

# Policing gender nonconformity in Victoria, 1900–1940

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## Abstract

**This article examines the policing of gender nonconformity in Australia in the early decades of the twentieth century. With a focus on Victoria, it asks: what are we looking for when looking for trans and gender diverse crime history, and what can history tell us about the experiences of trans and gender diverse people in Australia’s criminal justice system today? The article explores discourses around gender, sexuality, respectability and criminality relating to people who were arrested for presenting as a gender different to the one they were assigned at birth. Using case studies, it discusses some of the challenges of archival research into trans and gender diverse history, as well as the significance of uncovering these histories today.**

## Introduction

Australian transgender history is an understudied area and one that raises significant challenges for archival researchers. These issues are even more pronounced when it comes to historical trans and gender diverse experiences in the criminal justice system. This article discusses some of the practical challenges of tracing transgender histories in archival records of the justice system, and documents some of the ways I have sought to navigate these hurdles in my own research into Australian transgender criminal history. Through exploring examples of gender nonconforming presentation in the justice system in the first few decades of the twentieth century, this article shows what kinds of insights these stories can provide, both in terms of trans and gender diverse Australian history and in terms of methodological approaches for archival historians of transgender history. Ultimately, I ask: why are these stories important and what can they tell us about present-day issues facing trans and gender diverse people in the Australian justice system?

A key challenge in researching transgender history in the archives is identifying cases and navigating when something should be considered trans history. There are many historical examples of people presenting in gender nonconforming ways, sometimes in the context of theatre or festivals, sometimes in their public or private lives. ‘Transgender’ is a modern term. It did not come into consistent use in Australia until the 1990s.[1]

To contextualise my own relationship to this research: I am a transgender man who was born in the early 1990s and, as such, for essentially all my lifetime, I have understood gender diversity through the language of ‘transgender’ and the concepts that go along with it. Many transgender people seek out and cling to any representations of themselves they can find, even when those representations are incomplete, exploitative or sensationalised.[2] I certainly did. As a historian, one of the main areas I sought to find representations of people like me was in the past. But finding such representations is fraught with challenges.

It would be ahistorical to apply the word ‘transgender’ to people in the past who never heard the term and may not have identified with it. Archival sources around gender nonconformity are full of allusions to disruptive gender performances, queer behaviours and identity, but are often coded in language that obscures these elements in favour of reinforcing normative gender roles. Researchers need to think beyond the language and category of ‘transgender’ when interacting with archives. On the topic of trans historicity, there are no ways of determining when trans interpretations of past lives are verifiable and complete.[3] As stated by Kathleen P Long, even when researchers find ‘unmediated’ testimony from transgender people in the past, it must be remembered that such accounts were produced within a particular context: such transgender individuals were required to present their experiences in a way that was legible to authorities and

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others around them. Historians need to consider the contexts in which these documents were created when interpreting them as sources.[4] Nonetheless, finding these trans and gender diverse histories is essential to developing historical understandings of gender in periods when, as stated by Noah Riseman, 'discourses rendered gender diverse people less able to articulate their sense of self or connect to a group identity'.[5] In discussing the methods and practices of embracing trans\*historicalities, Leah DeVun and Zeb Tortorici have argued that there is room for pleasure and complexity in the process of exploring transgender histories. We can delve into what made gendered expressions and practices meaningful in the past; we can discover alternative language and concepts to those we hold in the present; and we can identify and imagine possible historical spaces for gender identity and exploration.[6]

A common term in late nineteenth and early twentieth-century Australia for both male and female assumed people who presented as a gender different to the one assigned to them at birth was 'masquerader'. Female assumed people who presented as male were usually called 'female masqueraders'—essentially, a 'female' person who engaged in masquerading. Masquerading did not only refer to cross-gender performances: it was used to talk about a range of acts of public disguise or deception. Another common term was 'girl/woman in male attire'. There has been some significant scholarship on a few notable 'girls in male attire' in Australian history. Lucy Chesser's book *Parting with my sex* is of relevance: in it, Chesser looks at cases such as Edward de Lacy Evans, who lived as a man and married three women between 1856 and 1868; and Marion (Bill) Edwards, who was the centre of significant press attention as a 'woman in male attire', with two court cases in 1906 and 1916, respectively. [7] Harry Crawford, who was arrested in Sydney in 1920 for the alleged murder of their wife, was another case of a female assumed person who lived as male. Crawford has been the subject of scholarship by several scholars, such as Ruth Ford, Suzanne Falkiner, Mark Tedeschi and Robin Eames.[8] There have also been studies of male assumed people presenting as female. For instance, Susanne Davies explored the ways in which Victorian police used vagrancy charges to criminalise an individual named Gordon Lawrence for publicly presenting as a woman in Melbourne in 1888. Davies discussed how presentations like Lawrence's disrupted the construction of sex and gender in society and necessitated that these categories be reconstructed and reinforced to remain stable.[9]

