

The Proliferation of Rights-Based Capitalist Violence and  
Pedagogies of Collective Action

Jodi Melamed, Marquette University

[Forthcoming in *American Quarterly* vol. 70 no. 2 (June 2018)]

In her 2017 Presidential Address, Professor Kandice Chuh addresses the suppression of dissenting scholars and the accelerated undermining of education in the Trump era with an intellectual boldness and along lines that I have come to associate with the scholarship of many ASA affiliated thinkers. She does not defend academic freedom; rather, she analyzes how the defense of academic freedom often strengthens a culture of “protest nationalism,” in which expressions of dissent reinforce and align with the rationalities of the nation-state.<sup>1</sup> She launches a full throttle critique of “the structured embrace of academic freedom in a liberal key.”<sup>2</sup> Importantly, Chuh identifies the true problem of academic freedom as not what scholars may or may not say, but rather, “the interested material power behind the very conception of the autonomous rights-bearing citizen iterated by academic freedom and the material power that marks its liberal-nationalist grounds.”<sup>3</sup>

Her second act challenges ASA members to deliberate a role for ourselves as an “us,” associating in the Association, in the historical present. Casting the pedagogical as where we do dissent, and dissent itself as a “point of departure,” Chuh asks us to think carefully about “the work of associating” and pointedly asks, “What will we have wanted the ASA to have been and done some decades hence?”<sup>4</sup> Implying a contrast with the AAUP (“through associating, the AAUP professionalized the activities of teaching and research”), Chuh lets us know that she expects our together work to be informed by the approaches to vitalizing collective existence ASA constituencies have learned from social movements and interdisciplinary frameworks attuned to the disavowed violences of freedom in racial and colonial capitalist modernity.<sup>5</sup>

In my response, inspired by Chuh's critique of academic freedom, I examine the proliferation and intensification of rights-based capitalist violence under the Trump administration and its connection to the assault on universities, public education, and critical thinking more generally. In a nutshell, I argue that we are experiencing a partial remaking of rights under the combined pressure of the ultracapitalist radical right, a block that leads today for extractive, financial, and corporate global capitalism, and the political resurgence of a libertarian-leaning ethno-nationalism, which we can think of as a highly individualistic (neoliberalized), lightly veiled version of white supremacy. These forces come together around relatively new articulations of "rights," which grow out of relatively old 20<sup>th</sup> century libertarian notions of economic liberty, and are routed through the First Amendment, anti-discrimination claims, and civil rights redone as libertarian counterrights. They amount to this: *the "right" to be unencumbered by concern for the wellbeing of others and the planet*. They come into play as tactics for coded attacks on democratic government itself, which for plutocratic libertarians represents majoritarian coercion of minority elites through taxation and other constraints on economic liberty. More antisocial even than everyday neoliberal rationality (for which markets and exchange remain minimally social), radical right and libertarian appropriations of liberal rights abstractions are radically individualistic and property supremacist; they argue for the unbridled "right" of entrepreneurs to accumulate capital in any manner, without limits, regardless of the consequences to anyone else. They include the "free speech" rights of *Citizens United*, which secured impunity for money to influence the state apparatus as a core exercise of First Amendment rights, and the "free speech" rights of radical right propagandists to speak on college campuses and to be protected from protest and criticism. They include state-level "anti-discrimination" measures, such as the many anti-boycott bills that forbid states from contracting

with businesses and individuals who support a boycott of Israel (using discrimination against Israel to abrogate boycotters' First Amendment rights and to block organized labor from taking up the issue).<sup>6</sup> Individual rights arguments are also forwarded to protect "the taxpayer" from being forced to pay for the government to provide services to other people, including, increasingly, public education. Finally, there are the "right not to have rights laws," including "right to work" laws and state laws forbidding municipalities from passing living wage, anti-discrimination, and voter protection ordinances.<sup>7</sup>

