# American Democracy and Ideology: A Critical-Polemical Perspective

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#### **Abstract**

The purpose of this article is to present a brief critical-polemical perspective on the Republican Party and the ultra-conservative Tea Party that controls it. We rely on two functions of ideology and how they influence the political behavior and decisions of the Republican Party. The ideologies of contradiction and reification limit the American people's ability to understand the political system that prevents them from engaging political communication with their elected officials. This study finds that elected officials tend to consciously and/or unconsciously influence American citizens to support the status quo by going against themselves and their economic, social, and political interests.

**Key Words:** Politics, Social Welfare, Democracy, Tea Party, Republican, Contradiction, Reification, Affirmative Action

#### 1. Introduction

Is it an understatement to say America invented democracy? America created a creed that supposedly lends itself to freedom, justice, and liberty for those who seek religious freedom and the pursuit of happiness, but does this creed embrace the changing demographics that influence presidential election outcomes? In the democratic realm, representative government has been America's proudest achievement, but few Americans exercise their rights to participate in a government they decreed by the Declaration of Independence. Since the 2010 elections that catapulted the Tea Party to power in the U.S. House of Representatives, this extreme faction of the Republican Party has created a hostile political relationship between Obama and the Republican-controlled House. What many American citizens have recently experienced in this country falls short of what the practice of democracy truly reflects. For most Americans, true democracy is an illusion and is enjoyed only by a few, the most powerful elite members of this society.

Our recent political crisis has demonstrated that the political elite have consciously and/or unconsciously created a system that represses the cultural life of the average American citizen, thus provoking the cultural alienation of the populace with heightened political infighting and lack of support for passing reform bills that serve the interests of the American people. Thomas Jefferson, John Adams, Benjamin Franklin, James Madison, and Alexander Hamilton have paved the way for a political intelligentsia to solve this nation's problems. With the magnanimity of their great minds, they set forth the path for future politicians to follow. Since many of these men lack the substantial material wealth of the aristocracy by today's standards, how would they respond to the state of affairs of our national polity today, where much gridlock between the first African American president and a Republican controlled Congress is met with political enmity? Would America be as prosperous as she is today if change had not taken place? What separates Obama from Congressional Republicans is that Obama wants pushes for true democratic change and the Republicans want to keep the status quo in place, a status quo that benefits the plutocrats.

The framers of the Declaration of Independence fought for democracy over aristocracy, liberty over class oppression, and justice over injustice by devoting their lives to the political and social welfare of average working class Americans, although that working class was largely Euro-American. Even though these men were as diverse in personality, opinion, and education as they were in the vast political differences that existed between them, they stood together for the unity of the country and penned the most august document that no other nation-state could rival from that day to now. Americans understand there will always be political dissension and polemical debates over various issues, but open unciviland unconstructive tones of disagreement have gone beyond the pale of dignity and respect that elected officials should accord one another, especially to the president of the United States, regardless of their philosophical differences and political ideologies.

The conduct of today 'selected officials, specifically the conservative right should cause great concern for the American electorate, but the gridlock between Obama and the Congressional Republicans only serves the interests of the Tea Party adamantine that would push this country to the brink of political insanity. Congressional Republicans may or may not be aware that the Tea Party is destroying the political fabric of U. S. democracy, but the Party has allowed itself to be dominated by the Tea Party's extreme ideologies. With the re-election of Barack Hussein Obama, anti-Obama sentiments continue to abound among die-hard conservatives who need an excuse to blame their bid for the White House on Mitt Romney, electoral fraud that backfired on the Republicans, and liberal conspiracies. This paper extends extant literature on political communication and social work as cohort disciplines from a critical-polemical perspective. On the political level, all communication is political. On the social work level, elected officials hold political office to protect the interests and well-being of the American electorate.

### 2. The Analysis: A Critical-Polemical Perspective

The first ideology we discuss is the *ideology of contradiction*. Since the presidential scepter has been passed to the Democrats for keeping the White House during both the 2008 and 2012 elections, we focus primarily on Congressional Republicans because they have controlled the House since the 2010 elections and have acquired a record on which we can critically analyze its contradictory nature against the democratic principles of the American creed. Therefore, this section focuses on the Republican Party and provides us with sufficient political communication to analyze the Party's contradictory nature.

