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Pareto Negativity: The Enemy of My Enemy is Not Necessarily My Friend – Latin Leadership, Coalition Building, and Predatory Globalization

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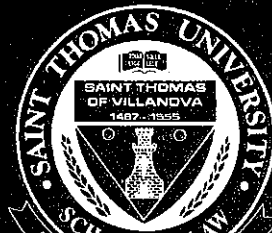
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**PARETO NEGATIVITY:
THE ENEMY OF MY ENEMY IS NOT
NECESSARILY MY FRIEND—LATIN
LEADERSHIP, COALITION BUILDING,
AND PREDATORY GLOBALIZATION**

Becky L. Jacobs

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PARETO NEGATIVITY:¹ THE ENEMY OF MY ENEMY IS NOT NECESSARILY MY FRIEND – LATIN LEADERSHIP, COALITION BUILDING, AND PREDATORY GLOBALIZATION

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I. INTRODUCTION

This Essay is based on my presentation at the LatCrit VII conference, which was part of a panel discussion on *Coalition Building, Globally and Locally*. The purpose of the presentation and of this Essay is to reflect upon the significant role of Latin civil society organizations (“CSOs”), not only in that region’s political, social and economic development of other regions, but also in the historical trajectory of the U.S.

As I prepared my remarks and noted the achievements of Latin CSOs, I began to question why there are so few Latino and Latina leaders in transnational CSOs and in the so-called *global civil society* movement (“GCS”), particularly in the movement to resist the predatory effects of

1. Given a set of alternative allocations/outcomes, a movement from one allocation/outcome to another that can make at least one individual better off, without making any other individual worse off, is called a Pareto improvement. *See generally* RICHARD A. POSNER, *ECONOMIC ANALYSIS OF LAW* 13 (4th ed. 1992). An allocation is Pareto efficient or Pareto optimal when no further Pareto improvements can be made. *See generally id.* Named after Italian economist Vilfredo Pareto (1906), Pareto optimality is a measure of efficiency. *See id.* An outcome is Pareto optimal if there is no other outcome that makes every player at least as well off and at least one player strictly better off. *See id.* That is, a Pareto Optimal outcome cannot be improved upon without hurting at least one player. *See id.* I use the term Pareto Negativity or Paretian negative to denote an outcome in which all players are hurt.

* Associate Professor of Law, University of Tennessee College of Law. Email: jacobs@utk.edu. I would like to thank the organizers of the Twelfth Annual LatCrit Conference for the opportunity to participate in this exciting program. I would also like to thank the other members of my panel, Guadalupe T. Luna, Valerie Phillips, and Darren L. Hutchinson, not only for their excellent and thought-provoking presentations, but also for their comments and suggestions. Any mistakes, sadly, are all mine.

globalization. Consider, for example, the citizen-led groups in Latin America such as the *cocaleros*² and *campesinos*³ who fought the Bolivian Water and Gas Wars and then helped elect *cocalero* Juan Evo Morales Ayma as the country's first indigenous head of state in 2005.⁴ Consider also, the broad-based coalition that led Luiz Inácio Lula da Silva to victory in the Brazilian presidential elections in 2002 and 2006.⁵ Groups such as these have been instrumental in effecting monumental political and social changes in their home countries. Why, then, have Latinos and Latinas not been more prominent within GCS networks?

As I will explain, what I have discovered might cause a less sanguine person to sink into a pit of despair, therefore, this Essay also could accurately have been titled *Why Dreams Die: The Soul-Crushing Disillusionment of a Naïve Optimist*. Yet, in a stunning display of the power of positive thinking and of faith in the influence of the academy, I conclude on a positive note.

II. NAÏVE OPTIMISM AND PARETO IMPROVEMENT

My remarks and any residual optimism that I may be hanging on to are inspired by my friend and colleague, Fran Ansley. Many members of the LatCrit family know Fran, who recently retired from the faculty at my law school, the University of Tennessee, and was honored with SALT's Great Teacher Award. In a 2001 article on community development in a global world,⁶ Fran discussed the scholarship of social movements and the search "for factors that could predict or explain [their creations],

2. The Spanish term "cocalero" refers to coca leaf growers, primarily those located in Bolivia and Peru. See Nancy Postero, *Indigenous Responses to Neoliberalism: A Look at the Bolivian Uprising of 2003*, 28 POLAR 73, 76 (2005) (emphasis deleted). There is a documentary titled *Cocalero*, directed by Alejandro Landes that captures the rise to power of Evo Morales, an Aymara Indian, in his political campaign to become the first president of Bolivia of indigenous descent. COCALERO (Fall Line Films 2007).

