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"Mad, Bad, & Dangerous to Know": Narratives of Female Serial Killers in Law & Media

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St. Edward's University Texas Tau Chapter

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Abstract

The dichotomy of "mad/bad" female killers underscores detrimental gender stereotypes, forging narratives that victimize or demonize women as spectacles of 'Otherness' based on their deviance from the discursive framework of femininity. This paper focuses on two primary cases of female killers: Andrea Yates and Aileen Wuornos. In each instance, the legal and media narratives employed to describe both women are examined. Further attention is devoted to the role of framing and typology in determining the disparate sentences both women received for their crimes. Similar cases involving killers such as Adair Garcia and Myra Hindley are also perused to determine how legal/media narratives impacted their individual sentences in ways similar to, or disparate from, Yates and Wuornos. The ultimate goal of this paper is not to propose new methodologies for circumventing the mad/bad dichotomy. Rather, it is to trace the representation of female killers in law and the media, with emphasis on how one-dimensional gender stereotypes can feed the construction of damaging identities—not merely for female criminals, but women for in general. The paper will also touch upon a number of theoretical perspectives, specifically Labeling Theory, Double Deviance, and Lacan's concept of the Other, as a means to understand how these simplistic narratives are employed to reinforce standards of what is acceptable versus unacceptable 'femininity,' even in the domain of crime and punishment.

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In both reality and virtuality, the phenomenon of the 'female killer' is imbued with the illicit charisma of transgression. History teems with literary and cinematic portrayals of women who kill, their personas mythologized until they have become staples in the popular imagination. Biblical archetypes such as Lilith, Salome, and Jezebel are steeped in evocative subtext of the predacious, pre-patriarchal feminine entity. Similarly, the tautological relationship between the femme fatale and the film noir genre has long since been established, with the femme serving almost as a repository for everything irresistibly devious, yet simultaneously aberrant to the prescribed roles of her gender. Indeed, when perusing any account of female murderers, from fictive to real-life, there is an implicit sense that violence is the realm of the masculine. Women who traverse this sphere, therefore, are aberrations – not just at the societal but also the biological level. Although 'femininity' is an ever-evolving concept, it remains entrenched in patriarchal presuppositions. The accepted roles of women continue to be those of nurturers, and idealized conceptions of womanhood remain tied to vulnerability, gentleness, and self-sacrifice. Consequently, the element of female violence becomes doubly jarring. It challenges society to reassess its established standards of sex/gender, exposing the deeply-embedded binarizations and prejudices still in play.

In order to rationalize the seemingly arbitrary behaviors of female murderers, two stock narratives are often employed by law, media, and fiction. Known predominantly as the "mad/bad" dichotomy, this construction can be traced as far back as Lombroso and Ferrerro's seminal criminological work, *The Female Offender*. Intended to explain non-stereotypical female crimes, such as homicide and filicide, Lombroso first delineates the essence of "normal womanhood"—

a paragon of passivity, guided by pure maternal instinct and utterly devoid of sexual desire. Women who depart from this definition are "closer to [men]... than to the normal woman," yet the masculinization does not elevate them to the level of their male counterparts. Rather, the criminal woman is a hybridized sub-species closer to children and animals. Firstly, as a creature of "undeveloped intelligence," she is riven by irresistible impulses and ungovernable emotions, thus susceptible to "Crimes of Passion/Mad Frenzy." Secondly, she exhibits a "diabolical" cruelty that far exceeds that of the male criminal, owing to a biological predisposition wherein her "evil tendencies are more numerous and varied than

men's" (31-183). As Lombroso sums up,

...in women, as in children, the moral sense is inferior... That which differentiates woman from the child is maternity and compassion; thanks to these, she has no fondness for evil for evil's sake (unlike the child, who will torture animals and so on). Instead... she develops a taste for evil only under exceptional circumstances, as for example when she is impelled by an outside force or has a perverse character. (80)

While such gendered contradistinctions have long since fallen into disfavor in criminological research, the "mad frenzy" versus "diabolical" categories continue to determine how female violence is portrayed in both media and legal discourse. Described by Brickey and Comack as a "master status template," these trajectories of 'mad' or 'bad' either victimize or pathologize female offenders, displacing the focus from the crime and onto the woman's inability to fit into predesigned boxes of normality, and more significantly, femininity (167). For instance, in the 'mad' polarity, the woman's agency is diminished in favor of painting her as a victim: "depressed," "traumatized," "deranged," and ultimately at the mercy of her emotions. It glosses over the killer's responsibility as an equal citizen under the law, falling back on archaic feminine tropes of passivity and helplessness that serve only to reinforce gender stereotypes. Granted, while mental illness can and has been a valid defense against culpability, it proves problematic when it reduces women who kill to Lombrosian roles of primitive infantalism. They are not dynamic actors in their own right, but tragic casualties of female physiology gone awry. On the 'bad' end of the spectrum, female killers are subsequently masculinized as per Lombroso's model, then stripped of all 'womanly' attributes, i.e. morality, kindness, and delicacy. The language employed by media, literature, and law alike tends to vilify them as deviants, beyond redemption or reform, and thus beyond the realm of humanity (Cranford 1426).

Both these approaches prove detrimental for a number of reasons. First, they force attention away from treating female offenders as nuanced singularities whose motivations are fluid and complex. Second, an outsized focus on their perceived biological or psychological failings does not offer a broader understanding of criminogenic behaviors at a macro-structural level. Indeed, it can be argued that such simplistic typologies as 'Victim' or 'Monster' serve only to highlight and feed harmful gender stereotypes, reducing these women to grotesque

spectacles of 'Otherness' based on their deviance from the discursive framework of femininity.

To be sure, women who kill are statistically rare. Data compiled by the Federal Bureau of Investigation from 2003-2012 revealed that males carried out the lion's share of homicides at 88% ("Ten Year Arrest Trends by Sex"). When filtered through the designative lens of serial murder, i.e. "...a series of three or more killings... having common characteristics such as to suggest the reasonable possibility that the crimes were committed by the same actor," the number of female offenders dwindles further ("Serial Murder" 7). In his work, Female Serial Killers: How and Why Women Become Monsters, Peter Vronsky remarks that only one in almost every six serial killers in the USA is a woman (3-5). Studies conducted in the early 1990s also revealed that men were six to seven times likelier to kill othersstrangers or relatives—than women (D'Orbán 560-571; Kellermann et al. 1-5). Similarly, Harrison and others found substantial effect sizes between both genders, in addition to marked sex differences in their modi operandi, i.e. males conforming to a "hunter" strategy of stalking and killing, while women resort to "gatherer" behaviors by targeting victims in their direct milieu for profit-based motives (295-306).

While these findings might explain the tenacious constructions of femininity—the and subsequent 'deviance' from—that still cling to the overall subject of female killers, they do not excuse them. Indeed, it can be argued that popular media portrayals of women who kill further fuel these stereotypes. News, infotainment, and cinema alike employ a highly effective formula whose pivotal components are simplification, sex, violence, and graphic imagery (Jewkes 43-60). Female killers cannot fully satisfy this sensationalist criterion except as caricatures. Otherwise, as highly complex and richly variegated individuals, their existence would prove to be a messy fissure within the neat constructions of gender and power dynamics—a status quo that the media arguably serves to reaffirm and maintain (Kirby 165-178).

It is unsurprising, then, that a marked dichotomy can be observed in the portrayals of male versus female killers. As previously noted, male serial killers are believed to exhibit "hunting" behaviors, with their crimes seen as the evolutionary offshoot of "unconscious drives" (Harrison 304-6). Applying this hypothesis under the aegis of patriarchy, men who kill subsequently become distortions of the masculine ideal: the quintessential hunter.

