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# AN EVALUATION OF THE AMERICAN PSYCHOLOGICAL ASSOCIATION'S TASK FORCE REPORT ON THE SEXUALIZATION OF GIRLS

*Dr. Richard P. Fitzgibbons, M.D.<sup>†</sup>*

*Dale O'Leary<sup>†</sup>*

## INTRODUCTION

The purpose of this paper is to evaluate the American Psychological Association's (APA) Task Force Report on the Sexualization of Girls (Report). The Report has four parts: evidence of the sexualization of girls; consequences of the sexualization of girls; positive alternatives; and recommendations. The Task Force on the Sexualization of Girls (TSG) presents ample evidence of the problems and consequences, as well as some positive alternatives and helpful recommendations. This paper will argue that the recommendations presented will not achieve the goal of protecting girls because the TSG fails to identify the underlying causes and implicitly accepts unsubstantiated ideologically based assumptions.

Part I will explore the causes. Part II deals with the factors the TSG does not take into consideration when presenting its recommendations and historical responses to the problem. Part III will analyze the ideological influences on the TSG, namely the Sexual Revolution and Radical Feminism. Part IV will deal with the fundamental question that the TSG avoids, namely: Should adolescent

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<sup>†</sup> Dr. Rick Fitzgibbons is the director of the Institute for Marital Healing outside Philadelphia. He trained in psychiatry at the Hospital of the University of Pennsylvania and the Philadelphia Child Guidance Center. In 2000 coauthored *Helping Clients Forgive: An Empirical Guide for Resolving Anger and Restoring Hope* with Dr. Robert D. Enright, University of Wisconsin, Madison, for American Psychological Association Books. His websites are [www.maritalhealing.com](http://www.maritalhealing.com) and [www.childhealing.com](http://www.childhealing.com). He currently serves as a consultant to the Congregation for the Clergy at the Vatican.

<sup>†</sup> Dale O'Leary is an author and lecturer, most notably for *The Gender Agenda: Redefining Equality One Man, One Woman*. She has authored numerous articles on her blog at <http://daleoleary.wordpress.com>. She is a graduate of Smith College. She is married and currently living in Florida.

girls engage in sexual activity or do the risks outweigh the benefits? The authors of the TSG Report appear to believe that they can preserve the sexual freedom of girls, while avoiding the negative effects of sexualization. There is no evidence that this is possible and, indeed, the Report itself presents substantial evidence of the failure of such a plan.

### I. EVIDENCE OF THE SEXUALIZATION OF GIRLS

In response to what has been identified by journalists, child advocacy organizations, parents, and psychologists as an increasingly serious problem, the APA formed the TSG:

The Task Force will examine and summarize the best psychological theory, research, and clinical experience addressing the sexualization of girls via media and other cultural messages, including the prevalence of these messages and their impact on girls. . .<sup>1</sup>

The Report of the TSG presents a comprehensive summary of reasons for legitimate concern. According to the TSG, "Virtually every media form studied provides ample evidence of the sexualization of women, including television, music videos, music lyrics, movies, magazines, sports media, video games, the internet and advertizing."<sup>2</sup> Women are more likely to be dressed in sexy clothing. In addition "a narrow (and unrealistic) standard of beauty is heavily emphasized."<sup>3</sup> According to the TSG Report, sexualization occurs when:

... a person's value comes only from his or her sexual appeal or behavior; the exclusion of other characteristics; a person is held to a standard that equates physical attractiveness (narrowly defined) with being sexy; a person is sexually objectified—that is made into a thing for others' sexual use rather than seen as a person with the

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1. AMERICAN PSYCHOLOGICAL ASSOCIATION, "REPORT OF THE APA TASK FORCE ON THE SEXUALIZATION OF GIRLS" 1, (2007), *available at* [http://www.ojp.usdoj.gov/newsroom/events/pdfs/apa\\_report.pdf](http://www.ojp.usdoj.gov/newsroom/events/pdfs/apa_report.pdf) [hereinafter TSG].

2. AMERICAN PSYCHOLOGICAL ASSOCIATION, "REPORT OF THE APA TASK FORCE ON THE SEXUALIZATION OF GIRLS: EXECUTIVE SUMMARY," 1 (2010), <http://www.apa.org/pi/women/programs/girls/report-summary.pdf> [hereinafter TSG, EX].

3. *Id.* at 2.

capacity for independent action and decision making; and/or sexuality is inappropriately imposed upon a person.<sup>4</sup>

The media is undeniably promoting the sexualization of girls and adult women by this definition. Direct cause and effect relationships in areas such as media influence are difficult to prove absolutely. There is certainly reason to consider the real possibility that constant media images of sexualized girls and women effect the way a woman thinks about her own body.<sup>5</sup>

It appears probable that viewing oneself as a sexual object or being treated as a sexual object has, as the TSG Report asserts, “negative effects in a variety of domains, including cognitive functioning, physical and mental health, sexuality, attitudes and beliefs.”<sup>6</sup> According to the TSG Report, “Research links sexualization with three of the most common mental health problems of girls and women: eating disorders, low self-esteem and depression or depressed moods.”<sup>7</sup>

The evidence presented by the TSG is compelling. The question not addressed is: Why should young women, who by all measures have better educational and vocational opportunities than women of any other generation in history, be suffering from serious mental health problems?

The TSG is not the first to draw attention to this problem. Mary Pipher, author of *Reviving Ophelia*, after seeing teenage girls in her private practice, who suffered from depression, eating disorders, and low self-esteem, concluded that, “Girls are coming of age in a very poisonous, girl-hurting culture.”<sup>8</sup> She blamed the images girls see in the media, and particularly in advertisements, for setting a standard the normal girl cannot attain. She argues that girls have “been taught that what’s valuable to them is their sexuality.”<sup>9</sup> While Pipher sees ‘lookism,’ sexism, and patriarchal society as at the root of the problem, the majority of adolescent girls with serious problems whose histories she presents have engaged in sexual activity. The

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4. *Id.* at 1.

5. *See id.* at 2-3.

6. *Id.* at 2.

7. *Id.* at 3.

8. Interview with Mary Pipher, Author, *Reviving Ophelia: Saving the Selves of Adolescent Girls*, 2 (1998) [www.mediaed.org/assets/products/303/transcript\\_303.pdf](http://www.mediaed.org/assets/products/303/transcript_303.pdf).

9. MARY PIPHER, *REVIVING OPHELIA: SAVING THE SELVES OF ADOLESCENT GIRLS* 8 (Ballantine Books 1995).

possibility that the conflict with parents, depression, drugs, eating disorders, self-mutilation, and suicide attempts which brought these girls to counseling may be related to or at least exacerbated by their sexual involvement is not explored, even though Pipher admits:

My own belief is that junior-high girls are not ready for sexual experiences. . . By high school, some girls may be mature enough to be sexually active, but my experience is that the more mature and healthy girls avoid sex. Because of my work, I see the unhappiness of early sexual intimacy – the sadness and anger at rejection, the pain over bad reputations, the pregnancies, the health problems and the cynicism of girls who have had every conceivable sexual experience except a good one. I’m prepared to acknowledge exceptions, but most early sexual activity in our culture tends to be harmful for girls.<sup>10</sup>

On the other hand, Pipher sees adolescence for girls is a time for “coming to terms with their own sexuality, defining a sexual self, making sexual choices, and learning to enjoy sex.”<sup>11</sup> Pipher does not explore this inconsistency.

