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Dainty Hands: Perceptions of Women and Crime in Sherlock Holmes Stories

Hadar Aviram*

I. INTRODUCTION:
THE VANISHING FEMALE OFFENDER?
A SOCIO-HISTORICAL VIEW OF WOMEN IN THE CRIMINAL PROCESS

"Meantime, lady"—he wagged a cautionary forefinger—"have a care! Have a care! You can’t play with edged tools forever without cutting those dainty hands."

—Arthur Conan Doyle, The Three Gables

How did women’s role in the criminal process change over time, and to what extent did cultural perceptions of women and crime effect that change? Until recently, this question generated little preoccupation in legal, sociological, and criminological scholarship. The traditional perception among criminologists has been that crime is and always has been a predominantly male phenomenon. Prior to the dawn of feminist criminology, any attention in literature paid to female crime was focused on etiology of female crime, or, more accurately, women’s propensity to commit crime. For the most part, this literature has focused on essentialist explanations for female criminality, or, more commonly, lack of criminality. The short and disappointing genealogy of gender and crime literature usually begins with Cesare Lombroso’s La Donna Delinquente, which characterized female criminals as doubly abnormal, both in their

* Associate Professor, University of California, Hastings College of the Law. The author is grateful to Nicola Lacey and Lucia Zedner for inspiring the ideas that led to this article; to the Sherlock Holmes Museum in London and the Hounds of the Internet listserve for fuelling her interest in Doyle’s stories; to Rosalin Etis, Malcolm Feeley, Chad Goerzen, Keely Kolmes, Erin Kuka, Ryan Newby and Annick Persinger for their support, and to my friends at the University of Hawai’i at Mānoa (particularly Meda Chesney-Lind, Danielle Conway, Jon Goldberg-Hiller, David Johnson, Avi Soifer, and the participants in the Women’s Studies departmental colloquium) for their gracious hosting and many kindnesses while writing this Article.

2. FRANCES HEIDENSOHN, WOMEN AND CRIME (2d ed. 1996).

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femaleness and in their criminality. Some twentieth-century theories fared little better, such as Otto Pollak’s hypothesis that women who committed crimes were caught less often than men due to their cunning nature. For a very long time, criminologists paid little attention either to women’s fate in the criminal process or to women’s correctional institutions. The emergence of critical and feminist criminologies generated more interest in female crime, both with respect to women’s criminal propensity and to the extent to which their behavior was criminalized and addressed by the criminal justice system compared to men. In the mid-1970s, Freda Adler and Rita Simon argued that women’s liberation would lead to more opportunities for crime, more active criminal role models for women, and thus more female participation in criminal enterprises. While subsequent works have largely discredited these assertions, the inquiry into women’s invisibility in the criminal process continues. For example, Manheim’s “chivalry theory” suggested that women are arrested, prosecuted, convicted, and punished at lower rates than men because the criminal justice system is more lenient and forgiving toward their transgressions. This theory has benefitted from subsequent refinement; Kathleen Daly’s work on gender and crime revealed that women are likely to be treated with “chivalry” in situations in which they conform to feminine stereotypes. That is, when women’s criminal acts reflect love, motherhood, passivity, and desperation, women are given lesser punishment than similarly situated men. However, when women commit masculine crimes, they are punished more severely than a similarly situated man. Indeed, studies have shown

5. CRIMINOLOGY AT THE CROSSROADS: FEMINIST READINGS IN CRIME AND JUSTICE (Kathleen Daly & Lisa Maher eds., 1998).
8. RITA JAMES SIMON, WOMEN AND CRIME (1975).
11. HERMANN MANHEIM, COMPARATIVE CRIMINOLOGY (1965).
that female stereotypes and descriptions of acceptable feminine behavior abound in media coverage of female offenders.13

However, more recent inquiries have suggested that women were not always a rare phenomenon on the criminal stage. Several scholars have found the late eighteenth and nineteenth centuries to be times of transition of female crime patterns. In *The Vanishing Female*, Malcolm Feeley and Deborah Little analyzed Old Bailey data to find a substantial decline in rates of female offenders over time.14 This surprising finding led Feeley,15 and later Feeley and Aviram,16 to collect and analyze data from the Netherlands, France, Sweden, and other countries, confirming that this trend extends beyond England. The data sets have shown a decline over time in the percentage of women among criminal defendants. In many cases, this data makes it possible to reject various particular and localized explanations for demographic changes, such as wartime population changes, sex ratio in particular locations, and the like, for the decline in women’s numbers as compared to men. Peter King challenged some of these findings, using the Old Bailey data to explain away some of the decline.17 Still, the findings indicate a broad trend of transition in female criminality, the criminalization of female behavior, or both.18

Lucia Zedner’s study of Victorian England provides one explanation for the decline in female defendant rates there.19 According to Zedner, the declining rates reflect a conceptual shift in popular understanding of female crime and subsequently a transformation in the forms of social control of female deviants.20 This transition involved an increased understanding of female deviants as “mad,” rather than “bad”—that is, a shift from a moralistic to a medicalized, therapeutic perspective.21 Whereas “bad” women were once convicted and incarcerated, “mad” women were treated: civilly committed and sent to asylums in lieu of prisons,22 which might

19. Id.
20. Id.
21. See generally id. at 264–95.
22. Id. at 265.
account for the decline in their proportion among criminal defendants.\textsuperscript{23} Another possible reason for the apparent decline that Zedner and many others have observed is in the way women’s transgressions were handled by law enforcement authorities.

Feeley and Aviram\textsuperscript{24} expand on Zedner’s explanation, arguing that the trend of decline can be attributed to a broad social transformation that occurred in the realms of both work and family.\textsuperscript{25} Building on the work of social historians,\textsuperscript{26} Feeley and Aviram argue that one of the most important side effects of the Industrial Revolution was greater differentiation in gender roles. Women were pushed away from the public market,\textsuperscript{27} which involved primarily low-wage labor,\textsuperscript{28} toward the home,\textsuperscript{29} or sex-segregated industries, such as women-only textile factories.\textsuperscript{30} This transformation

\begin{itemize}
\item \textsuperscript{23} Feeley, \textit{supra} note 15, at 255–56.
\item \textsuperscript{24} Feeley & Aviram, \textit{supra} note 16.
\item \textsuperscript{29} Jan De Vries, \textit{The Industrial Revolution and the Industrious Revolution}, 54 \textit{J. Econ. Hist.} 249 (1994).
\end{itemize}
imbedded the home with symbolism of feminine delicacy, romantic love, spiritual cultivation, and maternal nurturing, the Victorian "cult of domesticity." These developments may have contributed to the declining numbers of women in the criminal process after 1800 in two ways: by decreasing female crime rates (either through diminished opportunities or through increased socialization for passivity and domesticity) and by decreasing the state's enthusiasm and taste for publicly prosecuting women.

