# The IMF and Global Dispossession

A senior project proposal

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# Advised by Professor Lisa Lowe

# Introduction

# Background

Since its founding in 1944, the International Monetary Fund (IMF) has amassed a total of 705 billion Special Drawing Rights in spending capacity, or about \$1 trillion. As opposed to the World Bank's extensive general lending system, IMF loans have played a pivotal role specifically during times of crisis. The relatively small Washington-based organization (of only ~2,300 staff members) with no subsidiary organizations is able to move the global economy through these loans, millions of people at a time. Its focus on low-to-middle-income countries during crises means that the most vulnerable of the global population are affected by its work.

The IMF's loans are not without caveats. Under the stated purpose of ensuring loan repayment and financial stability, or "conditionality," the IMF requires that loan-receiving countries also implement a set of macroeconomic policy reforms known as Structural Adjustment Programs (SAPs). These include "purely" economic measures like currency devaluation, austerity measures, and restructuring or refinancing foreign debts, but also include liberalization of markets broadly, privatization of state-owned companies in particular, opening the country to foreign investment, and most relevantly to this project, a stipulation for the country to move towards resource extraction and export. Although the majority of IMF loans do come with market-rate interest rates and often require collateral, both of which can be a significant burden for countries requesting aid, SAPs are far more powerful in terms of creating long-term subjugating economic relations. SAPs push countries in the Global South to cheaply produce and export goods to the Global North, where only then they are realized as profit. SAPs push countries to denationalize basic necessities and turn them over to multinational corporations in order to qualify for loans. In more direct terms, SAPs push countries into a recapitulated racial hierarchy, a new imperialism,

<sup>&</sup>lt;sup>1</sup>This is the main subject of Smith, *Imperialism in the Twenty-First Century*.

<sup>&</sup>lt;sup>2</sup>See Ciafone, "Endowing the Neoliberal University" for a detailed history on Yale's relationship with privatizing Indonesian power.

an imperialism for the twenty-first century.<sup>3</sup>

# My project

My project seeks to explore the racial logic embedded in SAPs, rejecting the exterior colorblindness of contemporary financial loans by questioning the racial assumptions they make and the world-reordering consequences they bring forth.

This will begin with Paula Chakravartty and Denise da Silva's collection *Race, Empire, and the Crisis of the Subprime*. They note that while Marxist geographer David Harvey's theory of *accumulation by dispossession* emphasizes the social processes of dispossession that are at capitalism's core, Harvey takes race for granted in his writing because he notes simply the disproportionate burden of these acts of dispossession on people of color. He stops short of discussing the racial logic that would allow such a burden to appear. Thus, even while criticizing the burden of the economic impact on people of color, race and racism are taken as "primitive" or preexisting concepts over which modern capitalist forces take hold. Da Silva and Chakravartty push back on this and argue that race continues to order accumulation in and of itself, and specifically in the subprime mortgage crisis that Black recipients of loans are *continually* configured to be outside of the relationship of an economic transaction and the capacity to pay one side of the trade.<sup>5</sup>

But their discussion, while framed as a study of global capitalism and arguing that "race as the *naturalized* ways U.S. Americans deploy the term cannot be the privileged and sole critical descriptor" of the various manifestations of the logics of dispossession on the "others of Europe," still stops short of studying dispossession across the globe. Their collection does not touch on relationships between or across nations, institutions that drive these processes forth, or how the crises they discuss manifest elsewhere. My project will attempt to complement to their discussion by discussing debt and raciality as global concepts. While Chakravartty and da Silva focus on U.S. banking institutions and the subprime mortgage loan, I will focus on the IMF's crisis loans; while they critique the dispossession of the "others of Europe" by focusing on Black and Latino/a homeowners, I will focus on the (mis)handling of the 1997 Asian financial crisis, and as a case study focus on the crisis' escalation to catastrophe in South Korea.

South Korea is relevant for a number of reasons. It was under the rule of four different states over the past one hundred and fifty years, was destroyed by war and four decades of dictatorship after its supposed "liberation" from Japan, and was separated arbitrarily from its northern half by the whim of two U.S. Navy Officers. Yet today the nation enjoys a sort of "model modernity" status of postindustrial success.

<sup>&</sup>lt;sup>3</sup>Harvey, *The New Imperialism*; Smith, *Imperialism in the Twenty-First Century*.