The nature of their crimes is at once instrumental and agentic; their actions are rooted in destructive hypermasculinity, but masculinity all the same. Their actions are shocking, but in their own way they serve as paradigms of nonconformity. They have broken free from the artificial constraints of society, rejecting the very source that dares to judge them. Certainly, for Lombroso, the male killer was often coupled with genius, and his deviance linked to retrograde evolution, wherein his sloughing-off of societal norms—and, ultimately, sanity-was a biological reaction to being excessively endowed with high intellect. For Lombroso, while female killers were a biological anomaly, the males were often a trailblazing nexus between exceptionality and atavistic brutality—"creators of new forms of crime, inventors of evil" (74). In their book The Murder Mystique: Female Killers and Popular Culture, Laurie Nalepa and Richard Pfefferman remark that:

Murderers are not heroes. But killing—whether motivated by passion, greed, thrills, madness, ideals, or desperation—is an extraordinary act; not an honorable one, to be sure, but undeniably extraordinary. And extraordinary acts—even depraved ones—tend to have the effect of elevating the perpetrator to iconic cultural status (4).

It makes sense, then, that the media deifies such individuals by capitalizing on their notoriety. They are bestowed catchy yet edgy nicknames such as Boston Strangler, Skid Row Slasher, Night Stalker, etc. Their exploits receive exuberant, stylized coverage, while their actions are profiled and dissected to the point where they eclipse needful attention to their victims. History recalls with a horrified yet titillated clarity the names of Jeffrey Dahmer, Charles Manson, Ted Bundy, and Richard Ramirez. However, their victims are seldom so fervently immortalized. The implication is that these killers are superstars within their own sensationalist dramas, whereas their victims function as mere props to drive the narrative forward. As Lisa Downing notes in her book, The Subject of Murder: Gender, Exceptionality, and the Modern Killer, "a pervasive idea obtains in modern culture that there is something intrinsically different, unique, and exceptional about those subjects who kill. Like artists and geniuses, murderers are considered special ... individual agents" (1).

Cinema, too, reinforces the phenomenon by lending male killers, both real and fictional, a disreputable mystique—often elevating them to the status of cult fixtures. Examples of this trend include the critically-acclaimed American Psycho, which juxtaposes orgiastic violence with careless misogyny, but is nonetheless lauded as a masterpiece of urban self-satire, as well as the fastpaced psychedelia of Natural Born Killers, where chaotic murder-sprees are translated as thrilling acts of rebellion and self-expression against a hypocritical society. Similarly, the mythic Hannibal Lector, in Jonathan Demme's Silence of the Lambs, is portrayed as a ruthless strategist whose skills, while undoubtedly evil, can also be harnessed for good because of their collective desirability. Lector the killer may be abhorrent and ghoulish; however, Lector the man holds something of an esoteric appeal. His very transgressions serve to glamorize him as a shadowy figure of fascination and reverence (Roy 61-92).

The cinematic emphasis on male killers as paradigms of intelligence and charisma doesn't extend to pure fiction. Recent docufilms such as Joe Berlinger's Extremely Wicked, Shockingly Evil and Vile—which focuses on the exploits of real-life serial killer Ted Bundy, as played by the photogenically clean-cut Zac Efronfurther underscore the tendency to glamorize male killers. As Anne Cohen notes, far from throwing a necessary spotlight on Bundy's victims, the film reduces them to irrelevant footnotes against a fawning narrative of Bundy's private life, as served up from the POV of his then-girlfriend Elizabeth Kendall. While the film's original intent may be to illustrate how Bundy's boy-nextdoor glibness could successfully fool his intimate circle, it arguably overshoots the mark by romanticizing Bundy to the extent that the audience becomes just as infatuated with him as Elizabeth. As Cohen states, "There's only so many times we can watch Ted's tender acceptance of [Elizabeth] as a single mother, his devotion to her daughter Molly, his thoughtful gestures—cooking breakfast, playing in the snow, wearing a lame birthday hat—before we...start to feel enamored" (1). The subsequent backlash after the biopic's premiere, coupled with the perverse flurry of online admiration it rekindled for Bundy, is a classic case of the film's message becoming lost in translation (Millard 1). It also serves as a potent reminder that framing, whether intentional or accidental, allows male killers to maintain their position on the pedestal of cultural obsessions. As critic Richard Lawson puts it,

It's indeed a wicked bit of casting. In addition to his heinous crimes, Bundy was famed for being disarmingly good-looking and charming. But he certainly wasn't an Efron-level sun-god—so Efron's presence in the movie lends the proceedings an extra otherworldliness, heightening the insidious appeal of American serial-killer lore to something almost pornographic (1).

Ultimately, whether biopic or fiction, these films swim through similar undercurrents: within a patriarchal framework, the male killer is a magnetic symbol of human impulse. A dark reflection of reality, certainly—but not, as is the case with female killers, a deflection of it. In contrast, paradigmatic examples of female killers as Lombrosian aberrations exist abundantly in film. Cinematic classics such as *Basic Instinct* and *Fatal* Attraction both feature psychopathic female leads, their much-vaunted sex appeal serving as a sinister smokescreen for their more bloodthirsty agendas. Underpinning their sanguinary appetites however, is the implicit strain of 'deviance' that first lures, then terrorizes, their hapless victims. In Basic Instinct, Sharon Stone's neonoir femme fatale Catherine Tramell is portrayed as a bisexual, hard-partying thrill-seeker who indulges solely in her own mordant whims. Every facet of her character serves to scandalize the audience—a framing that calls to attention the more docile, morally acceptable standards of femininity, as well as their ubiquity and pervasiveness within society.

However, for all Tramell's seductive dynamism, it is arguable whether hers is an empowering or feminist icon. Her body serves too blatantly as an erotic spectacle for male fantasy, effectively displacing her more human complexities (if they exist at all). While Berlinger's Extremely Wicked offsets Bundy's erotic charge with a trickster's charm, and humanized nuances of emotion, Tramell's character remains a succubic enigma from start to finish. If anything, she appears to function as a two-pronged warning for male viewers. Firstly, that uncontrolled, untamed, and non-heteronormative female sexuality is intrinsically rooted in criminality (Davies and Smith 105-107). Secondly, that independent and sexually-dominant women are only palatable when their characters are flattened into pornographic caricatures (Meyers 300). In her book *The Dominance of the Male* Gaze in Hollywood Films, Isabelle Fol remarks that the film "appeals in particular to men to avoid deviant women and settle for a homely girl in order to evade the castration threat" (69).

This fact is seemingly underscored by the film's ultimate, ambiguous scene, where Stone and Douglas's

characters are locked in a voracious embrace in bed. A foreboding, Hitchcock-esque refrain rises to crescendo and the camera pans down to reveal an icepick—Tramell's weapon of choice—concealed beneath the bed. It is through this scene that Tramell's inherent irredeemability asserts itself most explicitly. Granted, she eludes the fate inevitable to a majority of Hollywood vamps, death as fitting punishment for rejecting the traditional roles of womanhood. However, by no means has she been 'cured' by the hero's love. If anything, the scene highlights her perpetual threat as the castrator. The moment the male protagonist fails to satisfy her, she will dispose of him with brutal efficiency before moving on to her next victim. In that sense, she is the 'bad' female killer par excellence, her perceived deviance serving only to reaffirm the status quo rather than dismantle it.

Similarly, Fatal Attraction follows a well-known cinematic formula. A flawed but sympathetic hero-Michael Douglas's philandering Dan Gallagher—is beguiled, bedded, and then ultimately betrayed by the volatile femme fatale, who refuses to be relegated to an inconsequential fling and instead seeks to invade every sphere of his life with the intent of eclipsing the very bedrock of patriarchal stability: the nuclear family. In doing so, the femme becomes, by her very nature, deviant, and must be quashed for the threat of chaos she represents. Certainly, the film goes to great lengths to paint Glen Close's character—the seductive and mysterious Alex Forest—as an unstable force who upends the hero's life with escalating levels of terror. An outspoken career woman, Forest also serves as the perfect foil for Gallager's more docile wife Beth, a whore/madonna dualism that is nearly as prevalent in cinema and literature as the mad/bad dichotomy.