II. CULTURAL PERCEPTIONS OF WOMEN: FROM MOLL FLANDERS TO TESS OF THE D'URBERVILLES

The transition in social control of women would probably not have had such a dramatic effect on patterns of prosecution and punishment were it not accompanied by a strong cultural shift in perceptions of female and male crime. In the last decade, several scholars have examined how the shift in perceptions was generated, by examining both media coverage of actual crime and trials, and fictional accounts of crime.

Peter King drew a comparison between trial records in the Old Bailey Sessions Papers and trial coverage in London newspapers. Among other interesting findings, he found a tendency for newspapers to give more coverage to sensational cases, particularly those involving capital punishment, and those involving female perpetrators. Knelman found much the same phenomenon in London a century later. Similarly, Downing found that the French media dedicated extensive and sensational coverage to violent crime committed by women. Ann Louise Shapiro found much attention was paid to the sensational and violent aspects of female crime, reducing these events to caricatures of female jealousy and rage, particularly in cases of throwing vitriol, the quintessential female modus operandi. The violent woman was consistently highlighted as an
unfeminine, rebellious, heartless character. On the other hand, Randall Martin, examining Early Modern English newspaper coverage of female crime, found increasingly sympathetic portrayals of women defendants. Over time, women were more often portrayed as victims rather than criminals, particularly for typically feminine offenses such as poisoning, infanticide, and child murder.

In contrast to these works, Nicola Lacey’s *Gender, Crime and Character* focuses on the representation of female crime in fiction literature, and particularly in novels. Lacey analyzes novels from the eighteenth and nineteenth centuries featuring transgressive female characters. At the heart of Lacey’s thesis is a paradigm shift in popular perception of female criminals, which Lacey sees illustrated in the fates of two very different literary heroines. Defoe’s Moll Flanders is an independent, entrepreneurial woman who shapes her own destiny as a free agent. In contrast, Hardy’s Tess of the d’Urbervilles is ultimately powerless to effectuate her own destiny despite her strong sense of personal responsibility.

While “Moll-esque” characters (sassy, resourceful, cunning, and proactive women) were tolerated, and perhaps even endorsed in the eighteenth century, such characters in nineteenth century novels (such as Thackeray’s Becky Sharp or Eliot’s Dorothea Brooke) were penalized in the age of “Tess-esque” powerless characters. Lacey proposes that these literary characters reflect broader social paradigms; the changes in ideas about female behavior would make Moll unthinkable to nineteenth century readers.

To Lacey, this literary shift reflected a broad cultural shift in the understanding of criminal responsibility in general and female criminality in particular. The broader concept of criminal responsibility, as understood legally and morally, changed from an understanding of criminality from

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37. SHAPIRO, supra note 36.
38. See generally RANDALL MARTIN, WOMEN, MURDER, AND EQUITY IN EARLY MODERN ENGLAND. (2007).
39. LACEY, supra note 31, at 11.
42. WILLIAM MAKEPEACE THACKERAY, VANITY FAIR (1848) (wherein Thackeray’s Becky arrives at a finishing school with no money or title, and proceeds to succeed in the world by cleverly ensnaring rich men and bending their will to hers. Her insight into the social rungs, and manipulation thereof, is remarkable).
43. GEORGE ELIOT, MIDDLEMARCH (1874) (wherein Eliot’s Dorothea chooses to leave a life of privilege and marry an aging scholar because of the potential of bettering her mind. When the marriage ends with her husband’s death, she devotes herself to social reform, and later marries a penniless conservative politician despite a condition in her late first husband’s estate that disinherits her as a consequence).
44. LACEY, supra note 31, at 10.
external “character evidence” and reputation, to internal *mens rea*, evidenced by an inquiry into knowledge and intent. This broader change had particular consequences for the perception of female crime. Eighteenth-century character-based criminality celebrated entrepreneurial criminal heroines. This model gave way to a model of desired passivity in women, and as a consequence, to less societal tolerance for female transgression. The new model, in law as in literature, reflects important social changes during the course of the nineteenth century: A constant representation of women’s proper comportment, accompanied by literary warnings as to the consequences of transgression (heeded by women, who were their primary audience); a shift from marriages as economic partnerships to notions of romantic matrimony, accompanied by broadened gaps and misunderstandings between the parties. Additionally, this period was characterized by the emergence of a culture of domesticity; the perception of acceptable female roles shifted from the “she-merchant” archetype of the eighteenth century to the homemaker, who resides in a separate sphere, removed from public life. The shift from Moll to Tess, argues Lacey, was not merely symbolic; to some degree it was reflected in the decreasing numbers of women brought into court, as well as the shifting standards of criminal responsibility that were embraced by the English criminal courts.

While novels undoubtedly contributed to public perceptions of gender and crime, it is problematic to rely on them as a social index. It is important to keep in mind that novel readership consisted mostly of the middle classes, even if the genre was aimed at moralizing to the working classes. While the ethos of feminine delicacy, developed by and for the middle classes may have bled to the lower classes as Lacey argues, it is unclear how quickly or completely that process occurred. Thus, to more accurately gauge popular opinion, it is useful to examine gender and crime as reflected in other, more widely read, categories of literature. This article

45. LACEY, supra note 31, at 17.
46. Id.
47. Id.
48. Id.
49. Novels were not even commonly purchased until the late nineteenth century because of their high price. Kate Flint, *The Victorian Novel and Its Reader*, in *THE CAMBRIDGE COMPANION TO THE VICTORIAN NOVEL* (Deidre David, ed., 2001) 17, 19–20. Serial periodicals like the *Strand* were much more accessible.
50. Id. at 29.
51. LACEY, supra note 31, at 30. Articles published at the time specifically expressed the concern that novels might convey to working-class readers the notion that women might not be satisfied with their role as mothers and homemakers. Flint, supra note 49, at 29–30.
uses Arthur Conan Doyle's Sherlock Holmes stories, which enjoyed a wider popularity and a more varied readership.\textsuperscript{52}