<sup>&</sup>lt;sup>4</sup>Chakravartty and da Silva, "Accumulation, Dispossession, and Debt."

<sup>&</sup>lt;sup>5</sup>See also Silva, *Toward a Global Idea of Race* for more from da Silva on this topic.

<sup>&</sup>lt;sup>6</sup>Some useful thinkers here are Chang, *Protest Dialectics*; Cho, *Haunting the Korean Diaspora*; and Cumings, *The Origins of the Korean War*.

While the term "model modernity" was said to me by Professor Lowe as a conversational, on-the-spot insight during an

Like the much-discussed myth of Asian Americans as a "model minority" in the U.S., that status connotes a group that has endured hardship but ultimately has played by the (Western) rules of capitalist success to achieve some semblance of "prosperity" today. Not only does this rely on a false notion of prosperity, for neither the "model minority" Asian Americans nor the "model modernity" of South Korea are liberated from colonialism today, but the status also hides how the logic that led to the "success" of certain groups perpetuates the oppression of others. South Korea has only enjoyed "order" because Korea has cemented patriarchal norms through draft culture, \$\gamma\$, and it has only enjoyed "peace" because it sent almost a million troops to Vietnam in exchange for U.S. capital and technology during the Vietnam War. Other countries that do not experience the same economic

The economic crisis of 1997 exemplifies this dynamic and exposes a momentary contradiction in the march to capitalist modernity. Before the crisis, South Korea was boasting record low unemployment rates, had worker's rights and labor laws that were among the strongest of the OECD group, all with a consistently low inflation rate and was known for its cautious stance on foreign investment. But the unemployment rate in South Korea quadrupled in less than a year after the crisis began in October 1997, and the IMF quickly transitioned from an obscure international economic agency into a household name. The former face of the new Korean generation and proclaimer of equality, Kim Dae-Jung, turned an about-face on his belief in protecting the Korean economy and quickly accepted the IMF's recommendation to put Korea's central banks up for sale. In other words, the glass image of capitalist stability was cracked and laid bare, as the IMF quickly opened the South Korean economy for outside financial institutions to buy up and the labor rights fought for by unions were reset after company acquisitions. My paper will uncover how this process was made possible – what racial and national categories were present, how *race* specifically was a relevant category, and why such a relationship between the IMF and the Korean government did not occur elsewhere in the world.

More than just being a difference in topic or scope, I hope that this positioning will enable my project to connect Chakravartty and da Silva's analysis of the racial logic of debt with postcolonial theory and theories of globalization. These are undoubtedly concepts that Da Silva and Chakravartty stretch towards in their collection, and other authors have similarly tried to bridge the gap between contemporary theories of race and theories of globalization.<sup>13</sup> But in my view, very little literature has questioned the

advising meeting, I believe others have deployed this term as well – specifically Lye, "Model Modernity"; but also Chettri and McDuie-Ra, "Delinquent Borderlands" and Wilks, *Race, Gender, and Comparative Black Modernism*.

<sup>&</sup>lt;sup>8</sup>Or "militarized modernity," as popularized by Moon, *Militarized Modernity and Gendered Citizenship in South Korea*.

<sup>9</sup>Chang, *Protest Dialectics*.

<sup>&</sup>lt;sup>10</sup>Clift, *The IMF and the Politics of Austerity in the Wake of the Global Financial Crisis*; Hwang, "Long-Term Implications of Neoliberal Restructuring and Rising Inequality"; Kim and Hong, "The IMF, Globalization, and Changes in the Media Power Structure in South Korea."

<sup>&</sup>lt;sup>11</sup>Kim and Finch, "Living with Rhetoric, Living Against Rhetoric"; Martin-Jones, "Decompressing Modernity"; Park, "The Labor Market Policy and Social Safety Net in Korea."

<sup>&</sup>lt;sup>12</sup>Chossudovsky, "The Recolonization of Korea."

<sup>&</sup>lt;sup>13</sup>Some of my favorite ones are Amin, Capitalism in the Age of Globalization; Featherstone, Global Culture; Sassen, Glob-

racial categories that give rise to the "globalized" world of today. Discussion on globalization criticizes the unequal economic nature and sometimes (like Harvey) notes the disproportionate impact of this economic burden on people of color, but no theoretical or empirical discussion has discussed how the racial and economic imbalances are not coincidental but part of the same fundamental process of capitalist dispossession. I hope that my thesis can fill this gap.