For these appropriations of liberal rights abstractions to do their work as well as possible, they need to circulate in a context free environment. In other words, the antisocial and supremacist use of rights seeks the "right" to be protected from criticism, from intellection, and when expedient, from facts. In this way, the attack on climate scientists connects to the intimidation of scholars of indigeneity, gender, sexuality, race, and ethnicity, and both connect to the push from Education Secretary Betsy DeVos and the entire Koch donor network to privatize or defund and thereby control organized education. In *Democracy in Chains*, Nancy MacLean shows that today's right wing and libertarian attacks on public education trace their origins to Jim Crow theorists who, building on Southern traditions of locking and blocking government to safeguard the political power of an elite minority, advised Southern elites to evade the school integration mandated by *Brown vs. Board of Education* by ending the state's responsibility for public education.<sup>8</sup> As MacLean evinces, the ultracapitalist right approach to education is two-pronged: first, by attacking and defunding public education in general, the libertarian right seeks to end "the most socialized industry in the world," which disseminates "community values ... inimical to free society"<sup>9</sup>; second, by building up networks of scholars and academic centers, the Olin, Bradley, Koch and other foundations transact with academia as a place in which to win the

hearts and mind of college students and to cultivate an anti-government, economic liberty-minded counterintelligensia.<sup>10</sup>

I use the phrase “rights-based capitalist violence” to refer to strategies that legitimate the use of violence – expropriative environmental, police, and other forms – as the mere exercise of rights, including property rights, economic rights, free speech rights, states’ rights, and individual rights. The proliferation of rights-based capitalist violence alongside white nationalist violence brings home anew the tragedy of what James Baldwin referred to as the betrayal of the civil rights movement, especially the “anti-communist” persecution of activism addressing the constitutive inter-relations of race and capitalism.<sup>11</sup> It also casts new light on what I have elsewhere described as the problem of state-sanctioned or official anti-racisms, which successively held sway over U.S. national culture after World War II (racial liberalism, liberal multiculturalism, and neoliberal multiculturalism).<sup>12</sup> By disciplining thinking about racial justice to cohere with the knowledge architecture of capitalism (possessive individualism, abstract equality, market opportunity), official anti-racisms intensified the co-conditioning and co-development of the logics and abstractions of capitalism and liberalism to the point that now, in legal and political contests between parties with “equal rights,” force decides, that is, the rights of capital regularly trounce the rights of individuals. At the same time, “the right to be unencumbered by concern for the wellbeing of other” clearly develops out of white and class supremacist articulations of racial capitalism. It structurally relies on the material force of the axiom that (racialized) others are inferior, unable to compete, threatening, and exploitable. We can draw a line from the anti-blackness that negated slave humanity to today’s neoliberalized white supremacist hatred for parasitical (racialized) public employees.<sup>13</sup>

From an American Studies perspective, we have to consider the long *durée* of how U.S. higher education has nurtured rights-based forms of racial and colonial capitalist violence in the name of the common good. As Jodi Byrd reminds us, every U.S. university was founded through indigenous erasure, and every ideal disseminated in U.S. higher education “has been forged in the territorially acquisitive modes of settler colonialism and are designed to foster and maintain indigenous dispossession and antiblackness.”<sup>14</sup> The complex relations between liberal rights, capitalism, and universities after World War II are the subject of an important and influential body of critical university studies scholarship, which is impossible to summarize here.<sup>15</sup> Yet to understand how a discourse of counterrights shapes the field of politics around higher education today – from the proposal to tax graduate student stipends to greater presence for radical right views on campuses – we have to look to the recent history of the radical right’s assault on higher education.

Jane Mayer and Nancy MacLean exhaustively detail how ultracapitalist libertarian donors, notably the Koch foundation, laid the groundwork for a network of think tanks, academic centers, fellowships, and policy support for radical right-leaning politicians, which became a force to be reckoned in 2010, after the passage of *Citizens United* and mid-term elections victories for radical right Republicans at the state and federal levels. Today the network has funded over 5000 scholars and more than 24 academic centers and contributed hundreds of millions of dollars to the teaching of free market ideology at more than 280 four-year colleges.<sup>16</sup> In addition to looking to academia for an amplifier effect to win prestige for libertarian ideologies, Koch philanthropists have financed the State Policy Network, which provides research to support ALEC sponsored legislation, whose coordinated adoption in state legislatures has broken down state governments along lines that allow for deregulation, greater donor

influence, and less majority accountability.<sup>17</sup> Radical right Republicans at the state level have especially employed their power to exert partisan influence over public universities like never before.<sup>18</sup> (As Christopher Newfield points out, Trump’s post-fact presidency marks a rupture between executive political power and “the knowledge economy” and was won through appealing not only to white racial resentment, but also to disdain for “knowledge elites” and professional authority.<sup>19</sup>)