In contrast to the young women who came to her for counseling, Pipher also interviewed several girls who appeared to be successfully surviving adolescence. She talked to Christy whom she met volunteering at a homeless shelter. Christy wanted to date, but not have sex.<sup>12</sup> She interviewed Leah, the daughter of a Vietnamese single mother, who said “I would never have sex until I was married. That would bring great shame on my family.”<sup>13</sup> Pipher was surprised that Lori, who believes sex comes with marriage, was “so well rounded and mentally healthy that I pondered how to explain it.”<sup>14</sup> Pipher was conflicted about Jody, who came from a very traditional family and who said, “I want to follow God’s plan for me. . . I want to marry and have a close family like mine.”<sup>15</sup> Pipher writes:

I struggled with the questions this interview raised for me. Why would a girl raised in such an authoritarian, even sexist, family be so well liked, outgoing and self-confident? Why did she have less anger

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10. *Id.* at 208.

11. *Id.* at 205.

12. *Id.* at 204.

13. *Id.* at 88.

14. *Id.* at 51.

15. *Id.* at 91.

and more respect for adults? Why was she so relaxed when many girls are so angst filled and angry?<sup>16</sup>

Maria and Evonne, two minority girls Pipher interviewed, were not sexually active. Pipher noted that, "It's interesting, given how mature they were compared to their peers, that they didn't feel ready for sex."<sup>17</sup>

It appears that Pipher sees the dangers of sexualization, but is unable in spite of the evidence before her to acknowledge that abstaining from sexual intimacy protects girls from the toxic culture. One can argue that the TSG Report suffers from the same failure to acknowledge the negative effects of sexual activity on girls.

## II. TSG RECOMMENDATIONS VERSUS TRADITIONAL APPROACHES

The TSG Report has identified serious problems for girls, and made a number of recommendations among them:

- Increased access for girls to athletic and other extracurricular programs that make them feel powerful.
- The development and presentation of comprehensive sexuality education programs which deal with this issue.
- Positive messages for girls from organized religious and other ethical instruction
- Alternative media to counter act the sexualized image in major media.
- Forums, research, and feminist activism to create awareness.

Granted that a problem of sexualization of girls exists, are the remedies suggested by the TSG Report the correct ones? Or has bias caused the authors to ignore other factors, in which case the suggested remedies will at best only deal with symptoms and at worst exacerbate the problem? The Report does not address why contemporary culture tolerates the sexualization of girls, why this has increased, and why media is so deeply involved. Unless the causes of the problem are correctly diagnosed, the solutions proposed may be less than effective.

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16. *Id.* at 92.

17. *Id.* at 281.

Several of the suggestions have merit. Awareness of the problem is important. Feminist groups should be concerned about the sexualization of girls. Religious teachings and a strong faith do act as a protection; however, traditional religious beliefs come into direct conflict with the messages promoted in comprehensive sexuality education courses and by feminist groups.

There are several factors, which the TSG Report fails to take into consideration and these include:

*A. Sex Differences*

There is a simple rule that should be applied to any effort at social change, "Accept the things you cannot change, change the things that can be changed, and have the wisdom to know the difference."<sup>18</sup> If society is going to successfully address the problem of the sexualization of girls, the part played by biology and human nature—in particular universal male and female desires, attractions, and responses should be taken into consideration. For example:

- 1) Men are sexually attracted to women, in particular to younger women and to women they perceive as beautiful.<sup>19</sup> They want to engage in sexual activity with them and will try to obtain that objective by various means including seduction and lies. While male sexual desire can be repressed and/or channeled,<sup>20</sup> there is no evidence that it can be eliminated. However, the male ideal of beauty is different for different cultures and at different times in history, therefore while men will always prefer women they perceive as beautiful, the standard of beauty can change.<sup>21</sup>
- 2) Women want to be loved by a man, to form a permanent relationship, and to have children.<sup>22</sup> Women are susceptible to seduction. They can be talked into engaging in sexual intimacy by promises of love and commitment. Young girls are particularly susceptible. The desire to be loved will lead them to attempt to attract the attention of males. Since men

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18. This is a truncated form of the Serenity Prayer attributed to Reinhold Neibuhr.

19. STEVEN RHOADS, *TAKING SEX DIFFERENCE SERIOUSLY*, 54-59 (Encounter Books 2004) [hereinafter Rhoads].

20. *E.g.*, TSG, *supra* note 1, at 34.

21. B. A. Bonafini & P. Pozzilli, *Body Weight and beauty: The changing face of the ideal female body weight*, 12 *OBESITY REV.* 62, 67 (2010); Rhoads, *supra* note 19, at 54-59.

22. Rhoads, *supra* note 19, at 190-191..

favor certain body types and physical characteristics, girls will seek to achieve an attractive appearance to make themselves more appealing.<sup>23</sup>

Any program aimed at reducing the negative effects of the sexualization of girls should take into account these fundamental differences. Unfortunately, the APA and numerous other professional associations have adopted an ideological agenda, generally known as political correctness, which—among other things—denies that there are natural human instincts and rejects the claim that men and women are naturally different.<sup>24</sup> Some contemporary views forward the belief that all observable differences between men and women are socially constructed, imposed by an oppressive society, and not manifestations of any underlying human instincts or hormonal reactions, and therefore, it is not considered politically correct to take traditionally recognized sex differences into account when developing social policy.<sup>25</sup> Men and women are told that their feelings and reactions are the product of social conditioning and can and should be changed.

The solutions suggested in the TSG Report are based on several dubious assumptions. For example, if girls feel powerful,<sup>26</sup> they will no longer want to be attractive to males and if the media no longer shows pictures of sexually attractive women,<sup>27</sup> men will no longer seek to have sexual relations with women they view as sexually attractive.<sup>28</sup> Such hidden assumptions are not supported by experience or evidence.

The belief that there are no natural differences between men and women is so engrained in academia, that when the president of Harvard suggested that there might possibly be some natural differences between men and women, those in academia were furious. No apology was sufficient and as a result he is no longer the president of Harvard.<sup>29</sup>

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23. Rhoads, *supra* note 19, at 86.

24. Rhoads, *supra* note 19, at 58.

25. United Nations Fourth Conference on Women, Beijing, China, September 4-15, 1995, *Global Framework*, ch. 2, para. 28, U.N. Doc. A/CONF. 177/20 (Oct. 17, 1995).

26. TSG, EX, *supra* note 2, at 6.

27. *E.g.*, TSG, EX, *supra* note 2, at 5-7.

28. *Id.*

29. William Saletan, *Don't Worry Your Pretty Little Head: the Pseudo-feminist Show Trial of Larry Summers*, Slate (Jan. 21, 2005, 6:46 PM), [http://www.slate.com/articles/health\\_and\\_science/human\\_nature/2005/01/dont\\_worry\\_your\\_pretty\\_little\\_head.html](http://www.slate.com/articles/health_and_science/human_nature/2005/01/dont_worry_your_pretty_little_head.html).

Instead of trying to change what cannot be changed, it might be more profitable to look at the things that can be changed. An article by Bonafini and Pozzeilli entitled “Body Weight and beauty: The changing face of the ideal female body weight,” points out that:

... there have been dramatic changes in what is considered a beautiful body. The ideal of female beauty has shifted from a symbol of fertility to one of mathematically calculated proportions. It has taken the form of an image responding to men’s sexual desires. Nowadays there seems to be a tendency toward the destruction of the feminine, as androgynous fashion and appearance dominate our culture.<sup>30</sup>

This change in fashion in the twentieth century occurred as the result of several factors: photography, film, and television accentuate body fat, make women look heavier than they are, and favor the thin.<sup>31</sup> Professional models that are tall and thin can display a wider variety of garments than those who are pleasantly plump. Gay male designers have an inordinate influence in international high fashion and may unconsciously favor androgyny and women with boyish figures, as well as fashion that borders on the obscene.<sup>32</sup> In the eighteenth and nineteenth centuries women achieved a thin waist by wearing corsets—which were uncomfortable and unhealthy. A woman’s thighs and hips were concealed. In the first half of the twentieth centuries, corsets were replaced with flexible girdles and then in the 1960’s artificial restrictions were done away with entirely; at the same time more of a woman’s body was exposed.<sup>33</sup> Given the emphasis on thin and athletic women, a woman who wished to be attractive had no option, but to reduce her weight.