#### Methods

#### Format of presentation

I will explore the IMF's processes of dispossession firstly through a paper that will give a history of the 1997 Asian financial crisis in South Korea and the IMF's response, focusing on the criteria the IMF uses to approve a loan and the policies they attach to it. These will mostly come from the IMF archives, found here, the South Korean government archives found here, and South Korean newspapers from the 1997-2000 years (the "IMF era") hosted here

I will explore this secondly in a creative medium, by creating a set of interactive visualizations of the relationships my paper will discuss. These will focus on import and export relationships held by loan recipient countries before and after IMF loans, SAPs' role in investment from former imperial powers into their formerly colonized countries, and a comparison of criteria used by the IMF in different geographic contexts. The web page will be a set of zoomable, clickable, scrollable maps on the global and national-level scales (i.e. the Korean peninsula). Next to each map will be a sidebar explaining the story behind each map. The web page will be made with the Vue, d3.js, and Mapbox GL JS libraries in JavaScript, and data processing will be done through the R language for statistical computing.

A version of the website in its current (extremely limited) state can be found at https://imfdispossession.info.

# One note on disciplines

My hope in this approach is to blend methods of presentation that have been useful to me, but beyond my personal preferences I hope to also unite disciplinary divides that have frustrated me for the past four years. I consider this project to be rooted in ethnic studies and cultural studies, because its main focus will be on cycles of oppression and its contestation by those directly affected by it. But my project will also incorporate quantitative (demographic) perspectives from economics and statistics, pushing back on the implicit notion of the critical as qualitative and conversely the quantitative as uncritical. To elaborate, the critical theory at the heart of ethnic studies is usually pursued through purely "qualitative" methods, which leaves much to be said on how "quantitative" methods of S&DS should be seen as just as subjective,

alization and Its Discontents; and Jenkins, The Bonds of Inequality, but there is so much insight and work in this field that cannot fit into a single footnote.

opinionated, and creative. In other words, numeric and technical methods are just as full of qualitative components as those methods of history, poem, memoir, ethnography, and so on that we canonically assign the label of "qualitative." Both of my double majors of ER&M and S&DS (and perhaps every major at Yale besides Computing and the Arts) abide by this disciplinary boundary, to the effect of upholding the binding of "critical" with "qualitative" and conversely reinforcing the separation of "critical" from "quantitative."

# Notes on research plan and timeline

The IMF reading rooms are currently closed to external visitors due to the COVID-19 pandemic. Many of their materials are already hosted online and viewable through the catalog page described above, but it will be difficult to access the bulk of their resources for the forseeable future. I will work with the IMF librarians on this point.

The most important scheduling point I should make known is that I hope to study abroad in South Korea for a year beginning in March of 2022, and have applied for the Light Fellowship in language study for this purpose. If I receive the fellowship, I will take a leave of absence from regular studies from January through December of 2022, and return to work on the thesis and finish my last semester of Yale in Spring of 2023.

- November 1st
  - annotated wireframes for website completed
  - at this stage gathering sources, preparing for potential winter break trip to IMF
  - Online primary resources gathered with notes
- November 15th
  - Prototypes for website graphics without animation completed
  - Literature review outline finished
- December 1st
  - Literature review finished
  - Main argument outline begun
- December 15th
  - Draft of first section of paper complete
- January 1st, 2023
  - Have visited the South Korean national archives and the IMF archives if they are available to the public.

- Begun writing main body of paper
- February 1st
  - Website and visualizations are near-complete (save for text, which will come from the inprogress paper)
- March 1st
  - First draft completed

#### The IMF and Global Dispossession

The IMF's loan packages require that recipient countries adapt Structural Adjustment Programs (SAPs), or macroeconomic policy changes. Although they have the stated neutral purpose of ensuring financial stability and loan repayment, in reality SAPs are deeply political maneuvers recreating imperial relationships in the contemporary era. One such avenue is through stipulating countries move towards export of manufactured goods, often to countries in the Global orth where they are realized as tax revenue and profit.

This map displays these relationships by showing loan recipient countries in red, each recipient's top five increased export destinations over the next five years in blue, and lines connecting these countries to show the flow of goods from the Global South to Global North. Zoom in with the mouse wheel or by double-clicking, flick or slowly drag to move the map, and change the year displayed through the slider at the top of the nage.