The Republican Party is full of contradictions and paradoxes. The United States was founded on democratic principles of freedom, justice, and liberty for all, which should reflect the will of the people. However, the nature of today's extreme right-wing politics has been contradicting the democratic principles of freedom, justice, and liberty for all Americans. Instead, the extreme conservative right has taken over the established Republican Party and has run moderate Republicans out of the Party. This extreme faction called the Tea Party adamantine, servesup its own agenda without regard to ninety-eight percent of the American people whose incomes have seen a decline over the last several years. Since the Party's defeat in the 2008 presidential election, it has engaged political tactics and relied on fear appeals to undermine Obama's domestic and foreign policies, especially Obama's healthcare reform bill.

Soon after Obama took office in 2009 and won re-election in 2012, the Republicans, their small constituency, as well as some Americans expected everything to get better after Obama's first 100 days in office. When nothing changed, according to their interpretation of positive changes, the conservative right began declaring Obama a failure three months after he was sworn into office in 2009 that continued up to his re-election in 2012. The benefits of the far reaching American Recovery and Reinvestment Act of 2009, which Obama signed into law during his first 30 days in office, wee yet to be felt, measured, and acknowledged. Moreover, the possibility that this and subsequent legislation may have helped to rein in or slow down an out of control economic situation was not fully appreciated. The Party has also shown disruption and hostility toward the first African American president. For example, whenever Obama delivers a speech during a joint session of Congress or a State of the Union Address, the Republicans engage in disruptive and uncivil behavioral practices. During Obama's first-term Joint Session of Congress, Rep. Joe Wilson yelled out, "You Lie," during Obama's healthcare speech. This behavior contradicted the way party members should treat one another, especially the way they should demonstrate respect for the Office of the Presidency, regardless of the president's political party. The Associated Press noted: "It wasn't the only interruption during Obama's speech to a joint session of Congress in the House of Representatives.

The Republican Party has become the party dedicated to sabotaging the American future. . . . [The] Republicans are the arsonists who burned down our national home. [They] combined the failed ideologies of the Religious Right, so-called free market deregulation and the Neoconservative love of war to light a fire that has consumed America. Now [they] have the *nerve* to criticize the 'architect' America just [elected]—President Obama—to rebuild from the ashes. The Party is doing nothing constructive, [but trying] to hinder the one person willing and able to fix the mess [they] created. . . . But something far more serious has happened than an image problem: the Republican Party has become the party of obstruction at just the time when all Americans should be pulling together for the good of our country. Instead, Republicans are today's fifth column sabotaging American renewal.

The Republicans' unwillingness to work with Obama and the Democrats to rebuild this nation illustrates that the Party does not have the nation's best interest at hand. Their political behavior also suggests that if they cannot have their way, they will block the Obama administration's efforts to carry out reform, no matter how many olive branches he extends to them. The Republicans contradict democracy by its "lack of support for a democratic president and their failure to send a patriotic message of unity to the world—and to all Americans." We are aware that the rest of the world may at times dislike America's foreign policies under Republican leadership because the Party's "preference for unilateral action [for deciding courses of action for war] . . . [is] often easier and more efficient, at least in the short term, than multilateralism." Multilateralism involves international cooperation to effectively deal with global problems. Consequently, terrorisms and global problems can only be resolved through cooperative efforts of all nation-states.

MSNBC aired Rush Limbaugh, conservative American radio talk show host and political commentator, during one of his radio talk shows ranting about running all the Democrats out of office for voting in favor of Obama's healthcare reform bill. It must be noted that the Affordable Care Act became the law of the land when the U.S. Supreme Court ruled in favor of the Act and said it was constitutional. Limbaugh said, "They must, my friends, be hounded out of office, every single Democrat who voted for this needs to know, safe district or not, they are going be exposed and hassled and chased from office. We need to defeat these [expletive]. We need to wipe them out." This kind of hostile, threatening, and unprofessional media reporting behavior suggests that Limbaugh and the rest of the Republicans who support and echo such rhetoric wanted Obama in his first term to fail to a point that they have driven themselves into a crazed pathological mindset. This political posturing also suggests that fairness and justice for the most vulnerable of society to have adequate healthcare does not prevail in their cognitive structure to understand that sickness and disease among some of a country's citizens can eventually spread, creating an epidemic. It also suggests that if Obama's predecessors over a 50-year period could not achieve healthcare reform, why would Congress and the Senate support an African American president to have such a victory? Does this suggest racism? In essence, this is not only bipartisan politics, but racism framed in hostile unrelenting politics. During one of Larry King's 2010 CNN From Larry King Live shows, King interviewed Bill Maher who discussed the primary elections and the future of the Republican Party. Maher claims that "the Republican Party cannot fathom the idea that we have a black president." He goes on to say that the "GOP doesn't like the idea of having a black president, and it is all about racism." The Republicans' behavior should make the American people see why nothing ever gets done in Congress or in the Senate while Republicans are in control.