It is not just the images of sexy women that are a problem. In a majority of television and movie comedies and dramas produced today, if an unmarried man and woman kiss, in the next frame they are falling into bed. However, it is interesting to note that dramas where sexual promiscuity are not part of the plot are popular—such

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30. Bonafini, *supra* note 21, at 62.

31. Personal observation of ballerinas who although they weighed less than 110 lbs were told they had to lose 10 lbs. to appear their original weight on television.

32. *Gay Fashion Designers*, FEMININE BEAUTY (Nov. 04, 2005, 22:16), <http://www.femininebeauty.info/gay-fashion-designers>.

33. *A ‘brief’ history of bras, undergarments and underwear over the past 200 years*, BRAS AND UNDERWEAR: A HISTORY OF BRAS, UNDERGARMENTS, AND UNDERWEAR, (2007), [brasandunderwear.com](http://brasandunderwear.com).

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as the dramatizations of Jane Austen novels, Harry Potter films, and Lord of the Rings.<sup>34</sup>

An emphasis on more modest clothing and pressure on the fashion industry to use models with various body shapes could certainly take the pressure off women to conform to unrealistic body image goals, but this is only a symptom of the real problem. No matter how women dress, men will lust after them and women will want to be loved.

Throughout history, various societies have sought to control male lust and channel it in ways that protected women and girls.<sup>35</sup> Such social policies reflected a general recognition that sexual activity outside marriage has negative consequences for society in general and women in particular:

- 1) Sexual intercourse leads to pregnancy. Pregnancy outside marriage presents a serious challenge to society, whose goal is to provide a stable environment for each baby—namely a father and mother who are committed to each other by marriage and therefore to the child. In the past the conception of a child outside marriage was often followed by a forced marriage. Unwed motherhood was considered a scandal and abortion was illegal and dangerous.<sup>36</sup>
- 2) Sexual intercourse outside marriage spreads sexually transmitted diseases, some of which cause infertility and some of which, while treatable, cause continuing health problem.<sup>37</sup>
- 3) Sexual intimacy causes the release of oxytocin in the woman, which causes her to bond to her partner and increases trust.<sup>38</sup> The woman may not be able to control her emotional response

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34. See generally Links to Jane Austen on the Web, <http://www.austen.com/onaust.htm> (last updated Dec. 29, 2010); See also Dan Alex, *Jane Austen TV and Movies* (last updated Feb. 2, 2012), <http://www.janeausten.org/jane-austen-movies.asp>. Over 100 films, TV programs, and adaptations of Jane Austen have been produced from 1938 to the present. In a current list of highest-grossing films 10 of the top 24 were of the Harry Potter series and the three films from the Lord of the Rings series. See List of Highest Grossing Films, WIKIPEDIA (Feb. 17, 2012, 9:33 AM), [http://en.wikipedia.org/wiki/List\\_of\\_highest-grossing\\_films](http://en.wikipedia.org/wiki/List_of_highest-grossing_films).

35. See John Melody, *Chastity*, NEW ADVENT (2009), <http://www.newadvent.org/cathen/03637d.htm>.

36. Bridget Potter, *Lucky Girl*, GUERNICA: a magazine of art & politics (March 2010), available at [http://www.guernicamag.com/features/1615/lucky\\_girl/](http://www.guernicamag.com/features/1615/lucky_girl/).

37. See generally *Sexually Transmitted Diseases*, Centers for Disease Control and Prevention (CDC) (last updated Feb. 16, 2012), <http://www.cdc.gov/STD/>.

38. MIRIAM GROSSMAN, UNPROTECTED: A CAMPUS PSYCHIATRIST REVEALS HOW POLITICAL CORRECTNESS IN HER PROFESSION ENDANGERS EVERY STUDENT 7 (Sentinel 2006); See Michael Kosfeld, *Oxytocin Increases Trusts in Humans*, 435(2) Nature 673, 673 (June 2005).

to a man she has been intimate with and may trust a man who is not committed to her. The breakup of the relationship leaves the woman feeling betrayed and depressed and lowers her self-esteem.<sup>39</sup>

- 4) Women want to be loved, married, and have children. If women refuse to grant sexual favors before marriage, men, desiring to win the favor of a particular woman, are more likely to propose marriage and accept the responsibility for the woman and the children born of their union.
- 5) Because women become pregnant, nurse babies, and are more likely to be responsible for the primary care for children, they are less available to engage in certain forms of economic activities and they and their children have to rely on the husband/father for support.
- 6) The family consisting of the father, mother, and their children is the fundamental unit of society and societies have therefore encouraged, supported, and privileged family foundation.<sup>40</sup>

Throughout history, various societies have recognized the negative consequences of sexual activity outside marriage and have, therefore, discouraged it. Reading through the nineteenth century novels of authors like Austen, Trollope, and Dickens, one can see the emphasis placed on a woman's chastity, the methods used to protect unmarried women and the tragedy predicted for those girls who fell from virtue:

- 1) The activities of girls and unmarried women were restricted. When in public, they were accompanied by family members or chaperons. The whole family, particularly the girls' father and brothers, was concerned about the preservation of the virtue of young women.
- 2) Women married young, often to men selected or at least approved by their parents. Although young women wanted to marry for love, economic consideration and social class played an important part in the choice of mate.
- 3) Girls' education was thereby restricted and, if they were educated, it was in all-female institutions.

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39. *Id.*

40. The Universal Declaration of Human Rights recognizes this reality: "The family is the natural and fundamental group unit of society and is entitled to protection by society and the State." *The Universal Declaration of Human Rights*, art. 16 (pt. 3), [http://www.ohchr.org/EN/UDHR/Documents/UDHR\\_Translations/eng.pdf](http://www.ohchr.org/EN/UDHR/Documents/UDHR_Translations/eng.pdf). "Motherhood and childhood are entitled to special care and assistance." *Id.* at art. 25 (pt. 2).

- 4) Because of limitation on education, early marriage, and negative attitudes to women's abilities, women's participation in the economic and political life of their communities was circumscribed.
- 5) Society recognized the effect of overtly sexual clothing on males; therefore girls' clothing was carefully chosen to avoid immodesty.
- 6) Girls were educated in religious and cultural values of chastity and modesty. They were taught that sexual relations were for marriage and sexual intimacy outside marriage was wrong.
- 7) Girls and women who were sexually active outside marriage brought shame on their families and were shunned by other women.<sup>41</sup>

In the second half of nineteenth century women rightly rebelled against restrictions on their education and on their right to participate in the political and economic life of their communities.<sup>42</sup> They objected to stereotypes that portrayed them as lacking intelligence and skills.<sup>43</sup> Women wanted to marry for love, rather than economic consideration, which were often primary in their parents' minds. In the twentieth century women won acceptance as full and equal citizens, but something happened which the nineteenth century foremothers of women's liberation had feared. Freed from restrictions, thrust into the male world without protection, women became vulnerable to the lust of men. Women were supposed to protect themselves by carefully monitoring their behavior. They did for a time have the support of society, which imposed various rules of behavior and provided safe environments. For example, young women attending co-ed colleges up until the 1960's were housed in sex segregated dormitories and males were not allowed above stairs or in the rooms of female students. Curfews were enforced.<sup>44</sup>

In the 1960's all this changed. Any residual protection of young women was swept away by two interconnected social movements: the Sexual Revolution and Radical Feminism.<sup>45</sup>

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41. See, *E.g.*, JANE AUSTEN, *PRIDE AND PREJUDICE* (Bantam Books 1981) (1813); See also CHARLES DICKENS, *BLEAK HOUSE* (Nicola Bradbury ed., Penguin Books 2006) (1853).