III. WOMEN AND CRIME IN SHERLOCK HOLMES STORIES: CAPTIVES, PROTECTORS, MUSES, AND ENTREPRENEURS

A. MODERNITY AND STEREOTYPE IN THE SHERLOCK HOLMES CANON

The Sherlock Holmes stories, Doyle's most beloved and popular works, were serially published in \textit{Strand Magazine} and in other venues throughout the late nineteenth century.\textsuperscript{53} Doyle provided \textit{Strand} readers—arguably a broader and less exclusive audience than that of more "highbrow" literary work—\textsuperscript{54} with fifty-six short stories and four novels, published between 1891 and 1927.\textsuperscript{55}

The Sherlock Holmes stories are characterized by an interesting mix of Gothic fiction elements and an unwavering commitment to the nascent forensic scientific method.\textsuperscript{56} The late nineteenth century saw the birth of positivist criminology—a family of criminological theories that ascribed an individual's criminal behavior to their innate pathological qualities.\textsuperscript{57} This new view of criminality challenged the Enlightenment-era philosophical notions of thinkers such as Cesare Beccaria\textsuperscript{58} and Jeremy Bentham,\textsuperscript{59} who saw crime as the outcome of cost-benefit analysis by free, rational agents, whose decision-making process could be changed by using punishment as a legal disincentive. In contrast, the heralds of the new positivist approach were continental scientists such as Cesare Lombroso and Enrico Ferri, whose object of inquiry was not crime itself, but rather the criminal.\textsuperscript{60}

\textsuperscript{52} Doyle perceived his Sherlock Holmes stories as populist entertainment and attempted to "kill off" his main protagonist and focus on writing "serious literature." \textsc{John Dickson Carr}, \textit{The Life of Sir Arthur Conan Doyle} 63–66, 69, 76 (1949). The public outcry that followed Holmes's "death" in 1893 eventually prompted Doyle to "resurrect" him. \textit{Id.} at 162–63.

\textsuperscript{53} \textsc{Doyle, supra} note 1.

\textsuperscript{54} \textsc{Chris Willis}, \textit{The History of the Strand}, \textit{Strand Magazine}, http://www.strandmag.com/hist.htm (last visited Jan. 25, 2011); \textit{see also} \textsc{Elizabeth Miller}, \textit{Framed: The New Woman Criminal in British Culture at the Fin De Siècle} 48 (2008).

\textsuperscript{55} \textit{Willis, supra} note 54. Doyle's stories greatly contributed to the popularity of the \textit{Strand}.

\textsuperscript{56} For a more in-depth analysis of this fascinating combination \textit{see} \textsc{Andrew Smith}, \textit{Victorian Demons: Medicine, Masculinity and the Gothic at the Fin-de-Siècle} (2004).

\textsuperscript{57} \textsc{Horn, supra} note 3.

\textsuperscript{58} \textsc{Cesare Beccaria}, \textit{On Crime and Punishment} (1764).


\textsuperscript{60} For a critical examination of positivism and a broader account of its emergence as a leading criminological theory \textit{see} \textsc{Horn, supra} note 3, at 59–60.
Lombroso’s book, *L’Uomo Delinquente* ("Criminal Man"),\textsuperscript{61} argues that criminals are characterized by atavism, a more primitive stage of evolution, and finds evidence for their criminal propensity in physical traits, ranging from cranial and bodily measurements\textsuperscript{62} to facial expressions and tattoos.\textsuperscript{63} Lombroso’s body of scientific work paid particular attention to ethnicity, providing pages upon pages of illustrations of criminals of different nationalities.\textsuperscript{64} Particularly pertinent to this Article is his book devoted to female criminals, in which he argued that they were “doubly abnormal,” due to their deviance from the norm in both their gender and their criminality.\textsuperscript{65}

Doyle’s universe of detective fiction was decidedly influenced by the positivist enterprise. Like some of his contemporaries, Doyle portrayed Holmes’s method as relying exclusively on logical deduction and scientific innovations.\textsuperscript{66} Probably modeled after Dr. Joseph Bell, Doyle’s mentor at the University of Edinburgh medical school and an innovator of forensic medicine,\textsuperscript{67} Holmes is described as scrupulously rational, calculating, and sometimes machine-like and devoid of feeling.\textsuperscript{68} Holmes constantly relies on crime scene findings, such as foot tracks and chemical analysis, to reach conclusions, but much of his reasoning is based on generalizations about human nature stemming from his observations of human behavior.\textsuperscript{69}

As with positivist criminologists, Doyle’s concern is not with the law, but with criminality as a phenomenon; the back story is at least as important as the crime itself. In that respect, Holmes’s position as the world’s only “consulting detective” awards him a certain ambiguous position with respect to official law enforcement. In many stories, Holmes

\begin{flushright}
\textsuperscript{61.} CESARE LOMBROSO, CRIMINAL MAN (Mary Gibson & Nicole Hahn Rafter trans., 2006).
\textsuperscript{62.} The nascent sciences of phrenology and physiognomy were important for the development of Lombroso’s scientific project. See HORN, supra note 3, ch. 3, pt. II.
\textsuperscript{63.} Id. at 18, 51. That such traits are not innate was fundamental in the critique of Lombroso’s body of work, id., but the stereotypes associated with the traits persisted long after the theory was discredited. Rebecca Fleming, Scanty Goatees and Palmar Tattoos: Cesare Lombroso’s Influence on Science and Popular Opinion, CONCORD REV. 196, 210, (2000), accessible at: http://www.tcr.org/tcr/essays/EPrize_Lombroso.pdf (last accessed Jan. 25, 2011).
\textsuperscript{64.} LOMBROSO, supra note 61.
\textsuperscript{65.} Id.; see also FRANCES HEIDENSOHN, GENDER AND CRIME (2001).
\textsuperscript{68.} Some argue that this idealization of the modern scientific man explains much of the cultural success of current television programs such as CSI. Ellen B. Harrington, Nation, Identity and the Fascination with Forensic Science in Sherlock Holmes and CSI, 10 INT’L J. CULTURAL STUD. 365 (2007).
\textsuperscript{69.} See Miller, supra note 54, at 33.
\end{flushright}
and Watson collaborate with the police, but they also accept private clients. Moreover, on several occasions, due to his innate sense of the just outcome of the case, Holmes does not report criminals to the police. He seems more focused on their story and etiology than on the technical elements of the offense. The fluidity in the amount of sympathy Holmes has for the different characters in his cases makes categorization of these characters as “victims” or “criminals” problematic. Nonetheless, the stories are populated by a gallery of characters—clients, witnesses, perpetrators from all social classes—and, among them, a surprising number of women.

