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# Thistle Writing Collective Every Rose Has Its Thorn Reflections from the 2020 Black Rose Split and a Warning to the Patriarchal Revolutionary Left March 2021

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# **Every Rose Has Its Thorn**

Reflections from the 2020 Black Rose Split and a Warning to the Patriarchal Revolutionary Left

Thistle Writing Collective



March 2021

representing the following localities: Boston, Chicago, Los Angeles, NYC, Portland OR, Providence, San Diego, Texas, Western Kansas, and abroad

All art included in this document was provided by its co-authors.

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# **Contents**

Soft Power and the Weaponization of Bureaucracy .				
Inability to Disagree	13			
Accountability	1			
Performative Politics and the Tokenization of Femi-				
nist Labor	19			
Inability to Respond	24			
What Are We For, Moving Forward	28			

easy answers. However, we can say unequivocally that it is impossible to build a healthy political organization capable of contributing to the growth of horizontal social movements unless we deal with the status quo of gendered and racial power dynamics on the revolutionary Left. Any organization that calls itself revolutionary and whose membership or leadership is majority white and male needs to consider the prejudices embedded in their political arguments and ask whether they are an obstacle to queer, women, and POC-led social movements attempting to carve out space as social actors. Are you engaging with new political ideas and demands emerging from these movements or are you comfortable with confining your discussions with others in your cocoon?

As we consider future political projects, we are utilizing our experience as former militants of BRRN to better orient and educate ourselves. We seek to understand and act on the intersectional nature of our struggles through organizing. We are moving towards a praxis that centers our realities and the historic and ongoing legacies of oppression. We know that there will always be white or male leftists who will reject any political project that fails to center them, but it is no longer our job to accommodate their discomfort. If we had remained BRRN's "women's auxiliary" and dutifully produced attractive content while avoiding internal conflict, we would have been encouraged to stay. But we have never been 'women anarchists interested in women's issues.' We are *feminists* of all and no genders and we are agents of our own destinies.

¡Nunca tendrán la comodidad de nuestro silencio otra vez!

They will never have the comfort of our silence again!

Thistle Writing Collective

Endorsed by 33 individual ex-militants of Black Rose Anarchist Federation / Federación Anarquista Rosa Negra,

## What Are We For, Moving Forward

"If anarchist feminism fails to adapt to the challenges of our political moment, we must resign ourselves to a decade of think pieces documenting the rollback of the few remaining rights hard won by the social movements of our predecessors.

We deserve better and we are ready to fight for it."

#### Romina Akemi and Bree Busk

"Breaking the Waves: Challenging the Liberal Tendency within Anarchist Feminism," 2016.

A new wave of feminism is surging around the globe. It champions the demands of past movements for women's rights, but also carries the seeds of a much larger struggle against all forms of exploitation and oppression. Whether it is the fight for indigenous sovereignty, against white supremacy, for the right to dignified labor, housing, and healthcare, or against capitalism itself, people oppressed by patriarchy are on the front line. As feminists living in the heart of the empire, this movement calls us to action. BRRN was unable and, in some cases, unwilling to respond to this call.

We know that the pressures and demands of this period further accentuated the political crisis within BRRN. We do not claim to have all the answers, but we know that these challenges have also been opportunities and we regret the absence of a strong, organized anarchist presence in the uprisings that followed the killing of George Floyd and the broader struggles against white supremacist violence as embodied by the police, the carceral state, and right-wing extremists.

Now more than ever, the US revolutionary Left needs to rethink its political priorities and strategic orientation. In the midst of a raging pandemic with right-wing extremists discussing civil war, this is no small task and there are no The Black Rose Anarchist Federation / Federación Anarquista Rosa Negra (BRRN) faced a massive wave of resignations beginning in late 2019, 59 in total, with two-thirds taking place in the fall of 2020. Those who left were disproportionally women, queer, trans, non-binary, and/or POC. Rather than reacting to a singular traumatic event, as is so often the case within leftist organizations, resignees described a variety of factors that led to their decisions. However, it was clear from the dozens of resignation letters that many of us were deeply impacted by issues with accountability, poor feminist praxis, tokenization, and the abuse of soft power within the organization. BRRN had ceased to be a healthy or productive vehicle through which we could grow our political work, feminism in particular.