42. Bonnie Eisenberg & Mary Ruthsdotter, *Living the Legacy: The Women's Right Movement 1848-1998* (1998), <http://www.legacy98.org/move-hist.html>.

43. LINDA BRANNON, *GENDER: PSYCHOLOGICAL PERSPECTIVES*, ch. 3 (5th ed., Pearson 2008).

44. Personal observation based on personal experiences of the authors.

45. Radical feminism applies Marxist class struggle theory to the relationship between men and women, classifying men as the oppressor class, women as the oppressed class, proposing a

### III. IDEOLOGICAL INFLUENCES IMPLICIT IN THE TSG

Pronouncements from the APA need to be carefully scrutinized for evidence of ideological bias, since the organization has come under the influence of special interest groups, which have imposed an ideology of political correctness upon it. In the book *Destructive Trends in Mental Health: The Well-Intentioned Path to Harm*, Rogers Wright, founding president of the Council for the advancement of Psychological Professions and Sciences, and Nicholas Cummings, past president of the APA, collected essays by various professionals documenting how the APA is failing in its professed mission. In the preface they write: “. . . psychology and mental health have veered away from scientific integrity and open inquiry, as well as from compassionate practice in which the welfare of the patient is paramount. . . . Psychology, psychiatry, and social work have been captured by an ultraliberal agenda.<sup>46</sup> According to Richard Redding, “Psychology’s manifestly liberal stance undermines its credibility. Scientific findings are rendered suspect.”<sup>47</sup> The authors of *Destructive Trends* argue that the APA is not a neutral professional organization seeking to provide the public with the fruits of objective scientific study, but an organization it has repeatedly taken sides in contentious public controversies, offering opinions which are outside its area of expertise, and not supported by well-designed, reliable research. Two ideological influences can be identified: the sexual revolution and radical feminism.

#### A. *The Sexual Revolution*

A movement promoting absolute freedom from all social restrictions on sexuality had been lurking beneath the surface for decades, but the invention of the birth control pill provided an opportunity for a full-scale revolt against traditional morality and common sense restrictions on sexuality. It became socially acceptable to promote absolute sexual liberation. According to anthropologist

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sex-class revolution that will overthrow the patriarchal system, and promoting abortion on demand and lesbianism as means to achieve their objectives. See SHULAMITH FIRESTONE, *THE DIALECTIC OF SEX* (Farrar, Straus, Giroux 1970); DALE O’LEARY, *THE GENDER AGENDA: REDEFINING EQUALITY* (Vital Issues Press 1997).

46. ROGERS WRIGHT & NICHOLAS CUMMINGS, *DESTRUCTIVE TRENDS IN MENTAL HEALTH: THE WELL-INTENTIONED PATH TO HARM* xiii (Routledge 2005).

47. *Id.* at 10.

Edward Green, "The sexual liberation paradigm holds a core belief that nothing should interfere with sexual freedom. . ." <sup>48</sup> Furthermore, "The sexual liberation paradigm grew out of the sexual revolution of the 1960s and 1970s, in which gay activists, feminists, and others sought equal rights and recognition (legal and societal) and rejected 'heteronormative' traditional sexual morality." <sup>49</sup> Likewise,

The advent of the availability of effective contraception and treatment for sexually transmitted infections removed much of the risk of pregnancy and disease from sexual intercourse. Casual sex came to be regarded as safe, liberating, fun, freely available and something that members of modern consumer cultures felt much freer to consume. <sup>50</sup>

The sexual liberation movement led to the development of intense narcissistic personality conflicts in adults and in youth, including the belief that no one was harmed by using another person solely as a sexual object for one's own pleasure. <sup>51</sup>

The proponents of sexual liberation convinced many that with the invention of a pill to prevent pregnancy and improved treatment of STDs, women were now as free to engage in sexual activity as men had always been. All restrictions, all social condemnation, all protections of women's chastity were tossed aside as irrational restrictions. Those who objected were told that they had Puritan or Victorian hang-ups. <sup>52</sup> Pornography, which had been hidden away, was brought out and became big business. Abortion, which had previously been available though illegal, was legalized first by New York State, and then in 1973, nationally, by the Supreme Court. <sup>53</sup> The Sexual Revolution was accepted by the media as a *fait accompli* and its promoters reveled in their new freedom. <sup>54</sup>

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48. EDWARD GREEN & ALISON HERLING RUARK, AIDS BEHAVIOR AND CULTURE: UNDERSTANDING EVIDENCE-BASED PREVENTION 40 (Left Coast Press 2011).

49. *Id.* at 39.

50. *Id.* at 29.

51. See Fred Hutchison, *Narcissism and the culture war*, Renew America (Feb. 8, 2004), <http://www.renewamerica.com/columns/hutchison/040208>.

52. Michael Wagner, *No Rules, No Civilization: The Sexual Revolution is a Fraud*, MY CHRISTIAN BLOG (Apr. 8, 2010, 2:04 AM), <http://mike42lan.wordpress.com/2010/04/08/no-rules-no-civilization-the-sexual-revolution-is-a-fraud-by-michael-wagner/>.

53. For the national legalization of abortion, see *Roe v. Wade*, 410 U.S. 113 (1973).

54. See Stephan Ridgway, *Sexuality & Modernity: The Sexual Revolution of the 60s* (1997), <http://www.isis.aust.com/stephan/writings/sexuality/revo.htm>.

However, contraception while universally available was not always universally used, and unplanned pregnancies increased. Not all the pregnant unmarried women opted for abortion, creating an underclass of single mothers, often with offspring by several fathers. It turned out that the medical profession had been overly optimistic about its ability to treat STDs. In addition to the classic STDs, — syphilis and gonorrhea—, new diseases became epidemic: Chlamydia—which could render a woman sterile; herpes—which could be controlled, but those infected remained vulnerable to reoccurrence and could continue to infect others; human papilloma virus—which has been linked to cancer; and AIDS—which was initially almost always fatal, and now is a chronic and debilitating disease.<sup>55</sup>

The Sexual Revolutionaries, unable to ignore the carnage their revolution had caused, did not retreat, instead they insisted that they and only they were capable of dealing with the problem. The liberal advocates demanded and received permission to institute comprehensive sexuality education courses K through 12.<sup>56</sup> They claimed that the objective of these courses was to prevent pregnancy and disease. And in the 1980s at the height of the AIDS epidemic with thousands dying, parents and school boards were concerned enough to give these sexual ‘experts’ free rein. What many did not understand was that the goal of the sexual revolutionary ‘experts’ was not to teach the students how to eliminate the risks involved with sexual relations outside marriage by abstaining from such activity (just as one eliminates the negative effects of smoking, by not smoking), but to teach the students how to reduce their risk through the use of condoms, contraception, and when that failed abortion (the equivalent of offering filter tip cigarettes). The primary concern of these experts was the preservation of their sexual revolution.<sup>57</sup> Students were taught that they were sexual beings from birth. This claim was based on the writings of Alfred Kinsey, who relied on the

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55. Jean Scandlyn, *When AIDS became a chronic disease*, 172 W.J.M 130, (Feb. 2000), <http://www.ncbi.nlm.nih.gov/pmc/articles/pmc1070775/pdf/wjm17200130.pdf>.

