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## Toeing the Line Between True Allyship and Subordination

Tumai Ly

### ABSTRACT

In recent years, there has been a rise in political movements in the United States. These movements have garnered attention, spurring actions both against and in favor of supporting inclusivity and diversity. On one hand, in order to sustain the status quo and keep the white majority in power, part of society has rejected the shift for inclusion and diversity, pushing back against movements such as Black Lives Matter and Stop Asian Hate. On the other hand, some have embraced these movements, evidencing a desire to promote racial equality. Of those that have embraced this shift and rise in political movements, there are individuals who wish to support racialized groups and see change happen with their own hands. In other words, allyship has purportedly increased. However, being an ally is not simply declaring oneself an “ally.” This paper examines the formation of allyship in the post-George Floyd and COVID-19 era. The focus of this paper is about the tiers of “allyship” I have created to categorize actions an individual may take as an ally. At the first level of allyship is “performative allyship,” where one purports to be an ally in order to gain a personal benefit. The next level of allyship is one I have created – “non-substantive allyship,” where an ally believes they are acting effectively, but their poor execution harms marginalized groups instead. The last level of allyship is “effective allyship,” where an ally truly supports a marginalized group, and their actions actually effect positive change. This paper also explores what it means to be a “true ally” and what “true allyship” looks like in practice. It also looks at how non-substantive allyship can be an unsuspecting form of microaggression, which sustains white dominance in the long run by compromising true allyship. This paper applies the tiers of allyship I created to real life by looking at various actions individuals have taken in the name of Black Lives Matter and Stop Asian Hate movements. This paper then concludes by advocating for minority-group solidarity and true effective allyship by adhering to the “platinum rule” – treat others the way *they* wish to be treated.

## INTRODUCTION

My mother and I walked into an Asian-owned grocery store one sunny morning in 2020. We wanted to buy ingredients to make a fulfilling dinner when we got home. After successfully locating what we needed, we stood in line to pay for our groceries. Everybody on the check-out line tried their best to practice social distancing, but the store only had so much space. Still, each shopper left a shopping basket's worth of space between each other. With only one cash register open, the line moved pretty slowly. But all was well, and everybody kept to themselves. Until one shopper didn't.

The shopper in front of my mother and I kept turning around to look at us. Not only was he on the phone and talking quite loudly, but he was also blatantly staring at us when he thought we weren't paying attention. We didn't give his actions a second thought and continued talking with each other quietly. The line moved forward. We took one step forward, expecting the man in front of us to move forward as well. Instead, he stayed still. He turned around completely to address us directly. "Back up!" He yelled. "Don't you know how to social distance?"

My mother and I were taken aback at the sudden yelling. We looked at each other before looking back at the man. "We are social distancing," my mother calmly explained. She pointed to the shopping basket between her and the man. "See?"

The man scowled and took one step towards us. "You keep walking forward! Stop pushing and trying to get closer!"

At this point, I was getting frustrated. Not only was he causing such a ruckus in the store and bothering other people, but he was also being disrespectful to my mom. "Sir," I spoke up.

“The line moved forward. Please turn around and keep it going. We only took a step because we thought you were going to move too.”

The man looked over his shoulder to see the line did, indeed, move forward. He turned around and kicked his basket forward, only to turn around once more when my mother and I followed suit. “Back up! I won’t say it again!” He yelled once more.

Before my mother or I could say anything, the customer behind us spoke up in our defense. “Look, man, they’re not doing anything wrong. Turn around.” When the man mentioned how we “might be sick,” the other customer just said, “They’re not. We’re all wearing masks, we’re all social distancing, and we’re all minding our own business. So turn around.” My mother and I thanked the customer for his help. Whether the man finally minded his own business was because of the customer’s words or his tall figure, we were grateful to be left alone.

Our ally was a Black man. Out of all the shoppers in the store, only that one man spoke up for us. Perhaps he was being a good ally. Or perhaps he simply felt the need to help two smaller women who were being harassed in front of him. In either case, the man, a marginalized individual himself, stepped up to be an effective ally to my mother and me.

After the death of George Floyd at the hands of the police, and after the rise in anti-Asian violence during the COVID-19 pandemic, there was a political shift. There was an increase in support for diversity and inclusivity. There were more active voices from people who purported to be allies. A lot more issues were being raised and more attention was brought to discuss how those issues should be addressed. There were a lot more people who became open to learning about issues happening outside their communities. On top of all that, allyship became a bigger

concept than ever before. The increased racial injustices at this time, particularly to the Black and Asian communities, led to an increase in marginalized-group solidarity.

However, given the increased activism, not all allyship produced effective and positive changes. So, what does it mean to be an “ally”? What exactly is “allyship”? And how can “allyship” end up being detrimental instead of helpful?

## I. WHAT DOES ALLYSHIP LOOK LIKE?

### A. Defining “Allyship”

#### 1. *What is Allyship?*

Allyship is “the state or condition of being an ally: [the] supportive association with another person or group.”<sup>1</sup> Specifically, allyship is the “association with the members of a marginalized or mistreated group to which one does not belong.”<sup>2</sup> However, allyship is more than just being supportive or being associated with a marginalized group. Allyship is also a “lifelong process of building relationships . . . with marginalized individuals and/or groups of people,” it is “not self-defined,” and it is “an opportunity to grow and learn about [oneself] whilst building confidence in others.”<sup>3</sup> There are many different ways to demonstrate allyship with a marginalized group. It could be a community-wide action with big, long-lasting impacts. Or it could be an individual action on a smaller scale. In either case, demonstrating allyship boils down to what the ally’s intentions are and the impacts the ally’s actions have.<sup>4</sup>

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<sup>1</sup> *Allyship*, Merriam-Webster, <https://www.meriam-webster.com/dictionary/allyship>.

<sup>2</sup> *Id.*

<sup>3</sup> Sheree Atcheson, *Allyship is Dictionary.com’s Word of the Year. So, What Does it Really Mean?*, Forbes (Dec. 9, 2021, 7:06 AM), <https://www.forbes.com/sites/shereeatcheson/2021/12/09/allyship-is-dictionarycoms-word-of-the-year-so-what-does-it-really-mean/?sh=765abb60632a>.