The Republicans are not interested in democracy, but are interested in political dominance, creating a plutocracy, and taking back the White House to get their legislation signed by a Republican president, a reason they did everything, from suppressing the vote to destroying labor unions, to prevent Obama's re-election. Only the president of the U.S. can sign legislation into law. To Obama's credit, he has remained calm and level-headed, and has not publicly used insolent or hostile language against Congressional Republicans or the GOP leadership in retaliation.

The Republicans continue to reject Obama's extended hand of bipartisanship for their input into the healthcare reform bill and other bills. Obama's healthcare reform legislation victory suggests that he has more than the experience and the ability to do his job, with the cooperation of all politicians, regardless of political party, but he has the grace to invite his opponents to the table for their input. The "intensification of long-standing hostility" and animosity between the Democrats and Republicans since the Republicans lost their political dominance in the 2008 and 2012 presidential elections, their undemocratic bipartisan attitude and deliberate polarization of American public opinion against the Affordable Care Act has aroused fear, anxiety, and hostile passions in low information and ill-informed Americans. Because most Americans are ill-informed about political issues, it is easy for their elected representatives to use contradictory and deceitful language against any of Obama's reform bills to influence public opinion. While granted that a minority of Democrats also opposed the healthcare legislation and some supporters may agree with certain sections more than others (as with any multifaceted policy). Republicans as a whole stood out in vehement opposition to healthcare reform efforts even after the U.S. Supreme court said it was constitutional. The Republicans have created a hostile division among the American people. For example, the few Americans who rallied outside Capitol Hill to protest Obama's healthcare reform bill shouted obscenities, used racist language, and spit on supporters of the healthcare reform legislation after it was passed. Because politics involves "conflict about material advantages, status, [political dominance], and moral issues," <sup>10</sup> and people will always see themselves as enemies, especially in politics. Language is at the heart of politics. For example:

Language about political enemies is drawn from a rather small set of contradictory and ambiguous propositions that are applied regardless of whether the highlighted difference turns on color, ethnicity, gender, race, class, nationality or ideology. From a stock pool of claims that evoke suspicion and hostility, those most likely to forge a coalition in the particular case dominate the course, constructing both the self and the other for people who become involved in the game [of politics].<sup>11</sup>

Given Edelman's statement, the Republicans use contradictory and ambiguous language to evoke in the American people fear of Obama and anyone who would support his political agenda. The heightened manifestation of suspicion and hostility constructed the supporters of the healthcare reform bill as enemies who would tamper with an already troubled economy and by increasing an already out-of-control deficit. In essence, the Republicans constructed the Democrats and supporters of the healthcare reform bill as evil and constructed themselves as virtuous, as the ones who truly have the American people's best interest at heart. But if the American people cannot see through the Republicans' veil of deception and the tactics they are using to publicly humiliate the president and his supporters by threatening to destroy their careers in the November election, then they cannot seem to comprehend who the real enemy is. The Republicans have contaminated the American social order by not accepting defeat and have contradicted democracy through their ideological rigidity.

Immigration is another issue in which the Republican Party contradicts itself, adding more fear to Americans' anxiety about the economy. The Party puts forth arguments that foreigners, particularly those of Mexican ancestry, are taking jobs away from the American people, when in reality, most Mexicans take on jobs that most Americans would not want to do (i.e., gardening, roofing, construction, carpentry, etc.). In fact, most Mexican's take on jobs that do not require high-level skills, but low skills that can be learned on the job. Perhaps the Party is directing Americans' attention to a supposed immigration problem to divert Americans' attention away from the real issues: the Party's destruction of the economy, a failed war, an eight-year reign of inept leadership where Americans' civil liberties have been limited. If the American people would examine closely the job situation as it stands, most jobs the American people want are being transferred to the international community, such as China, where companies exploit the labor of internationals. Why pay unskilled or semi-skilled Americans \$15 to \$20 an hour for making auto parts or a pair of shoes, when major manufacturers can pay internationals \$0.50 to \$0.75 a day for making the same item?