Of course, where the latter is concerned, Forest is emphatically depicted as mad. Her behavior is increasingly irrational and demanding, ranging from plaintive entreaties to Dan to return to her, to obsessively calling him at work and at home, to playing on his sense of guilt by announcing she is pregnant with his child, to throwing acid at his car, to killing and boiling his daughter's pet rabbit, to ultimately attacking his wife Beth in her bathroom. The film's penultimate scene, where she is shot dead by Beth after a frantic, bloody struggle with Dan, is represented as both triumphant and wholly justified. The survival of the male hero, as well as the continued sanctity of the family, is contingent on the demonization of the 'Other Woman' and her violent expulsion

from the narrative. The film's final, lingering shot of the Gallaghers' family portrait acts as a sanctimonious reminder of who the audience is meant to cheer for, from beginning to end. In her book *International Relations Theory: A Critical Introduction*, Cynthia Weber notes that,

Fatal Attraction is far from a gender-neutral tale. It is the tale of one man's reaction to unbounded feminine emotion (the film's symbolic equivalent for feminism) which he views as excessive and unbalanced. And his reaction is a reasonable one...because it is grounded in Dan's (and many viewers') respect for traditional family....Alex has a very different story to tell about her affair with Dan, one that the film works hard to de-legitimize (96).

Taken individually, the narratives of these films rooted in facile, frivolous fantasy—hardly seem to warrant academic scrutiny. However, central to their criticism is the idea of reflection theory, which purports that mass media is a prism through which core cultural values shine, combining misinformation and mythology into a seamless real-life spectrum (Tuchman et al. 150-174). That the media bears a cumulative, subliminal impact on its viewers goes without saying. However, so prevalent is its influence on how we perceive gender traits that we also fail to question the ubiquitous, ultimately harmful constructions concerning women and deviance at both judicial and psychological levels (Gilbert 1271–1300). In their work Judge, Lawyer, Victim, Thief, renowned criminologists Nicole Hahn Rafter and Elizabeth Anne Stanko remark that one-dimensional portrayals of women in media not only feed damaging cultural assumptions, but also contribute to countless "controlling images" in the sphere of criminal justice. Pigeonholed into tidy categories such as "woman as the pawn of biology," "woman as passive and weak," "woman as impulsive and nonanalytic," "woman as impressionable and in need of protection," "the active woman as masculine," and the "criminal woman as purely evil," these images saturate legal literature and obstruct worthwhile theoretical discourse. More to the point, they lead to sentencing outcomes where impartial justice often takes the backseat to parochial presumptions (1-6).

While it is tempting to succumb to the notion that sentencing guidelines in criminal law are based on airtight logic and objective fact, discretion—and its arguable corollary of discrimination—remains pivotal in shaping legal policy. The law is neither impartial nor inviolate, but as weighted down by normative baggage

and sociocultural discursivity as any other man-made construct. As Tara Smith remarks, "Law's meaning is not objective, and law's authority is not objective. The "objective" on its view, simply is: that which certain people would say that it is" (159). With that in mind, the actors in court (judge, jury, prosecution, defense) can sometimes play roles that are as rooted in confirmation-bias through the prism of storytelling as they are in factualism. Typologies such as mad/bad can serve as legal polemics against non-stereotypical female crimes, creating blurred lines between lived events and textual constructions as truth. More importantly, the evidence itself can go beyond context-specificity, not standing alone so much as being subject to common-sense fallacies of personal interpretation. As Bernard Jackson remarks,

triers of fact [i.e. judges, or, in some countries, the jury] reach their decisions on the basis of two judgements; first an assessment is made of the plausibility of the prosecution's account of what happened and why, and next it is considered whether this narrative account can be anchored by way of evidence to common-sense beliefs which are generally accepted as true most of the time. (10)

Two particularly notorious cases of female killers, which illustrate the simplistic narratives employed by law and media, are those of Aileen Wournos and Andrea Yates. In each instance, the women committed crimes of a similarly egregious magnitude. However, swayed by a rash of emotive media coverage, where one woman's perceived fragility was poignantly spotlighted while the other was emblazoned as a remorseless outcast, both women received opposite—and in the eyes of the public, apposite—sentences. Aileen Wuornos, for example, was fallaciously touted as the first postmodern female serial killer, a gender-averted Ted Bundy. Working as a smalltime prostitute in Daytona Beach, Florida, Wuornos was charged with the murder of seven male Johns between 1989 and 1990. In each case, the victims were shot at point blank range with Wuornos's .22 pistol. During her prolonged and extraordinarily-publicized trial, Wuornos's rationale for killing the men varied. Initially, she claimed to have committed the murders in self-defense, as the men either had or were about to rape her. Later on, her accounts took on a darker, more mercenary tinge, with her motives rooted in theft and revenge. After ten years on death row, she was executed by lethal injection in 2002. So mesmerizingly grotesque was Wuornos's

misfit persona—at least as it was painted by the media—that her murder-spree served as inspiration for the Oscar-winning film *Monster*, a title that seems at once apt and ironic.

On the other hand, Andrea Yates was a housewife in Houston, Texas, who was charged in 2001 with committing filicide on her five children by drowning them in the bathtub. Yates was suffering from post-partum psychosis which, coupled with extreme religious values, led her to believe she was under the influence of Satan, and that by killing her children, she was saving them from hell. Having called 911 shortly after her crime, then confessing once the police arrived, she was convicted of capital murder. Her case was at once highly publicized and polarized, with many condemning her actions while others sought to neutralize her culpability by focusing on her mental illness. The media in particular seized upon the latter aspect to portray Yates as a beleaguered and misguided woman whose crimes were merely a distorted translation of mother-love. Initially pronounced guilty, she was nonetheless spared the death penalty and sentenced to life in prison with the possibility of parole. In 2005, the verdict was overturned based on the erroneous testimony of an expert psychiatric witness. In her retrial the following year, Yates was found not guilty by reason of insanity and committed to North Texas State Hospital (Williams 1). She currently continues to receive medical treatment at Kerrville State Hospital ("Where in Andrea Yates now?" 1).

From an objective standpoint, it could be argued that Yates's crimes were diametrically opposed to Wuornos's on the murder spectrum. The latter had no intimate connection to her victims. They were adult strangers, albeit ones who reportedly sought to harm her. Yates's victims, on the other hand, all but epitomized helplessness: five children ranging from seven years to six months old. During their court trials, both women's histories of mental illness were presented as mitigating factors. Yet the outcomes of both cases were vastly different, owing—at least in part—to the different ways in which deviance and agency were conflated, then used either to repudiate or amplify each killer's crimes based on Lombrosian-style archetypes (Nalepa et al. 137). As mentioned previously, Lombroso, one of the earliest proponents of pathologizing female criminals, believed that women were by default amoral, with their redeeming feature being their maternal instincts. Devoid of this quality, the masculinized criminal female was ten times deadlier than the male, and inherently irredeemable (183). Despite the outdatedness of this paradigm, a thorough examination of the semantic fields forged by media and law reveals its disturbing prevalence during both Yates and Wuornos's trials. Each woman's description, peppered with loaded language and equivocal statements, served as implicit invitations to jury and bystanders alike to mold the story into the most suitable configuration by filling in the gaps.

In Andrea Yates's case, the media seized upon her status as housewife, former nurse, and high school valedictorian to separate her from the flagitious nature of her crime. In an illustration of insidious agency-denial, the focus remained on the underlying excuses behind her crime, rather than the crime itself. Articles from the NY and LA Times, utilizing statements such as "Andrea Yates was incapable of determining her actions were wrong...she was...driven by delusions that they were going to hell and she must save them," as well as "a simple, unremarkable Christian woman. She wore neat spectacles and had streaming hair...the Yates were an attractive family," all promulgated notions of helplessness and desperation, while also lending Yates's crime an aura of impossibility (Stack 25; "Killings Put Dark Side of Mom's Life in Light" 20). This was a sweet, submissive, God-fearing homemaker whose entire life revolved around her family. Her actions were a mysterious, once-in-a-lifetime tragedy, springing from utterly alien forces.

