

Only after laying this groundwork does Olson hone in on healthcare, specifically. As we would expect, Olson's focus on healthcare emphasizes not only the huge market opportunities healthcare presents in the US, but moral outrage at private equity's tendency to treat healthcare as just another industry to be exploited, with no special concern for the impact that such financial tactics have on lives. To show private equity's reach, subsequent chapters explore a wide array of topics, with Olson starkly declaring that "nowadays acquisitions and mergers are skyrocketing in all niches" (p. 127). Perhaps the most disturbing aspects of Olson's accounting of private equity's pilfering of American healthcare are her detailed discussions of equity's rapacious takeover of areas in which patients are particularly vulnerable, such as the largely for-profit home healthcare industry, as well as equity's deleterious effects on specific disease treatments, from addiction, to autism, to eating disorders.

The sweeping examination Olson provides of private equity's inroads into every corner of the massive American healthcare industry provides a sense of just how far equity's reach has extended. Depressingly, though honestly, Olson does not offer any reason for us to be optimistic that there are limits to this reach. As she explains in the closing pages of the book, state and federal action will be required if the malignant forces she describes are to be curbed. But given the degree of regulatory and legislative capture that private equity has already accomplished, the reader is given little reason to hope that a progressive democratic politics will arise to serve as a counterweight. Even more concerning is that there is little reason to believe that any lessons were learned from the COVID-19 pandemic, which actually provided investment opportunities for private equity to not only prey upon struggling healthcare practices, but to leverage federal relief funding for shrewd financial gains.

Taken together, Swenson and Olson's books give us different but similarly stark examples of why American healthcare policy continues to frustrate, and especially why progressive reform that puts patients and populations first is so elusive. Critics of American healthcare often fail to train their analyses on the actual forces that ultimately shape American health policy, which are lodged in the institutional underbellies of little-understood entities. While the inner workings of the organizations such as the AMA—the subject of Swenson's book—are not something most Americans know much about, Olson shows that private equity is actively shrouded in secrecy, and hence extremely difficult to study, even for scholars who admirably dedicate themselves to the cause.

Transparency—or the lack thereof—is therefore a unifying theme across both books, whether we are concerned with shadowy advertising and consultancy arrangements, nondisclosure agreements, or other tools of opacity. Even more than transparency, however, readers will be struck by the question of animating values. For Swenson, the

question is whether the AMA of the future, in a reversal of the last hundred years of its history, will transform itself to become a force for good within the larger field of American healthcare, especially by making public health and preventive care a priority. Olson's question is whether private equity's singular focus on profits can be reined in, especially through federal policy. While the fate of the AMA will be determined in a primarily endogenous manner, as a function of internal deliberations within the body's House of Delegates, Olson is under no illusion that only congressional action can prevent private equity's assault on American healthcare. Private equity is, after all, "ethically challenged."

Shorn of the sentimental veneer that allows medical professionals to recite oaths claiming that "doing no harm" is their central concern, these books remind us, in important ways, that medicine is at base just another industry ripe for the picking to those principally interested in reaping profits. There is just too much stakeholder power and investment potential in American medicine to sustain the fiction that medicine somehow operates outside of the vagaries of American capitalism, or that it is a special kind of commodity. Like so many other challenges in American healthcare, the only solution appears to be a revitalized progressive politics—both within organizations and beyond—to reconfigure American healthcare institutions so that they meaningfully operate in the public interest. And yet, few readers are likely to be sanguine about the prospects that such a politics will arise any time soon.

Rap and Politics: A Case Study of Panther, Gangster, and Hyphy Discourses in Oakland, CA (1965–2010).

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Lavar Pope's *Rap and Politics: A Case Study of Panther, Gangster, and Hyphy Discourses in Oakland, CA (1965–2010)* discovers the birth and transmutation of rap music as a megaphone of everyday Black lived experiences in Oakland, CA. Pope's study employs novel methods to capture imagery of militancy, internal colonization, and warfare lyrics that aided in the forming Black political identity in the Bay Area and Oakland. By expanding on themes found in the study of politics, African American studies, and history, Pope guides a discussion around Black political alienation and the community's reaction to such estrangement. Throughout *Rap and Politics*, Pope shines a floodlight on the failings of the American system and its stagnated pursuit to provide equity to the Black community.