This article examines lesser-known instances of the policing of gender conformity in Victoria in the period

1900–1940 and the kinds of archival traces such cases have left behind. The main sources used are press reports, primarily accessed through Trove and the State Library of Victoria (SLV), and documents held by Public Record Office Victoria (PROV) relating to justice, crime and law. The latter includes criminal trial briefs, police correspondence records, registers of prisoners and records of court cases. In most instances, I identified cases first on Trove via the search function, as this allowed large collections of newspaper reports to be searchable for keywords and phrases. These could then be used to identify reports specifically related to gender nonconformity and crime. I combined relevant phrases such as 'dressed as a man/woman' or 'masquerading' with words such as 'arrest', 'vagrancy' or 'offensive behaviour' to identify cases, which I then cross-referenced with PROV records and non-digital newspapers at SLV to locate additional details.

This research method enabled me to uncover a significant number of sources and cases; however, it is important to acknowledge that many arrests would also have been missed. Arrests that did not receive press attention or used coded language or were not included in the archive would not have been recoverable. Additionally, different newspapers reported on cases of gender diversity in different ways. Staid or more conservative newspapers were reluctant to cover 'scandalous' topics, whereas sensational tabloids, such as Melbourne's *Truth*, were happy to cover such topics in detail. Unfortunately, *Truth* has only been digitised from 1915 to 1918. While there are paper copies of *Truth* for other years at SLV, the research for this project was undertaken during the COVID-19 pandemic, significantly limiting access to in-person archives. Given these limitations and potentially significant silences, we must be aware not only of what the sources tell us—but also what is conspicuously missing.

Some brief notes on pronouns and terminology: I use they/them pronouns to refer to the individuals I discuss throughout this article (except when quoting directly from a source). This is not intended to assign gender identity (e.g. non-binary), but rather to acknowledge that I do not have enough information about their self-identity to use any other pronouns. I also use the terms 'female assumed' and 'male assumed' to discuss the presumed sex category of these individuals. I use this instead of more common terms such as 'assigned female/male at birth' because, as most cases I discuss were fleeting encounters with the justice system, they do not paint a full picture of an individual's life and, as such, we do not necessarily know what sex/gender they were assigned when they were born. By saying these people were male/female assumed,

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I am talking about the sex category the personnel of the criminal justice system (as well as the press reporting on them) presumed them to be at the point of their specific encounter. I do not assume that these people would have identified as trans or gender diverse as we understand these terms today—but, rather, that their experiences can shed light on how the justice system responded to gender diversity more broadly.

### **Respectability and vagrancy: policing female assumed gender nonconformity**

At the turn of the twentieth century, police primarily arrested gender nonconforming female assumed people via public order offences, such as vagrancy or offensive/ indecent behaviour. During the 1900s and 1910s, in particular, arrests of this nature were not uncommon. However, it was possible for some female assumed people to find leniency in the justice system and in the public eye if they could present themselves as respectable. To discuss why some female assumed people were received relatively positively while others were not, it is necessary to explore two key concepts: respectability and the idea of the ‘vagrant’ individual.

During the nineteenth century, and with the rise of urbanised lifestyles, colonial police forces increasingly began to regulate public order to enforce middle- and upper-class standards of respectable and moral public conduct.[10] Class divisions were more fluid in Australia than in England, causing anxiety about how standards of moral social virtue could be recognised and driving a desire for new ways to monitor and track respectability.[11] Policing disorder and public behaviour was a way of controlling social spaces and intertwining social class with perceived personal characteristics and morality.[12] Gender nonconforming expression for female assumed people was policed as a mechanism for reinforcing a dominant gender and sexual order.[13] Enforcement of Western gender norms was part of the colonial project: codes of respectability, public order laws, and binary gender and familial models were imported from Britain and maintaining them was part of the broader project of building colonial structures and institutions (including suppressing Indigenous gender and familial structures).[14] Imposing Western order in the realms of gender and sexuality was key to justifying colonial occupation and promoting an ideal of ‘European modernity’.[15] The idea of the ‘vagrant’ represented what failure to adhere to Western, gendered respectable conduct could look like. The vagrant was a character who was immoral, unproductive, impoverished and

criminal—and fundamentally unable to conform to the social expectations of their gender, whether this was industriousness for men or respectable motherhood for women.[16]