Yates's status as a mother—a role that is so often pedestalized and mythologized—was further spotlighted to render her somehow pristine: a murderer, yet morally inviolate because the filicide occurred while she was under extreme duress. Her defense attorney went so far as to state that "jurors...should pity a woman who was so tormented by mental illness that she killed her children out of a sense of 'Mother knows best'" (Weatherby et al. 7). Whether intentional or accidental, the discursive outcome allowed for the construction of an utterly mad woman—paranoid, pitiful, but most importantly passive—thus circumventing the challenges Yates might pose to our conceptions of both femininity and motherhood. In her paper "Women Who Kill Their Children," Jayne Huckerby goes so far as to state that Yates, as a white, middle-class suburban mother, served as a "poster girl" for the romanticized cult of motherhood. Her actions, albeit deviant, were seen as an isolated incident rather than symptomatic of greater systemic ills. Moreover, affixing her with the mad label—thus focusing solely on her medical malady—allowed her case to be elevated to a political cause. Interest groups such as NOW vehemently advocated against Yates's execution, citing her depression, schizophrenia, and hallucinations as excuses. The phrase mental "state" was used repeatedly during Yates's trial, with clear connotations of its temporal and disjunctive nature. Yates, judicial and media discourse seemed to imply, was not the killer; her mental illness was. This two-pronged tactic of medicalization and politicization garnered Yates extraordinary support, and quite likely owed to the lenience of her sentence (140-170).

To be sure, Yates's postpartum illness was not a fictional spin, but rather a legitimate diagnosis that affects women in everyday life. A Brown University study cited about 200 cases of maternal filicide in the US per year, from the 1970s to the early 2000s. It also suggested that psychiatric or medical disorders that lead to a reduction in serotonin levels heighten the risk of filicide (Mariano 1-8). In the US, both antenatal to postnatal depression continue to be debated as mitigating circumstances for murder (Carmickle et al. 579-576). However, in other countries, the close ties of birth and its attendant biological changes to mental illness have been legally acknowledged. Nations including Brazil, Germany, Italy, Japan, Turkey, New Zealand, and the Philippines have some form of "infanticide laws," allowing for leniency in cases of postpartum-linked mental illness (Friedman et al. 139).

In Andrea Yates's case, it could be argued that her declining mental health did not arise in a vacuum. Indeed, the highlights of Yates's psychiatric history, even prior to her children's murder, reveal a woman beset by proverbial psychological demons. In 1999, following the birth of her fourth son, Yates was already suffering from severe depression and struggling with a feeling that "Satan wanted her to kill her children." That same year, she attempted suicide by overdosing on medication, reportedly in a misguided attempt to protect her family from herself. She was subsequently hospitalized for psychiatric care, only to be discharged and then make a second suicide attempt five weeks later by cutting her throat She was eventually diagnosed with Major Depressive Episode with psychotic features. After few months' treatment via outpatient appointments, Yates dropped out on the claim that she was "feeling better." Also, despite the warnings from her treating psychiatrist

about the recurrence of postpartum depression, she and her husband decided to have another child. Following the birth, Yates went on to be hospitalized thrice more for psychiatric treatment. Her last unsuccessful suicide attempt involved her filling the bathtub, with the vague explanation that "I might need it" (Resnick 147-148).

Leading up to the mass-murder of her children, Yates continued to display psychotic symptoms, including the belief that the television commercials were casting aspersions on her parenting, that there were cameras monitoring her childcare, that a van on the street was surveilling her house, and finally that Satan was "literally within her." Convinced that her bad mothering was to blame for her children's poor development, she fixated on the verse from Luke 17:2, "It would be better for him if a millstone were hung around his neck and he were thrown in the sea than that he should cause one of the little ones to stumble." Ultimately, on June 20, 2001, Yates waited until her husband left for work, then proceeded to drown her five children in the bathtub. When the police arrived, Yates stated that she expected to be arrested and executed, thereby allowing Satan to die along with her. Of her children, she said, "They had to die to be saved" (Resnick 150).

While Yates's actions shocked the public conscience, they also garnered an intense outpouring of sympathy. Partly, it was because, as Skip Hollandsworth remarked, "Yates came with no baggage." From her ordinary appearance to her uncheckered background, Yates had the makings of an All-American mother who "read Bible stories to her five children...constructed Indian costumes for them from grocery sacks...[and] gave them homemade valentines on Valentine's Day with personalized coupons promising them free hugs and other treats" (1). Her daily routines were familiar, her struggles relatable. It was easy to cast her as a stand-in for other suburban mothers, with her decision to murder her children serving as a mirror for their own worst fears. As Newsweek's Anna Quindlen noted, "Every mother I've asked about the Yates case has the same reaction. She's appalled; she's aghast. And then she gets this look. And the look says that at some forbidden level she understands" (1). Ultimately, Yates's status as a suburban housewife allowed her to occupy the pedestal of the Everywoman. The predominant narrative, as imbricated by the law and media, was that of someone unstable, delusional, overwhelmed—yet undeniably feminine. Through her, the negative extremes of womanhood were allowed unfortunate expression, a fact that served to render her less culpable rather than more (Phillips et al. 4).

In direct contrast, Aileen Wuornos's narrative was afforded little opportunity for feminization, much less humanization. Rather, her status as a prostitute and lesbian was immediately seized upon by the law and media, then highlighted with pejorative, condemnatory rhetoric. Capitalizing on the strong stigma attached to prostitution, in conjunction with Wuornos's gruff, belligerent, decidedly un-feminine manner, the dominant 'bad woman' narrative was invoked. Central to the trial and its accompanying media coverage was the sense of Wuornos's inherent unfitness on both a gendered and societal scale. Caroline Picart remarks that "Wournos, even if given the title of being America's first female serial killer, in comparison with heterosexual male serial killers, was not generally perceived as a skilled serial killer but, rather, as being a woman who did not know how to be a real woman" (3). In point of fact, Wuornos's designation as the 'first' female serial killer was an embellishment: there are other women who could have fit the mold of the serial killer. However, prior to Wuornos's arrest, women who killed were stereotypically shrouded behind a ladylike mystique, their modi operandi veering from arsenic and cool calculation, as with Anna Maria Zwanziger, to maternal instincts warped by insanity, as with Brenda Drayton, to Angels of Mercy whose nurturing demeanor hid a crueler edge, such as Beverley Allitt's.

Wuornos, conversely, did not fit into any of the conventional molds of wife, widow, mother, nurse, or daughter. If anything, she subverted the conception of prostitutes as disposable victims, prowling along the same highways where numberless streetwalkers met their end. More to the point, her sexual preferences and choice of work marked her as a hostile threat to society, and more specifically to patriarchal stability. When interviewed by the TV show Dateline, she attempted to justify her killings by reminding audiences of the extreme dangers of prostitution. However, she failed to grasp that delving into the gory minutiae of such a socially-reviled profession did her no favors. Society too often finds convenient scapegoats in prostitutes. Shunned as breeders of contagion and social ills, they are reduced to receptacles for everything heteronormative family-life pretends to disavow. Yet, their role as the integral underbelly of society also necessitates their invisibility and, by extension, disposability—in order to preserve the immaculate image of the nuclear family. With that

in mind, perhaps it is at once ironic and unsurprising that *Dateline's* co-anchor Jane Pauley states, "This is a story of unnatural violence. The roles are reversed. Most serial killers kill prostitutes" (Hart 142).