56. See Ruth Mayer, *1996-97 trends in opposition to comprehensive sexuality education in public schools in the United States*, SIECUS Report, Aug.-Sept. 1997, at 20; See also Terry Sollom, *Tracking the trends. Year-end review of state actions on reproductive health policy. Teenage pregnancy prevention*, State Reprod. Health Monit, Dec. 1995, at 8.

57. See Barbara Dafoe Whitehead, *The Failure of Sex Education*, THE ATLANTIC MONTHLY (October 1994), available at <http://www.theatlantic.com/past/politics/family/failure.htm>.”

experiments of a notorious pedophile for his theory.<sup>58</sup> This claim purposefully confused the healthy recognition that one is male or female, with participation in activities designed to sexually arouse. Students (in some cases as early as kindergarten) were encouraged to engage in masturbation and various sexual behaviors when they felt they were ready.<sup>59</sup> What boy in lust does not think he is ready? What girl in love is not sure she can handle the consequences? Emotionally vulnerable teenagers were told that all they had to do was use the proper forms of protection. As the failure of comprehensive sexuality education in high school became evident, the experts insisted that the programs needed to start earlier—in junior high, then elementary school, then kindergarten. Parents were assured that comprehensive sexuality education would solve all the problems. In a very real sense, the schools hired the arsonists to put out the fire and the consequences were predictable. The problems increased. Rather than being the solution to the sexualization of girls, comprehensive sexuality education may well be a contributory factor.<sup>60</sup>

Wendy Shalit, in her book, *Return to Modesty: Discovering the Lost Virtue*, recounts her experience with sex education in the 4<sup>th</sup> grade. One day her math class was interrupted by a visit of a cheery woman with a Question Box. She said that she would open the box and read a question. The first question was “What is 69?” The boys giggled, but the woman insisted that there was nothing to giggle about. This was a class about Human Growth and Development and no question was off limits. Wendy raised her hand and asked to go to the bathroom. That evening Wendy told her mother about the class and after some negotiation with school authorities, it was agreed that Wendy would go to the library during the sex education class. Although she did not attend the sessions, she could not help but notice the effect the lessons had on the students who did attend. The boys used the information they had gained to harass the girls, asking

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58. JUDITH A. REISMAN & EDWARD W. EICHEL, *KINSEY, SEX AND FRAUD: THE INDOCTRINATION OF A PEOPLE* (John H. Court & J. Gordon Muir eds., Lochinvar Inc. 1990); See also JAMES JONES, ALFRED C. KINSEY (1997).

59. See *Zombie, Brave New World arrives ahead of schedule – sex indoctrination for toddlers*, PJ MEDIA (Aug. 26, 2011, 2:09 PM), <http://pjmedia.com/zombie/2011/08/26/brave-new-world-arrives-ahead-of-schedule-sex-indoctrination-for-toddlers/>.

60. WENDY SHALIT, *RETURN TO MODESTY: DISCOVERING THE LOST VIRTUE* 15-20 (1<sup>st</sup> ed. 2000).

them if they masturbated and why they weren't developing.<sup>61</sup> Mary Pipher confirms Wendy's observation:

While junior-high boys have always teased girls about sex, the level of teasing is different. Girls are taunted about everything from oral sex to pubic hair, from periods to the imagined appearance of their genitals. The harassment that girls experience in the 1990's is much different in both quality and intensity. The remarks are more graphic and mean-spirited.<sup>62</sup>

The authors of the TSG Report recognize the problem of the sexual harassment of girls, including pre-teens, "Even 10 to 12-year-olds, most of whom had not yet completed the fifth grade, reported significant and frequent experiences of sexual harassment in school."<sup>63</sup>

While the TSG Report decries sexuality "which is inappropriately imposed upon a person,"<sup>64</sup> Shalit reported on how under the influences of the comprehensive sexuality education programs school girls felt that they either had to engage in sexual activity in order to be regarded as 'normal' or (as she did) pretend to have participated in such behavior.

#### B. *Radical Feminism*

Throughout the first half of the twentieth century, women had been making gradual progress in education and in acceptance into the workplace. There were those, however, who felt that the choice of some women to accept traditional roles, to marry and have children severely limited women's progress. These Radical Feminists—Simone de Beauvoir, Betty Friedan, Gloria Steinem, Germaine Greer, Shilamith Firestone, Mary Daly—wanted to free women from all restrictions, not only those imposed by cultural stereotypes, but those considered by most to be biological.<sup>65</sup>

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61. *Id.* at 17.

62. PIPHER, *supra* note 9, at 69.

63. TSG, *supra* note 1, at 17.

64. TSG EX, *supra* note 2, at 1.

65. *See, e.g.*, SIMONE DEBEAUVOR, *THE SECOND SEX*, Guilford.edu (H.M. Parshley ed., 1976), available at <http://class.guilford.edu/psci/mrosales/gender/The%20Second%20Sex.pdf>; Firestone, *supra* note 45; MARY DALY, *GYN/ECOLOGY: THE METAETHICS OF RADICAL FEMINISM* (5th ed. 2008).

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Radical Feminists of the 1960s differed sharply from their nineteenth century foremothers. While the nineteenth century women had understood and celebrated the differences between men and women. The Radical Feminists denied them, insisting that the obvious differences were not natural, but oppressive patriarchal cultural constructions which could and should be eliminated so that men and women would participate in every activity of society in statistically equal numbers. In particular, they promoted absolute sexual liberation. If there were no differences between men and women, then there was no reason why women should not engage in sexual activity outside marriage. Old fears of pregnancy and disease were no longer a concern; women should be as sexually unrestricted as men. Women might be the only ones to get pregnant, but that didn't mean that women should take care of babies. Either the task should be shared equally by men and women, or children should be placed into state funded daycare facilities.<sup>66</sup> The Radical Feminists adopted social construction theory and decried "essentialism" and "[s]ocial construction theory challenges the notion that biology determines sexual identity and behavior and criticizes the cultural influence model for being essentialist and holding that certain phenomena such as sex roles are natural and inevitable."<sup>67</sup>

Radical Feminists insisted that men and women were equally interested in sexual activity and there was no reason for women to protect their virtue or virginity. Women could enjoy sexual liaisons with a number of different men, in the same way that men enjoy sexual encounters without commitment or love. This of course fell into line with the ideology of the Sexual Revolution, which was sweeping the country.

Manners, such as men opening the door for a woman, standing when she enters the room, or helping her with her coat were decried as sexist and men who observed these conventions were castigated as patriarchal oppressors. The men quickly learned that they no longer had to respect women as the weaker sex. They absorbed the message that women were just like men and wanted what men wanted—which included unlimited sexual access. Men who wanted a first date to end in a sexual encounter assumed that their date also did. When refused, the males resorted to emotional and in some cases physical pressure to achieve their end. 'No,' no longer meant no and date rape

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66. DALE O'LEARY, *THE GENDER AGENDA: REDEFINING EQUALITY* 135-44 (1997).

67. GREEN & RUARK, *supra* note 48, at 25.

became a real problem.<sup>68</sup> Women were seen by men—girls by boys—as available for sexual relations. All that was needed was the right line. The Sexual Revolution and its comprehensive sexuality education programs turned girls into sexual objects and males into narcissistic users. Feminism took away all their defenses.