The authors and signatories of this document are 33 exmilitants of BRRN who found common ground in our critiques of the organization as well as our aspirations for continuing to develop a practice of anarchism that meets the challenges of the current moment. We are a group overwhelmingly composed of people who experience gender oppression, many of whom are POC, which informs our experiences and analysis. When we reference gender oppression, we are describing the positionality of trans and cis women, trans men, and non-binary people in relation to patriarchy and the gender binary.

We do not claim to represent the views and experiences of all ex-militants, nor do our critiques extend to all comrades who have decided to stay in the organization. To that end, we have chosen not to include individual call-outs or detailed accounts of specific incidents in this letter. During our time in BRRN, our points of political disagreement were often attributed to miscommunication or clashing personalities. Here, we wish to leave no room for this type of mischaracterization. We hope that by contextualizing our decision to leave BRRN, an organization many of us had dedicated years of our lives to, we

can provide some valuable lessons to others who are facing the same struggles.

Our resignations were not capricious; they came after years of hard work in which we struggled to develop a deeper practice of feminism within BRRN through creative exploration and concrete proposals. However, these efforts were sabotaged by the very patriarchal culture we were attempting to challenge. Our intellectual and cultural work was used to promote a public image of BRRN as an internationally-oriented anti-racist feminist organization, but internally, these priorities were actively pushed to the margins.

Because BRRN lacked the framework to manage internal disagreements, any type of strong critique or call for change was treated as a dangerous source of destabilization and received strong pushback from militants who were comfortable with the status quo. These toxic dynamics were on full display in the leadup to BRRN's annual convention which took place virtually in September 2020. Every point on the agenda became a battleground; we demanded substantial change to address what we experienced as an organizational crisis while our critics vacillated between maligning our intentions and minimizing our concerns. It was in this context that individuals and local chapters began to resign en masse.

This is a story told in many voices. We began this process as a fragmented minority within an organization that stifled our ability to grow our politics through collective analysis and debate. Ironically, it is only after we left it behind that we were finally able to have the types of conversations we had all been so desperately craving. This letter is a direct result of those conversations and is organized around the themes that resonated most for us across our diverse experiences.



too is the particularly misogynist form of tone policing that we experienced when we tried to polemicize, speak truth, and express dissent. For BRRN to treat disagreement as intrinsically threatening was a reflection of how the current power structure prioritized defending its position over the possibility of building a new collective vision.



Those of us invested in feminism worked for political development and change in the organization for years. Efforts included caucusing, speaking tours, coordinating international militant exchanges, numerous attempts at developing accountability protocols, study groups, and the drafting of a 33-page internal discussion document (referred to as the "Feminist Document") which provided an in-depth analysis of BRRN's history with both feminism and patriarchy. Despite this diversity of tactics and level of involvement, again and again, internal efforts to shift the gender dynamics within BRRN suffered from a lack of buy-in and follow-through across the entire organization. Ultimately, those who participated in these efforts became less tolerant and more fully aware of the patterns embedded in BRRN's structures that upheld patriarchy.

Many of us felt the impact of these patterns over the years. That's why we participated in the efforts mentioned above. It was not until we began sharing our experiences that so many more of us realized that this was more than administrative protocols, study groups, and consciousness-raising could cure and it wasn't something that only individuals should be held accountable for. This was an organizational crisis and the entire membership needed to respond. Our shared analysis revealed that our efforts were never sustained for more than a few months and rarely went beyond a "discussion" of the issues; cis men, particularly dominant voices spearheading organizational strategy, never paused their projects or work to allow sufficient focus to create lasting change; the same voices eschewed or ignored the efforts to create a feminist praxis; the misogyny was buried in committees - isolated places, dominated by one or two people over an extended period of time; the ability to debate without over-personalizing critique was never fostered; and there were points of contention about feminism within the organization that reflected the fact that BRRN didn't have a strong analysis capable of uniting its militants.

sult of the practices and culture we have outlined so far: soft power, inability to disagree, lack of accountability, and performative tokenizing feminist politics. Borrowing from social reproduction theory and Tithi Bhattacharya most particularly, these are precisely the stable conditions that capitalism and subsequently patriarchy need to reproduce themselves within an organization. In other words, the very heart of social relations within BRRN produced a culture that depoliticized care and glorified masculinized "productive" work to the extent that a feminist analysis of the political moment wasn't even audible to the culture let alone understood as urgent. If the social relations within the organization were designed to reward individualized clout chasing as the productive form of militant praxis, any feminist who made a demand for more rigorous and collective political analysis was in violation of the patriarchal order of things. The relations within BRRN were reproduced to benefit male comrades. The order of things were designed to reproduce women and non-binary comrades as the unpaid social, administrative, physical, and emotional laborers not the strategists. With that toxic way of relating to others, it follows too, that BRRN could not develop a strong analysis and response to the political moment because the struggle of others mattered far less than a glossy reputation and the live action role playing of revolutionary praxis situating male comrades center stage.