On campuses a radical right property, free speech, and individual rights-based strategy is being deployed politically, intellectually, and strategically to further weaken the academy as a place of formation for (settler colonial, relatively class privileged) democratic constituencies and to strengthen further the intellectual capital of right wing conservatives, anti-multicultural neoliberals, and ultracapitalist libertarians. The negative strategy is seen in the defunding of universities by state legislatures, which target the humanities, social sciences, and interdisciplines. In the name of defending taxpayers rights, radical Republicans try to score political points and censor teaching in fields including climate science, Black studies, ethnic studies, American Indian studies, and gender studies by micromanaging syllabi and pressuring administrators to defend faculty teaching materials.<sup>20</sup> Importantly, many of the most vicious assaults carried out against scholars under the aegis of protecting individual rights, white/Jewish students, civility, and free speech – one thinks of Steven Salaita, Keeanga-Yamahatta Taylor, and Rabab Abdulhadi – target scholars and intellectual traditions that illuminate the hollowness and ahistoricity of radical rights appropriations of liberal rights abstractions, framing them as acts of colonial unknowing and disordered epistemic racism and sexism. Finally, the radical right makes positive use of “academic freedom” and “free speech” to influence campus event

programming and donor-controlled faculty hires, providing platforms at universities for their provocateurs and approved scholars.<sup>21</sup>

*Bronner et. al. v. Duggan et. al.* (2016), the lawsuit filed against the American Studies Association following its adoption of the Boycott of Israeli Academic Institutions resolution, is an important example of the connection between rights-based capitalist violence and attacks on scholars, the university, and critical thinking. The connection can be drawn immediately through the Louis D. Brandeis Center for Human Rights Under Law, and its President and General Counsel, Kenneth Marcus, who serves as a counsel for the plaintiff. Although the Brandeis Center describes itself as an independent, nonpartisan institution, it is part of the network through which the Koch foundation and its allies have created an ersatz “academy” for the dissemination of radical right libertarian ideology and policy.<sup>22</sup> The “Human Rights Under Law” part of the Center’s name – meshing law and order discourse with rights language – and its mission statement (“to advance the civil and human rights of the Jewish people and to promote justice for all”) weaponizes rights discourse for lawfare and pressure politics on university administrators to forbid criticism of Israel under the guise of fighting antisemitism, something it calls “anti-Israelism,” and discrimination against Jewish students, whose political, racial, and cultural diversity is elided.<sup>23</sup>

Kenneth Marcus is President Trump’s nominee to become Assistant Secretary for Civil Rights at the U.S. Department of Education. He is a master of the use of counterrights strategies to censor, suppress, and criminalize actual anti-oppression speech, scholarship, and campus activism.<sup>24</sup> His signature accomplishment has been to enlarge the scope of Title VI of the 1964 Civil Rights Act to include protection for Jewish students from antisemitic acts. Yet rather than address actual, increasing acts of antisemitism, anti-blackness, anti-Arab racism, anti-Muslim

racism, and settler supremacy on campuses, Marcus strategically deploys claims of discrimination against Jewish students to try to criminalize advocacy and scholarship promoting Palestinian, Arab, and Muslim human and civil rights. Similarly, Marcus has claimed the “human right to dominate” by proposing initiatives to end all race-conscious admissions and to protect religiously rationalized homophobia; in effect, his use of “civil rights” seeks to free the state of Israel, white privilege, and anti-LGBTQ movements from the context and criticism the academy can provide.<sup>25</sup>

Because over the last 20 years, many ASA scholars have turned their attention precisely to producing contextualized knowledge about racism, sexism, colonialism, capitalism and more, while developing critical methodologies precisely to pursue injustices that remain unknowable to liberal and conservative intellectual traditions, it is not surprising that the ASA now finds itself in the cross hairs of the radical right’s ersatz academy and at odds with university administrators increasingly beholden to wealthy donors and anti-public education state legislators. The first legal complaint against the ASA was on the basis of *ultra vires* conduct. It accused the ASA of acting outside its organizational authority by acting as a social justice organization, while maintaining that the boycott had nothing to do with American Studies and was therefore inconsistent with ASA’s constitutional purpose. In keeping with the decontextualizing strategies discussed above, the plaintiffs took the position that knowledge production must be apolitical. ASA withstood these charges, but not on First Amendment grounds. Rather, the presiding judge found it fit within ASA’s constitutional purpose, noting that in the ASA’s view Israel suppresses the academic freedom of Palestinian scholars and that the US plays a significant role in furthering that oppression.<sup>26</sup> While the main charge of *ultra vires* was denied, the judge ruled the case could proceed to discovery on the charges of corporate waste, breach of contract, and