<sup>4</sup> Berthine Crevecoeur West, *Proactive Allyship – Aligning Intent with Impact*, LinkedIn (May 10, 2022), [https://www.linkedin.com/pulse/proactive-allyship-aligning-intent-impact-berthine/?trk=public\\_profile\\_article\\_view](https://www.linkedin.com/pulse/proactive-allyship-aligning-intent-impact-berthine/?trk=public_profile_article_view).

Kenji Yoshino, a law professor at New York University, recounted a story of when he first began teaching at Yale Law School in 1998. His story is an example of how an ally's intention and impact does not reflect true allyship.

[A] friend spoke to me frankly. "You'll have a better chance at tenure," he said, "if you're a homosexual professional than if you're a professional homosexual." Out of the closet for six years at the time, I knew what he meant. To be a "homosexual professional" was to be a professor of constitutional law who "happened" to be gay. To be a "professional homosexual" was to be a gay professor who made gay rights his work. Others echoed the sentiment in less elegant formulations. Be gay, my world seemed to say. Be openly gay, if you want. But don't flaunt.<sup>5</sup>

While Professor Yoshino did not "experience the advice as antigay,"<sup>6</sup> the friend's intention may as well have been antigay. The friend's intention in advising Professor Yoshino was to ensure that his "gayness" was not blatant, so that heteronormative standards could be upheld. This concept of keeping certain "stigma from looming large" is known as "covering."<sup>7</sup> Sociologist Erving Goffman distinguishes "passing" from "covering" by observing that "passing pertains to the visibility of a characteristic, while covering pertains to its obtrusiveness."<sup>8</sup> While "passing" is overtly discriminatory in how it seeks to essentially "erase" otherness in an individual, "covering" is no less discriminatory in how it seeks to subtly reject an openly accepted otherness by minimizing its presence. Professor Yoshino's friend sought to "cover" the professor's gayness. The friend, despite purporting to be an ally to Professor Yoshino, was not demonstrating true allyship in that instance.

As stated above, allyship should be determined by two factors: (1) what the individual's

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<sup>5</sup> Kenji Yoshino, *The Pressure to Cover*, The New York Times (Jan. 15, 2006), [https://kenjiyoshino.com/articles/pressure\\_to\\_cover.pdf](https://kenjiyoshino.com/articles/pressure_to_cover.pdf).

<sup>6</sup> *Id.*

<sup>7</sup> *Id.*

<sup>8</sup> *Id.*

intentions are when acting, and (2) what impacts result from the individual's actions.<sup>9</sup> For allyship to be "true," the individual must have good intentions first. Whether those intentions manifest as a desire to help a specific marginalized individual or simply to provide help in general, good intentions are typically characterized as acts without any self-interest or self-motivation. The individual then must "consider the impact of [their] actions."<sup>10</sup> While it does not matter whether there are small or big impacts, the individual's actions should be substantive.

One potential weakness in my definition of "true allyship" is defining it as something that must produce material results. The definition of "material," which is "having real importance or great consequences,"<sup>11</sup> suggests that only important actions with real changes would be considered "true allyship" actions. But that is not true. As mentioned earlier, the impact of an individual's actions may be small. In the grand scheme of things, a small change would not be considered as "having real importance" or be a "great consequence," but it is still a change. However, one may argue that the "small change" for the marginalized person did have "real importance" and was a "great consequence" to them. As I define "true allyship," I lean towards the notion that any change, whether big or small, is subjective in how it depends on who is perceiving the change to assign its importance. In that case, any action would be true allyship if it results in any type of change for the intended person.

Another potential weakness in my definition of "true allyship" is measuring how substantive an action must be by the impacts that result. "Substantive" can be defined as being "real rather than apparent."<sup>12</sup> If the basis for "true allyship" is a real or permanent action, then most actions would not be in furtherance of "true allyship." However, as established above,

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<sup>9</sup> West, *supra* note 4.

<sup>10</sup> *Id.*

<sup>11</sup> *Material*, Merriam-Webster, <https://www.merriam-webster.com/dictionary/material>.

<sup>12</sup> *Substantive*, Merriam-Webster, <https://www.merriam-webster.com/dictionary/substantive>.

small changes can still be categorized as true allyship if a person perceives those changes as material. Similarly, seemingly “insignificant” actions may still be in furtherance of true allyship if a person perceives those actions as real and enduring to them. “True allyship,” as I define it, is subjective in how it also depends on who is perceiving the action to determine its significance. Thus, it is important to align intent with impact when acting as a true ally.<sup>13</sup>

In the example above, Professor Yoshino’s friend was not demonstrating true allyship because of the impact of his action. Although the friend was acting as an ally and had good intentions in mind, the result of the friend’s action was to “cover” Professor Yoshino’s gayness. On the other hand, Dr. Martin Luther King Jr.’s friendship with the Vietnamese Buddhist Zen Master Thích Nhất Hạnh demonstrated true allyship. Although the two leaders only met twice in person, their friendship developed because of their desire for peace, nonviolence, and community.<sup>14</sup> Nhất Hạnh sent Dr. King a letter in June of 1965, asking for the Civil Rights leader’s support in speaking out to end the war in Vietnam, and the two met a year later.<sup>15</sup> Dr. King demonstrated true allyship to Nhất Hạnh when he chose to speak out against the Vietnam War. Dr. King chose to support Nhất Hạnh, despite his closest friends and advisors’ warnings that doing so may result in increased risks to his life and decreased effectiveness in advancing the Civil Rights movement.<sup>16</sup> Dr. King was not an ally just because he decided to support Nhất Hạnh, but because he chose to take action on behalf of Nhất Hạnh, as requested, and he chose to do so despite the risks such actions presented to his own interests.

These two examples show how the slightest difference in an ally’s action can alter how

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<sup>13</sup> West, *supra* note 4.

<sup>14</sup> *When Giants Meet*, Thích Nhat Hanh Foundation (Jan. 11, 2017), <https://thichnhathanhfoundation.org/blog/2017/8/9/when-giants-meet>.