3. The term "campesino" refers to a native of a Latin-American rural area, more particularly a Latin-American farmer or agricultural worker. MERRIAM-WEBSTER ONLINE DICTIONARY, <http://m-w.com/dictionary/campesino> (last visited May 28, 2008).

4. See, e.g., Cameron Ming, *Zero Coca, Zero Culture: Bolivia's Struggle to Balance Cultural Identity and the Need for Economic Stability in the Midst of the Expiring Andean Trade Promotion and Drug Eradication Act*, 14 TULSA J. COMP. & INT'L L. 375, 375-76 (2006-2007) (discussing the path of Morales from cocoa farmer to President and his continuing dedication to the cocoa leaf); Postero, *supra* note 2, at 76-77 (discussing the support of Evo Morales for the cocaleros, who were targeted by the U.S.).

5. See, e.g., Bradley S. Romig, *Agriculture in Brazil and Its Effect on Deforestation and the Landless Movement*, 11 DRAKE J. AGRIC. L. 81, 82 (2006).

6. See generally Fran Ansley, *Inclusive Boundaries and Other (Im)Possible Paths Toward Community Development in a Global World*, 150 U. PA. L. REV. 353, 402 (2001).

characteristics, growth, impact, and decline”⁷ Fran’s article also warns of the “exclusionary potential of the ‘bounded polities’ and ‘local roots’ imagery” frames that social movements often construct.⁸

But Fran’s article noted causes for optimism. For example, she remarked upon the AFL-CIO’s 1999 policy change on immigration that called for the repeal of employer sanctions and for “a new amnesty for a broad group of undocumented workers in the United States.”⁹ Fran found, as did many of us, this move to be heartening and significant “in light of the exclusionary history embedded in many segments of the labor movement.”¹⁰ Fran also mentioned the post-Seattle emergence of global networks bent on protesting corporate-led, and what some would call predatory, globalization.¹¹

I too found cause for optimism in these developments. Like many of us, I read and fervently believed that the 1999 Battle for Seattle was the official “coming out party” for the global civil society movement.¹² As Nicanor Perlas declared on this event, stating that “It was global civil society as the third force that actually determined the outcome of the WTO talks in Seattle. We now live in a tripolar world of large businesses, powerful governments and global civil society.”¹³ And my optimism seemed justified when I read the 2002 Joint Statement of NGOs and Social Movements rejecting the WTO’s Doha Outcome and Manipulative Process.¹⁴ Over 150 civil society groups from all over the world with diverse interests signed this Statement, including a number of Latin organizations.¹⁵ It seemed that the Seattle-inspired coalitions were holding together and that there was no decrease in the momentum of the movement.

Alas, my naïve optimism recently was crushed when I met a high ranking labor lawyer in Washington D.C. who had coordinated the activities for a number of civil society groups at the famous Battle of Seattle WTO protest. With enthusiastic hand gesturing and great

7. *Id.* at 356–357.

8. *Id.* at 399–400.

9. *Id.* at 402–403.

10. *Id.*

11. *Id.* at 407.

12. See generally Ronaldo Munck, *Global Civil Society: Royal Road or Slippery Path?*, 17 *VOLUNTAS* 325, 327 (2006).

13. *Id.*

14. See Third World Network, *Joint Statement of NGOs and Social Movements, International Civil Society Rejects WTO Doha Outcome and the WTO’s Manipulative Process*, THIRD WORLD NETWORK, Jan. 26, 2002, <http://www.twinside.org.sg/title/ngo2a.htm> (last visited May 28, 2008).

15. *Id.*

animation, I shared with him my admiration for the alliance which I believed he had been instrumental in forging with leaders of Latin interest groups and other communities of color in Seattle and beyond. With somewhat pitying laughter, he disabused me of my idyllic notions, telling me that "those cats hated me." When I asked incredulously why, he directed me to an archived collection of interviews with Latin leaders associated with the Seattle resistance.¹⁶ Crushed, I slunk away and dug into the materials to find some semblance of meaning to explain my pain.