B. FEMALE CHARACTERS IN SHERLOCK HOLMES STORIES

Women in Sherlock Holmes stories represent a full spectrum of the Victorian social universe (See Table 1). Doyle casts women as victims and perpetrators of crime with equal frequency, and includes women in the roles of various neutral parties as well. With respect to social class, the characters run the gamut from street women and outcasts to royalty. Some characters in the later stories could be characterized as “new money,” due to marrying industrialists; and a few characters are placed outside the traditional social class ladder, especially those with artistic or bohemian interests.

<table>
<thead>
<tr>
<th>Role in story</th>
<th>Victim</th>
<th>Neutral party</th>
<th>Perpetrator or accomplice</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lower/working class</td>
<td>12</td>
<td>17</td>
<td>3</td>
</tr>
<tr>
<td>Lower middle class</td>
<td>17</td>
<td>3</td>
<td>3</td>
</tr>
<tr>
<td>Governess/teacher</td>
<td>3</td>
<td>3</td>
<td>3</td>
</tr>
<tr>
<td>Social class</td>
<td>Upper middle class/estate</td>
<td>10</td>
<td>10</td>
</tr>
<tr>
<td>Nobility/royalty</td>
<td>8</td>
<td>8</td>
<td>8</td>
</tr>
<tr>
<td>“New money”</td>
<td>4</td>
<td>4</td>
<td>4</td>
</tr>
<tr>
<td>Bohemian/artist/society</td>
<td>5</td>
<td>5</td>
<td>5</td>
</tr>
<tr>
<td>Ethnicity</td>
<td>British</td>
<td>43</td>
<td>43</td>
</tr>
<tr>
<td>British</td>
<td>43</td>
<td>43</td>
<td>43</td>
</tr>
<tr>
<td>Colonies(North)</td>
<td>8</td>
<td>8</td>
<td>8</td>
</tr>
<tr>
<td>American/Australian</td>
<td>8</td>
<td>8</td>
<td>8</td>
</tr>
<tr>
<td>European</td>
<td>6</td>
<td>6</td>
<td>6</td>
</tr>
<tr>
<td>Latin American</td>
<td>3</td>
<td>3</td>
<td>3</td>
</tr>
</tbody>
</table>

Table 1: Descriptive Characteristics

70. Table 1 includes a complete coding of all Doyle female characters who appear in a significant role in the novels and stories (excluding women mentioned in passing once or twice in a given story). Coding was done according to explicit information provided in the narrative about the female characters’ backgrounds. Some women belonged to more than one category, and were therefore “counted” twice for the purpose of coding.
Ethnicity also varies among Doyle's cast of secondary characters and plays an important part in the stereotypes applied to these women. Most of Doyle's female characters are British, but there is a considerable minority of American and Australian women. There are also a few European and a handful of Latin American characters in Doyle's later stories.

Women's roles as victims, neutral parties, or perpetrators in the stories vary across social classes. Sensational violent crime is perpetrated by women of noble stature (such as the anonymous murderess of blackmailer Charles Augustus Milverton)\(^1\) as well as by ill-reputed street women (such as Kitty Winter, who threw vitriol in Baron Gruner's face to avenge his corruption of her in *The Noble Bachelor*).\(^2\) Women outside the social order (bohemian/artistic) are more likely to be cast as entrepreneurial free agents. The quintessential example is Irene Adler, discussed in depth below,\(^3\) but there are others, such as Mrs. Ronder (a circus professional involved in a sophisticated plot to murder her husband).\(^4\) In other cases, wealth appears to be a double-edged sword. Most wealthy women (like the victims of blackmailer Charles Augustus Milverton,\(^5\) the kidnapped Lady Frances Carfax,\(^6\) and maltreated wives Nancy Barclay\(^7\) and Mary Brackenstall\(^8\)) are cast as prisoners in gilded cages. A few others, like Isadora Klein,\(^9\) find wealth a source of power and strength (and often a resource assisting them in committing crime). Women of certain social classes, particularly single women, are portrayed as especially vulnerable to victimization. Examples include governesses and women of independent wealth traveling alone. In the former group are women placed under the power of families in remote estates such as Violet Hunter,\(^10\) enlisted against her will to participate in identity deceit, and Violet Smith,\(^11\) whose employer plans to marry her for money. An example of the latter group is Lady Frances Carfax, who falls prey to dangerous swindlers.\(^12\)

Ethnicity, too, plays an important part in explaining not only the role but the etiology of the woman's criminality or her victimhood. European women figure into the stories mostly as minor (and sometimes reluctant) accomplices to male European criminal masterminds. For example, Sophia

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71. DOYLE, *supra* note 1, at 645.
72. Id. at 243.
73. Id. at 117.
74. Id. at 1107.
75. Id. at 645.
76. Id. at 815.
77. Id. at 377.
78. Id. at 711.
79. Id. at 1059.
80. Id. at 272.
81. Id. at 599.
82. Id. at 815.
in *The Greek Interpreter* is under the power of rascals who kidnapped her brother; Elsie in *The Engineer’s Thumb* is under the power of a master counterfeiter; and Mrs. Schlessinger in *The Disappearance of Lady Frances Carfax* helps her husband to kidnap and plan to bury alive the eponymous Lady Frances.

Eight stories feature women from colonies in the Americas or Australia. South American women are often depicted as wild, disturbed, and possibly insane. All eight women from the colonies were cast as having had “grown up wild” in America or Australia, and all stories involving them feature unsavory aspects of their past—former husbands or suitors, for the most part—haunting them in the present. Some of these past connections were tied to organized crime in the colonies (Elsie Cubitt from *The Dancing Men* is stalked and threatened in letters written in a special code), while others are related to exotic occurrences (the death of Effie Munro’s African-American husband in a fire; the loss of Lady St. Clair’s former husband in the San Francisco mines). All colonial women are explicitly described as wild, spirited, and passionate.

Doyle devotes a considerable amount of energy to describing his female characters. Following the introduction of a female client or witness, the stories include a paragraph describing her appearance as well as the character traits stemming from that appearance. In other cases, this description is provided by one of the other protagonists in the story. Table 2 summarizes the qualities attributed to all female characters.