Click<u>here</u> for a blog post on the map,<u>here</u>for a paper on its message, and<u>here</u> for the source code. Contact Nathan Kim at nathan.kim@yale.edu with any questions.

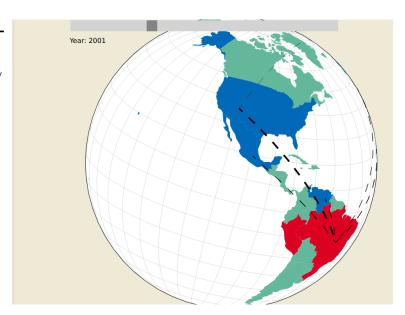


Figure 1: A preview of the current state of the site.

# Preliminary Bibliography

### Primary sources

"Asian Crisis - Chronological Files." The International Monetary Fund, November 1997. https://archivescatalog.imf.org/Details/archive/110001667.

"Asian Crisis, General - Subject Files: Criticisms of Fund Programs." The International Monetary Fund, October 5–9, 1999. https://archivescatalog.imf.org/Details/archive/110002948.

"Asian Crisis, General - Subject Files: Financial Sector, Economic Crises and the S. Fischer Speech to Conference on Deposit Insurance, Washington D.C." The International Monetary Fund, September 10, 1998. https://archivescatalog.imf.org/results.

"Asian Crisis, General - Subject Files: Financial System Stability Assessments (FSSAs)." The International Monetary Fund, April 15–19, 1999. https://archivescatalog.imf.org/Details/ArchiveDescriptions/110032025.

- Commerce and Industry, Korea Chamber of. "The Impact of the IMF Bailout and Our Response," December 1, 1997. http://theme.archives.go.kr/viewer/common/archWebViewer.do?bsid= 200041030436&gubun=search.
- "Integrated Public Use Microdata Series, International: Version 7.3." University of Minnesota Population Studies Center, 2020. https://doi.org/10.18128/D020.V7.2.
- "Issues of the Kyunghang Newspaper." Maeil-Gyungjae, January 1997–December 1999. https://newslibrary.naver.com/viewer/index.nhn?publishDate=1997-01-01&officeId=00020&pageNo=1.
- "Issues of the Maeil-Gyungjae (Economics Daily)." Maeil-Gyungjae, January 1997–December 1999. https://newslibrary.naver.com/viewer/index.nhn?publishDate=1997-01-01&officeId= 00009&pageNo=1.
- "Issues of the Tonga Ilbo." The Tonga Ilbo, January 1997–December 1999. https://newslibrary.naver.com/viewer/index.nhn?publishDate=1997-01-01&officeId=00009&pageNo=1.
- "Monitoring of Fund Arrangements Database." The International Monetary Fund, n.d. https://www.imf.org/external/np/pdr/mona/index.aspx.
- Republic of Korea, Economics Bureau of the. "Fiscal Reform Under the IMF System," December 20, 1998. http://theme.archives.go.kr/viewer/common/archWebViewer.do?bsid=200041020104&gubun=search.
- ——. "Two years of the IMF, as seen through statistics," November 1999. http://theme.archives.go. kr/viewer/common/archWebViewer.do?bsid=200041048438&gubun=search.
- "Speeches Files "Lessons from the Asian Financial Crisis", Hubert Neiss CATO Institute, Washington, DC. Memos, Pre-Conference Information." The International Monetary Fund, October 22, 1998.
- "World Integrated Trade Solutions Database." The World Bank and the United Nations Statistical Division, n.d. https://wits.worldbank.org/.

## Secondary sources

- Amin, Samir. Capitalism in the Age of Globalization: The Management of Contemporary Society. Zed Books Ltd., 2014. https://books.google.com?id=Tw9kDgAAQBAJ.
- Beck, Ulrich. Risk Society: Towards a New Modernity. SAGE Publications, 1992.
- Chakravartty, Paula, and Denise Ferreira da Silva. "Accumulation, Dispossession, and Debt: The Racial Logic of Global Capitalism—An Introduction." *American Quarterly* 64, no. 3 (2012): 361–85. https://www.jstor.org/stable/23273527.
- Chang, Paul. Protest Dialectics: State Repression and South Korea's Democracy Movement, 1970-1979. Stanford University Press, 2015. https://books.google.com?id=EJeZBgAAQBAJ.
- Chettri, Mona, and Duncan McDuie-Ra. "Delinquent Borderlands: Disorder and Exception in the Eastern Himalaya." *Journal of Borderlands Studies* 35, no. 5 (October 19, 2020): 709–23. https://doi.org/10.1016/j.com/