What I found was truly discouraging. Those of us not directly involved in the Seattle protests believed that we were seeing the emergence of an unprecedented consolidated international civil society comprised of interesting alliances from north and south, labor and environmentalist, young and old. However, what we were really seeing was a number of disparate groups doing their own thing that just happened to be doing it in the same place. The interviews that I read revealed that many Latinas and Latinos and people of color felt marginalized from the process of organizing the Seattle protests.¹⁷ From their perspective, the large national and international civil society groups swooped in and totally disregarded local grassroots organizing.¹⁸ The leaders of these large groups were mainly white, and Latin and other minority leaders felt that these national and international groups were focused on issues of sovereignty, the environment, and human rights in a more academic or theoretical sense and that their approach to these issues was designed to appeal to a primarily

16. See generally WTO History Project, Interview Index, http://depts.washington.edu/wtohist/interview_index.htm (last visited May 28, 2008). These interviews are part of a collection of interviews with protest organizers and participants that "shed light on the behind-the-scenes cooperative (and sometimes continuous) relationships among social movement organizations involved in the protests." The material was collected by the WTO History Project, a joint effort of several programs at the University of Washington. *Id.*

17. See, e.g., Interview by Monica Ghosh with Juan Bocanegra and Cindy Domingo, Northwest Labor and Employment Law Office (Aug. 18, 2000), available at http://depts.washington.edu/wtohist/interviews/Bocanegra_Domingo.pdf (transcript at 2); Interview by Monica Ghosh with Lydia Cabasco, Staff Organizer, People for Fair Trade/Network Opposed to WTO (Aug. 15, 2000), available at [http://depts.washington.edu/wtohist/interviews/Cabasco%20\(Ghosh\).pdf](http://depts.washington.edu/wtohist/interviews/Cabasco%20(Ghosh).pdf) (transcript at 5).

Veteran LatCritters, such as Professor Guadalupe T. Luna, note that this is an age-old problem within any activist framework. Guadalupe T. Luna, Chasing Food, Glorious Food: Latina/o, Native American and Black Farmer Coalitions, Panel at the Twelfth Annual LatCrit Conference (Oct. 6, 2007). By ignoring those at the "bottom," theorists are in fact engaging in forms of colonialism. This problem also is inherent when there are attempts to clump all groups into one false norm without regard to the specifics of each group's battles against the status quo, a contested new regime, etc. This recurrent issue has been addressed in LatCrit scholarship such as Symposium, *Class in LatCrit: Theory and Praxis in a World of Economic Inequality*, 78 DENVER U. L. REV. 467, 471 (2001).

18. Interview with Lydia Cabasco, *supra* note 17 (transcript at 5).

white constituency.¹⁹ Communities of color felt that they were being left behind, that their resources were being squandered, and that the issues important to them were being ignored or were being addressed in ways that were not relevant or favorable to them.²⁰ Was this just another form of colonialism, CSO-style?

Accordingly, rather than attempt to coordinate their efforts, these communities turned their backs on the larger organizing endeavors and planned their own activities to present an alternative analysis, one that focused on their experiences and on why the WTO is harmful to them.²¹ Indeed, not only did several Latin groups decide not to join the national organizing efforts, they also made a conscious decision to organize independently even from coalitions of minority groups.²² For example, although Latin organizers had contacts with the regional Filipino support movement, they did not agree with that movement's analysis of the global situation and therefore did not work within that coalition during the Seattle protests.²³

Thus, while it looked like a strong and united protest to those of us watching it from afar, the Battle of Seattle was a struggle not only to resist the predatory effects of WTO policies, but also was a battle of competing ideologies and approaches between the "armies of resistance."

III. PARETO INEFFICIENCY

My disillusionment thus was complete. Why, I asked myself, would national organizations reject the expertise and resources of enthusiastic local grassroots groups, and why would local groups turn away from the resources and organizational advantages of a larger group or similarly situated minority alliances when all of these groups are united in their opposition of the WTO? Is it merely Nietzsche's Will to Power²⁴ playing out within the dynamic of CSO interactions? It appears to a cynic that the national groups would prefer to engage in exclusionary tactics, rather than to re-evaluate their membership and message. A cynic also might ask why communities of color apparently gave up so easily trying to access the majority "insider" projects, seemingly content to fall back on outsider strategies? The combination of these

19. *Id.* (transcript at 3-4).

20. *Id.* (transcript at 7).

21. *Id.* (transcript at 6).

22. *Id.* (transcript at 8-9).