<table>
<thead>
<tr>
<th>Attribute</th>
<th>No. of women so characterized</th>
<th>Years of publication for relevant stories</th>
</tr>
</thead>
<tbody>
<tr>
<td>Beautiful</td>
<td>32</td>
<td>1887–1927</td>
</tr>
<tr>
<td>Sweet</td>
<td>13</td>
<td>1887–1927</td>
</tr>
<tr>
<td>Wild</td>
<td>13</td>
<td>1891–1926</td>
</tr>
<tr>
<td>Passive/overpowered</td>
<td>12</td>
<td>1891–1922</td>
</tr>
<tr>
<td>Passionate</td>
<td>6</td>
<td>1891–1924</td>
</tr>
<tr>
<td>Brave</td>
<td>6</td>
<td>1891–1904</td>
</tr>
<tr>
<td>Smart</td>
<td>3</td>
<td>1891, 1892</td>
</tr>
<tr>
<td>Evil</td>
<td>2</td>
<td>1893, 1911</td>
</tr>
<tr>
<td>Insane</td>
<td>2</td>
<td>1904, 1922</td>
</tr>
</tbody>
</table>

83. *Doyle*, supra note 1, at 399.
84. *Id.* at 230.
85. *Id.* at 815.
86. *Id.* at 583.
87. *Id.* at 320.
88. *Id.* at 243.
As mentioned earlier, Lacey posits that the shift in perceptions of women’s criminality from entrepreneurial to powerless was an ongoing process throughout the nineteenth and twentieth centuries. An examination of the qualities ascribed to the female characters in the Holmes stories bears out this hypothesis. The stories published in the late nineteenth century feature mostly passive women, many of them overpowered by men. The stories also feature women described as brave, clever, and driven. It is notable, though, that descriptions of characters as smart, brave, and resourceful, occur for the most part in the earlier stories (the characters’ intelligence is not noted until after 1892; bravery disappears from categorizations in 1904; and five out of the six brave characters appear before 1893), and that the only two insane or pathological characters appear in the later stories (1904 and 1922). The most common descriptor of these women is their physical beauty, which remains consistent in texts across all years of publication.

B. NARRATIVES OF WOMEN AND CRIME: CAPTIVES, PROTECTORS, MUSES, AND ENTREPRENEURS

The Sherlock Holmes stories place women in a variety of situations involving criminality and victimization. These situations can be placed into four main schemas: Captives, Protectors, Muses, and Entrepreneurs, as presented in Table 3. The first three categories are excellent examples of Lacey’s “Tess-like” women, whose fates are largely determined by circumstance and a powerful patriarchal society. The fourth category, however, describes “Moll-esque” characters with drive, initiative, and free agency who were still present in the late nineteenth century. This is consistent with Lacey’s assessment that such characters were still embraced, to some extent, into the late nineteenth century.

One of the most important findings about these characterizations is that they apply to criminals and noncriminals alike. In each category there are women who commit crime, women who witness crime, and women who fall victim to crime. Granted, their actions under the circumstances are praised or reviled according to Holmes’s—Doyle’s—sense of justice, which does not necessarily neatly map onto the likely legal disposition of the case. However, the dichotomies of power and powerlessness, free agency and predetermination, protection and support, apply to the female characters regardless of their position on the victim/criminal divide. The women are primarily categorized by their position in society and relationship with men in their lives. This suggests that femininity, rather than criminality, is the organizing principle in crafting these characters. Table 3 presents this categorization, including some subcategories.
1. Captives

Many examples of captives populate the Holmesian canon. These are women trapped in situations over which they have no control. The classic female Holmes client is a “damsel in distress,” asking for his help and protection in navigating oppressive circumstances. Some such clients, like The Speckled Band’s Helen Stoner and A Case of Identity’s Mary Sutherland, are at the mercy of ruthless male relatives. Some, like The Sign of the Four’s Mary Morstan, are thrown into messes created by such relatives. Others, like The Copper Beeches’ Violet Hunter and The Solitary Cyclist’s Violet Smith, are exploited by evil employers. Some of them, like the eponymous Lady Frances Carfax, are apprehended and overpowered by villains when they exhibit independence that exceeds the appropriate female social roles. It should be noted that these characters, and others in the “captive” category, are often thrown into the path of peril when they assert their independence in any meaningful way, such as seeking employment, traveling, or planning to marry against parental wishes or interests. The Copper Beeches is particularly interesting in this respect. Violet Hunter, an aspiring governess pondering on the prudence of accepting a peculiar position, seeks Holmes’s advice not only as a professional consulting detective, but as a surrogate male relative:

“You will excuse my troubling you, I am sure,” said she, as my companion rose to greet her, “but I have had a very strange experience, and as I have no parents or relations of any sort from whom I could ask advice, I thought that perhaps you would be kind enough to tell me what I should do.”

Table 3: Patterns

<table>
<thead>
<tr>
<th>Role</th>
<th>Description</th>
<th>Count</th>
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<tbody>
<tr>
<td>Captives</td>
<td>Maltreated/abused</td>
<td>15</td>
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<tr>
<td></td>
<td>Under the power of men</td>
<td>16</td>
</tr>
<tr>
<td>Protectors</td>
<td>Supportive of her man</td>
<td>8</td>
</tr>
<tr>
<td></td>
<td>Acts to protect a lover or family member</td>
<td>9</td>
</tr>
<tr>
<td>Muses</td>
<td>Object of desire</td>
<td>12</td>
</tr>
<tr>
<td>Entrepreneurs</td>
<td>Crime of passion</td>
<td>2</td>
</tr>
<tr>
<td></td>
<td>Defiant/subversive</td>
<td>7</td>
</tr>
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89. DOYLE, supra note 1, at 214.
90. Id. at 148.
91. Id. at 67.
92. Id. at 273.
93. Id. at 599.
94. Id. at 815.
95. Id. at 273.
Holmes responds in kind:

"I confess that it is not the situation which I should like to see a sister of mine apply for." 96

When later developments regarding Hunter's new employers confirm Holmes's and Hunter's concerns, he asks for her cooperation in assisting his and Watson's entry to the house in question:

"You seem to me to have acted all through this matter like a very brave and sensible girl, Miss Hunter. Do you think that you could perform one more feat? I should not ask it of you if I did not think you a quite exceptional woman." 97

And, lest we think that Hunter's qualities may be common among women, Watson ends the story by explicitly informing us of her idiosyncrasy and uniqueness through her later exploits:

As to Miss Violet Hunter, my friend Holmes, rather to my disappointment, manifested no further interest in her when once she had ceased to be the centre of one of his problems, and she is now the head of a private school at Walsall, where I believe that she has met with considerable success. 98

It is important to mention, however, that not all captives are innocents. An important subcategory of captives is that of women who find themselves under the power of ruthless criminal men, be they lovers, husbands or fathers. In many instances the woman falls prey to the man's machinations; in others, she is made an accomplice to his crimes, which makes her no less of a captive. Such accomplices are often, though not always, portrayed with sympathy despite their involvement in committing the crime.