The media, of course, ruthlessly weaponized Wuornos's outsider status against her. Her checkered history was touted as proof of her immorality, with news coverage running the gamut from mean-spirited to sensationalist. The NY Times was quick to point out that "Ms. Wuornos served a year in prison in 1982-83 for armed robbery...she also faced charges of vehicle theft and grand larceny," "[she] was a prostitute part of the time," "residents can now rest easy," "Ms. Wuornos was 'a killer who robs rather than a robber who kills" (Smothers 16). Meanwhile, the LA Times ran an interview with police officers stating that "We believe she pretty much meets the guidelines of a serial killer" ("Transient Woman Accused in Florida Serial Killings" 40). Every aspect of Wuornos's life was vilified and picked apart, the better to construct the image of an unnatural creature. Even descriptions of her physical appearance underscored the extremes to which the media tried to demonize her. A 2002 article at the Palm Beach Post describes her as "a haggard-looking drinker and heavy smoker...her weathered face has a cold, dead stare that morphs into a wildeyed laugh" (Wells 5). By so assiduously focusing on Wuornos's Inegative traits, the media sought to render her as unrelatable and undeserving of human sympathy. However, at the crux of her deviance was not the violent nature of her crimes, but rather how far she had strayed from the boundaries of traditional femininity. Wuornos—caricatured as a monster of sheer lunatic aggression, wanton sadism, and unmitigated cruelty—was not a 'real' woman. As Jeffner Allen notes in her work Lesbian Philosophy: Explorations, "Violence is defended as the right to limit life and take life that is exercised by men...A woman, by definition, is not violent, and if violent, a female is not a woman" (22-30).

Similar to Andrea Yates, Wuornos grappled with mental illness. During her trial, both the defense and the prosecution employed psychologists who testified that she suffered from Borderline Personality Disorder (BPD) in addition to symptoms of posttraumatic stress. First used by analyst Adolph Stern in 1938, BPD describes patients who are at the border between neurotic and psychotic. Individuals with BPD may suffer from patterns of instability in mood, jobs, relationships, and self-image. The diagnosis is applied predominantly to

survivors of sexual abuse. (Giannangelo 19). In Aileen Wuornos's case, her experiences of sexual abuse from childhood to adulthood, her violent and unstable years as a transient, in addition to her ninth-grade education level and mental disabilities, were well-documented. However, the prosecution minimized these factors during the trial, insisting that they were not "substantial" and in no way impaired Wuornos's capacity as an instigator of violence. As the district attorney claimed in his closing statement, "Aileen Wuornos at the time of the killing knew right from wrong."

This focus on individual action is by itself hardly noteworthy, if not for the courts' further descriptions of Wuornos as "primitive" and "damaged"—a subhuman designation at odds with the portrait of the controlled and calculating serial killer (Sarat 75-77). In Wuornos, the courts attempted to reconcile two seemingly contradictory yet equivalent extremes of 'badness'—the Lombrosian archetype of the atavistic female, a primal degenerate driven by a cruel thirst for sex and bloodshed, and the paradoxical essence of 'evil' as it applies to the feminine shadow, with an ice-tipped propensity for malice and manipulation. Yet, where the male killer wears both masks of wildness and wit with a dynamic ease, embodying a transcendental self-mastery beyond moral codes, homicidal females such as Wuornos find their narratives consistently entrenched in gendered morality. Even when afforded agency for their own crimes, their humanity (three-dimensional, flawed, self-directed) is downplayed in favor of wholesale monstrosity. Their true crime is not taking a human life. Rather, it is straying, with eyes wide open, beyond the province of womanhood. As Ashley Wells remarks,

What's fascinating about Aileen is how little her own mental illness played into her trial and the media hoopla surrounding it... There was no narrative in place for female serial killers the way there was for male ones. So instead of focusing on her mental illness or her horrific childhood, the way we might for a male serial killer now that we have so many to choose from, the media latched onto the fact that Wuornos was a prostitute and a lesbian, some sort of unholy alliance of the two types of women it only knew how to deal with in the broadest possible stereotypes. (1)

It goes without saying that criminologists have embraced a broad spectrum of theoretical perspectives, from sociological, philosophical and psychoanalytic, the better to explicate the disturbing relationship between law/media and homicidal women. Predominant among them is Labeling Theory, which can be traced back to Frank Tannenbaum's 1938 work *Crime and the Community*. Chiefly focused on self-identity, Labeling Theory purports that deviant behavior—both singular and recurrent—is predicated on external categorizations, i.e. the self-fulfilling prophecy of stereotypes. Social categorizations function in pernicious ways, wherein people will subconsciously or deliberately begin altering their behavior to conform to the labels they receive.

In the case of Andrea Yates, Labeling Theory asserted itself on multiple levels. First, it was present in the defense constructed by Yates's lawyers, who cleaved tenaciously to the idea that she was a loving mother whose crime—while terrible—was episodic, fueled by depression. The media, too, seized this narrative: the poignant image of Yates as a mother who had, quite literally, loved her children to death. Lastly, the insidious strength of labeling manifested itself through the personality of Yates herself. Her terror of failing to conform to the image of a perfect mother by damning her children to Hell led her to a shocking act of filicide. Rosenblatt and Greenland note, "it is the very attempt to fulfill her culturally defined role as wife and mother in our society which is often at the source of much of her violence" (180). Certainly, everything about Yates corresponded with the cultural view of women as emotional, flighty, and easily led astray. Even her classification as 'mad' came to be viewed with the more sympathetic connotations of the word. Ultimately, it was that exculpatory label that framed the way Yates was perceived by the courts and public alike (Weatherby et al. 3).

Skip Hollandsworth, as previously noted, drove home Yates's appeal as the Everywoman due to her lack of "baggage" (1). Ironically, the coverage of Yates's case was laden with it. The *LA Times*, for instance, noted that in the first four weeks of Yates's trial, "more than 1,150 articles" were devoted to dissecting her morality versus her mental health (Gamiz 3). Early public opinion was sharply polarized, with some painting her as a vindictive modern-day Medea, while others condemned not Yates herself, but her husband, her psychiatrist, her neighbors, and even the societal constructions of motherhood at large for allowing the rigors of childcare to overshadow Yates's clinical emergency. Ultimately, both arguments allotted focus not to Yates's crime, but to how inextricably it was fused to both sympathetic and

censorious conceptions of motherhood. During the early parts of the trial, for instance, the prosecution clung to the scheming Medea narrative, claiming that she had deliberately faked her postpartum issues in order to coerce her husband into buying her a house (the family lived in a school bus before moving to a house in Clear Lake, Houston). Meanwhile, the defense and the mainstream media veered toward the Madonna archetype, wherein Yates's mental collapse sprang from trying to attain the impossible ideal of the perfect mother. In either case, the disparate opinions were not an ideological split so much as two sides of the same coin: the saturation of gender in "neutral categories of criminality and intent" (Hyman 193-208).

Unsurprisingly, while Labeling Theory offers an opportunity to examine its impacts on female filicidal perpetrators within criminological discourse, male perpetrators receive very different socio-legal epithets. As the Yates case makes apparent, both law and media doggedly adhere to the exaltation of certain social characteristics (white, female, attractive, middle-class). In order to exculpate the offender, most if not all of these boxes must be checked. Filicidal men, however, cannot readily satisfy this criterion. Cases similar to Yates's, such as that of Adair Garcia in 2002, highlight the lopsided nature of both media coverage and legal sentencing. Like Yates, Garcia was suffering from mental illness, mistakenly gripped by the delusion that by killing himself and his children, they would be "going to be a better place, a painless place." After putting his six children to bed, he disconnected the smoke detector and phone, then lit the charcoal in the barbecue grill and placed it in the hallway. By the next morning, five of his children had died, although Garcia and his eldest daughter, who was nine at the time, survived. Despite the defense's arguments that Garcia had sunk into a deep depression after his wife left him and was "unable to think straight," he was found guilty of the five counts of first-degree murder and one of attempted murder, then sentenced to life without parole (Wang 1).

