Libertarian economist Thomas Sowell identified what he says are negative results of affirmative action in his book, Affirmative Action Around the World: An Empirical Study [REF]. Sowell writes that affirmative action policies encourage non-preferred groups to designate themselves as members of preferred groups [i.e. primary beneficiaries of affirmative action] to take advantage of group preference policies; that they tend to benefit primarily the most fortunate among the preferred group (e.g., upper and middle class blacks), often to the detriment of the least fortunate among the non-preferred groups (e.g., poor white or Asian); that they reduce the incentives of both the preferred and non-preferred to perform at their best &mdash; the former because doing so is unnecessary and the latter because it can prove futile &mdash; thereby resulting in net losses for society as a whole; and that they engender animosity toward preferred groups as well [REF