A classic example of this subcategory is The Hound of the Baskervilles' Beryl Stapleton, who, while sympathetic to her husband's unsuspecting victim, can hardly escape from her overpowering collaborator's shadow. 99 Other examples include Emilia Lucca, whose husband, Gennaro, guarantees her safety and keeps her collaboration to a minimum; 100 Mary, niece to Alexander Holder, who is tempted by a no-good lover to assist in stealing a valuable jewel; 101 and The Musgrave Ritual's Rachel Howells, persuaded to hunt an ancient treasure by her ruthless lover and later driven mad by his betrayal to the point of murdering

96. DOYLE, supra note 1, at 276.
97. Id. at 284.
98. Id. at 287.
99. See id. at 488 for a typical interaction.
100. Id. at 809.
101. Id. at 260.
Howells's actions are violently sensational and yet stem from powerlessness and rejection; Doyle describes this duality as follows:

What smouldering fire of vengeance had suddenly sprung into flame in this passionate Celtic woman's soul when she saw the man who had wronged her—wronged her, perhaps, far more than we suspected—in her power? Was it a chance that the wood had slipped and that the stone had shut Brunton into what had become his sepulchre? Had she only been guilty of silence as to his fate? Or had some sudden blow from her hand dashed the support away and sent the slab crashing down into its place? Be that as it might, I seemed to see that woman's figure still clutching at her treasure trove and flying wildly up the winding stair, with her ears ringing perhaps with the muffled screams from behind her and with the drumming of frenzied hands against the slab of stone which was choking her faithless lover's life out.

Here was the secret of her blanched face, her shaken nerves, her peals of hysterical laughter on the next morning. But what had been in the box? What had she done with that? Of course, it must have been the old metal and pebbles which my client had dragged from the mere. She had thrown them in there at the first opportunity to remove the last trace of her crime.

2. Protectors

A second large category of female characters commits transgressions in order to protect loved ones. The most endearing of those is, perhaps, The Yellow Face's Effie Munro, who hides her black daughter for fear of her husband's wrath. Munro's explanation of her behavior is typically feminine: The dilemma she faces is choosing between her loyalty to a loved daughter and a loved husband.

"That is John Hebron, of Atlanta," said the lady, "and a nobler man never walked the earth. I cut myself off from my race in order to wed him, but never once while he lived did I for an instant regret it. It was our misfortune that our only child took after his people rather than mine. It is often so in such matches, and little Lucy is darker far than ever her father was. But dark or fair, she is my own dear little girlie, and her mother's pet." The little creature ran across at the words and nestled up against the lady's dress. "When I left her in America," she continued, "it was only because her

102. DOYLE, supra note 1, at 358–59.
103. Id at 363–64.
104. Id at 320.
health was weak, and the change might have done her harm. She was given to the care of a faithful Scotch woman who had once been our servant. Never for an instant did I dream of disowning her as my child. But when chance threw you in my way, Jack, and I learned to love you, I feared to tell you about my child. God forgive me, I feared that I should lose you, and I had not the courage to tell you. I had to choose between you, and in my weakness I turned away from my own little girl. For three years I have kept her existence a secret from you, but I heard from the nurse, and I knew that all was well with her. At last, however, there came an overwhelming desire to see the child once more. I struggled against it, but in vain. Though I knew the danger, I determined to have the child over, if it were but for a few weeks. I sent a hundred pounds to the nurse, and I gave her instructions about this cottage, so that she might come as a neighbor, without my appearing to be in any way connected with her. I pushed my precautions so far as to order her to keep the child in the house during the daytime, and to cover up her little face and hands so that even those who might see her at the window should not gossip about there being a black child in the neighborhood. If I had been less cautious I might have been more wise, but I was half crazy with fear that you should learn the truth.\textsuperscript{105}

Either of the two choices, it should be noted, would confirm Munro’s adherence to a stereotypical female position. It is important, nonetheless, to note that Munro does not face a dilemma between, say, her own aspirations and a loved one. As presented in the story, Munro’s choice to hide the child speaks not so much of her gender, but of prevailing notions of colonialism and race.

Another classic protector is \textit{The Second Stain}’s Lady Hilda Trelawney-Hope, who attempts to steal back state documents to protect her husband’s government career.\textsuperscript{106} The documents had been stolen by Lady Hope from her husband in order to sell them to a foreign agent, who was blackmailing her using indiscreet romantic correspondence that preceded Lady Hope’s marriage.\textsuperscript{107} Her explanation of her crime is an example of the distinction between the public realm of diplomacy, in which Hope had no part or share, and the private realm of feelings and domestic happiness.

“Put yourself in my position, Mr. Holmes! What was I to do?”

“Take your husband into your confidence.”

\textsuperscript{105} \textsc{Doyle, supra note 1, at 329.}
\textsuperscript{106} \textit{Id.} at 739.
\textsuperscript{107} \textit{Id.}
"I could not, Mr. Holmes, I could not! On the one side seemed certain ruin, on the other, terrible as it seemed to take my husband's paper, still in a matter of politics I could not understand the consequences, while in a matter of love and trust they were only too clear to me. I did it, Mr. Holmes! I took an impression of his key. This man, Lucas, furnished a duplicate. I opened his despatch-box [sic], took the paper, and conveyed it to Godolphin Street."

Two additional characters—The Abbey Grange's Lady Brackenstall and The Crooked Man's Nancy Barclay—are also examples of protectors. Each attempts to obstruct the investigation of her husband's murder to protect the lover who committed the murder.

3. Muses

The last two examples, Lady Brackenstall and Nancy Barclay, can also be classified as muses. They are women whose main role in the Holmesian plot is to be objects of love or desire who drive their suitors, lovers, or former husbands to commit crime. Importantly, their indirect roles in the crimes are described by their respective lovers—the free agents who committed the crimes. Holmes confronts the killer of Colonel Barclay:

"I have already heard of your meeting with Mrs. Barclay, and your mutual recognition. You then, as I understand, followed her home and saw through the window an altercation between her husband and her, in which she doubtless cast his conduct to you in his teeth. Your own feelings overcame you, and you ran across the lawn and broke in upon them."