- //doi.org/10.1080/08865655.2018.1452166.
- Cho, Grace M. *Haunting the Korean Diaspora: Shame, Secrecy, and the Forgotten War*. U of Minnesota Press, 2008. https://books.google.com?id=VagzEDjnZpcC.
- Choi, Chungmoo. "The Discourse of Decolonization and Popular Memory: South Korea." In *The Politics of Culture in the Shadow of Capital*, 461–84. Duke University Press, 1997. https://doi.org/10.1515/9780822382317-018.
- Chossudovsky, Micehl. "The Recolonization of Korea." *Los Angeles Times*, June 16, 2000. http://www.hartford-hwp.com/archives/55a/232.html.
- Ciafone, Amanda. "Endowing the Neoliberal University." In Work and Culture, 2005.
- Clift, Ben. *The IMF and the Politics of Austerity in the Wake of the Global Financial Crisis*. Oxford University Press, 2018.
- Cumings, Bruce. The Origins of the Korean War: Liberation and the Emergence of Separate Regimes, 1945-1947. Yuksabipyungsa, 2002. https://books.google.com?id=3hJyAAAAMAAJ.
- Escobar, Arturo. Encountering Development: The Making and Unmaking of the Third World. Encountering Development. Princeton University Press, 2011. https://doi.org/10.1515/9781400839926.
- Featherstone, Mike. Global Culture: Nationalism, Globalization and Modernity. SAGE, 1990.
- Ferguson, James. *The Anti-Politics Machine: "Development," Depoliticization, and Bureaucratic Power in Lesotho.* U of Minnesota Press, 1994.
- Giddens, Anthony. The Consequences of Modernity. Stanford University Press, 1990.
- Gruneau, Richard, and John Horne. *Mega-Events and Globalization: Capital and Spectacle in a Changing World Order*. Routledge, 2015.
- Haggard, Stephan. Pathways from the Periphery: The Politics of Growth in the Newly Industrializing Countries. Cornell University Press, 1990. https://books.google.com?id=lb4JfBRgXBcC.
- Harvey, David. The New Imperialism. Oxford University Press, 2003.
- Hwang, Sun-Jae. "Long-Term Implications of Neoliberal Restructuring and Rising Inequality :South Korea after the 1997 Asian Financial Crisis." □□□□□ 49, no. 3 (June 2015): 97–120. https://doi.org/10.21562/kjs.2015.06.49.3.97.
- Jenkins, Destin. *The Bonds of Inequality: Debt and the Making of the American City*. University of Chicago Press, 2021.
- Kim, Daeho, and Seok-Kyeong Hong. "The IMF, Globalization, and Changes in the Media Power Structure in South Korea." *Media and Globalization: Why the State Matters*, 2001, 77–92.
- Kim, Seung-Kyung, and John Finch. "Living with Rhetoric, Living Against Rhetoric: Korean Families and the IMF Economic Crisis." *Korean Studies* 26, no. 1 (2002): 120–39. https://doi.org/10.1353/ks.2002.0008.
- Lazzarato, Maurizio. *The Making of the Indebted Man: An Essay on the Neoliberal Condition*. Semiotext(E), 2012.