violation of DC Nonprofit Corporation Act. The plaintiffs' legal team now alleges that a small cadre of "extremists" associated with U.S. Campaign for the Academic and Cultural Boycott of Israel manipulated the ASA membership, despite two-thirds of voters favoring the boycott resolution. A goal of the extended lawsuit is to intimidate other academic associations, as Kenneth Marcus has made clear in public statements.<sup>27</sup> I think another is to deny the sociality of our intellectual work. By presenting the majority of ASA members as dupes, the lawsuit insinuates there is no possibility of collective thinking in our associating, no being together in thinking and doing, however, incomplete and dissensual

In response to Professor Chuh's question about the difference our work of associating can make, I conclude with some thoughts on pedagogies of collective action. How might learning collectively, while cooperatively engaged in social action, enable us to learn collectivity (reflexes for it, desire for it)? How can the sociality of thinking together strengthen forms of the social rooted neither in the nation-state, nor in terms of difference determined by structures of domination? As an Association, our thinking collectively about the collective action of the boycott resolution has continued well past the resolution's passing. We may consider this along the lines of a pedagogy of collective action: in asserting the collective right to bear witness to Palestinian suffering and the removal of Palestinian voices from the field of U.S. knowledge production, we (re)oriented our collective learning, as is borne out by a watershed of scholarship in this journal, at the annual conference, and by ASA members.<sup>28</sup> Perhaps one reason the act of boycott in general is so threatening right now is that it represents a collective affirmation that global capitalism remains rooted in social relationships, so neither abstract nor self-regulating. Boycott also reveals disruption to be the Achilles' heel of today's logistical, extractive, and financial capitalism; at best, it prefigures a globalization of anti-oppression struggles waiting in

the wings of history.

Social movement scholar Chris Dixon warns that a fetish for direct action can signal an over-attachment to militancy, short term effectiveness, and the mere veneer of collectivity.<sup>29</sup> Yet to think “direct action” under the rubric of “pedagogies of collective action” lets us contemplate an incredibly thick kind of relationality, one that arises through the process of “direct action,” as simply, acting together to stop something from happening, or acting together to make something happen, without regard for legality as defined by legal traditions best suited for safeguarding property rights.<sup>30</sup> Time permits only the barest sketch of the field of thick relationality that backgrounds the differentiated experiences of the critical-practical activity of direct action. But we can call to mind scenes from Standing Rock and other native-led treaty camps to block pipelines and mines; from the daily actions all over the West Bank by Palestinians to rebuild and hold on to land, home, villages, and city spaces in the face of settler violence; and from the ceaseless Black Lives Matter actions filling streets, parks, courthouses, highways - the everywhere of systematized black premature death - with the meaningfulness of Black collective being. I think of the thickness of the relationality of those stopping or making something happen together in the shape of praying, singing, chanting, holding hands, arms, clothing, staying in a line or a pod in the face of police, military, or private security trying to take away individuals, and moving forward together, embodied movement declaring care, for land, for each other, for collective modes of being, which has been out-lawed. It strikes me that especially in the American Indian treaty camps and West Bank villages, co-resistance takes the shape of guest/host relations under conditions where resistance is existence. Setting up normal circulations of life – kitchens, roads, tents, meeting spaces – bespeaks pre-existing circulations

that know and treat land, collective existence, and belonging otherwise, as they disrupt the logisticality of extraction and dispossession.

What would it look like to center American Studies more around pedagogies of collective action? Would it mean more space and time at the annual and regional meetings for teach-ins, free schools, and report backs from many front lines? Would it mean more humility and more space for thinkers without degrees? Would it mean bringing more parts of our “collective, constitutively communal, relation, plural” selves and others into the conference rooms, or would it mean leaving those rooms more often for other meetings?<sup>31</sup>

---

<sup>1</sup> Kandice Chuh, “Pedagogies of Dissent.” *American Quarterly* vol. x, no. y (2018): x.

