case of Catherine MacKinnon. *American Political Science Review*, 95 (3), 699-708.
- Schor, N. (1994). Previous engagements: The receptions of Irigaray. In C. Burke, N. Schor & M. Whitford (Eds.). *Engaging with Irigaray: Feminist philosophy and modern European thought*, pp. 3-14.

New York: Columbia University.

Scruton, R. (1982). *A dictionary of political thought*. New York: Harper & Row.

Spragens, T. A. (1981). *The irony of Liberal reason*. Chicago: University of Chicago.

Szacki, J. (1979). *A history of sociological thought*. Connecticut, USA: Greenwood.

Theodorson, G. (1969). *A modern dictionary of sociology*. New York: Crowell.

Varney, S. (2000). The "cause" of sex: or, the discontent of Liberal theory. *Journal for the Psychoanalysis of Culture & Society*, 5(1), 72-76.

Voyles, S. (2000, April 11th). Alliance embraces liberal causes in often-

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conservative state. *Reno Gazette-Journal*, 1-4. Retrieved September 1st, 2006, from

http://www.rgj.com/news_old/stories/reno/955425004.html

Walzer, M. (1980). *Radical principles: Reflections of an unreconstructed democrat*. New York: Basic books.

West, R. (1998). Universalism, liberal theory, and the problem of gay marriage. Mason Ladd Lecture delivered at the Florida State University College of Law. Florida State University Law Review, posted 1998,

<http://www.law.fsu.edu/journals/lawreview/issues/254/west.html> (Original work 1997)

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