<sup>15</sup> *Id.*

<sup>16</sup> *Id.*



allyship is defined. If Professor Yoshino’s friend phrased his advice as a warning to be careful of others seeking to “cover” Professor Yoshino’s gayness, then his friend’s actions would have demonstrated allyship. If Dr. King chose not to speak out against the Vietnam War because of the damaging effects it would have had on the Civil Rights Movement, then he would not have demonstrated allyship to Nhất Hạnh, even if Dr. King shared Nhất Hạnh’s sentiments. Ultimately, allyship should be defined by what the ally’s intentions are when acting and what material effects resulted from those actions.

## 2. *Allyship in the Post-George Floyd and COVID-19 Era*

In 2021, Dictionary.com named “allyship” as the Word of the Year.<sup>17</sup> The police brutality case of George Floyd saw an increase in participation in the Black Lives Matter movement.<sup>18</sup> The COVID-19 pandemic gave rise to the Stop Asian Hate movement.<sup>19</sup> With the rise in racial tensions and the spotlight on these racial movements, it was no wonder “allyship” was picked as the Word of the Year. However, what kind of allyship was being practiced during the post-George Floyd and COVID-19 era? The news showed protests that lined the streets of various cities.<sup>20</sup> Celebrities used their platform to amplify the voices of the Black community.<sup>21</sup>

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<sup>17</sup> *Dictionary.com’s 2021 Word of the Year Is Allyship*, Dictionary.com (Dec. 6, 2021), <https://www.dictionary.com/e/word-of-the-year-2021/>.

<sup>18</sup> The Black Lives Matter (BLM) movement was founded in 2013 after the death of Trayvon Martin and subsequent acquittal of his murderer. The Movement is an organization “whose mission is to eradicate white supremacy and build local power to intervene in violence inflicted on Black communities by the state and vigilantes.” It gained traction after the murder of George Floyd. (see <https://blacklivesmatter.com/about/>).

<sup>19</sup> The Stop Asian (or Asian American Pacific Islander (AAPI)) Hate movement was founded in 2020 in response to “the alarming escalation in xenophobia and bigotry resulting from the COVI-19 pandemic.” The Movement strives to “advance equity, justice, and power by dismantling systemic racism and building a multiracial movement to end anti-[AAPI] hate.” (see <https://stopaapihate.org/about/>).

<sup>20</sup> Larry Buchana, Quoc Trung Bui, Jugal K. Patel, *Black Lives Matter May Be the Largest Movement in U.S. History*, The New York Times (Jul. 3, 2020), <https://www.nytimes.com/interactive/2020/07/03/us/george-floyd-protests-crowd-size.html>.

Communities worked together to escort elderly Asians so they would not be victims of violent assaults.<sup>22</sup> These actions demonstrated true allyship because of the intentions driving them and the impacts that resulted.

As a result of the Black Lives Matter protests in the wake of George Floyd’s murder, significant changes were made. The City Council in Minneapolis “pledged to dismantle its police department.”<sup>23</sup> Lawmakers in New York “repealed a law that kept police disciplinary records secret.”<sup>24</sup> More cities and states passed laws banning police chokeholds.<sup>25</sup> The protestors acted with good intention, pushing for change that would prevent future police brutalities against the Black community, and were met with real and lasting changes.

In a similar vein, many celebrities use their platform to uplift the Black Lives Matter movement, while some use it to educate their fans, even if such public support could be detrimental to their careers.<sup>26</sup> Not only are these celebrities acting with good intentions, but their support and contributions had great impacts for the marginalized community.

Due to the string of assaults against elderly Asians during the height of the COVID-19 pandemic, volunteers of all ages and backgrounds came forward to offer help and comfort to the elderly community by walking with them.<sup>27</sup> In one instance, one person’s desire to offer “some

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<sup>21</sup> Sonia Rao, *Celebrities are Rushing to Support the Black Lives Matter Movement. Some Might Actually Make an Impact*, The Washington Post (Jun. 11, 2020, 6:00 AM), <https://www.washingtonpost.com/arts-entertainment/2020/06/11/celebrities-black-lives-matter-movement/>.

<sup>22</sup> Kelsie Smith, *Hundreds of People are Volunteering to Escort Elderly Asian Americans to Help Keep Them Safe*, CNN (Feb. 15, 2021, 8:38 AM), <https://www.cnn.com/2021/02/15/us/volunteer-group-helps-to-keep-elderly-asian-americans-safe-trnd/index.html>.

<sup>23</sup> Buchana, *supra* note 20.

<sup>24</sup> *Id.*

<sup>25</sup> *Id.*

<sup>26</sup> Rao, *supra* note 21.

<sup>27</sup> Smith, *supra* note 22.

kind of comfort” led to big project to protect the community in Oakland, California.<sup>28</sup> Jacob Azevedo, the project’s founder, only had good intentions, and his actions resulted in a significant development for the community.

However, while these actions demonstrate allyship that is genuine and effective,<sup>29</sup> there are many more examples of purported “allyship” that leads to negative results or empty platitudes instead. For instance, many big corporations publicly supported Black Lives Matter by sharing “statements enouncing discrimination” or promising to change certain policies in the pursuit of racial equality.<sup>30</sup> However, these companies have not taken more meaningful action beyond what can be seen on the surface.<sup>31</sup> Another example is how the spa shooting in Atlanta<sup>32</sup> was initially labeled as a crime motivated by the shooter’s alleged “sex addiction” instead of a hate crime.<sup>33</sup> Although six of the eight victims were Asian women,<sup>34</sup> the shooting in Atlanta was not just a crime where the victims happened to be Asian. The shooter knew the spas he targeted were predominately occupied by Asian women.<sup>35</sup> It is also a known stereotype of Asian women to be “exotic, hypersexual, [and] submissive beings.”<sup>36</sup> By initially labeling the crime according

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<sup>28</sup> *Id.*

<sup>29</sup> Here, “genuine” and “effective” are used interchangeably with “true allyship” in this paper.