"I did, sir, and at the sight of me he looked as I have never seen a man look before, and over he went with his head on the fender. But he was dead before he fell. I read death on his face as plain as I can read that text over the fire. The bare sight of me was like a bullet through his guilty heart."

Doyle provides a similar narrative for the killer of Sir Eustace Brackenstall:

"Well, I never thought to see her again, but last voyage I was promoted, and the new boat was not yet launched, so I had to wait for a couple of months with my people at Sydenham. One day out

108. DOYLE, supra note 1, at 739.
109. Id. at 715.
110. Id. at 382.
111. Id. at 386–87.
in a country lane I met Theresa Wright, her old maid. She told me all about her, about him, about everything. I tell you, gentlemen, it nearly drove me mad. This drunken hound, that he should dare to raise his hand to her, whose boots he was not worthy to lick! . . . I crept round there last night and scratched at the window. At first she would not open to me, but in her heart I know that now she loves me, and she could not leave me in the frosty night. She whispered to me to come round to the big front window, and I found it open before me, so as to let me into the dining-room. Again I heard from her own lips things that made my blood boil, and again I cursed this brute who mishandled the woman I loved. Well, gentlemen, I was standing with her just inside the window, in all innocence, as God is my judge, when he rushed like a madman into the room, called her the vilest name that a man could use to a woman, and welted her across the face with the stick he had in his hand. I had sprung for the poker, and it was a fair fight between us. See here, on my arm, where his first blow fell. Then it was my turn, and I went through him as if he had been a rotten pumpkin. Do you think I was sorry? Not I! It was his life or mine, but far more than that, it was his life or hers, for how could I leave her in the power of this madman? That was how I killed him. Was I wrong? Well, then, what would either of you gentlemen have done, if you had been in my position?"

Interestingly, after consulting with Watson, whom he perceives to be “eminently fitted” to represent a British jury, Holmes decides to “acquit” the perpetrator. Holmes sees the perpetrator as the savior of an innocent damsels in distress rather than a scoundrel, and allow him to escape the authorities.  

While both women—Mrs. Barclay and Lady Brackenstall—hide the identity of the perpetrator from law enforcement agents, their own agency in the story is limited to serving as the inspiration and muse for men’s altercations.

4. Entrepreneurs

As Lacey suggests, the entrepreneurial free agent image did not entirely disappear from cultural crime narratives even late in the nineteenth century. As demonstrated in Doyle’s stories, such examples are not rare, but their representation undergoes transformation, particularly in the later stories.

112. DOYLE, supra note 1, at 724–25.
113. Id. at 725.
The quintessential example of an entrepreneurial, independent female adversary is, of course, *A Scandal in Bohemia*’s Irene Adler—the “adventuress” who captured the heart of Holmes’s client, the King of Bohemia. In a fascinating reversal of the more common “damsel in distress” scenario, it is the man who comes to Holmes for help, asking him to retrieve a photograph in Adler’s possession, in order to save his impending marriage. Doyle provides Adler with an artistic, class-defying biography, which frees her to engage with kings and solicitors, and to move freely across the demographic divide.

“Let me see!” said Holmes. “Hum! Born in New Jersey in the year 1858. Contralto—hum! La Scala, hum! Prima donna Imperial Opera of Warsaw—yes! Retired from operatic stage—ha! Living in London—quite so!”

Adler proves a worthy adversary to Holmes. While Holmes succeeds in locating the photograph, Adler eventually fools and defeats him when, in the ultimate act of gender transgression, she dares to greet him in the street dressed as a man. In a letter to her adversary, she explains:

“But, you know, I have been trained as an actress myself. Male costume is nothing new to me. I often take advantage of the freedom which it gives. I sent John, the coachman, to watch you, ran upstairs, got into my walking-clothes, as I call them, and came down just as you departed.”

Holmes is extremely impressed with Adler. The following exchange, defying notions of class and nobility, is telling:

“What a woman—oh, what a woman!” cried the King of Bohemia, when we had all three read this epistle. “Did I not tell you how quick and resolute she was? Would she not have made an admirable queen? Is it not a pity that she was not on my level?”

“From what I have seen of the lady she seems indeed to be on a very different level to your Majesty,” said Holmes coldly.

In Holmes’s mind, therefore, the king’s vacuous, pompous mannerisms are clearly inferior to Irene’s resourcefulness and courage.

The Sherlock Holmes canon includes other well-developed independent female characters. One such character is Isadora Klein from *The Three Gables*, whose solution to the prospect of being defamed by a
young novelist—attempts to buy all copies of the novel, as well as the house where the last copy is located, and then hiring rougher hands to discourage him from publishing—are nothing if not entrepreneurial. In Klein’s case, it is wealth rather than a class-transcending background that awards her free agency. However, that should not be taken to mean that Doyle casts wealth as inherently providing freedom. Other female characters in the Holmes canon (like Clotilde Lothman von Saxe-Meningen, King Wilhelm’s fiancée,118 and Violet de Merville, Baron Gruner’s fiancée119) are female “prisoners in a golden cage,” frozen, flat, and colorless in their noble and affluent backgrounds. And, notably, Holmes’s warning to Klein is a clear example of gender stereotyping. While chivalrously allowing her to escape the law unscathed, he warns her of the consequences of her unladylike behavior.

“Meantime, lady”—he wagged a cautionary forefinger—“have a care! Have a care! You can’t play with edged tools forever without cutting those dainty hands.”120

It is worth pointing out that male adversaries are not treated to such concerned advice in the Holmes oeuvre. The difference between Irene Adler and Isadora Klein may be attributable to the amount of time between the two publications. A Scandal in Bohemia was published in 1891 and The Three Gables in 1926. It may be that the transformation in attitude toward “Moll-esque” characters was an ongoing process well into the twentieth century.