We believe that over the years, BRRN grew in quantity but not in quality. An internal culture of comradery where militants felt socially responsible to one another did not develop. Committee work was largely carried out in isolation and not as an extension of a clear organizational strategy developed collectively by the membership. BRRN's inability to address or respond to unfolding movements is connected to a toxic culture within BRRN that also plagues the broader Left. Building strategy should not be a controversial aim for a political organization. The inability to tackle strategy and the organizational defeatism we perpetually confronted is all too common. **So** 

## **Inability to Respond**

"We would like to challenge our comrades and fellow travellers to do better than this half-hearted liberal project that facilitates the reduction of complex social and economic problems to interpersonal dynamics and individual privileges. Our struggle is collective, and so too must be our tools and analysis."

#### Common Cause Ottawa

"With Allies Like These: Reflections on Privilege Reductionism," 2014.

In 2020, militants came together to write a COVID-19 statement. Writing about the pandemic was an opportunity to flesh out political positions that we had yet to collectively explore, such as healthcare access and the social implication of the pandemic. It could have been a chance to explore our response to the racist and sexist dynamics of care labor and essential workers. After attempting to discuss the social and health crisis associated with the pandemic, the anti-racist uprising initiated by the killing of George Floyd rippled across the country and the world. A movement of this magnitude that altered mainstream attitudes about policing was something we could only imagine when reading about social movements of the past. For an organization that talks about social movements being the seeds for revolutions, it was offensive when some in BRRN dismissed the moment, claiming it would just blow over. When the same dismissal was made about the pandemic itself, the political division within the organization became clear. Claiming the moment wasn't revolutionary or ripe enough for collective action had become a proxy for avoiding political debate and rigorous analysis.

We believe that BRRN's inability to respond to the crisis of COVID-19 and the Black Lives Matter uprising is a direct re-

Even when experiencing political roadblocks, we did not want to leave. This was our organization too. We had invested years of effort and BRRN was our political home. We prepared discussion statements and presentations on the feminist crisis we were experiencing. However in the period leading up to the 2020 annual convention, we realized that not only did we no longer share a vision for the organization with many comrades, but they were willing to actively fight against us through rumors and gossip, even going so far as to claim that some of us were conspiring with our international contacts to split the organization. Feminists aligned with the dominant BRRN culture went to great lengths to delegitimize our concerns and add to the sexist narrative that was actively promoted by the men who benefited from it.

Our comrades heard our personal testimonies of patriarchy in the organization and saw no political importance in them. While we, through diligent and rigorous study and exchange, knew that they formed a pattern of patriarchal dominance and subordination. We argued that the only remedy to a political crisis is political action. They argued that we should mediate our concerns with our abusers one on one and not bother the rest of the organization with what was only an interpersonal misunderstanding. We believe open organizational debate on political differences informed by work in our communities is crucial to building the knowledge, experience, and trust necessary to topple hetero-patriarchy and colonialism. That is not what transpired within BRRN.

We now understand that our politics and how we advanced them were only tolerated because the public image of the organization benefited from our labor. Our writing, art, and organizing made BRRN appear feminist from the outside, but in reality, it was only a veneer over the crisis within. We wrote this letter to expose these dynamics outside our small corner of the Left. We believe we are not alone in this experience, and know that we cannot create change alone.

The rest of the letter is organized in five areas that describe the dynamics and political disagreements that formulated our decision to leave.

- Soft Power and the Weaponization of Bureaucracy
- Inability to Disagree
- Accountability
- Performative Politics and the Tokenization of Feminist Labor
- Inability to Respond

# **Soft Power and the Weaponization of Bureaucracy**

"Psychological terrorism is fundamentally a liberal tactic of male supremacy used mainly by so-called liberal men and women to attack women who move for justice in their daily lives and inside the women's liberation movement. It is a liberal tactic because it does not employ direct physical force nor openly oppose women's liberation. Rather it works to trick, confuse, surprise and throw people off balance when they are facing the oppressor and need to feel secure in their approach and beliefs."