<sup>30</sup> Tracy Jan, Jena McGregor, Renae Merle, Nitasha Tiku, *As Big Corporations Say ‘Black Lives Matter,’ Their Track Records Raise Skepticism*, The Washington Post (Jun. 13, 2020, 6:21 PM), <https://www.washingtonpost.com/business/2020/06/13/after-years-marginalizing-black-employees-customers-corporate-america-says-black-lives-matter/>.

<sup>31</sup> *Id.*

<sup>32</sup> The Atlanta Spa-Shooting occurred on March 16, 2021, in Atlanta, Georgia. The shooter, Robert Aaron Long, was a 22-year-old white male who murdered eight individuals, six of which were Asian women. He received four sentences of life without parole, with an additional 35 years. (*see* <https://www.npr.org/2021/09/28/1041137210/atlanta-spa-shooting-suspect-pleads-not-guilty-robert-aaron-long>).

<sup>33</sup> Cary Chow, *Two Weeks After the Atlanta Spa Shootings, There’s Still A Lot to Talk About*, *Andscape* (Mar. 30, 2021), <https://andscape.com/features/two-weeks-after-the-atlanta-spa-shootings-theres-still-a-lot-to-talk-about/>.

<sup>34</sup> *Id.*

<sup>35</sup> *Id.*

<sup>36</sup> *Id.*

to the shooter's allegations, the entire idea of "hate crimes" became discredited, and the Asian community had another hurdle to fight and overcome.

Allyship becomes complicated when we factor in some of the societal reactions to racially marginalized groups. Although 2021 showed a lot more interest and participation in being an ally to marginalized groups, a part of society pushed back on these racial movements.<sup>37</sup> They denied support to them, whether due to explicit prejudices against minorities,<sup>38</sup> or because of implicit biases held within.<sup>39</sup> Implicit bias "is a negative attitude, of which one is not consciously aware, against a specific social group."<sup>40</sup> Implicit biases exist in every single individual, and racial microaggressions can sometimes manifest from those biases. Racial microaggressions can be defined as "brief and commonplace daily verbal, behavioral, and environmental indignities, whether intentional or unintentional, that communicates hostile, derogatory, or negative racial slights and insults to the target person or group."<sup>41</sup> The best way to understand the relationship between implicit biases and allyship is to understand the idea of a "triangular" relationship within allyship.<sup>42</sup> Professor Yoshino describes this relationship as where an individual who is either the source of conflict, the affected party, or the ally stands at each point of the triangle.<sup>43</sup> Throughout life, every person will find themselves standing at each point of the triangle.<sup>44</sup> This is because, no matter how conscious an individual is of all the stereotypes

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<sup>37</sup> *Racial Resentment and Whites' Feelings Toward Black Lives Matter: A Q&A with Dr. Emmitt Y. Riley, III*, University of California Press (Jan. 15, 2021), <https://www.ucpress.edu/blog/54246/racial-resentment-and-whites-feelings-toward-black-lives-matter-a-qa-with-dr-emmitt-y-riley-iii/>.

<sup>38</sup> Explicit prejudices and racism is not allyship. Not the focus of this paper.

<sup>39</sup> *Supra* note 37.

<sup>40</sup> *Implicit Bias*, American Psychological Association, <https://www.apa.org/topics/implicit-bias>.

<sup>41</sup> Derald Wing Sue et al., *Racial Microaggressions Against Black Americans: Implications for Counseling*, 86 J. Counseling & Dev. 330, 330 (2008).

<sup>42</sup> Kenji Yoshino, *The Empathy Triangle*, <https://business.linkedin.com/content/dam/me/business/en-us/talent-solutions/events/2022/recruiter-reunion/Empathy-Triangle-Postcard-Kenji-Yoshino.pdf>.

<sup>43</sup> *Id.*

that exists or what their own biases are, microaggressions may still sometimes manifest and compromise allyship.

## B. How Does Racial Microaggression Factor into Allyship?

### 1. *What Exactly is Racial Microaggression?*

As noted above, racial microaggressions are indignities that communicate hostile, derogatory, or negative racial slights and insults, whether intentional or unintentional.<sup>45</sup>

Microaggressions can be broken down into three subcategories: microassaults, microinsults, and microinvalidations.<sup>46</sup>

Microassaults are “intentionally and explicitly derogatory verbal or nonverbal attacks.”<sup>47</sup> For example, calling someone a racial slur is a type of microassault. Microinsults are actions that “convey insensitivity, are rude, or directly demean a person’s racial identity or heritage.”<sup>48</sup> Believing a person got their job due to a program instead of their own merits is an example of a microinsult. Microinvalidations are “actions that exclude, negate, or nullify the psychological thoughts, feelings, or experiences of people of color.”<sup>49</sup> An example of a microinvalidation is asking someone where they are “really” from.

Implicit biases and the racial microaggressions that may result from those biases can sustain white dominance. In fact, racial microaggressions and white dominance are an example of a chicken and egg situation. Where white dominance creates conditions for racial microaggressions to occur,<sup>50</sup> racial microaggressions also cause white dominance.<sup>51</sup> Because the

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<sup>44</sup> *Id.*

<sup>45</sup> Sue, *supra* note 41.

<sup>46</sup> *Id.*

<sup>47</sup> *Id.*

<sup>48</sup> *Id.*

<sup>49</sup> *Id.*

dominant power in society is white, the majority of people have internalized whiteness as the standard.<sup>52</sup> There is an automatic association of positive stereotypes and attitudes with whites, while other communities face less preferential treatment as a result.<sup>53</sup> True allyship is negatively impacted when an individual's implicit bias for whiteness manifests in one of the three types of microaggressions. If that individual does not check their biases and ensure they do not manifest as a microaggression, then their allyship may be negatively affected.

## 2. *How Does Microaggression Impact Allyship?*

Allyship is negatively impacted when implicit biases and microaggressions overwhelm rational thought. For instance, where society has implicitly adopted favoritism towards whiteness, then many people will consider whiteness as the standard. Whenever an alleged ally makes a joke at the expense of a marginalized individual, such as making fun of someone's features, that "ally" has not demonstrated true allyship. It does not matter whether the "joke" was meant to be light-hearted or funny. Instead, that "ally's" actions would be considered a microinsult to the marginalized person for looking different from "normal." Another example is when a purported ally decides to explain a concept to a marginalized individual who speaks two languages. However, when speaking to them, the "ally" overpronounces words and oversimplifies explanations as if the individual was incapable of understanding the English language. In these scenarios, the actions of the alleged ally do not amount to allyship. Instead, their "allyship" has been negatively affected by microaggressions that stemmed from their implicit biases that whiteness is the standard.