Some of the anti-Mexican immigration sentiment could likely stem from the fact that Latinos have historically favored the Democratic Party and their growing numbers are perceived as a growing threat to Republican Party interests (party votes, limited intervention with respect to social welfare concerns, etc.). Their increased support of Obama in 2012 versus the 2008 election has likely served as a wake-up call that the Latino vote can be a critical factor, and more especially in swing states. A party's limited-government stance cannot be taken lightly since history has shown that market forces alone tend to be ineffective in bringing about comprehensive and meaningful improvements in the lives of disadvantaged groups.

Finally, the Republican Party purports a conservative Christian platform and claims to believe in traditional family values, marriage union between a man and a woman only, and smaller government. As a side note, we make reference to this kind of behavior because the Republicans cite themselves as Christian moralists while denouncing the alleged deviance in other elected officials as well as Obama. But extant literature informs us that Obama is only guilty of being an African American president, a deviation from the traditional faces to which Americans are accustomed to seeing in the White House. <sup>12</sup>To embrace a moral value system that Americans have traditionally accepted and then behave contrary to this fundamental value system, most people would call this kind of behavior contradictory. Besides, during the second half of the 19<sup>th</sup> century and the first 12 years of the 20<sup>th</sup> century, the Republicans were known as the party of the working class and the working poor. But now, the Republicans [have] systematically tried to prevent the poor, the elderly, and racial minorities from voting in key swing states.

There is one documented case of widespread voter fraud this year, [but it was] committed by a Republican group. Republicans have fueled the birther movement with routine references to birth certificates, including the presidential candidate Mitt Romney. Not one Republican leader has publicly criticized this obviously racist movement. Republicans [have not been truthful] about the Obama administration's changing welfare rules in order to stoke white racial resentment. Republicans [had] an explicitly racial strategy to win the election—to deny voting rights to minorities and make racist appeals to whites. . . . Republicans have shattered all the records for filibusters in the Senate. They say no to everything, even to their own ideas when they are embraced by president [Obama]. They are more interested in denying the president any political victories than they are in solving the country's problems. Republicans have killed numerous jobs bills, including one for returning veterans. <sup>13</sup>

As we can see, the Republican Party has become the party of "no," and has been led by the Tea Party adamantine to deny Obama any degree of success and the American people any relief from a depressed economy. The Party has been pulled so far to the right that it cannot see the effects of long-term damage it is doing to the American people. Today, the Republican Party has become the party of plutocrats, which is a contradiction for what it once stood.

From the very beginning, affirmative action has been experienced as an abstraction for most people of color. Skin color remains the most visible marker of white privilege because it "has been [and is still] used to rank order people for practical things like jobs, promotions, loans . . ., housing, [and access to quality education]." Even though affirmative action does not help the majority of the disadvantaged, it should be kept in place.

Affirmative action provides palliatives that help Americans of color who are already poised to succeed when given half a chance. It does little for the millions of African Americans bottom-mired in urban hells by the savage time-release social debilitations of American slavery. It also does little for some Americans of color who inherit grinding poverty, poor nutrition, bad schools, unsafe neighborhoods, low expectation, and overburdened mothers. Lamentably, there will always be poverty. But African Americans are overrepresented in this economic class for one reason and one reason only: [the stigma of] American slavery and the vicious climate that followed it. 16

There has been tension and dissociation between the theory of the policy and its practice. The illusionary reified nature of the policy is seen as a fraud for Americans of color and women. Even though white women have been the major beneficiaries of this policy, they still experience discrimination in U.S. patriarchal institutions. Those Americans who oppose affirmative action oppose it because they believe that Americans of color, specifically African Americans and Latina, will take away the jobs to which they have been entitled through white privilege. The idea of average white male or whites in general sharing job opportunities with people of color and women is unfathomable. The notion that Americans of color do not deserve the same privileges as whites and women do not deserve as much as men is an age-old problem in U.S. society. As for women, perhaps the Republican Party would rather see them return to traditional gender roles of representations: taking care of husbands and children and not to be heard or seen in male-dominated roles. For example, we can assume that presidential candidate Hillary Rodham Clinton left the Senate because she could not break through the glass ceiling of the "good old boy network." One of the authors of this article recalls watching a 60 minutes segment in July 2001 when an older Republican senator was interviewed about the Senate's perception of Hillary Clinton.