#### Kathie Sarachild

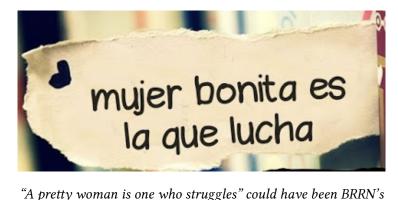
"Psychological Terrorism...," New York: 1974, published in Feminist Revolution, Redstockings of the Women's Liberation Movement.

In early 2019, a group of BRRN feminist militants held conversations about the need to instigate organized discussions

Tokenization was a factor in both visible and invisible ways. Writing was solicited from women and non-binary militants and then heavily edited or even omitted in the final publication. In some cases, publication was delayed indefinitely with no explanation, which generated negative consequences for the contributors. Original artwork was used, edited, and reused without permission in order to give the organization a pretty feminist face at our expense. Our labor was rendered so disposable that it could be appropriated and dropped into something that had nothing to do with our original intentions and wishes. We came to realize that our feminism represented an aesthetic that BRRN favors: the angry feminist to be contained within the borders of the screen, not an angry feminist militant raising important political issues through work within and outside of the organization.

When we questioned the misappropriation of our creative work and labor, we were met with either defensiveness, disingenuously concerned calls and texts about our emotional state, or gaslighting about how we were overdramatizing the situation. Our art, writing, and other media are still on BRRN's website, social media accounts, and podcast with zero acknowledgment that the militants who produced it were forced to abandon the organization.

For many of us, participation in BRRN induced a constant state of cognitive dissonance in which we saw our political work promoted to the public as being representative of the organization, all while we were isolated, ignored, and even actively undermined in BRRN itself. Beyond negatively impacting our experiences as militants, this practice of organizational gaslighting harmed our mental health and made it difficult for us to trust in our own experiences of mistreatment or oppression.



"A pretty woman is one who struggles" could have been BRRN's feminist slogan, since our bodies, labor, and work were only valued when they made the organization "bonita."

about patriarchal practices prevalent in the organization. We shared stories of our personal experiences and observations that allowed us to recognize harmful patterns of behavior in our internal committee work and organizational decision-making that we later presented in a 33-page document which came to be known as the "Feminist Document." We outlined key issues that impacted our political work and participation, including the lack of an accountability protocol, uneven application of political training for potential militants, unclear lines of internal communication, and failed commitments to political development. While these factors may not appear overtly patriarchal on the surface, there was an overarching problem with men utilizing gatekeeping and other "soft" practices in a way that directly contributed to all these issues and subsequently harmed militants oppressed by patriarchy.

We saw that certain militants leveraged their social capital to wield influence within BRRN. This soft power accumulated when skills and information were not passed on to newer militants who were subsequently unable to access full organizational participation. Soft power was mostly exerted by men who often worked together to evade challenges to their behavior. This took many forms: not responding to criticisms or callouts, claiming ignorance while dodging accountability, characterizing challenges as misunderstandings rather than political disagreements, and, in the lead up to our mass departure, spreading rumors and attacking the characters of those who spoke out.

Many men in BRRN skimmed, did not read, or otherwise failed to engage with the Feminist Document in a serious way, either intellectually or collaboratively. This lack of commitment was evident in all subsequent efforts to center feminism within the organization. Even on the occasion that a project was actually put into motion, participation dragged and the toxic internal dynamics remained unmentioned and unaddressed. Feminism never became an official area of

political work within BRRN. It was a well-publicized side project carried out by militants who experience gender-based oppression. It is unsurprising then that most of the militants and local chapters that left BRRN in 2020 were committed to feminist work, including all 12 authors of the Feminist Document.

The weaponization of bureaucratic processes became a key method in maintaining soft power within BRRN. Meetings were strategically stacked with supporters in order to block or smother a competing political position, opinion, or proposal. Instead of embracing open debate, some militants relied on backchannel chat groups to coordinate talking points and arguments as an organized and undisclosed faction. In the Feminist Document, we expressed concern about the over-reliance on bureaucracy to solve deeper problems, especially those arising from our patriarchal internal culture. The tendency to push all work out to committees and avoid organization-wide political discussions meant that nearly all efforts to cut to the root of the tensions and disagreements devolved into personal attacks, diverting the conversation from its political content. In this way, certain men were able to maintain their positions of influence in BRRN while steering the organization away from the political work that they saw as a distraction at best and a threat at worst.