The masterful way in which Pope intertwines his own lived experiences in the Bay Area rap scene with the narratives of the locale's most dauntless revolutionaries

lends much credence to the focus and motivations of the book. In Chapter 1, Pope delineates the nucleus of his argument. He contends that “by looking at rap music from particular locales during moments of local, regional, national, or international crisis, we can get a more complete understanding of race, social movements, and urban politics” (p. 4). Moreover, Pope articulates that rap music is a sonic power source of translocal Black identity and history. While employing the ring shout during days of baking under the scorching sun, through the long night of Jim Crow, and into modernity with the use of rap, Black folks have employed music as a form of everyday resistance to reclaim power from their captors. Pope suggests that this act of power reclamation is evident in the Oakland locale, given the rise of militant youth aggrieved with the government’s flippant attitude toward their plight. Specifically, these militant youth are utilizing rap music to combat “internal colonization” and the egregious acts that have followed such efforts (p. 192).

Pope, the participant observer, serves as a tour guide into familiar terrain with his scathing indictment of this form of translocal domestic colonization. He characterizes internal colonization as *de jure/de facto* segregation, exploitation, and domination, of marginalized communities within a state’s borders. Pope asserts that insidious conceptions such as internal colonization allow a state to enforce racial hierarchy while allowing for maintaining the status quo. Eventually, oppressed groups will develop and deploy weapons of the weak to combat the oppression of exploitative systems.

Being forced into action by the omnipresent policing that faces Black Americans, the Black Panther Party for Self Defense (BPPSD) sprung onto the scene in Oakland to regain control over their community. In Chapter 2, Pope effortlessly depicts the mosaic of Panther activity in Oakland. Seen through a Black nationalist’s lens, the BPPSD allowed space for common Black folk to challenge the dominate/subordinate paradigm that exists in America and ultimately provided an international platform from which to air their grievances. In the section entitled, “Factors and Influences,” Pope exposes how the BPPSD was a reaction to the unmet needs, wants, desires, and promises of opportunity, for the Black community. Forced to fight over mere floor scraps, many Blacks in Oakland were subject to the politics of deprivation, and the BPPSD finally allowed the Black citizens a militant backing to help fight for a seat at the table. Given the group’s international standing, members could articulate how the “American dream” had turned into an urban nightmare for inner-city Black people. Essentially declaring sovereignty from tyrannical governments known for mistreating Black people across the diaspora, the BPPSD began to churn out militant and antistate literature. Such strident literary attacks on the government influenced the Oakland sound by fostering a platform of empowerment.

The rappers in Oakland began to feel as if they could fully put their feelings, emotions, and grievances over unmet needs on their tracks. Unfortunately, given some administrative stumbles and COINTELPRO infiltration, the BPPSD ceased to exist, yet the insatiable appetite for freedom and apparent power void remained.

As a result of state-sanctioned attacks on the BPPSD, a leadership vacuum existed on the streets of Oakland. In Chapter 3, “The Gangster Discourses,” Pope masterfully depicts the rise of the gangster aesthetic in the Oakland locale. He pinpoints the spawning of the Oakland sound, influenced by the work of the Panthers; gangsters, bastards of the Black Panther Party, began to use their voices in another way to reclaim their streets from their colonizers, by rap music. Pope contends that “the rapper is able to point out a discrepancy between the promises of equality in America and the reality that he is faced with on a day-to-day basis” and, as such, serves as a type of street historian who aids in the conveyance of Black identity to a regional, national, or international audience (p. 171). As Oakland’s gangster era marched on, a local rapper rose to global prominence. Pope highlights the impact of the son of two Black Panthers, Tupac Shakur, on the Oakland sound. Undoubtedly, Shakur became a street prophet with his charismatic flow and authoritative lyrics. Tupac worked valiantly up until his death to share the unfortunate circumstances that faced countless Black folks in America. Tupac’s premature death ushered in a new epoch in Oakland sound.

After panning over the Panther and gangster periods of Oakland’s sound development, and subsequent ideological refinement, Pope escorts us to the most recent mutation in Oakland’s rap music, hyphy rap. A reaction to the state power dynamics and having been influenced by the Black militant counterculture that came before, hyphy rappers gave Oakland another iteration of its unique sound. Contemporarily, hyphy rappers continue carrying the Oakland critique of the American nightmare. Underground artists continue to serve as “local discourse carriers” who seek to culturally expose the underpinnings of the attack on Black life by White patriarchal, capitalistic society (p. 258). As found in the previous iterations of Oakland’s sound, rap allows Black people to erect sonic safe spaces where they can produce and share their innermost feelings about the Black condition to all who will listen.

Overall, Pope argues that throughout the various stages of Oakland’s sound development, ideological distillation occurred based upon the literary and vocal work of the previous era’s leading actors and the power voids left in their stead. *Rap and Politics* is explanatory, absorbable, and engaging to the academy and the broader reading public alike. Pope’s interdisciplinary approach communicates the formation of Oakland’s music and centers this city’s importance to Black music

and politics. Throughout the book, Pope confronts the ideological paradigms entrenched in quotidian Black American life. Pope rebuilds and fortifies the boundaries of Black politics and music by demanding recognition of Oakland as an epicenter and incubator of Hip Hop culture.

