

briefs renders justices more likely to rethink their preconceptions. Consequently, variability increases. Chapter 6 brings the discussion of the democratic question full circle when it analyzes the effect of amicus briefs this time on the Court's democratic *output*—separate opinions registered by individual justices. Since they raise novel issues and reduce the cost of writing separately, amicus briefs increase the likelihood that a justice would write or join a dissenting, special concurring, or regular concurring opinion.

The informational value of the briefs is clear from the analyses presented. Yet particularly in the theory in Chapters 5 and 6, the main function of the information is to obfuscate and overload justices' cognitive processes, which results in inconsistency and more separate opinions. However, the confusing effect of briefs may be overstressed. In fact the function of briefs may be to eschew obfuscation and clarify what used to be convoluted issues for the justices. Briefs may serve to elucidate legal questions, illuminate policy implications, and explain vague issues. By reading such briefs, justices would be able to think more (rather than less) clearly about the questions presented. That said, the final behavioral effect might be similar—thinking more clearly about a case, justices might realize, for example, that the questions it presents involve four rather than just two policy dimensions. This may result in a greater number of separate opinions or more variance in decisionmaking. But the indistinguishable behavioral upshot is a result of cognitive clarity rather than cognitive overload.

*Friends of the Supreme Court* is an exceptional work of scholarship. Social scientists from several disciplines as well as legal researchers will appreciate the theoretical depth and interdisciplinary approach. The book has obvious appeal for courses in judicial politics and public law. What makes this volume particularly appealing for students is the way the author elegantly interweaves cutting-edge methods of inference with examples from actual cases argued before the Supreme Court. This book is bound to become an authoritative source for scholars of judicial behavior and interest groups and for students at the graduate and undergraduate levels.

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*The Women's Movement Against Sexual Harassment*. By Carrie N. Baker. New York: Cambridge University Press, 2008. Pp. 286. \$83.99 cloth; \$25.99 paper.

Reviewed by Sabine Lang, University of Washington

*The Women's Movement Against Sexual Harassment* offers a dense and meticulously researched narrative on the origins of mobilization against sexual harassment in the United States. As her starting point,

historian Baker chooses the controversies around establishing sexual harassment as a topic for public discourse in the United States in the early 1970s. Part two of the book delineates the growth of the movement against sexual harassment and highlights the key role not just of the emerging second wave feminism, but of organized women workers going on strike to fight sexual harassment. Part three addresses the pervasive influence that movement action had on public policy from the federal down to the local level. For example, Baker's rich study documents early initiatives in cities such as Washington, D.C., where a sexual harassment task force was appointed after several employees filed complaints in 1979. Finally, the appendix presents a very useful timeline and a glossary of select cases.

One of the main assets of this book is that it constructs the feminist movement of the 1970s not, as many have come to believe, as a white upper-middle-class movement. Mobilization against sexual harassment "emerged from multiple feminisms—the grassroots activism of diverse groups of women—and the resulting public policy reflected this diverse participation" (p. 3). The two organizations whose commitment to the cause of sexual harassment is chronicled in most detail, Working Women United and the Alliance Against Sexual Coercion, succeeded in bringing together women from diverse class and racial backgrounds to adopt a common frame that emphasized the violation of women's civil rights.

One of the more interesting questions emerging from Baker's book is the interaction between a legal-regulatory framework and movement activism. In the early stages, the legal framework seems to have taken precedence over movement voice. The initial inroad to sexual harassment legislation was Title VII of the Civil Rights Act, which included sex/gender as a basis for discrimination only as an afterthought. Ultimately, it was not extensive movement activism but a consequential error in judgment by Republican members of Congress that produced the opening for stronger sexual harassment legislation. Once Title VII took effect and the first lawsuits were brought in the name of sex discrimination, the emerging women's movement had a strong legal framework to reference. And even though by the late 1970s part of the movement started to question the primary reliance on legal means of redress and individual case law, Baker makes a compelling case for the effectiveness of the strategy in turning the issue from a private matter into part of public discourse on gender equality.

In order to highlight this crucial interaction between a legal and bureaucratic political opportunity structure and feminist mobilization in the United States, Baker might have been served well to include some comparative perspectives in her study. Taking for example Zippel's arguments in her 2006 study "The Politics of Sexual Harassment. A Comparative Study of the United States, the

European Union, and Germany” into account, Baker could have gauged the effects of early legislation even better. Zippel’s study shows that as opposed to the European Union and Germany, where no regulatory-legal base for defining sexual harassment existed, activists in the United States could early on capitalize on Title VII, on some high-profile cases, and on the ensuing publicity around the issue. Moreover, Zippel argues that legal frameworks and policies shape intervention strategies, but the way in which politics and laws operate depends on specific cultural and institutional traditions. Thus, the role of the amicus briefs, which Baker clearly identifies as a focal point for activist alliances in the United States, did not exist in Zippel’s European cases, and this lack of advocacy synergy translated into a much more laggard legal and bureaucratic response to sexual harassment there, most notably in Germany.

If one wants to get a sense of the pervasiveness of sexual harassment and of how mobilization develops within a specific political opportunity structure, this is the book to read. At times with a bit too much attention to miniscule details at the expense of the overarching argumentative line, Baker’s study ends with some thoughtful questions about where to take this issue in the future. In particular, she points to the downside of legal and bureaucratic codification of sexual harassment as employment discrimination. Sexual objectification of women in broader cultural terms has increased. At the same time, sexual harassment has become a de-gendered concept that is often dissociated from a feminist analysis of power, privilege, and oppression. How the women’s movement is engaging with these new challenges and whether the past sexual harassment frame will suffice to address discriminations outside of the workplace remain research questions for the future.

#### Reference

Zippel, Kathrin (2006) *The Politics of Sexual Harassment: A Comparative Study of the United States, the European Union, and Germany*. New York: Cambridge Univ. Press.

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*Three Generations, No Imbeciles: Eugenics, the Supreme Court, and Buck v. Bell*. By Paul A. Lombardo. Baltimore: Johns Hopkins University Press, 2008. Pp. xiv+365. \$29.95 cloth.

Reviewed by Courtney P. Smith, University of Oregon

In *Three Generations, No Imbeciles*, law professor and historian Lombardo provides readers with a strikingly detailed account of the development, climax, and continuation of eugenics movements and policies in the United States. Though the central focus of the