What it meant to be respectable was more than solely a question of social class. In theory, it was possible to be respectable regardless of class; the key was the moral competency demonstrated by respectable conduct.[17] For those who were not wealthy, it was beneficial to be able to present, and be perceived, as respectable, as it could provide relief from the stigma associated with poverty.[18] Respectability was centred around the family: virtuous behaviour was modelled within the family, and presenting the family as a unit living up to these practices of respectability was essential to maintaining one’s status. [19] A family’s status as respectable could determine how the criminal justice system treated them.[20]

When a female assumed ‘masquerader’ could be read as respectable, they were often treated more leniently—and sometimes understood in quite positive terms. However, when they were seen as vagrants they received significantly less leeway. Marion (Bill) Edwards provides a clear example of what a positive representation of a ‘girl in male attire’ looked like. Edwards was a popular figure in the Australian press, treated as savvy, attractive and quick-witted during and after their trial.[21] It was not unusual for Edwards’s name to come up in reports of similar cases, often suggesting that the gender nonconforming person was following Edwards’s lineage.[22]

In my research, examples of arrests associated with gender nonconforming behaviour for female assumed people typically fell into one of two categories: respectable or vagrant. The criminal justice records for these cases tends to be sparse, typically consisting of a couple of lines in a petty sessions court register. By contrast, newspaper reports editorialising the ‘masquerades’ were full of detail and flavour. Even as minor cases, they drew interest because of the gender nonconformity angle. The cases I have chosen to examine here demonstrate the kinds of disparities between sentencing and reporting of incidents that depended on the perceived respectability of a defendant.

The first case is Jessie Rogers, a 16-year-old who was arrested for vagrancy in 1901 while dressed in male clothes. The court record stated Rogers’s name, the name of the police constable who brought them in, the charge and one word under the court’s decision: ‘discharged’.[23] The petty sessions record made no mention of Rogers’s presentation or dress; however, newspaper coverage was

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a different story. The press stated that Rogers ‘appeared to be highly intelligent and respectable’ and that their family was reputable.[24] Their father, a salesman for a firm of sewing machine manufactures, was described as ‘evidently respectable’.[25] Rogers was said to behave in court in a manner that ‘conveyed the idea that she appreciated the humour of the situation’ and gave their name, jokingly, as ‘Dick Richards’ upon arrest.[26] Family and friends stated that Rogers had undergone a change in character in the month or so prior to the arrest. Rogers had had a job in the city but had been fired when they began to wear excessive amounts of makeup.[27] The family they were staying with described their change in character as being ‘a little bit “off her head”’. Rogers was also described as going through ‘an erratic turn’ or a ‘freak’. Nonetheless, the family also called them honest, trustworthy and a person of ‘excellent character’.[28]

We cannot say what motivated Jessie Rogers’s purported change in behaviour, which culminated in them driving a milk cart through Newport wearing male clothing and with their hair cut short.[29] However, the descriptions of Rogers’s appearance in court and their prior ‘freak’ suggests that they were dissatisfied with their prospects in domestic service and presented as they did to find work as a farm labourer.[30] Some descriptions of Rogers in the press are evocative of the ways newspapers described ‘flash’ girls: unruly, street-smart working class women who ‘carried [themselves] with an air of sexual knowing’ and dressed in eclectic, eye-catching styles.[31] According to Mellissa Bellanta and Alana Piper, the phrase ‘hair cut short’ was a regular press description for flash women between the 1880s and the early twentieth century.[32] However, the way that Rogers’s friends and family (and the press) continually emphasised their intelligence and respectability had the effect of casting their ‘freak’ and ‘masquerade’ as something that did not impugn their moral character.[33] Rogers’s perceived respectability made courts more likely to view this incident as something from which Rogers could recover, rather than as part of a broader pattern of morally questionable behaviour—concluding in their discharge from court.

Contrast this with someone like Alice May Bunting, who was arrested in June 1905 for vagrancy while dressed in male clothes. Bunting had previously been charged with larceny in 1904, fined £20 and sent to prison for two months when they could not pay.[34] Bunting’s apparent cycle of poverty and crime marked them as a vagrant type and reports did not frame them with the same intrigue or adventurous spirit as they had with Rogers. Instead, the sparse reports described Bunting as ‘covered with dirt’ and framed them as poor and not respectable.[35]

Sexual impropriety may also have been a factor. Bunting was pregnant when arrested (and later sent to the Lying in Hospital of the Ballarat Benevolent Asylum)[36] and was living with a man, presumably unmarried.