The effects have been widespread. Elementary school boys pressured girls into performing oral sex, on occasion in the back of classrooms. Boys no longer feel obliged to go through the motions of dating and instead offered to be “friends with benefits.” Dr. Miriam Grossman reports in her book *Unprotected* how she counseled a young college woman who was depressed and confused about her “friends with benefits” arrangement. The young man with whom she was involved did not want to go to the movies or engage in other dating behavior because that would mean they were in a “relationship.” She was depressed and felt that he was getting the “benefits” and she was not getting anything. What is interesting is that having been exposed to the current attitudes about sexuality as promoted at her university, this young woman felt that there was something wrong with her for feeling used.<sup>69</sup>

Dr. Grossman was outraged that while the health services at her university warned young women about the dangers of smoking and poor diet, they failed to even mention the physical and psychological risks associated with sexual activity as experienced on campus. Young women were depressed because relationships had broken up, traumatized after contracting an STD, and suffered posttraumatic stress after abortion. Not only was there no campus outreach to these women, they were made to feel that their reactions were illegitimate. Academia required absolute adherence to the belief that there were no differences between men and women. Women who expected commitment were categorized as clingy. Those broken hearted after a breakup were told to get over it. Abortion was promoted as a minor

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68. See Henry K. Lee & Erin Allday, *Oral-sex charges in Oakland second-grade class*, San Francisco Chronicle, Jan. 22, 2011, <http://www.sfgate.com/cgi-bin/article.cgi?f=/c/a/2011/01/21/BALV1HCLA4.DTL>; Laura Hibbard, *Kindergarten Sex Games: New York School Parents of Five-Year-Olds Outraged (Video)*, Huffington Post, Feb. 6, 2012, [http://www.huffingtonpost.com/2012/02/06/parents-of-five-year-olds\\_n\\_1257807.html?view=print&comm\\_ref=false](http://www.huffingtonpost.com/2012/02/06/parents-of-five-year-olds_n_1257807.html?view=print&comm_ref=false); Laura Hibbard, *'Rape Tag' Playground Game Upsets Minnesota Parents (Video)*, Huffington Post, Feb. 3, 2012, [http://www.huffingtonpost.com/2012/02/03/rape-tag-disturbing-playground-game-outrages-parents\\_n\\_1252858.html?view=print&comm\\_ref=false](http://www.huffingtonpost.com/2012/02/03/rape-tag-disturbing-playground-game-outrages-parents_n_1252858.html?view=print&comm_ref=false).

69. GROSSMAN, *supra* note 38, at 32.

procedure that empowered women.<sup>70</sup> While students were warned about the long term effects of diet and smoking, these young women were not warned that they were risking their fertility by engaging in sex with multiple partners and putting off having children until their thirties.<sup>71</sup>

Radical Feminists, with their disdain for motherhood, failed to mention to the young women who embraced their cause that there might be a price for sexual freedom. A woman, who believes that she can finish her education, establish her career, and wait for the perfect man, may discover that she has waited too long. The window of opportunity for pregnancy is open only for a certain period of time. Silent sexually transmitted diseases can cause infertility. Even with all the modern reproductive technologies now available, very few women are able to have their first child after thirty-five.<sup>72</sup>

Anne Taylor Fleming had been totally committed to the feminist ideology. In her thirties however, her "protracted and adamant and yes revolutionary journey away from maternity" came to an end. She wanted a baby, and was faced with "the revenge of the womb."<sup>73</sup> In vain she endured years of expensive and debilitating procedures in hopes of becoming pregnant.

Sylvia Anne Hewlett has dedicated herself to promoting women's advancement in the workplace. In her study of high achieving women, she discovered that, among high earning career women ages forty to fifty-five, thirty three percent are childless and not by choice.<sup>74</sup> They wanted children, but waited too long. Her book *Baby Hunger* is a warning to young women that if they want to have a baby, they should not wait too long.

It is interesting to note that some of the most influential feminists later retreated from the anti-family, marriage, and motherhood stance that dominated the movement in the 1960s and 1970s. Early feminist icon Betty Friedan, in her book *The Second Stage* recognized that motherhood is important to women:

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70. See THE BOSTON WOMEN'S HEALTH BOOK COLLECTIVE, *THE NEW OUR BODIES, OURSELVES* 370 (Simon and Schuster, 1996).

71. GROSSMAN, *supra* note 38, at 119-41.

72. SYLVIA ANN HEWLETT, *BABY HUNGER: THE NEW BATTLE FOR MOTHERHOOD* 52-53 (2002).

73. ANNE TAYLOR FLEMING, *MOTHERHOOD DEFERRED: A WOMAN'S JOURNEY* 186 (Fawcett Columbine 1995).

74. HEWLETT, *supra* note 71, at 51.

... many feminists knew all along that the extremist rhetoric of sexual politics defied and denied the profound, complex human reality of the sexual social psychological, economic, yes biological relationship between women and man. It denied the reality of women's own sexuality, her childbearing, her roots and life connection in the family.<sup>75</sup>

Germaine Greer, who championed promiscuity, came to realize that motherhood can be a meaningful choice. In her book *Sex and Destiny*, she wrote:

Because motherhood is virtually meaningless in our society is no ground for supposing that the fact that women are still defined by their mothering function in other societies is simple an index of their oppression. We have to at least consider the possibility that a successful matriarch might well pity Western feminists for having been duped into futile competition with men in exchange for the companionship and love of children and other women.<sup>76</sup>

It is interesting to note that that while Radical Feminists promote absolute sexual freedom and expect men to be responsible for their behavior, they do not expect the same kind of responsibility from women. Women may dress in ways clearly calculated to incite male desire, and then be held innocent when the desire they have enflamed is openly expressed. The TSG Report reflects this double standard, "It is important to underscore that girls do not "cause" harassment or abusive behavior by wearing sexy clothes; no matter what girls wear, they have the right to be free of sexual harassment, and boys and men can and should control their behavior."<sup>77</sup>

#### IV. THE FUNDAMENTAL QUESTION

##### A. *Sexual Involvement*

Before the sexualization of girls can be addressed, there is a more fundamental question that needs to be answered: Should unmarried women of any age engage in sexual activity? Are the risks for women

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75. BETTY FRIEDAN, *THE SECOND STAGE WITH A NEW INTRODUCTION* 39 (Harvard U. Press 1982).

76. GERMAINE GREER, *SEX AND DESTINY: THE POLITICS OF HUMAN FERTILITY* 29 (Harper Row 1984).

77. TSG, *supra* note 1, at 34.

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simply far greater than the benefits? For generations, most cultures believed that they were. However, the authors of this report, although they never say so explicitly, appear to believe that the goal is for women to have the option of engaging in sexual relations regardless of their marital state, so long as they don't feel sexualized. For example they write, ". . . [T]een girls are encouraged to look sexy, yet they know little about what it means to be sexual, to have sexual desires, and to make rational and responsible decisions about pleasure and risk within intimate relationships that acknowledge their own desires."<sup>78</sup>

Even in a non-sexualized culture teen girls are not mature enough to make a rational and responsible decision to take the risks, both physical and psychological involved in an intimate relationship. Rather than recognize this problem, the TSG Report argues that the improper sexualization they decry differs from healthy sexuality, "Self-motivated sexual exploration on the other hand, is not sexualization, by our definition, nor is age-appropriate exposure to information about sexuality."<sup>79</sup> According to the TSG, "Healthy sexuality is an important component of both physical and mental health, fosters intimacy, bonding, and shared pleasure, and involves mutual respect between consenting partners."<sup>80</sup> The authors of the TSG Report appear to assume that it is possible to preserve the sexual freedom of men and women, including girls, while avoiding the negative effects of sexualization. They do not present evidence that this is possible. They put their faith in "comprehensive sexuality education and other sexuality education programs" and believe without evidence that these will solve the problem. According to the TSG Report, comprehensive sexuality education includes:

. . . the presentation of accurate, evidence-based information about reproduction and contraception, the importance of delaying intercourse initiation for young people, and the building of communication skills. Most relevant to combating sexualization, many also address media, peer, and cultural influences on sexual behaviors and decisions and promote a notion of sexual

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78. TSG, *supra* note 1, at 3.