He told the viewing audience that they pulled her aside and informed her that it did not matter if she had been a first lady or how popular she is, that she was a junior senator, and that she would have to work her way up through the ranks. He also informed the viewing audience that after they had their little chat with her, she would come to meetings, sit quietly, and studiously take notes in which they approved her behavior. Clinton's posture suggested that it pleased the "good old boys" that she sat unheard and unnoticed. Does this suggest that women senators walk the chalked line and give in to the reified nature of a political system that renders them invisible? Or does this suggest that female elected officials who sit quietly and say nothing are in complicity with their own oppression? Could this perhaps be a reason Clinton left the Senate and struck a deal with Obama to concede the election to become his Secretary of State? By doing so, she would not have to leave politics and find herself without a top-notched political position. In fact, the Secretary of State position would give her more power and visibility than she had in the Senate. Given Clinton's experience in the Senate, we can assume that other female senators are trapped in a reified system of social relations with their male counterparts, where most appear voiceless, marginalized, and *de*-centered from mainstream activities in this political context.

As Congressional Republicans and state legislatures engage in bitter polemics over affirmative action, it has become a hotbed issue in presidential elections. There was a "proposal in Congress to eliminate all federal affirmative action programs. . . . And conservative Republicans were moving to strike affirmative action statues from the books in almost two dozen states." Given this political stance, it suggests that the Republicans lack the interest and desire to recruit Americans of color and women as legitimate party members with a voice to express their concerns. The Party is located on the wrong side of history and needs to strengthen its voter base to demonstrate its interest in touting the democratic values for all Americans and not just for the plutocrats.

Affirmative action will always be a contested site for much polemical debate and political struggle. There has been more "doublespeak" about the nature of this policy. The policy's intentions were to give qualified disadvantaged group members representation in mainstream organizations and a fair opportunity to secure employment, education, and business, on an even playing ground, from which they have been historically excluded. But the theory and practice of affirmative action have been misunderstood and the language has been replaced with euphemisms, such as "quotas,""race-based," and "gender-based" hiring, regardless of one's qualifications. Moreover, the fact that white men are also potential beneficiaries of affirmative action is generally overlooked. White men with disabilities, including those who were former veterans, also comprise the protected class of disabled workers. The use of esoteric language pretends to communicate the real purpose of affirmative action, but "conceals and prevents any meaningful discussion to correct historical wrongs. Many individuals react . . . viscerally whenever affirmative action is put on a state or national agenda for discussion.

Rather, it is the intentional use of language to mislead, to distort, . . . to corrupt,"<sup>19</sup> and to put fear in the minds of the low information and ill-informed, specifically white Americans, who believe that affirmative action will replace qualified whites with unqualified minorities in the job market. Perhaps one reason affirmative action has not been able to live up to its true purpose for righting historical wrongs against Americans of color (i.e., African Americans and Native Americans) and women working in political institutions is that affirmative action is no more than a reified system of ideological illusions that creates false realities in politics, social institutions, academic institutions, etc. What we think is *real* is not *real* at all. Frank Luntz, a *New York Times* best-selling author, conducted a survey and found that Americans want their elected officials to renew American citizens expectations about life, opportunity, and the American dream; to renew their celebration of the American family; to reestablish the respect for religion in America; to rebuild the mutual commitment between employer and employee; to re-instill accountability in the our government and politicians; to restore personal responsibility and empower creativity among America's youth; to respect the accomplishments, experience, and continuing resource of America's seniors; and to invest time and commitment into mentorship for all Americans, regardless of race, class, and gender.<sup>20</sup>

### 3. Conclusion

At first, it appeared that Americans had lost confidence in their elected officials as well as President Barack Obama. With the re-election of Obama and a 7.9 percent unemployment rate looming over his head, things looked dismal. But with the re-election of Obama, over half of the American electorate believed the Republican Party was out of touch with the American people and our democratic principles because the Party is controlled by an extremist Tea Party adamantine that wants to impose its austere measures of smaller government on a fragile economy. Because of their extreme hegemonic viewpoint of governing, nothing gets done in Washington. If true democracy prevailed, "a more modest goal of democratic accountability may be within reach." To this end, the extreme ideological position of the conservative right may have turned America into "a nation of well-meaning [benevolent] hypocrites, "where freedom and justice for all elude them."