<sup>2</sup> *Ibid.*, x.

<sup>3</sup> *Ibid.*, x.

<sup>4</sup> *Ibid.*, x.

<sup>5</sup> *Ibid.*, x.

<sup>6</sup> As of December 2017, 23 states have enacted bills or resolutions against boycotts of Israel. For a state-by-state summary of anti-bds legislation, see Anti-BDS Legislation in the United States. *Palestine Legal*, <https://palestinelegal.org/righttoboycott>.

<sup>7</sup> Tennessee, Arkansas, and North Carolina have state laws prohibiting localities from extending anti-discrimination protections beyond those recognized in state law. For a comprehensive analysis of recent preemptions by states, see “City Rights in an Era of Preemption: A State-by-State Analysis,” National League of Cities. 2017, <http://www.nlc.org/sites/default/files/2017-03/NLC-SML%20Preemption%20Report%202017-pages.pdf>.

<sup>8</sup> Nancy MacLean, *Democracy in Chains: The Deep History of the Radical Right’s Stealth Plan for America* (Viking Press, 2017).

<sup>9</sup> *Ibid.*, 196.

<sup>10</sup> See Jane Mayer, *Dark Money: The Hidden History of the Billionaires Behind the Rise of the Radical Right* (Anchor Books, 2017).

<sup>11</sup> James Baldwin, *The Evidence of Things Not Seen* (Henry Holt, 1985), 56. See also Mary L. Dudziak, *Cold War Civil Rights: Race and the Image of American Democracy* (Princeton University Press, 2000).

<sup>12</sup> Jodi Melamed, *Represent and Destroy: Rationalizing Violence in the New Racial Capitalism* (University of Minnesota Press, 2000).

<sup>13</sup> See Daniel Martinez HoSang and Joseph Lowndes, “‘Parasites of Government’: Racial Antistatistism and Representations of Public Employees amid the Great Recession,” *American Quarterly* Vol. 68, no. 4 (2016): 931-954.

---

<sup>14</sup> Jodi Byrd, “Pedagogies of Anti/Facism.” Presented at the 2017 ASA Conference: Pedagogies of Dissent, Chicago, Illinois, November 2017. See also Craig Wilder, *Ebony and Ivy: Race, Slavery, and the Troubled History of America’s Universities* (Bloomsbury Press, 2013).

<sup>15</sup> See for example, Christopher Newfield, *Unmaking the Public University: The Forty-Year Assault on the Middle Class* (Harvard University Press, 2008); Christopher Newfield, *The Great Mistake: How We Wrecked Public Universities and How We Can Fix Them* (Johns Hopkins University Press, 2016); Roderick Ferguson, *The Reorder of Things: the University and its Pedagogies of Minority Difference* (University of Minnesota Press, 2012); Sarah Goldrick-Rab, *Paying the Price: College Costs, Financial Aid, and the Betrayal of the American Dream* (University of Chicago Press, 2016); Piya Chatterjee and Sunaina Maira, *The Imperial University: Academic Repression and Scholarly Dissent* (University of Minnesota Press, 2014).

<sup>16</sup> Jane Mayer, *Dark Money*, 354-378.

<sup>17</sup> See Mayer, *Dark Money*, 427; MacLean, *Democracy in Chains*, 215.

<sup>18</sup> My state of residence, Wisconsin, exemplifies this: along with undermining teachers’ unions, the administration of Governor Scott Walker tried to replace the truth-seeking mission of the “Wisconsin Ideal” with a terse statement making job training the university system’s mission. The Bradley Foundation, long the force behind school vouchers in Wisconsin, dominates the University of Wisconsin Board of Regents, which has put itself in charge of disciplining student protestors and made the will of administrators to change or end academic programs a grounds for loss of tenure. State senate Republicans comb through humanities syllabi, and have threatened to withhold funding to the state’s flagship university for teaching a “Problems of Whiteness” course, for providing fact-sheets on “right-to-work” laws, and for assigning an essay on the sexual preferences of gay men. See Pat Schneider, “Wisconsin Republicans Attack on UW ‘whiteness’ class Attracts national attention.” *The Cap Times*, December 21, 2016. [http://host.madison.com/ct/news/local/education/university/wisconsin-republican-attack-on-uw-whiteness-class-attracts-national-attention/article\\_305557c7-3548-5d1f-8a42-d19c2a4c56d9.html](http://host.madison.com/ct/news/local/education/university/wisconsin-republican-attack-on-uw-whiteness-class-attracts-national-attention/article_305557c7-3548-5d1f-8a42-d19c2a4c56d9.html).