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<sup>50</sup> Catherine Wells, *Microaggressions in the Context of Academic Communities*, 12 Seattle J. Soc. Just. 319, 320, 327 (2014).

<sup>51</sup> Ronald Wheeler, *About Microaggressions*, 108 Law Libr. J. 321, 324 (2016).

<sup>52</sup> Robert Smith, Justin Levinson, Zoe Robinson, *Implicit White Favoritism in the Criminal Justice System*, 66 Ala. L. Rev. 71, 924 (2015).

<sup>53</sup> *Id.*

Another way allyship can be negatively impacted is when minority groups find themselves fighting among each other as they “compete” for acknowledgement from the white majority about the inequalities they face in society. One form of this “competition” is called “Oppression Olympics.”<sup>54</sup> The term “Oppression Olympics” means “the competition between people for the title of ‘most oppressed.’”<sup>55</sup> The basis for these minority groups to “compete” with each other ties back to the implicit belief of the majority that whiteness is the “universal identity.”<sup>56</sup> Any other identities are considered “outsiders,” no matter how proximate their status is to “being white.”<sup>57</sup>

Another “competition” is described by bell hooks in her book, *In Killing Rage: Ending Racism*. hooks discusses the idea of the “institutional Black power” and how that lends “privilege” to the Black community in getting attention for their issues.<sup>58</sup> She notes how the annoyance of being an ally to marginalized groups, especially to the Black community, is because of the belief that the marginalized groups are “vying for white attention.”<sup>59</sup> Allyship and solidarity among minority groups cannot be achieved when such in-fighting exists. For example, at the height of the pandemic and the turbulent times after George Floyd’s death, the Asian and Black communities banded together “to cooperate to reduce violence and discrimination against people of color.”<sup>60</sup> However, “no major efforts have been made” since then, and “talks of

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<sup>54</sup> Amen Gashaw, *In the Oppression Olympics, Don’t Go for the Gold*, Harvard Political Review (Oct. 24, 2021), <https://harvardpolitics.com/in-the-oppression-olympics-dont-go-for-the-gold/>.

<sup>55</sup> *Id.*

<sup>56</sup> *The Color Blind Society: Whiteness as the Default Standard*, Teacher’s College Columbia University (Sep. 15, 2003), <https://www.tc.columbia.edu/articles/2003/september/the-color-blind-society-whiteness-as-the-default-standard/>.

<sup>57</sup> *Id.*

<sup>58</sup> bell hooks, *Killing Rage: Ending Racism*, 200 (1995).

<sup>59</sup> *Id.*

<sup>60</sup> Kellen Browning and Brian X. Chen, *In Fight Against Violence, Asian and Black Activists Struggle to Agree*, The New York Times (Dec. 19, 2021), <https://www.nytimes.com/2021/12/19/us/black-asian-activists-policing-disagreement.html>.

solidarity have petered out.”<sup>61</sup> If the two communities, and in general all marginalized groups, can work together, then the allyship and solidarity among those groups can be a strong force against the common goal of “dismantling white supremacy.”<sup>62</sup>

As mentioned earlier, the basis for the “competition” hooks describes stems from the idea that whiteness is the standard. American philosopher Lewis Gordon breaks down this standard when he writes, “whiteness could not be achieved without white recognition.”<sup>63</sup> Essentially, the white majority controls who they can recognize as worthy of their acknowledgement. The need for marginalized individuals to achieve whiteness is shown in “two principles that emerge[d] in an antiblack society. They are ‘be white’ and ‘avoid blackness.’”<sup>64</sup> Gordon concludes that marginalized individuals should strive to turn white and avoid slipping back into “blackness”<sup>65</sup> because being white is the standard and being black basically amounts to being subpar or being an “other.”

Because the white majority possess the implicit belief that being white is the standard to live up to, and because microaggressions may stem from such implicit bias, allyship can be negatively impacted by those who view society through those lenses. However, these scenarios I have provided thus far regarding microaggression in allyship are overt examples of actions that do not demonstrate true allyship. But what happens when an individual purports to be an ally, is conscious of the fact that whiteness is not the “universal identity,” and takes actions that seemingly help a marginalized group, but ultimately, their efforts do more harm than good?

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<sup>61</sup> *Id.*

<sup>62</sup> Kat Moon, *How a Shared Goal to Dismantle White Supremacy is Fueling Black-Asian Solidarity*, TIME (Mar. 25, 2021, 4:56 PM), <https://time.com/5949926/black-asian-solidarity-white-supremacy/>.

<sup>63</sup> Lewis Gordon, *What Fanon Said: A Philosophical Introduction to His Life and Thought*, 38 (2015).

<sup>64</sup> *Id.* at 36.

<sup>65</sup> *Id.* at 40.



These individuals and their “allyship” can end up sustaining white dominance instead, by simply being a form of unsuspecting microaggression.

## II. HOW “ALLYSHIP” CAN BE A FORM OF UNSUSPECTING MICROAGGRESSION

### A. Tiers of Allyship

It is generally understood that there are two types of allyship: performative and effective.<sup>66</sup> I believe there is a third category. This third category is the type of allyship that falls between performative and effective allyship. Below are the tiers of allyship I have created, listed in order of most harmful to least harmful for marginalized groups.