Unsupervised interaction between the sexes in the early twentieth century led to public anxiety about the dangers of sexual immorality.[38] Notions of respectability set standards of behaviour in friendships, work and gendered interaction, and advocates of moral reform considered unsupervised interaction dangerous to women’s wellbeing.[39] Women were upheld as the moral guardians of men, and it was believed that crime or immorality from women would lead men into drunkenness and criminality.[40] The number of young, unmarried women entering refuges for unwed mothers concerned moral reformers at this time, who sought to curtail these behaviours and were concerned with men taking advantage of young women, and the moral corruption women faced being removed from domestic, familial spheres.[41] Police arrested Bunting again the following year for larceny, seemingly still in the cycle of vagrant offences. While their entry into the convict records included no further mention of gender nonconforming presentation, such records rarely did.[42]



Figure 1: Alice May Bunting. PROV, VA 1464 Penal and Gaols Branch, Chief Secretary’s Department, VPRS 516/ P2 Central Register of Female Prisoners, Volume 13, p. 58.

### **Offensive behaviour, sexuality, morality and male assumed gender nonconformance**

There were fewer reports of arrests for male assumed people presenting as female than female assumed people presenting as male in the first decades of the twentieth century in Victoria. Male assumed people were more likely to be charged under provisions for offensive or indecent behaviour as opposed to vagrancy. This points to a

difference in how the two types of gender nonconformity were perceived. Both charges—vagrancy and offensive behaviour—were concerned with public spaces, decency and morality. Police used vagrancy charges as a tool to police the poor for being visibly poor in public. Offensive behaviour charges, by contrast, were more concerned with individual conduct and sexuality. Records from the *Victoria Police Gazette* show that, around the turn of the twentieth century, men were arrested for both vagrancy and offensive/indecent behaviour almost twice as often as women.[43] However, this statistic does not consider the reason for arrest; therefore, it cannot tell which, if any, of those arrests were related specifically to gender nonconforming presentation—a much less common offence than other public order violations.

For public gender nonconformity, the perceived sex of the individual influenced how policing played out. From searches in press reports related to gender nonconforming expression, it appears that, between 1900 and 1919, female assumed gender nonconforming people were arrested and reported on more often than male assumed people. As mentioned, there was also a significant difference in the charges they received. I found no examples of male assumed people in this period in Victoria who were charged with vagrancy: all male gender nonconforming cases in this sample were charged with offensive behaviour. This is based on data sourced for this project from Trove and only includes Victorian cases. While these data by no means include all reporting in relation to gender noncompliance for the period under review (only those that were captured in the search terms and were evidently relevant to the research topic), as a representative sample, they can provide an estimate of the prevalence of reporting on these incidents. By contrast, female gender nonconforming cases were charged with both offences, but vagrancy was more common than offensive behaviour.

Why was male assumed gender nonconformity considered more offensive? There was a decidedly sexual element to the policing of these cases. Male assumed people who were able to rebuke the sexual connotation of their gender nonconforming act were more likely to be found innocent.

When gender nonconformity could be read as comedic or as an innocent performance, it was more acceptable. However, if it was associated with sexual ‘deviancy’ in any way, policing was harsher. This was due to differences in the level and type of anxieties male and female gender nonconformity provoked. Male sexual ‘deviancy’ linked to homosexual activity or identity (a concept that was still developing at this time) has historically been the subject

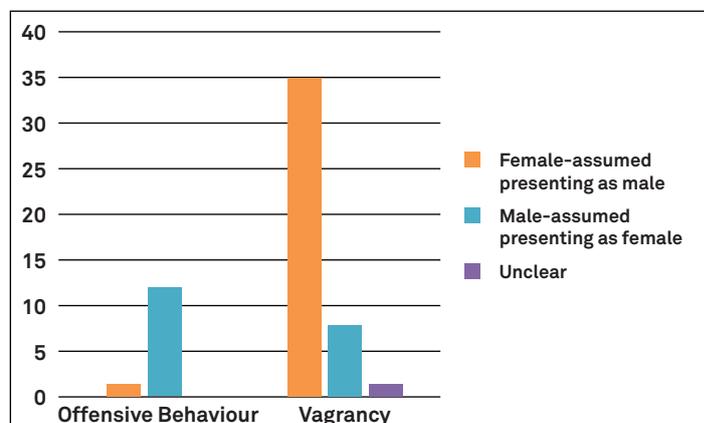


Figure 2: Sample of articles referencing cases of gender nonconformity found on Trove between 1900 and 1940.[44]