23. *Id.*

24. FRIEDRICH WILHELM NIETZSCHE, *THE WILL TO POWER* (Walter Kaufmann ed., Walter Kaufman & R. J. Hollingdale trans., Vintage Books 1968) (1901).

perspectives leads to a Paretian negative, so to speak, where both parties are worse off.

I have tried to envisage why civil society groups might prefer this Pareto negative state. With regard to majority groups, as Fran has written, dominant white civil society/special interest groups aligned against WTO policies that have focused primarily on defending sovereignty and community from a national, ethno-centric, or environmental perspective, for reasons of both ideological heritage and perceived self-interest.²⁵ They are comfortable with familiar forms of collective action, or "repertoires," that are known by those in the relevant setting to have proved successful in the past, even if circumstances have changed and if the repertoires no longer are as effective.²⁶ Or, if one views it with a more jaundiced eye, these majority groups have been co-opted by neoliberal globalization into a "controlled environment, where even critical voices serve the overall purpose of stabilizing the existing order."²⁷ Scholars have drawn uncomfortable analogies between the mission and message of many of today's international CSOs and those of colonial-era religious missionaries seeking to civilize "native" populations.²⁸ Both claim altruistic motives and assert a form of universalism that is transcendently "good."²⁹ These groups promote global governance, which some contend is merely an extension of neoliberal ordering rather than a counter-hegemonic contestation of the existing order.³⁰ This perspective might explain why the larger majority CSOs might accept what I would consider to be a Paretian negative result.

On the other hand, cultural conditioning and lived experience may cause Latin groups to be resigned to the Paretian negative. Scholars examining the development of civil society in Latin America make much of the ambiguous relationship that the region's social actors have to the liberal tradition.³¹ Latin American trajectories of independence involved

25. Ansley, *supra* note 6, at 405-06.

26. *See id.* at 357.

27. *See generally* Munck, *supra* note 12, at 325, 328-30 (providing a more thorough analysis of this rather cynical perspective).

28. *See, e.g., id.* at 329. (quoting Craig Calhoun, *The Class Consciousness of Frequent Travelers: Towards a Critique of Actually Existing Cosmopolitanism*, *DEBATING COSMOPOLITICS* 86-116 (D. Archibugi, ed., London: Verso., 2003) and K. Anderson & D. Rieff, "Global Civil Society: A Skeptical View," *GLOBAL CIVIL SOCIETY* 26-39 (H. Anheir, M. Glasius, & M. Kaldor eds., London: Sage 2004-2005)).

29. *See id.*

30. *Id.* at 325.

31. *See, e.g.,* Miguel Schor, *Constitutionalism Through the Looking Glass of Latin America*, 41 *TEX. INT'L L. J.* 1, 21-33 (2006) (discussing the liberal constitutions of Latin America). Some scholars believe that these liberal constitutions, focused on individual rights, contrasted with the

mobilizing the masses to fight for independence, yet the institutions formed in the wake of independence often precluded the realization of citizen rights.³² Constitutional democracies facilitated elite power and masked how power was exercised.³³ This process, part of the developmental stage labeled by Guillermo O'Donnell *profundización*, fractured the alliance between economic actors and the state on the one hand, and the popular sectors on the other.³⁴

In a number of Latin American countries, "social spending was reduced, the labor movement ousted from the state's ruling alliance, forms of public pressure on the state were legally forbidden, and . . . civil and political rights were either abolished or *de facto* ignored."³⁵ In these countries, many grassroots groups were formed more as a means of societal self-defense during the authoritarian cycle than as a tools for social change.³⁶ Given this history of *co-optization* of social movements which become instruments to further entrench repressive power structures, one can certainly understand that U.S.-based and other Latin groups active here would be skeptical of established forms of organized resistance.

Indeed, even many scholars within the movement have expressed skepticism over the "internationalization" of autonomous social movements.³⁷ Given that the main international NGOs are almost exclusively Northern in terms of their social base, their cosmology, and their politics, critics justifiably question whether they can "represent" global civil society in any meaningful way.³⁸ As Petras and Veltmeyer have written, NGOs have been contracted by international organizations—and the governments engaged in the international development project—to become the social wing of the neoliberal offensive against the subaltern peoples and regions of the world.³⁹

reality of the region, which was social inequality and "lack of experience with self-governance." *Id.* at 15. Others believe that these liberal "constitutions were not adopted to institute liberalism but were simply façades for dictatorship." *Id.*

32. Leonardo Avritzar, *Introduction: The Meaning and Employment of 'Civil Society' in Latin America*, 4 *CONSTELLATIONS* 88, 88–89 (1997).