Despite the similarities in both Yates's and Garcia's cases, there was a striking divergence in the media coverage. Compared to the widespread scrutiny garnered by the Yates's family, a paltry 77 articles were devoted to the Garcia case (Gamiz 3). This fact did not go unnoticed by *The Globe and the Mail's* Doug Saunders. "The distinction," he wrote, "lies deep in human psychology. When fathers kill their offspring, it is viewed as a serious

crime; when mothers do it, it is seen as a deep sickness, one that garners both sympathy and profound horror" (1). Subsequent disparities would also be observed in the tone of media articles, with Garcia pegged as "twisted" and seeking "revenge" on his spouse, whereas Yates would be described as a "Houston mother," with news articles posing headlines such as "What drives a mom to kill?" and "Andrea Yates 'still grieves for her children" (Adams 1; Landau 1; "Twisted Dad..." 1). The contrasting narratives are a grim reminder that violence, even from filicidal fathers, is perceived as biological hardwiring, and somehow emblematic of men as a gender. As Hollandsworth remarks, "Men who go mad do not interest us. But women who go mad are haunting" (1).

Ultimately, it was this feminized conflation of madness with victimhood that diffused Yates's responsibility as a murderer. By clinging to labels that separated her from her crime and yet sought to "preserve [her] femininity, fidelity and commitment to motherhood," her agency as an individual with complexity and self-determination was utterly disregarded (Hyman 208). Nancy Taylor Porter, in her book Violent Women in Contemporary Theatres: Staging Resistance, describes Yates as a "cipher" (297). In both literature and cinema, "ciphers" are characters who bear similarities to the writer—"attitudes, traumas, even life events" (Boyd 1). However, in Yates's case, her cipher status rendered her not polysemantic, but faceless. Beyond simply a woman who "lost herself," she was someone who appeared to have never been found: she seemingly had no personal desires to dissect or decode. ("She was always trying to be such a good girl," her mother remarked in a Newsweek interview. "Always thinking of other people, never of herself.") In Yates, both the courts and media constructed a figure that was less a person than persona. She was an empty vessel waiting to be filled with the most socially-appropriate label and made significant through said label (Hollandsworth 1).

Ironically, this same vein of reductionism in the media's stance led to Aileen Wuornos's widespread condemnation and later execution. While Labeling Theory is certainly influential in examining the coverage and outcome of her trial, more fitting still is the theory of Double Deviance, developed by a number of contemporary feminist criminologists (Heidensohn 102; Chesney-Lind 115; Berrington & Honkatukia 50-72). According to Double Deviance theory, women who commit crimes are punished twice as harshly, owing to the fact that they

have transgressed not only criminal law but procreative norms. Certainly, this element of condemnation can be observed in Wuornos's journalistic treatment. Whereas Andrea Yates was afforded the protective barrier of respectability (a former nurse, a mother, a suburban housewife), Wuornos, as a prostitute and a lesbian, was regarded as depraved in mind, body and moral fiber. Hers were crimes not just against her victims but against her gender itself. The harsh, almost dyslogistic language used by media both addresses and feeds her status as a pariah. Certainly, one might argue that 'first female serial killer' would not be such a shocking designation if women weren't so intrinsically linked to passivity. For a taboo to be broken, it is essential to recognize the unwritten rules that preside over our existence; the intangible myths that are enforced as reality through tradition and repetition. Similarly, femininity, softness, or mercy would not be sacrosanct for society if they were not also concepts that were fragile and vulnerable to violation. With that in mind, a woman transgressing laws, either man-made or 'natural,' is perceived as openly more agentic-and therefore deviant-than the woman who simply disavows those same boundaries.

It comes as no surprise, then, that Wuornos received such widespread censure. Granted, the nature of her crimes was brutal. But that very brutality-so masculinized and deliberate—was what shocked the public and jurors alike. Not only were a majority of her victims found stripped naked and riddled with close-range gunshot wounds, but Wuornos also divested them of their wallets and other valuable possessions, in addition to stealing their cars. How could the public reconcile these predatory actions with a woman—the so-called weaker sex—unless she was somehow evil? When Wuornos's profession, sexual orientation, and poverty were brought to light, it seemed only to exacerbate her guilt. This wasn't a 'normal' woman (the scope of normality here being limited to the white, heterosexual, middle-class population), but an anomaly.

An article from the *Washington Post* illustrates the tenuous position that Wuornos—brash, foul-mouthed, stridently unrepentant—occupied in society: "Women do this kind of thing? Poison, yes, and the occasional queenly beheading, but can women be serial murderers like Jeffrey Dahmer or Ted Bundy? Spiderwoman! Avenging angel!" (Allen 1) Although the appellations bear a tinge of humor, they also serve to emphasize the essential absurdity of a homicidal woman. Such an indi-

vidual becomes an incongruous breach within the fabric of our dominant cultural framework. More to the point, she is a blot on the pristine mythology of the perfect woman. This is precisely what makes the heinousness of her offense so blatant, and her stigmatization that much harsher (Phillips et al. 10).

To be sure, Wuornos was not alone in being pathologized as a grotesque aberration of womanhood. Similar judicial and media language was used in the case of Myra Hindley, an English serial killer who, alongside her partner, Ian Brady, raped and killed five children between 1963 and 1965. Although both were eventually apprehended, tried, and found guilty, he of three counts of murder and she of two, the subsequent media attention surrounding the couple was noteworthy for the gendered lens of exceptionality versus abnormality that came into play. Although equally agentic in terms of planning and implementing the sexual assaults, Hindley would be dubbed "The Most Evil Woman in Britain," an incendiary label that far exceeded, and outlasted, the public's condemnation of her male counterpart (Cummins 115). Further legal and press discourse would reduce the pair to a heteronormative microcosm of gender roles, with Brady serving as the cunning mastermind while Hindley served as the obedient helpmate. However, this stereotypical slant, far from minimizing her responsibility as a killer, horrified the public, precisely because Hindley was a member of the supposed fairer sex. In an article for the *Independent*, Geraldine Bedell wrote, "Higher standards are expected of women when it comes to the care of children: Myra betrayed her sex and exploited her sex so that children could be sexually assaulted, tortured and killed" (1).

Similar disparities would arise during the trial, with Brady's attitude toward children being only cursorily examined, while Hindley was lengthily and harshly grilled for her absence of maternal instinct toward her victims ("The screams of a little girl of ten...Did you put your hands over your ears...?...Or get the child out of the room and see that she was treated as a woman should treat a female child, or any other child...?"). Comparable to Wuornos, the crux of the issue was less that Hindley had failed the moral standards of society than the social constructions of femininity. Also like Wuornos, everything from her appearance ("the Medusa face of Hindley, under the melon puff-ball of hair") to her sexuality ("longstanding and passionate affairs with other prisoners...she had them all eating out of her hand")

were fair game for vilification. Her face would be emblazoned across newspapers and magazines as an icon of evil, comparable to the "image of Medusa" (Birch 32), and similarly mythologized as a one-dimensional symbol of monstrousness (Birch 51; Goodman 159-224; Jones 163; Stanley n.p.). In contrast, her partner-incrime, Brady, would slip through the cracks of collective societal memory, meeting the prosaic fate of living and dying in prison. Helena Kennedy, who once represented Hindley, notes,

We feel differently about a woman doing something consciously cruel because of our expectations of women as the nurturing sex. The adage is that women who commit crime are mad, bad or sad. The bad may be few in number, but once given the label there is no forgiving. It defies explanation that someone, especially a woman, stood by and allowed torture to take place, but it is important to remember that women did it in the concentration camps, and evidence is emerging that women are doing it in Syria and Iraq with Islamic State. Terror is a man, but wickedness is a woman. (1)

Jaques Derrida, citing Montaigne, has famously stated, "There is more ado to interpret interpretations than to interpret things" (278). This certainly applies to the mandate of womanhood in legal discourse and the pernicious effects it exerts on sentencing outcomes. Jacques Lacan, one of the most influential psychoanalysts of the twentieth century, has gone further by emphasizing the role of language in social and gendered regulation. That the proliferation of stereotypes has been absorbed into the fabric of language goes without saying. But more intriguing is Lacan's theory that the very bedrock of linguistics is the system of binary opposites: male/female, good/evil, self/other (Bertens 44). This proves problematic when the subject of homicidal women arises. Aggression is, by and large, considered an essential component of masculinity. Therefore, murders committed by men, across the varied spectrum of violence, are easily equated with maleness. More perverse still—as the celebrity status of Ted Bundy and Charles Manson testifies—they are often lauded as exceptionalities, a type of Nietzschean superman beyond mundane moral codes (Waller 7). Conversely, female killers disrupt the workings of cultural codes due to their incompatibility with gender roles. Their discursive constructions by law and media are therefore intended either to squeeze them into a narrow, comprehensibly

feminine niche (the mad woman), or viciously excise them from the social script (the bad woman). As Helen Birch remarks in her work *Moving Targets: Women, Murder and Representation*, "we do not have a language to represent female killing, and [cases like these disrupt] the very terms which hold gender in place" (61).