of highly visible abjection and regulation. By contrast, female homosexual ‘deviance’ has been obscured. Public reference to female homosexuality in this period was typically vague or outright invisible.[45] By contrast, a clear connection was drawn between public sexuality, male gender nonconformity and possible homosexuality, enabling police to use indecent behaviour laws to regulate male gender nonconformity when charges such as gross indecency were unavailable.[46] These laws assumed that anything that could indicate homosexual expression violated moral behaviour.[47] One danger was that a male assumed person, by presenting as female, might become the recipient of homosexual attraction directed towards them. On the flip side, if they enjoyed their own gender nonconformity too much, this raised questions about the motivations behind their performance and the sexual or gender deviancy it could indicate.[48]

Arrests for public gender nonconformity for male assumed people increased greatly in the 1920s–40s. The perceived connection between homosexuality and gender nonconformance characterised much of the discussion on these topics in the first half of the twentieth century (and, sometimes, through to the present). Frequently, the laws used to target gender nonconforming behaviour were also used interchangeably to target homosexuality. Australian discourse was influenced by the British and continental field of sexology and theorists such as Richard von Krafft-Ebing and Havelock Ellis who categorised homosexuality and ‘inversion’ within the broader field of medicine.[49] The interplay of medical theories about homosexuality and gender nonconformance, and how the court system applied them, was incredibly messy. Discussing the relationship between homosexuality, psychology and the criminal justice system, Yorick Smaal referred to

‘fractured modelling and composite theories layered over decades past’.[50]

Sometimes the press, courts and medical system discussed homosexuality and gender nonconformance in a relatively sympathetic way. In 1927, for example, an Australian newspaper described ‘the majority of homosexual persons’ as ‘decent, self-restrained members of the community’. It was the ‘flagrant invert of the police-court’ who represented the dangerous side of homosexuality. Often the court system linked homosexuality with ‘perversion’, which encapsulated moral deviance and medical/mental failing and included all sexual offenders.[51] This criminal side of gender and sexual nonconformity was linked with deviant sexuality and social danger. Australian discourse negotiated these ideas in scattered and inconsistent ways. The construction of a homosexual ‘type’, and the related associations with sexual deviance, influenced policing and the sentencing of gender nonconformity. Medical discourses, although rarely referenced directly, provided the basis for archetypes of deviancy, gender nonconformity and homosexuality, which found their way into criminal justice discourses and policing. Medical discourses constructed a deviant homosexual archetype, and society, the press and the criminal justice system framed this archetype as morally and criminally dangerous.

In 1937, police arrested Roy Bellamy, also known as Minnie McKensie (and sometimes Edward Davidson or Edward Shaw on their prisoner records), on Flemington Road, North Melbourne, and charged them with vagrancy. They were wearing a black skirt, black shoes, an old fur coat and white stockings at the time of their arrest.[52] They were sentenced to six months—a relatively harsh sentence that reflected how the police and courts perceived them: as sexually deviant and disreputable. The police were familiar with Bellamy/McKensie, considering them a ‘reputed thief’ who associated with other thieves and ‘men who masqueraded as women’: thieves and gender nonconforming individuals were lumped together in the newspaper reporting.[53] Press coverage of Bellamy/McKensie’s arrest framed the incident within a lens of sexual deviance and criminality, but these details were absent in the Court of Petty Sessions Register. The court simply noted that the accused was charged with being ‘an idle or disorderly person’ and as having ‘insufficient means of support’. No further details on the context of their arrest were provided.[54] This is typical of how such arrests were officially recorded and demonstrates one of the many challenges historians face in finding cases of gender nonconformity in court archives: they exist but are often obscured by generalities.



Figure 3: Roy Bellamy (also known as Edward Davidson). PROV, VA 1464 Penal and Gaols Branch, Chief Secretary’s Department, VPRS 515/ P1 Central Register of Male Prisoners, Item 89, p. 69.