In advance of the 2020 annual convention, the original authors of the Feminist Document and others for whom this analysis resonated organized a series of open meetings in order to revisit issues that had gone ignored or unnoticed. However, this initiative was undermined by the same problematic dynamics described above. We were treated as if we were hysterical, and gaslighting and victim-blaming became the order of the day. Many of the men who had been previously criticized for upholding this toxic culture remained strategically silent, preferring instead to spread rumors and misinformation in order to provoke conflicts with other militants, particularly other

of the intellectual and cultural labor of these very same militants, most of whom were Latinx and of oppressed genders.

little success in coming to collective positions and, moreover, has rarely even tried. The result is an outward-facing media presence that relies heavily on the contributions of individual militants and re-shares of material featuring broad anti-institutional critiques.

Political projects carried out on the local level were also publicly promoted as important examples of BRRN's commitment to "building power from below," even when they were not seriously engaged with or supported internally. In fact, the local chapters responsible for this supposedly invaluable work ended up feeling abandoned when they received little support from the rest of the organization when facing internal conflicts or state repression. Furthermore, there was little interest in analyzing or strategically expanding that work to other local chapters beyond public talks that could be recorded and used for yet more public promotion. The same can be said of the work carried out by individual militants.

As BRRN never successfully established an internal culture of vibrant analysis and debate, political positions and priorities would usually rise to the top at the behest of a well-organized local chapter or a passionate individual. It was also common for pools of interest to form around certain ideas or practices that arose from research projects or on-the-ground political activity. For example, the idea of the feminist strike as championed by Latin American and European feminist movements sparked a great deal of interest among a subsection of the membership. In fact, many of these militants went on to heavily identify with the anti-capitalist feminist politics associated with these movements and attempted to promote them through writing, art, projects, and proposals. However, these efforts all suffered a similar fate. Broad engagement from the membership never occurred nor did BRRN's political priorities shift towards a more specific, combative, and mobilized form of feminism. Yet one would never know this was the case from the organization's social media accounts, which were bursting with the products

women. When those who should have been our feminist comrades acted to protect the interests and positions of men who wanted to preserve the status quo of tokenized feminism, it was clear that soft power had eclipsed the possibility of any authentic engagement with our concerns and demands.

## **Inability to Disagree**

BRRN turned into an organization that was unable to handle disagreement, dissent, and critique. To some, anarchists avoiding conflict sounds like an oxymoron. The image of the anarchist diving headfirst into conflict — verbal, physical, and political, is deeply ingrained in our minds. But an individual's, or an organization's, carefully crafted political positions do not mean they know how to discuss, debate, or live them in their daily activism. We raise this point because it did not only contribute to the stifling internal culture that pushed us to leave BRRN, but we believe it is a trend in many anarchist spaces that deserves more analysis and critical reflection.

BRRN suppressed disagreement not through McCarthyesque censorship, but by controlling the parameters within which dissent and questioning were allowed.

- Within side groups, never through public discussions, and always with the burden on those raising the concerns.
- Without any consideration or analysis regarding which discussions *should* be given more space.
- Without organizational buy-in or follow-through: proposals could be passed but unless individual militants cared to follow through on those decisions or mandates, they would be lost to the past and forgotten without any consequences.

• Without personal conflict: debate was welcome, but not if you raised your voice or voiced a concern too often, especially when it was in conflict with other proposals.

Bureaucratic solutions seeking to resolve political disagreements or cases of abuse were regularly abandoned or gutted of participation soon after passing a referendum vote with no one accountable for their implementation or failure. **These bureaucratic solutions gave the** *appearance* **of organizational accountability without ever actually addressing or resolving anything.** Similarly, attempts at strategic discussion ended with the assignment of tasks and the creation of sub-committees, further promoting volunteerism. The result only codified the lines of debate rather than building common analysis.

This pattern of practice gives the illusion of support to differing political opinions, without ever having to take them seriously to create lasting change. The status quo is maintained. Capitalism can make room for a lot of dissent without changing who is in power, so can US anarchism.

The organization's structure was used to minimize conflict to the detriment of enabling militants to learn how to use political disagreement for deepening analysis, understanding, and empathy, and for building trust for collective action. When we minimize our opportunities to disagree with one another we stunt our abilities to more meaningfully agree. Why does an anarchist organization avoid these discussions and debates? Because the consequences are worth it for those who hold power. When militants were silenced and decided to leave, it was framed as interpersonal disagreement, rather than the perpetuation of a system that continues to marginalize those already more oppressed outside the organization. This was not interpersonal conflict. It was a difference in politics.