#### 1. *Performative Allyship*

The first type of allyship is performative. Performative allyship is “based on the idea of self-gratification.”<sup>67</sup> It is “disingenuous,” and does not look at the responsibilities one has within a community.<sup>68</sup> The biggest example that encapsulates performative allyship is the idea of the “model minority” as applied to the Asian American community. The “model minority” is a myth that the white majority created and imposed on marginalized groups to create a racial wedge between the Asian American community with other minority communities, particularly the Black community. This myth involves “ignoring the role that selective recruitment of highly educated Asian immigrants has played in Asian American success followed by [] making a flawed comparison between Asian Americans and other groups, particularly Black Americans, to argue that racism . . . can be overcome by hard work and strong family values.”<sup>69</sup>

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<sup>66</sup> *Effective Allyship*, University of Kent, <https://www.kent.ac.uk/equality-diversity-inclusivity/effective-allyship#:~:text=Allyship%20is%20a%20lifelong%20process,effective%20allyship%20and%20performative%20allyship>.

<sup>67</sup> Anna Fosberg, *How Do You Distinguish Effective Allyship from Performative Allyship?*, Penn State Law (Feb. 26, 2021), <https://pennstatelaw.psu.edu/news/effective-allyship-part-one>.

<sup>68</sup> *Id.*

The white majority have purported to be allies to the Asian American community, but their allyship is tainted with the self-interest of denigrating Black Americans instead. Not only does this myth ignore the history the United States had in barring Asians from entering the country or denying Asians from applying for United States citizenship, it also “falsely conflate[s] anti-Asian racism with anti-black racism.”<sup>70</sup> It has been argued that the Asian American community was uplifted by the white majority because “discrimination against them lessened – and only when it was politically convenient.”<sup>71</sup> This argument reflects Lewis Gordon’s notion that achieving whiteness – or proximity to whiteness – can only be done by white recognition. When the majority wanted to uplift the Asian American community and “support” them, they did so by imposing this label that did nothing but create a racial wedge to further a hidden agenda – downgrade the Black community.

## 2. *Non-Substantive Allyship*

The second type of allyship is what I have called “non-substantive allyship.” Non-substantive allyship is well-intended, but poorly executed. The actor does not have any self-interest or hidden motivations, as individuals do with performative allyship, but their actions do not actually result in any positive change, as individuals do with effective allyship. This type of allyship is what I call “non-substantive” because, while actors believe they are acting in the interest of a marginalized individual or group, their actions are insignificant or trivial.<sup>72</sup> In other words, their actions start with good intentions, but end without any real change happening.

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<sup>69</sup> Kat Chow, ‘*Model Minority*’ Myth Again Used as a Racial Wedge Between Asians and Blacks, NPR (Apr. 19, 2017, 8:32 AM), <https://www.npr.org/sections/codeswitch/2017/04/19/524571669/model-minority-myth-again-used-as-a-racial-wedge-between-asians-and-blacks>.

<sup>70</sup> *Id.*

<sup>71</sup> *Id.*

<sup>72</sup> *Substantive*, Merriam-Webster, <https://www.merriam-webster.com/thesaurus/substantive>.

The idea of convenient allyship is not new. Since the increased participation in the Black Lives Matter movement and the rise of the Stop Asian Hate movement, activism on social media has been at an all-time high.<sup>73</sup> A lot more people have been exposed to issues within marginalized communities and are able to learn more about what effects those issues may have on a marginalized individual's life.<sup>74</sup> The term "slacktivism" was created to define these types of actions. "Slacktivism" can be defined as "actions taken to endorse and promote political or social causes and movements, but involving only minimal commitment, effort, or risk."<sup>75</sup> According to this definition, "slacktivism" essentially does nothing to either help or hurt marginalized groups. However, "slacktivism" does not encompass what I purport non-substantive allyship to be.

Unlike slacktivism, non-substantive allyship actually results in negative change.<sup>76</sup> True allyship, as stated earlier, is about supporting marginalized groups by acting with good intentions and with positive effects resulting from those actions. An example of such support would be amplifying the voices of marginalized groups. Instead of allies using their voices to spread a message a marginalized individual wishes to spread, like Dr. King did with Nhất Hạnh, non-substantive allies take the microphone away from marginalized individuals to speak on their behalf beyond what is necessary. Allies should follow up on their duty to ensure those who listened to them know what to do and where to go for more information. Instead of doing that, non-substantive allies take away the marginalized individual's ability to speak for themselves.

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<sup>73</sup> Valerie Wirtschafter, *How George Floyd Changed the Online Conversation Around BLM*, Brookings (Jun. 17, 2021), <https://www.brookings.edu/techstream/how-george-floyd-changed-the-online-conversation-around-black-lives-matter/>.

<sup>74</sup> *Id.*

<sup>75</sup> *Slacktivism*, Dictionary.com, <https://www.dictionary.com/browse/slacktivism>.

<sup>76</sup> Shannon Ho, *A Social Media 'Blackout' Enthralled Instagram. But Did it Do Anything?*, NBC News (Jun. 13, 2020), <https://www.nbcnews.com/tech/social-media/social-media-blackout-enthralled-instagram-did-it-do-anything-n1230181>.

As described earlier, hooks argues that “allies” and other individuals become annoyed when issues from marginalized groups are given too much attention.<sup>77</sup> Such annoyance stems from the idea of an “institutional power” that gives them “privileges” to air their grievances on a large scale. Consider a hypothetical situation where a non-substantive ally speaks for an oppressed group but does not do anything to follow up on their actions. When those marginalized individuals wish to speak for themselves, they are often times told to stop because their issues have already been given time in the spotlight.<sup>78</sup> Non-substantive allies end up doing a disservice to the group they are trying to support. As a result, they end up perpetuating the suppression of marginalized groups instead.

Non-substantive allyship is also a form of unsuspecting microaggression in the sense that it upholds the notion that proximity to whiteness is better than being an “other” or “outsider.” Non-substantive allies take actions that do stem from good intentions and do try to positive changes. However, these allies do not take actions consistently or effectively. For instance, with the political shift towards inclusivity and diversity, many people have begun to celebrate certain marginalized groups during a specific month with more fervor than before. Some examples include Asian Heritage Month in May, Black History Month in February, and Pride Month in June. However, consider the fact that recognizing and learning the history of marginalized groups should be done whenever possible, and not just within a specific month. Instead of celebrating Black history in its entirety, one month limits how much attention is brought to its history. As a result, a different theme is assigned for Black History Month each year,<sup>79</sup> which does not address the shared experiences and entire history sufficiently. Of course, no one is

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<sup>77</sup> hooks, *supra* note 58.