79. TSG EX, *supra* note 2, at 1.

80. TSG, *supra* note 1, at 2.

responsibility that includes respect for oneself and *an emphasis on consensual, nonexploitative sexual activity*.<sup>81</sup>

The key word is “comprehensive”—this translates to programs which stress contraception, abortion, condom usage with every act, the gay, lesbian, bisexual, transgendered and questioning (or Queer) agenda (GLBTQ), masturbation and the promotion of sexual pleasure for minors, and as an afterthought, abstinence. These are “how-to” have “safe-sex” courses.”<sup>82</sup> No one should be surprised if students put what they learn into practice. However, while they absorb the “how to have sex” part, the “safe” part has proven illusive. If an adolescent girl engages in sexual activity, she opens herself to being used for sexual pleasure in a temporary relationship and as a result, she will feel used as a sexual object. The writers of the TSG admit that if girls are rewarded for allowing themselves to be seen as sexual objects, they will self sexualize.

Self-sexualization—Girls may treat and experience themselves as sexual objects. If girls learn that sexualized behavior and appearance are approved of and rewarded by society and by the people (e.g., peers) whose opinions matter most to them, they are likely to internalize these standards, thus engaging in self-sexualization.<sup>83</sup>

Surely girls will self-sexualize if they allow themselves to be used as sexual objects. Comprehensive sexuality education courses are supposed to promote sexual health. According to the TSG, “diminished sexual health” can be “measured by decreased condom use and diminished sexual assertiveness.”<sup>84</sup> If sexual assertiveness means teaching a young woman how to tell a young man that she intends to wait till marriage that would be a worthy goal. But if, as the quote suggests, “sexual assertiveness” means insisting that her partner wear a condom, then it will be very difficult to achieve real sexual health, given that condoms provides little or no protection against several STDs and are one of the least effective barriers to

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81. *Id.* at 37 (emphasis added).

82. NATIONAL GUIDELINES TASK FORCE, *Guidelines for Comprehensive Sexuality Education: Kindergarten through 12<sup>th</sup> Grade*, SIECUS (2004), <http://www2.gsu.edu/~wwwche/Sex%20ed%20class/guidelines.pdf>.

83. TSG, *supra* note 1, at 3.

84. *Id.* at 26 (quoting E. Impett, D. Schooler, & D. Tolman *To be seen and not heard: Femininity ideology and adolescent girls' sexual health*, 35 ARCHIVES OF SEXUAL BEHAVIOR, no. 2 129-142(2006)).

pregnancy. Such assertiveness is hardly a prescription for physical or psychological health. As one young woman traumatized by the end of an affair explained to Dr. Grossman,

When it ended, it hurt so much. . . I think about him all the time, and I haven't been going to one of my classes, because he'll be there, and I can't handle seeing him. I was so unprepared for this. . . why do they tell you how to protect your body – from herpes and pregnancy – but don't tell you what it does to your heart.<sup>85</sup>

The TSG Report's advocacy for "comprehensive sexuality education" reveals their unstated agenda. According to Clover Simon, vice president for Planned Parenthood of the Greater Northwest, an advocate for comprehensive sexuality education, "The whole point of people having good accurate information that is age appropriate for wherever they're at, is so that they can enjoy sex and avoid the negative consequences of sex."<sup>86</sup>

However, Ms. Simon admits that "Birth control does fail for many, many people because people aren't perfect and we don't take it perfectly. And so people experience failures."<sup>87</sup> Of course as an employee of the largest provider of abortion services, Ms. Simon may not see such failures as a catastrophe, but there is substantial evidence that the women and men who experience these 'failures' carry the scars for decades.

Study after study demonstrates that adolescent girls who are sexually active are at risk. A study of the relationship between depression suicide attempts and sexual activity among girls 14 to 17 found that 25.4% of those who were sexually active felt depressed "a lot of the time" or "most of the times" versus 7.7% of those who were not sexually active. Among the sexually active, 14% attempted suicide versus 5.1% of the not sexually active.<sup>88</sup> A new survey of African American youth has found that almost half report

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85. GROSSMAN, *supra* note 38, at 3.

86. Joel Davidson, "Someone's values always win." *CATHOLIC ANCHOR*, Sept. 2, 2011, <http://www.catholicanchor.org/wordpress/archives/4933>.

87. *Id.*

88. ROBERT RECTOR, KIRK JOHNSON & LAUREN NOYES, SEXUALLY ACTIVE ARE MORE LIKELY TO BE DEPRESSED AND TO ATTEMPT SUICIDE (Heritage Foundation Center for data Analysis Report, #03-04, June 3, 2003).

considerable pressure to have sex.<sup>89</sup> A study of sexual satisfaction among late adolescent girls, referenced in the TSG found that 28% of women “perceived their first sexual experience to be physically satisfying” and less than 28% perceived their first sexual experience to be psychological satisfying,” which means a substantial percentage found the experience unsatisfying.<sup>90</sup> In another study of 13, 791 youths engaging in sexual behaviors places adolescents, especially girls, at risk for future depression. The research demonstrated that 44% of girls with multiple sexual partners experienced depression as opposed to 4% of girls who were virgins experienced depression.<sup>91</sup>

The APA has a professional responsibility to provide informed consent to youth about the psychological dangers inherent in the sexual behaviors it is advocating for adolescent females. TSG demonstrates the failure on the part of APA to provide informed consent. The APA appears to be denying the research that demonstrates the trauma to adolescent females in particular from being used as sexual object.

Those who oppose ‘comprehensive sexuality education’ believe that for girls the risk of sexually transmitted diseases and unmarried pregnancy so outweigh the benefits of teenage pleasure seeking that abstinence until marriage is the only thing that should be promoted. If girls are taught that they have a ‘right’ to sexual pleasure, girls will be motivated to seek male attention and the only way to get male attention is to conform to the male image of a pretty or sexy girl. If she wants to win male attention, she will feel compelled to sexualize herself. The TSG Report admits concern about self-sexualization. If the goal of comprehensive sexuality education is to encourage young unmarried women to engage in sexual activity, then sexual objectification is inevitable, men will continue to view women as objects to be used for their sexual pleasure and women will try to make themselves attractive to men by starving themselves and dressing provocatively.<sup>92</sup>

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89. Jeremy Kryn, *Nearly half of African-American youth report pressure to have sex: survey*, LIFESITENEWS, (Sept. 12, 2011), <http://www.lifesitenews.com/news/nearly-half-of-african-american-youth-report-pressure-to-have-sex-survey>.

90. C. Darling, J. Davidson & L. Passarello, *Mystique of first intercourse among college youth*, 21 J. OF YOUTH & ADOLESCENCE 97, 97 (1992).

91. Denise D. Hallfors, et al., *Which Comes First in Adolescence – Sex and Drugs or Depression?* 29(3) AM. J. PREV. MED. 163, 163-170 (2005).

92. Jean Kilbourne, *Killing us Softly* (Nov. 1, 2010), <http://teenidentity.net/2010/11/01/the-sexual-objectification-of-women-in-media/>.