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When covering *Griswold v. Connecticut* in my constitutional law course, I begin by playing portions of the oral arguments. The class sits back and listens as Justice Potter Stewart repeatedly asks a fumbling Joseph B. Clark, the attorney for Connecticut, the purpose of the legislation restricting the sale of contraceptives. Each time, Clark provides a different answer, including the population argument, to which he adds, “I personally am not too happy with it, but—” An exasperated Stewart responds: “Well, what argument are you happy with?” Nevertheless, Stewart did not join the majority in striking down Connecticut’s law as unconstitutional. And in his dissent, he penned some of the most memorable lines in any constitutional law casebook: “I think this is an uncommonly silly law.... But we are not asked in this case to say whether we think this law is unwise, or even asinine. We are asked to hold that it violates the United States Constitution. And that I cannot do.”

Only one other justice, Hugo Lafayette Black, joined Stewart’s dissent. Black is the subject of one of George Thomas’s chapters in *The (Un)Written Constitution*. Thomas focuses on Black’s own dissent in *Griswold* because he is interested in the justice’s textualist approach in limiting judicial power. As Thomas writes, “Black reasoned that any movement beyond the words of the Constitution itself was to indulge opinions based on ‘natural’ rights and justice” (p. 17). In *Griswold*, Black accused his brethren of doing just that. The majority was engaging in an effort “to keep the Constitution in tune with the times.” It was a philosophy Black rejected. If changing the Constitution was desired, individuals ought to pursue the amendment route. For Thomas, while Black insists “on the centrality of the text,” he nevertheless relies on “unwritten understandings” of the “proper role of the legislature and judiciary in a democracy.... The judiciary should not be in a position to second-guess the legislature—unless the Constitution very clearly marked off specific textual provisions that authorized judicial protection. In the vast majority of cases the democratic process should simply get its way” (p. 23).

In the following chapter Thomas analyzes the work of another—albeit quite different—textualist, Justice

Antonin Scalia. According to Thomas, “like Justice Black, Scalia’s constitutional jurisprudence was driven by a desire to limit judicial discretion within a democracy” (p. 35). Scalia’s originalist approach is undoubtedly different from Black’s; he focused on the original understanding of the Constitution’s text to those who ratified it and its amendments while Black looked to the framers’ intent (p. 37). Nevertheless, according to Thomas, Black and Scalia are linked by their desire to limit judicial discretion (p. 43). In focusing on Black’s dissent in *Griswold* and Scalia’s dissents in similar cases like *Casey*, *Lawrence*, and *Obergefell*, Thomas has indeed identified areas of agreement between these two pathbreaking justices.

But Black and Scalia’s conceptions of the place of the judiciary in maintaining democracy were not ultimately in agreement. Consider the very law in question in the *Griswold* case, a Victorian era statute—known as a “little Comstock law”—designed to protect the good citizens of Connecticut from their own immoral urges. As Connecticut attorney Clark stressed, this was not a dead-letter law because the Connecticut General Assembly routinely rebuffed efforts to remove it from the books. But that legislative body was grossly malapportioned. And in 1965, when the High Court was considering the state’s ban on contraceptives, that was about to change because state legislators had failed to enact a reapportionment plan consistent with the Supreme Court’s “one-person, one-vote” opinion of *Reynolds v. Sims*. I raise this case because Justice Black joined the majority. Here, Black was quite willing to use judicial authority to enhance democracy. Indeed, I would suggest that judicial interventions to enhance democracy defined much of his work as a justice. Black, a former US senator from Alabama, was the very first justice to call for an end to school segregation, denying southern state legislators the opportunity to continue a system of White supremacy. Black, along with Justice Douglas, resisted the horde of citizens and legislators eager to punish members of the Communist Party for their political advocacy during the McCarthy era. In pursuing his textualist approach to free speech, Black tried to draw a sharp textualist line between pure speech and symbolic speech. But he did so based on a conception of democracy defined by his fear of groups like the Ku Klux Klan, of which he was once a member.

Space constraints prevent me from discussing Scalia in as much detail, but few—if any—would suggest he was committed to using judicial authority in the same way. Scalia was willing to override the will of Congress to allow an influx of corporate cash in campaigns in *Citizens United*, and to do so again by severely limiting the Voting Rights Act in *Shelby County*. He also joined the majority in ending the Florida recount in *Bush v. Gore*. Finally, he often suggested that those interested in changing the Constitution pursue the amendment process while