33. *Id.* I recognize that one might wonder whether this state of affairs is any different than that which exists in the U.S.

34. AVRITZAR, *supra* note 32, at 89.

35. *Id.*

36. *Id.*

37. See e.g., Munck, *supra* note 12, at 325–32.

38. JAMES PETRAS & HENRY VELTMAYER, *SOCIAL MOVEMENTS AND STATE POWER: ARGENTINA, BRAZIL, BOLIVIA, ECUADOR* 14–15 (2005).

39. *Id.*

IV. PARETO OPTIMALITY

If this is true, must we then accept the Pareto negative state? Are Latin outsider groups *entre a cruz e a espada*?⁴⁰ Must they be resigned to being or remaining on the margins? Or, equally unappealing, must they choose to pay the price of inclusion for “being heard” and perhaps cease being agents of progressive social change and become part of the social wing of neoliberal predatory globalization?

The Fran Ansley-inspired optimist in me still believes that there are Pareto optimal outcomes available to autonomous civil society groups, outcomes where the notion of social movements working together to forge an alternative world order still is possible and even preferable.

Most of us are not opposed to globalization, just to its predatory form. The fledgling emergence of an international coalition of social movements, a truly international civil society, is an alternative process of globalization, one that is compassionate and inclusive rather than predatory or exclusionary.⁴¹

And LatCritters in the Academy are uniquely positioned to support this globalization effort.⁴² As Fran noted, “LatCrit scholars, because of their languages, cultures, experiences or studies, are in a position to serve as guides for members of the dominant culture, or for members of other subordinated communities who want to know more about Latinos/as” and their unique interests and perspectives.⁴³

LatCrit scholars can demonstrate to majority groups that changed circumstances require a re-examination of membership and message. In today’s globalizing environment, interest alignment involves constituencies whose members are not merely comprised of those who share a dominant national, ethnic, or racial background. The traditional majority membership of these insider groups may have, as my co-panelist Professor Darren Lenard Hutchinson warns, grown tired of issues of race.⁴⁴ Yet, a

40. This Brazilian phrase, which translates as *between the cross and the sword*, is comparable to the North American phrase, *between a rock and a hard place*. See, e.g., Ian Fisher & Larry Rohter, *The Pope, Addressing Latin America’s Bishops, Denounces Capitalism and Marxism*, N.Y. TIMES, May 14, 2007, at A10 (providing an example of the phrase between the cross and the sword).

41. See generally Ansley, *supra* note 6, at 381–82.

42. See, e.g., *id.* at 353, 406, 415.

43. Fran Ansley, *Borders*, 78 DENV. U. L. REV. 965, 975-77 (2001) [hereinafter Ansley, *Borders*].

44. Darren Lenard Hutchison, Panel at the Twelfth Annual LatCrit Conference (Oct. 5, 2007). See also Darren Lenard Hutchison, *Progressive Race Blindness?: Individual Identity, Group Politics, and Reform*, 49 UCLA L. REV. 1455 *passim* (2002).

group who seeks to truly be global must avoid message "frames" that are hyper-nationalist or exclusionary.⁴⁵

Global groups also must recognize that problems that persist on an international scale are not amenable to one-size-fits-all solutions. Professor Carmen G. Gonzalez discusses this phenomenon in the context of "environmental imperialism," a term that traditionally refers to the North's imposition of its ecological agenda on the South, but which also, according to Professor Gonzalez, is an apt description of the North's systematic and ongoing appropriation of the South's natural resources.⁴⁶ Professor Gonzalez reminds us that there is no one-size-fits-all solution for environmental degradation and that environmental injustice manifests itself in different ways for different groups and calls for different solutions at both the global and local level.⁴⁷

With regard to both framing and adaptive solutions, LatCritters can serve as guides and partners in this process of self-examination, always reminding dominant groups of the importance of economic justice in a highly asymmetrical global system and of the claims of all those who have been excluded and oppressed.⁴⁸

LatCritters also are often in a position to move in the opposite direction as well, serving as guides for Latin groups who are seeking ways to collaborate or build coalitions with majority groups and to project their messages more effectively. LatCrit scholars are ever mindful that, without such guidance or support it might be impossible for poor and working-class Latin groups in the world's North to achieve the capacity to build organizations that are strong enough to defend their interests or to carry out successful campaigns for economic justice.⁴⁹