We understand that disagreement is necessary to cultivate an evolving, responsive, and generative anarchist organization.

# Performative Politics and the Tokenization of Feminist Labor

"Revolutionary men who are struggling for their freedom fight only against the outside world, against a world opposed to desires for freedom, equality and social justice. Revolutionary women, on the other hand, have to fight on two levels. First they must fight for their external freedom. In this struggle men are their allies in the same ideals in an identical cause. But women also have to fight for their inner freedom which men have enjoyed for centuries. And in this struggle women are on their own."

Ilse, "La doble lucha de la mujer,"
Mujeres Libres, 8 mes de la Revolución, cited in
Nash, "The Debate over Feminism in the Spanish
Anarchist Movement,"
MS. Universidad de Barcelona. 1980.

Over the years, BRRN has moved along two tracks, one public and one private. Publicly, BRRN has leaned hard into social media in order to take advantage of the mainstreaming of leftist politics initiated by Bernie Sanders and built upon by figures such as Alexandria Ocasio-Cortez. Since liberal outrage was increasingly widespread, BRRN used Facebook, Twitter, and Instagram to fill the niche of the anarchist killjoy, condescendingly reminding the freshly politicized that all politicians are bound to disappoint and that the only alternative is, of course, to "build power from below."

While we believe it is fair to say that this position broadly reflected the politics of the membership, it was often little more than an empty slogan in practice. This can be partially attributed to the fact that the organization has had very



In order to expand what is prefiguratively possible, we need to question how we organize and structure our engagement with social change in our communities. While militants within BRRN had been working since the beginning to integrate feminist practices into the federation, recent years saw an influx of new membership — many of whom were oppressed by patriarchy with different experiences and expectations for what a feminist organization looks and feels like. In an organizational culture that could handle disagreement generatively, this could have led to important experiments in new ways of organizing, holding each other accountable, and practicing anarchist feminism. Instead, our efforts were sidelined and minimized, our comrades were gaslit, demonized, and pushed into resignation, and the federation pulled off bureaucratic acrobatics to de-legitimize critiques and amplify a liberal feminist subset advocating for business as usual. This was the last straw, and revealed the deeper truth that the federation had become incapable of incorporating ideas that felt threatening to those who held power within it.

We want an organization that investigates political questions critically and rigorously. Deep and serious political inquiry does not negate our capacity for personal empathy and understanding of our fellow comrades. It does mean that we can differentiate between them and understand that successful collaborative analysis requires both.

## **Accountability**

Since its founding in 2013, BRRN experienced a multitude of internal conflicts and crises, many of which stemmed from instances of oppressive behavior and gendered violence. Some of these did not escalate beyond the local level and as a result, were swiftly forgotten outside the circle of those immediately

affected. Other cases went on to consume entire local chapters and left a lasting impact on BRRN as a whole.

Every situation had its own unique features, but patriarchal behavior was a dominant theme, often embodied by an individual or a group of friends within a local chapter. Some of these conflicts ended in clear decisions, but others lingered on without any satisfying resolution. What's more, new militants entered the organization with little to no understanding of this mixed history, leading to bad or confusing surprises later on. This is not the story of a political organization where militants can say with certainty that what had happened before would not happen again or that potential conflicts would be handled more quickly, compassionately, or effectively than they had been in the past.

When this topic was raised (often in the midst of a new crisis), the conversation centered on administrative solutions rather than political ones. We believed the former was desperately needed but would remain symbolic and unenforced without a massive transformation in BRRN's feminist praxis, a study and debate on accountability practices, and a significant restructuring of organizational priorities.

On the Left, there is an unspoken belief that finding solutions for intra-movement violence (especially of a sexual or gendered variety) is "women's work," meaning that the burden is placed on those most likely to have already experienced abuse rather than those most likely to perpetuate it. BRRN is firmly located in this patriarchal tradition.

There was little to no examination among the broad membership of how gender politics come into play when generating (or failing to generate) an organizational culture that is safer, welcoming, transparent, and democratic. Within the organization, this work remained narrowly confined to small working groups and individuals. From its founding until the time of our resignations, BRRN was not able to implement a procedure or

protocol for dealing with oppressive behavior, including sexual violence and harassment.