Several female criminals engage in sensational crimes of passion, echoing those reported in contemporary news.121 Among these are Kitty Winter, who engages in the quintessential nineteenth century female passion crime—throwing vitriol in the face of her cruel former lover;122 Mrs. Gibson from The Problem of Thor Bridge, who cleverly crafts her suicide to frame her husband’s new mistress;123 and a distinguished woman, whose identity remains undisclosed, who shoots the known blackmailer Charles Augustus Milverton.124 It is debatable whether these women operate as free agents. While their crimes are violent, sensational, and daring, they are perpetrated from a position of despair and victimization. These are, for the most part, desperate acts of revenge. In Mrs. Gibson’s case, her crime includes her own death. Holmes ties her sensational plot to her femininity:

118. Doyle, supra note 1, at 123.
119. Id. at 1043.
120. Id. at 1069.
121. Shapiro, supra note 36.
122. Doyle, supra note 1, at 1049.
123. Id. at 990.
124. Id. at 653.
“It must be admitted that the workings of this unhappy woman’s mind were deep and subtle, so that it was no very simple matter to unravel her plot. I do not think that in our adventures we have ever come across a stranger example of what perverted love can bring about. Whether Miss Dunbar was her rival in a physical or in a merely mental sense seems to have been equally unforgivable in her eyes. No doubt she blamed this innocent lady for all those harsh dealings and unkind words with which her husband tried to repel her too demonstrative affection. Her first resolution was to end her own life. Her second was to do it in such a way as to involve her victim in a fate which was worse far than any sudden death could be.”125

Despite the desperation behind these crimes, they serve as a reminder that even in situations with impossible choices, resorting to crime is in and of itself a freely chosen path, albeit an extreme and tragic one.

Another category of active female characters, though a far cry from Irene Adler, are women who are “captive” and nonetheless try to subvert their powerlessness by providing warnings against their captors/lovers/accomplices to others. Elsie tries to warn the engineer against remaining in the counterfeiter’s house. Sophia, at great risk to herself, attempts to rescue her brother from their oppressors. Lastly, Beryl Stapleton tries to warn Sir Henry Baskerville from her scheming, murderous husband. While women like Irene Adler and Isadora Klein act from a position of freedom and independence, these three women try to subvert their powerlessness by doing what little is in their power: warning others against their captors.

IV. CONCLUSION

There are several notable insights from the Sherlock Holmes stories, which strongly support Lacey’s observations about the negotiation of accountability in the age of Tess. First, stereotypical female offenders, while almost invariably trapped in situations of powerlessness, come from a variety of social classes. This suggests that “separate spheres” for women had “bled” over from the middle classes and could explain powerlessness for women in various situations. Second, the characters who exercise relative freedom are often unmarried, have independent wealth or careers, or have lived abroad, many in the American or Australian colonies.126 These unusual backgrounds often explain these female characters’ ability to

125. DOYLE, supra note 1, at 996.
126. See, e.g., the stories featuring Mary Fraser and Lady Brackenstall, (DOYLE, supra note 1, at 715); see also Hatty Duran and Lady Saint-Simon (Id. at 245); and Alice Turner, (Id. at 164).
escape easy classification within the oppressive British class system.

Finally, while the stories include examples of both Tess-like "typically feminine offenders" and Moll-esque entrepreneurial offenders, most of the stories include elements of the former, and Doyle finds various ways to highlight the exceptionality of the latter.

Another important insight pertains to the lack of clear distinction between the attributes and patterns of female criminality and victimization. Powerlessness, protectiveness and support, and muse-like behavior occur across categories, both for victims and for perpetrators. Only small factual details transform a woman overpowered by a strong male figure from a victim to an accomplice. This blurring of the lines is important in two ways. First, it demonstrates that femininity, rather than criminality, is the organizing principle behind understanding Doyle's female characters. Second, it echoes the insights of positivist criminology, suggesting that rather than focusing on the legal categories and definitions, the analytical focus of crime should be on the individual and his or her propensity for certain behaviors. While these behaviors could be interpreted as crime, victimization, or illness, they still suggest essential, innate qualities of the individual, and in the case of women, their femininity is such a master trait.

It is valuable to expand on the issue of innate traits. As mentioned earlier, the appearance of insanity in the later stories coincides with the dawn of psychiatry and bears out Zedner's point about the increasing tendency to view women as "mad" rather than "bad," toward the late nineteenth and early twentieth centuries. Much of this phenomenon can be ascribed to the rise of the medical profession, and their monopolization of the definitions of "normal" and the "sane." Some of it can also be ascribed to the need to clearly define the boundaries of free will.

The rise of positivism in general, and of the medicalization of crime in particular, is a valuable lens for understanding criminal justice policies toward women. As criminal law seemed to develop the concept of culpability, criminology saw a somewhat opposite trend—the rise of positivism—that would dominate the field and much of the rationale behind correctional policies in Western Europe and the United States until the second half of the twentieth century. While the "harder" Lombrosian criminologists were eventually discredited, "softer" determinism persisted, and criminal justice professionals regarded the offender’s background as

127. ZEDNER, supra note 18.
significantly narrowing his or her choices. It is important to keep in mind that while the legal system moved towards adjudicating guilt through a prism of free will, it also moved toward determining sentences through a prism of determinism and rehabilitation. Moreover, the rise of positivism arguably affected women more than men: their criminal propensity, with the added deviance of their womanhood, was more stigmatizing and immutable. Policy-wise, they were reclassified from “bad” to “mad” and increasingly labeled with and treated for mental illness at a greater rate than men.

The insights drawn from these popular Gothic stories, when added to the body of literature analyzed by Lacey, also offer support for the hypothesis that the decline of women in the criminal process, as observed by Feeley and Little, and later Feeley and Aviram, may have had less to do with actual criminal energy of women than with cultural notions of female passivity and delicacy. When added to Zedner’s insights regarding the rise of “madness” among such women, it is one more building block in the explanation of the disappearance of women from the criminal scene. Of course, the Strand stories did not single-handedly cause the decline in female criminal defendants, but they reflected public notions and opinions prevalent at the time. These notions may have contributed to the prosecutorial reluctance to assign culpability to passive, powerless women.

Understanding the past, which includes the fictionalized past, is an important part in making sense of the present. Our fascination with, and concern about, female violence, as well as our stereotypes about victimization, particularly in the realms of domestic violence and sexual abuse, can be better understood, among other contexts, in light of the legacy of Victorian popular literature and its impact on our cultural universe. Overcoming these cultural stereotypes to see the real, rather than the sensational and gendered, is imperative not only for understanding female crime and victimization, but also for creating meaningful and liberating policies.

131. Horn, supra note 3, at 52.
133. Feeley & Little, supra note 14.
134. Feeley & Aviram, supra note 16.