<sup>78</sup> Ho, *supra* note 76.

<sup>79</sup> Jonathan Franklin, *Here's the Story Behind Black History Month – and Why It's Celebrated in February*, NPR (Feb. 1, 2022, 5:00 AM), <https://www.npr.org/2022/02/01/1075623826/why-is-february-black-history-month>.

prevented from learning about Black history on their own. However, if we consider the notion that whiteness is the standard and how much exposure is really given to Black history outside of February, we can see that there should be more attention given to Black history. The Black community can strive to shift the focus onto their history, but their efforts can really be uplifted by support from allies doing the same.

Another example can be seen in how institutions support marginalized groups on the surface without actually enacting changes internally. By allowing “people, governments, and corporations that don’t do tangible work to support LGBTQ+ communities at any other time during the year to slap a rainbow on top of something in the month of June,”<sup>80</sup> helps to perpetuate white supremacy instead of fighting against that system.

### 3. *Effective Allyship*

The third type of allyship is effective. Effective allyship “requires you to understand how to support a marginalized community.”<sup>81</sup> It requires you to take real actions that actually do something, and also requires the ally to follow through with their action.<sup>82</sup> There are many examples of allyship that enact positive changes. Actions can be on a grander scale, like leading a protest or speaking out at an event. Actions can also be seemingly miniscule, but their effects are no less impactful. Reaching out to an affected individual to let them know you have their back, or even just educating yourself on how to be more conscious of your actions, are all effective actions towards demonstrating true allyship.

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<sup>80</sup> Georgia Mooney, *What is ‘Rainbow-Washing’? How to Tell If It’s Happening to You*, The Tab (2021), <https://thetab.com/uk/2021/06/02/what-is-rainbow-washing-how-to-tell-if-its-happening-to-you-207906>.

<sup>81</sup> Fosberg, *supra* note 67.

<sup>82</sup> *Id.*

Examples of effective allyship include “purposeful and action-focused” changes.<sup>83</sup> These actions include embedding diversity, equity, and inclusion (DE&I) data in processes, as well as actively using them for decision-making or measuring progress.<sup>84</sup> One can also challenge the promotion or hiring decisions, or believe in an underrepresented person’s experiences.<sup>85</sup> One should always call out inappropriate behavior when it is witnessed, against another person or especially against yourself.<sup>86</sup> Additionally, one should embed inclusion in their company’s values, as well as realize that intention and impact may not always align, but it is important to continue educating oneself and taking the steps to act in ways that will benefit and support a marginalized individual.<sup>87</sup>

#### B. Examples of Non-Substantive Allyship in Modern Times

The renewed vigor in supporting the Black Lives Matter movement emerged during and after the killing of George Floyd. “Since Floyd’s murder, [#BlackLivesMatter] online activism has only accelerated.”<sup>88</sup> Following the incident of police brutality, there was a dramatic increase in the use of the hashtag.<sup>89</sup> While this may seem to be a positive change, an increase in numbers does not equate to demonstrating effective allyship. There were concerns that “much of this engagement was performative, seeking to capitalize on the moment for social clout rather than actually support the movement and its demands.”<sup>90</sup> Others may call this type of online activism as “slacktivism.” However, I believe the category I created, “non-substantive allyship” is a more

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<sup>83</sup> Atcheson, *supra* note 3.

<sup>84</sup> *Id.*

<sup>85</sup> *Id.*

<sup>86</sup> *Id.*

<sup>87</sup> *Id.*

<sup>88</sup> Wirtschafter, *supra* note 73.

<sup>89</sup> *Id.*

<sup>90</sup> Jordan Jenkins, *The Blurred Lines Between Genuine Allyship and Performative Activism*, Yale News (Nov. 12, 2020, 1:37 AM), <https://yaledailynews.com/blog/2020/11/12/the-blurred-lines-between-genuine-allyship-and-performative-activism/>.

suitable description of the online movement. These individuals have acted with good intention. However, instead of taking action that would actually result in any type of positive change, these “allies” go to Twitter to tweet a hashtag and call it a day. If, however, these allies followed up on their tweet by taking meaningful action offline, then they have demonstrated true effective allyship as I have defined earlier.

Another online movement centered around supporting the Black Lives Matter movement is the #BlackoutTuesday social media movement. Just like with the #BlackLivesMatter activism, these convenient allies believed going to Instagram to post a black square is sufficient action to support the Black community. However, “what it ultimately did [was] it muted the conversation . . . and in a time when [the Black community was] trying to amplify [the Black community’s] voices, [they] are inherently silenced.”<sup>91</sup> Instead of supporting the movement, non-substantive allies ended up “unintentionally drown[ing] out critical information being used by organizers on the ground.”<sup>92</sup> Although the actions these “allies” have taken were born from good intentions with a desire to help, it did not result in any positive impacts. In fact, negative impacts resulted instead. Posting black squares is a great example of how non-substantive allyship is a form of unsuspecting microaggression. The Black community’s voice was suppressed in favor of the non-substantive ally to allegedly act on behalf of the Black community, to the community’s detriment instead.

In a similar scenario, the Stop Asian Hate movement faced unsuspecting microaggression from non-substantive allies as well. In response to the Atlantic Spa Shooting and other Asian hate crimes, and after the “successful” Blackout Tuesday movement on social media, non-substantive allies believed it was a good idea to post yellow squares as a parallel support to the

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<sup>91</sup> Ho, *supra* note 76.

<sup>92</sup> Jenkins, *supra* note 90.