LatCrit members also can stand witness to, document, and inform others of successful examples of outsider coalitions fighting to create, in Fran's words, "more just and sustainable arrangements for the world's economy."⁵⁰ For example, the moderator of my panel, Professor Guadalupe T. Luna, enthusiastically recounted the experience of Latina/o, Native American and Black farmer coalitions combining resources to more effectively compete in the global agricultural market.⁵¹ The stories of

45. See Ansley, *supra* note 6, at 408. See also Hutchison, *supra* note 44, at 1455.

46. Carmen G. Gonzalez, *Beyond Eco-Imperialism: An Environmental Justice Critique of Free Trade*, 78 DENVER U. L. REV. 979, 1004 (2001).

47. See *id.* at 1009, 1013-14.

48. See Ansley, *supra* note 6, at 406, 415.

49. See Munck, *supra* note 12, at 329.

50. Ansley, *supra* note 6, at 359.

51. Guadalupe T. Luna, *Chasing Food, Glorious Food: Latina/o, Native American and Black*

successful and productive alliances demand LatCrit study and attention in order that other groups might benefit from their efforts and accumulated best practices.

The LatCrit project also can serve as a model for learning the lessons of pluralism. As my co-panelist Professor Valerie J. Phillips reminded us, LatCrit has not always practiced what it preaches about coalitional theory.⁵² Professor Phillips' discussion of "A Pluralistic Approach to Fighting Oppression" addressed ways in which LatCrit praxis could promote social justice for indigenous peoples in a manner consistent with our anti-subordination principles.⁵³

Given the commitment, talents, and diversity of the LatCrit family, I am convinced that we can serve as agents of change for social transformation and economic justice in the asymmetrical process of globalization. To quote Fran, "it is my conviction that members of LatCrit, using the tools of analysis developed by LatCrit scholars and seeking direction from the principled commitments of LatCrit activists, can and should play an important role in the national and international debates and decisions to come."⁵⁴

V. CONCLUSION

To conclude, in a tribute to the triumph of hope over experience, I still believe that there is a Pareto Optimal result for Latin civil society within the larger GCS movement. The precise shape of the much vaunted GCS still is emerging and likely will be a perpetually evolving and mutable matrix of various social groupings as they realign and redefine themselves in relation to other groups and groupings within the larger grid.⁵⁵

Thus, those of us who still are engaged in this project must always do what we can to make "global civil society" more global, placing it firmly outside the predominantly western neoliberal frame.⁵⁶ We also must be vigilant that patterns of colonialism are not reproduced within the academy

Farmer Coalitions, Panel at the Twelfth Annual LatCrit Conference (Oct. 6, 2007). Professor Luna also recommended alternative approaches to ensure the economic viability of farmers of color, methods that are consistent with existing anti-trust laws. *Id.*

52. Valerie J. Phillips, A Pluralistic Approach to Fighting Oppression, Panel at the Twelfth Annual LatCrit Conference (Oct. 6, 2007).

53. *Id.*

54. Ansley, *Borders*, *supra* note 43, at 997.

55. See Munck, *supra* note 12, at 330.

56. See Elaine Bernard, *The Battle in Seattle: What Was That All About?*, WASH. POST, Dec. 5, 1999, at B1.

or in civil society.⁵⁷ Despite our momentary disillusionments or our sense of helplessness, we, as LatCritters, are uniquely positioned to apply our resources to seek a Nash Equilibrium,⁵⁸ so to speak, where the outcomes for all groups, and for society at large, can be improved.

57. Cf. Guadalupe T. Luna, "La Causa Chicana" and *Communicative Praxis*, 78 DENVER U. L. REV. 553, 557 (2001) (discussing issues from the Fifth Annual LatCrit Conference); Teresa Cordova, *Power and Knowledge: Colonialism in the Academy*, in *LIVING CHICANA THEORY* 17 (Carla Trujillo ed., 1998).

58. A Nash Equilibrium, named for its proponent, John Forbes Nash, is a set of mixed strategies for finite, non-cooperative games between two or more players whereby no player can improve his or her payoff by changing their strategy. See John Nash, *Non-Cooperative Games*, 54 ANNALS OF MATHEMATICS 286 (1951).