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### B. *Adult Intervention*

The solutions suggested in the TSG do not address the causes of problem and therefore have little chance of reducing the sexualization of girls. The authors make the following suggestions for real change. Real change could occur if adults—parents, teachers, and community leaders—decided to accept their responsibility to protect girls. Real change could occur if adults—parents, teachers, and community leaders, including clergy—decided to accept their responsibility to educate girls about romantic love, true loving friendship and sexuality and, thereby, protect girls from the sexual utilitarian and contraceptive mentality so prevalent in the culture.<sup>93</sup>

The writings of Blessed John Paul II are of great assistance in this formation process. He wrote, "Every educational program, whether Christian or secular, must emphasize that true love is chaste love, and that chastity provides us with a founded hope for overcoming the forces threatening the institution of marriage and the family and at the same time for freeing humanity from devastation wrought by scourges such as HIV/AIDS and promiscuity; that is, using people as sexual objects." 2004. Parents, teachers and clergy need to teach that freedom without responsibility is the opposite of love, as is using another person as a sexual object.

Also, parents need to say no to comprehensive sexuality education. If they cannot have it banned in their children's schools, they need to insist that their children be excused from the sex education classes. Fears that their child will be subjected to teasing are unjustified. The promise by sex educators that the classes will also include lessons on abstinence is not sufficient, since the goals of the two approaches are diametrically opposed. Parents should not support the idea that to have sex or not to have sex is the child's option and here are the pros' and con's. They should send a clear and univocal message, "Wait until you are married."

While abstinence education is certainly preferable to comprehensive sexuality education, it has a serious flaw. It puts the entire burden on the girl. She is thrust out into a world of young men who are sexually aroused and given 50 ways to just say 'No.' This is not enough, society can't tell girls to "Just say no." when adults who should be their protectors can't just say no.

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93. POPE JOHN PAUL II (KAROL WOYTYLA), LOVE AND RESPONSIBILITY 260-261 (Farrar, Straus, Giroux 1981).

There needs to be serious consideration of a return to some of the old rules, to the time when parents and those in charge of women's education had no trouble saying 'No.' Parents and particularly fathers must just say no to un-chaperoned dating. Young men can come to the house only when the family is home. Adults must say no to co-ed dorms and provide privacy for women. No more men in women's dorms, period. Living at home, particularly during the first two years of college should be considered. Parents of girls in junior high need to ban together to encourage single sex activities, single sex schools, and discourage dating. Parents need to monitor their daughter's clothing choices. School uniforms can be a useful means of eliminating immodest clothing. Fathers should take an active part in modesty education, explaining delicately the effect of certain kinds of clothing on young men. Girls need to be taught how to keep the focus on their faces.

Fathers are essential to young women's self esteem. Self -esteem comes not from media images, but from having a father who takes an active interest in her welfare and who protects her from men who would use her sexually or treat her as a sexual object.<sup>94</sup> Above all a father must never treat his own daughter as a sexual object.

Bullying prevention should switch its focus from promoting the GLBTQ agenda, to severely punishing the sexual harassment of girls at every level of education.<sup>95</sup> One way to achieve this is to sex segregate anti-bullying programs and encourage girls to band together to protect one another. Programs could focus on training girls with leadership qualities to protect the weak and report boys who sexually harass vulnerable girls. Sexual harassment via the internet and "sexting" should be prohibited.

The failure of adults to recognize the risks involved in sexual relations outside marriage and protect young women from seduction is at the heart of the problem. In addition to curfews, chaperons, and strict rules, girls need to receive one unequivocal message: For a woman, sex before marriage is the path to disease, pregnancy, infertility, and a broken heart. Parents need to teach their daughters that just as they must plan for their education and possible career,

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94. MEG MEEKER, *STRONG FATHERS, STRONG DAUGHTERS* 7-10 (Ballantine 2006).

95. Peter Baklinski. *School trustee balks as gay anti-bullying material exposes children to gay porn videos*, LIFESITENEWS, (Oct. 6, 2011), <http://www.lifesitenews.com/news/school-trustee-balks-as-gay-anti-bullying-material-exposes-children-to-gay>.

they must also plan for marriage and children and not do anything that will jeopardize these goals.

C. *A Philosophy of Responsibility*

Blessed John Paul II in his 1960 book *Love and Responsibility*, presents a comprehensive response to the problem of the sexualization of girls. He explains why sexual relations outside marriage—no matter how much emotion is involved—never can achieve the kind of love that a woman desires. Women in non-marital relationships feel used, because they are being used and can be discarded if they no longer provide the pleasure desired by their partner. According to John Paul II, “True love is a love in which sexual values are subordinate to the value of the person.”<sup>96</sup> Girls need to be taught that just as it is wrong for boys to use girls as objects, it is wrong for a girl to allow herself to be used. According to John Paul II “The person cannot (must not) voluntarily descend to the position of an object of use for another person or persons.”<sup>97</sup> Girls have a right to be loved, for themselves not treated as objects either by the culture or by sexual partners seeking transitory pleasure, “Man’s capacity for love depends on his willingness consciously to seek a good together with others, and to subordinate himself to that good for the sake of others, or to others for the sake of that good.”<sup>98</sup> Only in marriage can there be a true unity of the two, in which neither is using the other, but each is making a complete gift of self.

A 37-year-old woman complained that when she was young the pressure to have sex led to an affair, which in turn led to “the loss of innocence, the desire to feel clean and whole.”<sup>99</sup> She now believes, “A healthier society would protect women from premarital sexual experience.”<sup>100</sup>

While young people may complain about restrictions, Wendy Shalit believes that many young women would welcome adult concern, she writes:

We have so few rules these days, and even when we do, no one seems to enforce them. Why is no one enforcing our rules? Don’t

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96. POPE JOHN PAUL II, *supra* note 92, at 183.

97. *Id.* at 182.

98. *Id.* at 29.

99. SHALIT, *supra* note 59, at 209.

100. *Id.*

they care about us? . . . Today adults err on the side of not intervening at all, . . . I often find myself lecturing adults about why they should be lecturing me, which is a strange position to be in. I'm always pining for someone to young-lady me. As in, young lady what are you doing? Where are you going? But no one ever young-lady's me, so I have to young lady myself.<sup>101</sup>

So long as schools present adolescent girls with 'choices,' when the evidence is overwhelming that the only safe choice is "No," the problem presented by the TSG will continue. So long as boys are exposed to explicit, how-to, comprehensive sexuality education courses, boys will see girls as sexual objects and girls will either accept their status as sexual objects or be forced to continually defend themselves in an increasingly hostile environment. It is time for adults to lovingly, but firmly, just say "No."

#### CONCLUSION

The APA's Task Force Report on the Sexualization of Girls presents compelling evidence of the sexualization of girls in our culture and of the negative consequences of such sexualization. While some of the positive alternatives and recommendations, offered are helpful, because they do not address the causes of the problem, even if they were implemented there is no evidence presented that they would reverse this trend. Because the TSG fails to identify the underlying causes and implicitly accepts unsubstantiated ideologically based assumptions, the recommendations presented will not achieve the goal of protecting girls. Also, the APA does not cite the literature that demonstrates the psychological harm to adolescent females from irresponsible sexual behavior. The APA is thereby negligent in its responsibility to provide informed consent about recommended behaviors for girls.

The fundamental question the TSG avoids is: Should adolescent girls engage in sexual activity or do the risks outweigh the benefits? The authors of the TSG Report appear to believe that they can preserve the sexual freedom of girls, while avoiding the negative effects of sexualization. If adolescent girls are encouraged by comprehensive sexuality education and other cultural messages to believe that if they feel mature enough they can decide to engage in sexual relations, they will underestimate the risks and overestimate

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101. *Id.* at 195-196.

the positive benefits. When sexual activity is an option, young men will push young women to surrender to their lust and the inevitable result will be that—regardless of media images—they will view girls as available for sexual use. Girls will be sexualized.

Rejection of the ideologies of the sexual revolution and radical feminism and adoption of a strategy that stresses education in true love, modesty, chastity, and adult supervision has the potential to protect girls from the current harmful culture.