The constable who arrested Bellamy/McKensie saw them talk to two men on Flemington Road, and one man ‘accompanied him in the direction of the gardens’.[55] Public gardens often served as beats (semi-public spaces where men could meet anonymously for sexual encounters) and were closely monitored by police. The constable also stated that he had previously warned Bellamy/McKensie about going out dressed in women’s clothes.[56] When Bellamy/McKensie went to court, they went on the witness stand in their female attire, even though they had earlier asked the police to find them other clothes to wear. The police insisted that Bellamy/McKensie went to court dressed as they were. On the stand, Bellamy/McKensie attributed their masquerade to ‘the wine they were drinking that night’.[57] These compounding factors—the police insistence that they wear their feminine clothing to court, their prior reputation as a thief who associated with other masqueraders and the homosexual association of them accompanying a man to the gardens—all shaped Bellamy/McKensie’s

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experience and ultimately their sentencing. Bellamy/McKensie was renowned as someone with a 'queer' habit who 'pirated' men while dressed in women's clothing. The way that medical discourses framed the category of the gender nonconforming homosexual solidified their treatment as deviant and criminal.[58]

The arrest of Percy Douglas in 1932 demonstrates how gender nonconforming behaviour, even conducted in private, could be 'offensive' to police. Police arrested Douglas in their room at the Victoria Coffee Palace, Little Collins Street, at 12.45 am. Douglas was alone and in bed, wearing woman's pyjamas. They had only female clothing and lingerie in their room.[59] Douglas was charged with offensive behaviour. Douglas's gender nonconformity seemed to be very private: according to their statement in court, they lived on a 300-acre farm outside Bannockburn, where they tended to livestock and 'did not see any other human beings'.[60] While on the farm they dressed in feminine attire, motivated by 'a silly crank' and the 'theatrical properties' they had obtained putting on amateur theatre in England before moving to Australia. [61] Although Douglas explained their presentation using language of theatre and performance, they did not appear to 'masquerade' for an audience. According to reports, Douglas had not 'spoken to any person, man or woman, in Melbourne, except to give his order to a waitress for food'—at which point their voice 'betrayed' them.[62] Their 'offensive behaviour' charge was less about any disruption or insult caused by their masquerade and more about the offence innate in a male-assigned person habitually dressing in female clothing. Some reports identified the crime as 'being a male [yet walking] abroad in feminine attire', making it clear that gender transgression was what was being policed.[63] Douglas was ultimately discharged with a warning—perhaps because, unlike Bellamy/McKensie, there was no evidence that they engaged in other 'deviant' behaviour, whether criminal or sexual.[64]

## Conclusion

The cases examined in this article are all recorded in fragments: single lines in petty sessions registers, brief newspaper accounts, notes in registers of prisoners. Trans and gender diverse archival history often presents itself in vague allusions, obscured language, suggestion and euphemism. By way of conclusion, I would like to briefly explore why it is so important to navigate these challenges and find these stories—fragmented as they are.

While there have been many strides—particularly in the latter half of the twentieth century and into the twenty-

first—towards LGBT rights and acceptance, queer people, and transgender people especially, still face challenges in the criminal justice system and beyond. Queer and trans people, especially those who do not live up to modern-day standards of respectability, such as queer homeless youth, sex workers, beat users, etc., are still disproportionately regulated and policed.[65] While laws targeting (either explicitly or indirectly) LGBT people have been gradually repealed over the decades, these legal changes do not always translate into practice and instead merely alter the methods used by law enforcement for policing queer and trans lives.[66] Trans and gender diverse people report significantly higher rates of violence than those officially recorded by police.[67] Australian surveys such as the *Enough is enough* report (2000) and the more recent *Private lives* (2020) and *Writing themselves in* (2021) reports show that LGBT people, and transgender people especially, are more likely to have contact—and specifically negative contact—with police. They are less likely to report abuse, intimate partner violence or harassment to the police out of a perception that police do not support them.[68] Transgender people face alienation and discrimination in society across a range of institutions, including health, work, housing and criminal justice—and when trans and gender diverse people face barriers to stable housing and employment, these factors also increase the likelihood that they will move through the criminal justice system.[69]

Understanding how and why gender nonconformity was policed in the past can help us develop better understandings of why trans and gender diverse people continue to face challenges today. A lot has changed for gender diverse and gender nonconforming people over the last century. One hundred years ago most of the language that we now use to discuss trans and gender diverse experiences did not exist, and there was little understanding, socially or medically, of what it meant for someone to step away from the gender role they were assigned at birth. But still we can see glimpses in the archives of how the justice system regulated gender nonconforming people, and how they navigated these institutions. These archival glimpses show us how much has changed for gender nonconforming people in the last century—and also that the policing of gender diversity has a historical legacy that lingers today.

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