Asian community.<sup>93</sup> No matter that the intentions were rooted in genuine support, the impacts were definitively negative. The color yellow has long been associated with the Asian community in America, and for a negative reason. The term “Yellow Peril” was coined to refer to the fear that Asians, particularly the Chinese, would “invade Western land” and “disrupt Western values.”<sup>94</sup> Posting a yellow square would perpetuate racism and xenophobia against the Asian community, instead of supporting them through a tragic and difficult time.<sup>95</sup>

### III. FOLLOWING THE “PLATINUM” RULE

#### A. Being A True Effective Ally

##### *1. Know Where Your Actions Stand*

The first thing one should do to be an effective ally is understand how the different tiers of allyship operate to know where your actions would be classified. The first step is in having an open mind and being open to change. Understanding that receiving criticism is vital in knowing where you went wrong and how to move forward. After righting the wrong in yourself, you simply pay it forward and identify and right the wrongs in others. The most important thing to remember is that people are still learning and developing attitudes about topics regarding race and allyship. They are still learning how to be an ally for marginalized groups. “Everyone needs to start somewhere, and we should not diminish those first tentative steps.”<sup>96</sup> Henrik Serup Christensen found that the “Internet has a positive effect on offline mobilization.”<sup>97</sup> As long as

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<sup>93</sup> Chris Barilla, *Posting a Yellow Square on Instagram is a Controversial Move, But Why?*, Distractify (Mar. 18, 2021, 11:25 AM), <https://www.distractify.com/p/yellow-square-meaning-instagram>.

<sup>94</sup> *Asian Immigration: The “Yellow Peril”*, Bowling Green State University, <https://digitalgallery.bgsu.edu/student/exhibits/show/race-in-us/asian-americans/asian-immigration-and-the--yel>.

<sup>95</sup> Barilla, *supra* note 93.

<sup>96</sup> Mary Joyce, *Five Reasons Not to Use the Word “Slacktivism”*, Open Society Foundations (Apr. 30, 2012), <https://www.opensocietyfoundations.org/voices/five-reasons-not-use-word-slacktivism>.



allies understand that showing support for marginalized groups through convenient steps does not end there, but is rather the beginning instead, then those allies have started down the path of being an effective ally.

## 2. *Understand that Giving and Receiving Support is Not Mutually Exclusive*

It is also important for minority groups seeking to demonstrate allyship for each other to understand that sharing space to bring attention to their issues and receiving support from outsiders are not mutually exclusive. No one should have to compete to voice their concerns and share their desires for help. Instead, marginalized groups should look at how Dr. King and Nhất Hạnh understood and supported each other as an example. When Dr. King and Nhất Hạnh met in person for the first time, they “had a discussion about peace, freedom, and community. And [they] agreed that without a community, [they] cannot go very far.”<sup>98</sup> By forging a community and fostering understanding for each other, marginalized groups can achieve true solidarity to stand against white supremacy. This type of allyship is beyond effective and would bolster each group’s voice in righting the wrongs wrought upon them. As anti-racist consultant and author Kim Tran said, “[O]ne of the things that would be the most productive move for American racial discourse is to be able to hold racial difference and racial injustice in their own specific and unique lived experiences.”<sup>99</sup> She notes how “[t]hey’re not equivalent, and we should not rank them.”<sup>100</sup> Instead of trying to compete and pit groups against each other, ranking issues to determine who should receive attention, truly listening to each other and providing support whenever possible should be the main focus to achieve group solidarity and true allyship.

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<sup>97</sup> *Id.*

<sup>98</sup> *Supra*, note 14.

<sup>99</sup> *The History of Solidarity Between Asian and Black Americans*, NPR (Apr. 2, 2021, 4:00 PM), <https://www.npr.org/2021/04/02/983925014/the-history-of-solidarity-between-asian-and-black-americans>.

<sup>100</sup> *Id.*

## B. How to Use the Triangular Model of Allyship

Professor Yoshino created a relationship chart he calls the “empathy triangle.” As introduced earlier, the triangle is a relationship between three people: the affected person, the source of conflict, and the ally. A great tool in learning how to be a true and effective ally is to use Professor Yoshino’s triangular relationship to figure out what to do. As an ally, the individual will face many different choices – do they act? Should they help the affected person? What about the source, how should the ally deal with them?

The first thing an ally should do is ask themselves: do they have the proper motivations? Are they informed? Are they willing to make mistakes? What about other systemic solutions? The next step is to assess how the affected person is doing. Do they want help? What kind of help do they want? The ally should also consider the burden they may place on the affected person by acting. Lastly, the ally should look at the source and make some determinations as well. Are they able to separate the behavior from the person behind the source of conflict? Is the ally showing they are learning as well? Does the ally have a response ready?<sup>101</sup>

Being able to understand and use the triangular relationship will help individuals wishing to become true allies to act effectively. Not only does the relationship acknowledge the fact that an individual may end up on any point of the triangle, it also provides an ideal scenario for each person to learn from each other. It also adheres to the platinum rule – to treat others the way they want to be treated. By putting this rule in the forefront of the ally’s mind, Professor Yoshino emphasizes the importance of doing the right thing for the affected party, no matter what your intentions are. As I have defined earlier, true allyship depends on not just one’s intention, but the

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<sup>101</sup> Yoshino, *supra* note 42.

impact that result from them. If the intention and impact are not aligned, then true allyship has not been achieved.

## CONCLUSION

Exploring allyship and what it means to be an ally has been a relatively new shift in society, despite the concept existing for many years now. The idea of allyship does not have one fixed definition, but it does have a core basis to measure how true one's allyship is – what the intentions were and how those actions impacted interested parties. In taking actions to support a marginalized group, one must keep in mind the tiers of allyship I have created and what category their actions would fall under. It is also important to be conscious of any implicit biases one might have, as they may lead to unintentional microaggression that undermine and compromise the allyship they wish to demonstrate.

What can we do to maintain the current movement towards true allyship and keep the conversations about racial equality going? How can we encourage participation in outsiders and spur actions from allies that are truly helpful? These questions are not easy to answer. In an ideal world, it would be easy to educate one another, point out flaws in one's actions, and mend one's belief immediately. However, those notions are wholly idealistic and would be near impossible to achieve. Many people are stubbornly set in their ways and are unwilling to change their views. Many more are unaware of any biases they may hold regarding certain races. As such, the ideas set forth in this paper are based on an idealistic approach to society. It depends on individuals to be open to change, to be open to continuously learning, and to be open to receiving criticism. It also depends on individuals to act with good intentions, to act when the situation calls for it, and to be active in general. As idealistic as the idea of "true allyship" can be, it may still be achievable. Perhaps not immediately, but if people keep learning, slowly, our society can change.