<sup>19</sup> Christopher Newfield, “Trump’s Triumph Over the Professional Middle Class.” *Middle Class Death Trips*, December 11, 2016, <http://toodumbtolive.blogspot.com/>.

<sup>20</sup> On attacks on climate scientists see Oliver Milman, “Climate scientists face harassment, threats and fears of ‘McCarthyist attacks’,” *The Guardian*. 22 February 2017, <https://www.theguardian.com/environment/2017/feb/22/climate-change-science-attacks-threats-trump>. Among the many recent examples of Republican state politician harassing faculty at public universities are the attempt to cancel a “Problems of Whiteness” course at the University of Wisconsin, Madison, a public attack by Republican state senators on the English Department at the University of Nebraska, Lincoln, and a failed proposal by Arizona law makers to ban “divisive” college courses (HB 2120).

<sup>21</sup> Conservative and libertarian organizations are currently urging state legislatures to pass a bill they call the “Campus Free Speech Act,” which would make it illegal for public colleges to disinvite controversial speakers and would instruct institutions “to remain neutral ... on the public policy controversies of the day.” See Jake New, “Conservative, Libertarian Groups Propose Campus Free Speech Bill.” *Inside Higher Education*, February 1, 2017, <https://www.insidehighered.com/quicktakes/2017/02/01/conservative-libertarian-groups-propose-campus-free-speech-bill>.

---

<sup>22</sup> According to *The Nation*, the Koch brothers' fund the Brandeis Center indirectly; their Donors Capital Fund makes donations to Daniel Pipes' Middle East Foundation, which then funds the Brandeis Center. Pipes' IRS 990 form, filed in 2013, shows that provided \$51,000 to the Brandeis Center, constituting around 20% of its budget that year. See Radhika Sainath, "Major Report Exposes Insidious Campaign Against Pro-Palestine Activists on U.S. Campuses." *The Nation*, October 8, 2015, <https://www.thenation.com/article/major-report-exposes-insidious-campaign-against-pro-palestine-activists-on-us-campuses/>.

<sup>23</sup> The Center's mission statement appears on its homepage: <http://brandeiscenter.com/>

<sup>24</sup> His appointment to the OCR is thus in keeping with the Trump/libertarian strategy of appointing to head government departments persons likely to dismantle or de-operationalize them.

<sup>25</sup> On "the human right to dominate," see Nicola Perugini and Neve Gordon, *The Human Right to Dominate* (Oxford University Press, 2015).

<sup>26</sup> Simon Bronner et. al., v. Lisa Duggan, et. al. Case 1:16-cv-00740-RC Document 28 Filed 03/31/17 Civil Action No.: 16-0740 (RC) Re Document No.: 21 Memorandum Opinion by Rudolph Contreras, United States District Judge.

<sup>27</sup> Marcus is quoted by *The Jewish Voice* as stating, "The victory is much bigger than merely the ASA. When the MLA attempted a boycott vote, this case was cited, by those on both sides of the issue, as one of the reasons the resolution was defeated. See "Federal Judge Advances Lawsuit Challenging the American Studies Association's Israel Boycott." *The Jewish Voice*, April 20, 2017, <http://thejewishvoice.com/2017/04/20/federal-judge-advances-lawsuit-challenging-the-american-studies-association-s-israel-boycott/>

<sup>28</sup> Since ASA starting providing session subject indexes in 2006, the index has included "Middle East American Studies." In 2017, there were more than twice as many sessions listed under the category, including a Presidential plenary. Using the keyword 'Palestine' to search the *American Quarterly* through the Project Muse search engine results in 15 articles for the period from 2010-2013 (including a special forum on Chicano-Palestinian connections from December 2010), compared to 52 articles for 2014-2017 (including a special forum on Palestine and American studies from December 2015).

<sup>29</sup> Chris Dixon, *Another Politics: Talking across Today's Transformative Movements* (University of California Press, 2014), 137.

<sup>30</sup> Ibid.

<sup>31</sup> Chuh, "Pedagogies of Dissent," x.