The solution, then, as Derrida puts it, might be to deconstruct the overriding mad/bad narratives as they apply to homicidal females. Only through unraveling these binary systems is it possible to expose the interstitial spaces where these women exist as multifaceted beings with depth, nuance and agency. There is, by and large, no static or singular explanation for why women kill. Their motives and methods are an evolving, organic bricolage shaped by family, education, economics, religion, and a host of other institutional configurations (Yardley et al. 1-26). By superficializing each individual case study—thus treating the women's proclivities as either anomalies or generalities—we are in fact sacrificing knowledge at both the macro and micro levels. Instead, what is essential is to look beyond social paradigms and comprehend that guilt or innocence is merely an effect of how each is interpreted, framed, and eventually typified in order to perpetuate and protect dominant mythologies. True, breaking free from the security of labels might place us in the disquieting position of owning our own ambiguous natures. However, it may also challenge us to examine women as hyper-specific (individual) and sometimes self-contradictory beings-and to further apply that ambiguity to homicidal women. To do so successfully is to confront aspects of human nature and criminogenic behavior that would otherwise be invisible beneath the shadow of institutionally-generated abstractions. Dichotomizing female killers as Victim or Monster, on the other hand, serves only to perpetuate harmful gender stereotypes, reducing such women to grotesque spectacles of Otherness based on their deviance from the discursive framework of femininity.

Works Cited

- Adams, Char. "Mom Still 'Grieves for Her Children' 15 Years After Drowning Them" *People Magazine*, 1 Sept 2016, pp. 1, https://people.com/crime/andreayates-now-she-grieves-for-her-children-15-yearsafter-drownings/.
- Allen, Henry. "Essay Section." *The Washington Post*, Feb 12, 1992, p. c.01
- Allen, Jeffner. *Lesbian Philosophy: Explorations*. Institute of Lesbian Studies, 1986.
- Taylor, Boyd. "On Writing #9: On Cipher Characters, Why They Can Be Flat, and How to Fix Them." 5 Oct 2010. sboydtaylor.com/2010/10/05/a-new-on-writing-one-of-my-best-o/
- Bednell, Geraldine. "Profile: Beyond Forgiveness?: Myra Hindley." *Independent Digital News and Media*, 23 Oct. 2011, pp. 1, https://www.independent.co.uk/voices/profile-beyond-forgiveness-myra-hindley-geraldine-bedell-on-the-child-murder-er-with-an-enduring-1456064.html.
- Berrington, Eileen, and Päivi Honkatukia. "An Evil Monster and a Poor Thing: Female Violence in the Media." *Journal of Scandinavian Studies in Criminology and Crime Prevention*, vol. 3, no. 1, 2002, pp. 50–72.
- Bertens, Johannes Willem., and Joseph P. Natoli. *Post-modernism: The Key Figures*. Blackwell Publishers, 2002.
- Birch, Helen. *Moving Targets: Women, Murder, and Representation*. University of California Press, 1994, pp. 51.
- Carmickle, L., et al. "Postpartum Illness and Sentencing: Why the Insanity Defense Is Not Enough for Mothers with Postpartum Depression, Anxiety, and Psychosis." *Journal of Legal Medicine*, vol. 37, February 23 2018, pp. 579-576.
- Cranford, Victoria et al. "Hearth and Home: Images of Women in the Mass Media." *Social Forces*, vol. 57, no. 4, 1979, pp. 1426.
- Chesney-Lind, M. Media Misogyny: Demonizing 'Violent' Girls and Women. Walter De Gruyter Inc, 1999.
- Cohen, Anne. "Netflix's Extremely Wicked, Shockingly Evil & Vile Has Too Much Sexy Ted Bundy." Refinery, 1 May, pp. 1. 2019, https://www.refinery29.com/en-us/2019/05/231467/extremely-wicked-shockingly-evil-vile-review-ted-bundy-netflix-movie.

- Comack, Elizabeth, and Salena Brickey. "Constituting the Violence of Criminalized Women." *Canadian Journal of Criminology and Criminal Justice*, vol. 49, no. 1, 2007, pp. 1–36., doi:10.3138/5523-4873-1386-5453.
- Cummins, Ian, et al. Serial Killers and the Media: the Moors Murders Legacy. Palgrave Macmillan, 2019.
- D'orban, P. T. "Women Who Kill Their Children." *The British Journal of Psychiatry*, vol. 134, no. 6, January 1979, pp. 560–571.
- Davies, Jude, and Carol R. Smith. *Gender, Ethnicity and Sexuality in Contemporary American Film.* Keele University Press, 1997.
- Derrida, Jacques. *Writing and Difference*. Translated by A. Bass. Routledge & Kegan Paul, 1978.
- "Doctor Says Mother was 'Driven by Delusions." *New York Times*, 7 March 2002, Late Edition, East Coast, p. A.25
- Downing, Lisa. *The Subject of Murder: Gender, Exceptionality, and the Modern Killer*. University of Chicago Press, 2003.
- Federal Bureau of Investigation, "Ten-Year Arrest Trends by Sex, 2003–2012," UCR, 2012.
- Fol, Isabelle. Dominance of the Male Gaze in Hollywood Films. Grin Verlag, 2006.
- Friedman, Susan Hatters, et al. "Child Murder by Mothers: Patterns and Prevention." *World Psychiatry*, vol. 6, no. 3, October 2005, pp. 137-141.
- Gamiz, Manuel. "2 Tragic Cases Show Marked Contrasts." *Los Angeles Times*, 15 Apr. 2002, pp. 1–3.
- Giannangelo, Stephen J. Real-Life Monsters: A Psychological Examination of the Serial Murderer. Praeger, 2012, pp. 18-19.
- Gilbert, P. R. "Discourses of Female Violence and Societal Gender Stereotypes." *Violence Against Women*, vol. 8, no. 11, January 2002, pp. 1271–1300.
- Goodman, Jonathan. *The Moors Murders: The Trial of Myra Hindley and Ian Brady*. Magpie, 1994, pp. 159-224.
- Hart, Lynda. Fatal Women: Lesbian Sexuality and the Mark of Aggression. Princeton University Press, 1994.
- Harrison, Marissa A., et al. "Sex Differences in Serial Killers." *Evolutionary Behavioral Sciences*, vol. 13, no. 4, 2019, pp. 295–310., doi:10.1037/ebs0000157.
- Heidensohn, Frances. *Crime and Society*. New York University Press, 1989.