#### Notes

(VIDEO).http://www.huffingtonpost.com/2009/09/09/gop-rep-wilson-yells-out\_n\_281480.html (accessed November 12, 2012)

<sup>&</sup>lt;sup>1</sup> Tom Cohen, "Archconservatives: anger, denial but no acceptance of Obama's victory" http://www.cnn.com/2012/11/20/politics/tea-party-grief/index.html (accessed on January 1, 2013)

<sup>&</sup>lt;sup>2</sup>Rep. Joe Wilson Yells Out "You Lie!" During Obama Healthcare Speech (VIDEO).http://www.huffingtonpost.com/2009/09/09/gop-rep-wilson-yells-out\_n\_281480.html (accessed

<sup>&</sup>lt;sup>3</sup> Ivo H. Daalder and James M. Lindsay, *America Unbound: The Bush Revolution in Foreign Policy* (Hoboken, NJ: John Wiley & Sons, Inc., 2005), 101.

<sup>&</sup>lt;sup>4</sup> Frank Schaeffer. Open Letter to the Republican Traitors (From a Former Republican).http://www.huffingtonpost.com/ frank-schaeffer/open-letter-to-the-republ\_b\_172822.html (accessed on March 2, 2012). <sup>5</sup> Ibid.

<sup>&</sup>lt;sup>6</sup>Daalder and Lindsay, op cit. (see reference 2), 13.

<sup>&</sup>lt;sup>7</sup> MSNBC's *The Ed Show* aired on March 22, 2010.

<sup>&</sup>lt;sup>8</sup> Ibid.

<sup>&</sup>lt;sup>9</sup>Murray Edelman, *Constructing the Political Spectacle* (Chicago, IL: University of Chicago Press, 1988), 69.

<sup>&</sup>lt;sup>10</sup>Ibid., 66.

<sup>&</sup>lt;sup>11</sup>Ibid., 74.

<sup>&</sup>lt;sup>12</sup>D T Dollard, *Obama Guilty of Being PresidentWhile Black* (Grand Prairie, TX, Book Express, 2009), Kindle Electronic Edition, Location 8, Paragraph 1196.

<sup>&</sup>lt;sup>13</sup>"Don't Stop at the Filibuster, Get Rid of Senate 'Holds'" Too. http://www.winningprogressive.org/tag/filibuster (accessed on December 31, 2012).

<sup>&</sup>lt;sup>14</sup>Affirmative Action (2009, April).http://plato.stanford.edu/entries/ affirmative-action/ (assessed on December 2, 2012).

<sup>&</sup>lt;sup>15</sup>Philip C. Wander, Judith N. Martin, and Thomas K. Nakayama.The Roots of Racial Classification. In Paula S. Rothenberg (Eds.), *White Privilege: Essentials Readings on the Other Side of Racism*. (3<sup>rd</sup>ed.). New York: Worth Publishers, 2008, p. 29.

<sup>&</sup>lt;sup>16</sup> Randall Robinson. *The Debt: What America Owes to Blacks*(New York: Dutton Publishers by the Penguin Group, 2000), 8.

<sup>&</sup>lt;sup>17</sup> Michael A. Fletcher, "Losing Its Preference: Affirmative Action Fades as Issue" http://www. washingtonpost.com/wp-srv/politics/special/affirm/stories/aa091896.htm (accessed on January 1, 2013).

<sup>&</sup>lt;sup>18</sup> Gary C. Woodard and Robert E. Denton, Jr., *Persuasion & Influence in American Life* (Prospect Heights, IL: Waveland Press, Inc., 2000), 77.

<sup>&</sup>lt;sup>19</sup> Ibid.

<sup>&</sup>lt;sup>20</sup> Frank I. Luntz. *What Americans Really Want . . . Really: The Truth about Our Hopes, Dreams, and Fears* (New York: Hyperion Publishers, 2009). Dr. Luntz is a *New York Times* bestselling author of words that work. <sup>21</sup>Ibid.. 121.

<sup>&</sup>lt;sup>22</sup> Ibid.

<sup>&</sup>lt;sup>23</sup>Ibid., 253.