- Lee, Benjamin, and Edward LiPuma. *Financial Derivatives and the Globalization of Risk*. Duke University Press, 2004.
- Lee, Catherine H. "To Thine Ownself Be True: IMF Conditionality and Erosion of Economic Sovereignty in the Asian Financial Crisis." *University of Pennsylvania Journal of International Economic Law* 24 (2003): 875. https://heinonline.org/HOL/Page?handle=hein.journals/upjiel24&id=885&diy=&collection=.
- Lim, Timothy C. "Racing from The Bottom in South Korea?: The Nexus Between Civil Society and Transnational Migrants." *Asian Survey* 43, no. 3 (2003): 423–42. https://doi.org/10.1525/as.2003. 43.3.423.
- Loomba, Ania. Colonialism/Postcolonialism. Routledge, 2015.
- Lye, Colleen. "Model Modernity: The Making of Asiatic Racial Form, 1882-1945." Ph.D., Columbia University, 1999. https://www.proquest.com/docview/304501240/abstract/81687A9388744E79PQ/1.
- Martin-Jones, David. "Decompressing Modernity: South Korean Time Travel Narratives and the IMF Crisis." *Cinema Journal* 46, no. 4 (2007): 45–67. https://www.jstor.org/stable/30137719.
- McCleery, Robert K., and Fernando De Paolis. "The Washington Consensus: A Post-Mortem." *Journal of Asian Economics*, A tribute to Seiji Naya, 19, no. 5 (November 2008): 438–46. https://doi.org/10.1016/j.asieco.2008.09.004.
- Medley, Joseph E. "The East Asian Economic Crisis: Surging U.S. Imperialism?" *Review of Radical Political Economics* 32, no. 3 (September 1, 2000): 379–87. https://doi.org/10.1016/S0486-6134(00) 80028-5.
- Moon, Seungsook. *Militarized Modernity and Gendered Citizenship in South Korea*. Duke University Press, 2005. https://doi.org/10.1515/9780822387312.
- Morris, Nancy, Silvio Ricardo Waisbord, and Silvio Waisbord. *Media and Globalization: Why the State Matters*. Rowman & Littlefield, 2001.
- Mueller, Julie L. "The IMF, Neoliberalism and Hegemony." *Global Society* 25, no. 3 (July 2011): 377–402. https://doi.org/10.1080/13600826.2011.577032.
- Muga, David A. "The Marxist Problematic as a Model Interdisciplinary Approach to Ethnic Studies." *Journal of Ethnic Studies* 17, no. 4 (Winter 1990): 53–80. http://www.proquest.com/docview/220134386?pq-origsite=360link.
- Noble, Gregory, and John Ravenhill. "The Good, the Bad and the Ugly: Korea, Taiwan and the Asian Financial Crisis," 80–107, 2000. https://doi.org/10.1017/CBO9781139171328.005.
- Park, Se-II. "The Labor Market Policy and Social Safety Net in Korea: After the 1997 Crisis." The Brookings Institution, September 1, 1999. https://www.brookings.edu/research/the-labor-market-policy-and-social-safety-net-in-korea-after-the-1997-crisis/.
- Radelet, Steven, and Jeffrey Sachs. "4. The Onset of the East Asian Financial Crisis." In Currency Crises,

- 105-62. University of Chicago Press, 2007. https://doi.org/10.7208/9780226454641-007.
- Rankin, William. "How the Visual Is Spatial: Contemporary Spatial History, Neo-Marxism, and the Ghost of Braudel." *History and Theory* 59, no. 3 (2020): 311–42. https://doi.org/10.1111/hith. 12162.
- Riley, Stephen P. The Politics of Global Debt. Springer, 2016.
- Robertson, Roland. Globalization: Social Theory and Global Culture. SAGE, 1992.
- Sargent, Thomas J., George Hall, Martin Ellison, Andrew Scott, Harold James, Era Dabla-Norris, Mark De Broeck, Nicolas End, Marina Marinkov, and Vitor Gaspar. *Debt and Entanglements Between the Wars*. International Monetary Fund, 2019.
- Sassen, Saskia. Globalization and Its Discontents. New York: New Press, 1998.
- Silva, Denise Ferreira Da. Toward a Global Idea of Race. U of Minnesota Press, n.d.
- Smith, John. Imperialism in the Twenty-First Century: Globalization, Super-Exploitation, and Capitalism's Final Crisis. NYU Press, 2016.
- Stuelke, Patricia. *The Ruse of Repair: US Neoliberal Empire and the Turn from Critique*. Duke University Press, 2021. https://www.dukeupress.edu/the-ruse-of-repair.
- Vasudevan, Ramaa. "Finance, Imperialism, and the Hegemony of the Dollar." *Monthly Review*. New York, United States: Monthly Review Press, April 2008. https://doi.org/http://dx.doi.org/10.14452/MR-059-11-2008-04 3.
- Veltmeyer, Henry. "Development and Globalization as Imperialism." *Canadian Journal of Development Studies / Revue Canadienne d'études Du Développement* 26, no. 1 (January 2005): 89–106. https://doi.org/10.1080/02255189.2005.9669027.
- Wilks, Jennifer M. Race, Gender, and Comparative Black Modernism: Suzanne Lacascade, Marita Bonner, Suzanne Césaire, Dorothy West. LSU Press, 2008. https://books.google.com?id=IEMNBL0bz28C.