- Huckerby, Jayne. "Women Who Kill Their Children: Case Study and Conclusions Concerning the Differences in the Fall from Maternal Grace by Khoua Her and Andrea Yates." *Duke Journal of Gender Law & Policy*, vol. 10, no. 1, 2003, pp. 149-172.
- Hyman, Rebecca. "Medea of Suburbia: Andrea Yates, Maternal Infanticide, and the Insanity Defense." *Women's Studies Quarterly*, vol. 32, no. 3, 2004, pp. 192–210.
- Jackson, Bernard S. "Anchored Narratives and the Interface of Law, Psychology and Semiotics." *Legal and Criminological Psychology*, vol. 1, no. 1, 1996, pp. 17–45., doi:10.1111/j.2044-8333.1996. tb00305.x.
- Jewkes, Yvonne. "Media Representations of the Causes of Crime." *Criminal Justice Matters*, vol. 55, no. 1, 2004, pp. 43–60.
- Jones, Janie, and Carol Clerk. *The Devil and Miss Jones: The Twisted Mind of Myra Hindley*. Smith Gryphon, 1993, pp. 163.
- Kellermann, Arthur L., and James A. Mercy. "Men, Women, And Murder." *The Journal of Trauma: Injury, Infection, and Critical Care*, vol. 33, no. 1, 1992, pp. 1–5.
- Kennedy, Helena. "The Myth of the She-Devil: Why We Judge Female Criminals More Harshly." *The Guardian News and Media*, 2 Oct. 2018, pp. 1. https://www.theguardian.com/uk-news/2018/oct/02/themyth-of-the-she-devil-why-we-judge-female-criminals-more-harshly.
- Kirby, Mark, and Tanya Hope. *Sociology in Perspective* for OCR. Heinemann, 2000.
- Lawson, Richard. "Zac Efron Is Unnervingly Good as Serial Killer Ted Bundy—But to What End?" Vanity Fair, Vanity Fair, 1 Feb. 2019, pp.1, https://www.vanityfair.com/hollywood/2019/01/zac-efron-ted-bundy-movie-review-extremely-wicked-shocking-ly-evil-and-vile.
- Lombroso, Cesare, et al. *Criminal Woman, the Prostitute, and the Normal Woman*. Duke University Press, 2004.
- Lombroso, Gina, and Cesare Lombroso. *Criminal Man: According to the Classification of Cesare Lombroso*. Filiquarian Publishing, 2011.
- Mariano, Timothy Y., et al. "Toward a More Holistic Understanding of Filicide: A Multidisciplinary Analysis of 32 Years of U.S. Arrest Data." *Forensic Science International*, vol. 236, 2014, pp. 46–53., doi:10.1016/j.forsciint.2013.12.019.

- Meyers, Marian. Women in Popular Culture: Representation and Meaning. Hampton Press, 2008.
- Millard, Anna. "Zac Efron's New Ted Bundy Movie May Be Taking Our Obsession With Serial Killers Too Far." Zac Efron's New Ted Bundy Movie Might Be Too Sexy, Refinery, 27 Jan, pp. 1. 2019, https://www.refinery29.com/en-us/2019/01/222717/zac-efron-ted-bundy-extremely-wicked-critics-react.
- Nalepa, Laurie, and Richard Pfefferman. *The Murder Mystique: Female Killers and Popular Culture*. Praeger, 2013.
- Phillips, Dretha M., Lois DeFleur Nelson, and Gregory B. Walters. "The Female Offender and Public Opinion: Perceived Seriousness of Crimes and Recommended Dispositions." *National Institute of Justice*, 1976, pp. 4-10.
- Picart, CJ. "Crime and the Gothic: Sexualizing Serial Killers," *Journal of Criminal Justice and Popular Culture*, vol. 14, no. 3, 2006, pp. 3.
- Porter, Nancy Taylor. *Violent Women in Contemporary Theatres: Staging Resistance*. Palgrave Macmillan, 2019, pp. 297.
- Quindlen, Anna. "Playing God On No Sleep." *Newsweek*, 14 Mar. 2010, pp. 1. https://www.newsweek.com/playing-god-no-sleep-154643.
- Rafter, Nicole Hahn, and Elizabeth Anne Stanko. *Judge, Lawyer, Victim, Thief: Women, Gender Roles, and Criminal Justice*. Northeastern University Press, 1982.
- Resnick, Phillip J. "The Andrea Yates Case: Insanity on Trial." *Cleveland State Law Review*, vol. 55, no. 147, 2007, pp. 147–156.
- Rosenblatt, E. and C. Greenland. "Female Crimes of Violence." *Canadian Journal of Criminology & Corrections*, vol. 16, no. 2, April 1974, pp. 173-180.
- Roy, Jody M. Love to Hate: America's Obsession with Hatred and Violence. Columbia University Press, 2002.
- Sarat, Austin et al. *Performances of Violence*. UMass, 2011, pp. 75-77.
- Saunders, Doug. "Mom Kills, Dad Kills: Two Takes on Tragedy." The Globe and Mail, 2 March. 2002, https://www.theglobeandmail.com/news/world/mom-kills-dad-kills-two-takes-on-tragedy/article22395397/.
- "Serial Murder: Multi-Disciplinary Perspectives for Investigators." *National Center for the Analysis of Violent Crime*, pp. 1–71. FBI.

- tem. Cambridge University Press, 2015.
- Smothers, Ronald. "Woman Arrested in a Series of Killings in Florida." New York Times, Late Edition. East Coast, January 18, 1991, p. A.16
- Stack, Mega K. "Killings Put Dark Side of Mom's Life in Light: Until her children were drowned in a tub June 20, most knew Andrea Yates as a quiet, doting Christian woman." Los Angeles Times, July 8, 2001, pp. 20.
- Stanley, Liz. Documents of Life Revisited: Narrative and Biographical Methodology for a 21st Century Critical Humanism. Routledge, 2016, n.p.
- "Transient Woman Accused in Florida Serial Killings." Los Angeles Times, Home Edition, January 18, 1991, p. 40.
- Tuchman, Gaye et al. Hearth and Home: Images of Women in the Mass Media. Oxford University Press, 1978.
- "Twisted Dad Killed His Kids after Making Them Record a 'Goodbye' Video for Their Mum." Life Death Prizes, 28 July 2017, https://www.lifedeathprizes.com/real-life-crime/adair-garcia-killed-hischildren-70845.
- Vronsky, Peter. Female Serial Killers: How and Why Women Become Monsters. Berkley Books, 2007.
- Waller, S. Serial Killers—Philosophy for Everyone: Being and Killing. Wiley-Blackwell, 2010.
- Wang, Andrew. "Father Guilty of Killing 5 of His Children." Los Angeles Times, 30 Mar. 2005, pp. 1, https://www.latimes.com/archives/la-xpm-2005mar-30-me-grill30-story.html.
- Weatherby, Georgie Ann. "The Value of Life: Female Killers & the Feminine Mystique." Journal of Criminology and Criminal Justice Education, vol. 2, no. 1, 2008, pp. 1-20.
- Weber, Cynthia. International Relations Theory: a Critical Introduction. Routledge, 2001.
- Wells, Ashley. "Revisiting Aileen Wuornos in Light of #MeToo." Medium, 11 May 2018, pp. 1
- Wells, Libby. "Woman Who Killed 6 Men Faces Death Herself Today." The Palm Beach Post, October 9, 2002, p. 5.
- "Where Is Andrea Yates Now? A Peek inside Her Life in a State Mental Hospital." ABC13 Houston, 20 June https://abc13.com/where-is-andrea-yatesnow-peek-inside-her-secluded-life/1980992/.

- Smith, Tara. Judicial Review in an Objective Legal Sys- Williams, NBC's Pete, and News Services. "Convictions Overturned for Mom Who Drowned 5 Kids." NBCNews.com, NBCUniversal News Group, 7 Jan. 2005, http://www.nbcnews.com/id/6794098/ns/us news-crime and courts/t/convictions-overturnedmom-who-drowned-kids/#.XdyUfchKjIU.
 - Yardley, Elizabeth, and David Wilson. Criminological Institutionalism and the Case of Mary Ann Cotton: Female Serial Killers In Social Context. Policy Press, 2015.