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The Crafting of Law and the Coining of Culture: Legal Semiotic of the American Quarter

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Abstract
As emblematic productions of folk legality, coins are significant in viewing the constitutive relationship between law and politics. Additionally, images on coined money legally manipulate our American cultural historical recollection. The harsh historical reality of the United States in terms of racial violence, imperialist conquest, and the elimination of native peoples is dim against picturesque images of palm trees, Magnolia blossoms, and sailboats. Because these historical controversies legally and socially shape who we culturally are today, that which is valued and semiotically crafted by law should reflect these important and defining struggles in American history. Legal images that appear on coins are visual connections to an American legacy of confronting injustice that is omitted by the bucolic and innocently trivial legal depictions of American history that these coinage programs promote. In this article, I consider the ways in which coined images represent a visual crafting of law through which political memory is selectively depicted. Through a legal semiotics framework of symbolic articulation and analysis, I assert that the coinage issued under the United States Department of the Treasury’s Coinage Programs since 1999 depicts the politicization of folk art as a type of legal currency that illustrates and memorializes a nationalistic cultural identity. Here, coins literally become specialized portrayals of American history in which discrimination, conquest, and injustice are intentionally visually unrepresented in favor of pictures of trees, animals, mountains, and even fruit. Through such legislation as The 50 States Commemorative Coin Program Act of 1997 [Public Law 105-124], The Native American $1 Coin Act of 2007 [Public Law 110-82], and The District of Columbia and United States Territories Quarters Program under the Consolidated Appropriations Act of 2008 [H.R. 2764], coins are being issued as legal statements of who we as Americans are and where we have come from.
Head or tails? In American society, the quarter dollar coin, referred to simply as the quarter henceforth, is ubiquitous. Whether used as a token in a coin toss, as the subject in such popular songs as Frank Sinatra’s *Three Coins in the Fountain* suggests, as the medium for wishes tossed in wells or fountains, or simply as pocket change jingling in our pockets for the laundromat, the bus, or the vending machine, the quarter endures as an extremely useful coin in American society. This coin represents the many visages of the United States, ranging from former presidents, to national icons, to the American landscape. Through this imagery, American quarters materially provide a unique site on which to communicate national culture. One key example of this is the image of the first American president, George Washington, a monarchic figure in American history and national culture, who appears as the head on the “heads” side of the quarter. A variety of other images ranging from racecars to buffaloes appear on the “tails” side of the coin. Upon closer examination, these images provide detailed insight into the constitutive relationship between law and culture in the contemporary American setting and as such, provide the basis for the analysis in this article. As emblematic productions of folk legality, coins provide a vantage point from which to view the constitutive relationship between law and politics. Imagery on coined money legally characterizes American cultural historical recollection evident in selectively chosen representations of the nation’s public memory. For instance, national events involving racial violence, labor strife, and the domestic elimination of native peoples are dimmed against such picturesque images as palm trees, Magnolia blossoms, and sailboats. Consequently, and perhaps purposefully, images that appear on coins become visual connections to an American legacy of imperialism and injustice that is easily forgotten against the depiction of the bucolic and innocently trivial characterizations of American history that such coinage laws and programs engender and presently promote. Because the privileging of a particular sense of American culture is visually constructed on the most banal of national markers, the coin, quarters are more than simply just art. Instead, quarters are a legal semiotic of American identity in which public memory, folk legality and nostalgic jurisprudence shape the legal landscape in which the spatial imaginary of American culture is aligned with the crafting of sanitized legal narratives.

In this article, I consider the ways in which coined images on American quarters hermeneutically perpetuate the visual crafting of law through which political memory is portrayed. Through a semiotic framework of symbolic articulation and jurisprudential analysis, I assert that quarters issued under the United States Department of the Treasury, through such legislation as the 50 States Commemorative Coin Program Act of 1997\(^1\) and

The District of Columbia and United States Territories Quarters Program under the Consolidated Appropriations Act of 2008,2 depict the politicization of folk art as a type of cultural currency that legally frames history via illustrations that memorialize a particular public memory of the American nation. In this way, these quarters represent specialized portrayals of American identity that are culturally sanitized via trees, animals, mountains, and even fruit. As a result, the semiotic discourse that appears on the face of these quarters carries hidden meaning in how law manipulates culture through the legal presentation of cultural value. Here, visual meaning is legally crafted for the purposes of representing an anesthetized public memory. The legal production of the national story3 is told in the United States through the images that appear on American quarters in which the national narrative appears as numismatic image design. The centrality of visual design as it concerns the legal framing of culture engenders law as “a system of signs which enables the lawyer, the linguist, the reader, and even the viewer to analyze the public space in a semiotic sense.”4 Through the context of the quarter, the image on the coin serves as the visual medium of state power in which the United States Treasury ultimately exercises the authority to sculpt cultural values and public understandings of American history and identity.

Through these quarters programs, public memory is visually constructed on quarters as tangible statements of American culture. In this way, these material constructions provide a cultural forum for that which is to be remembered as well as a legal venue for solidifying selected national memory. Isn’t it “just art” on our money? Aren’t quarters just “chump change”? Through sheer ubiquity and unassuming banality, the designs appearing on quarters emulate the design of a built environment in which the portrayal of certain images constructs a coined environment of selected public memory and what is meant to be remembered in the national consciousness.5,6

Similar to American quarters, postage stamps convey a message of public memory and national identity. In the French context of stamps, Wagner and Bozzo-Rey7 analyze the roles of “historical, cultural, and linguistic interpretants in the reading process of stamps.” The two authors consider the construction of “national identity in a small country with richly heterogeneous cultural and legal backgrounds as intermedial texts.”8 Similarly, David Scott,9 also analyzing the French postage stamp, characterizes the stamp as a “privileged site of cultural memory” as “an icon,” “an index,” “a sign,”

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8. Wagner and Bozzo-Rey, “Postage Stamps,” p. 308.
as well as “a vehicle of commemoration.” He traces the stamp through Pierre Nora’s concept of *lieux de mémoire* in order to find signs of national memory.

Similar to the iconic national text of postage stamps, this article will argue that the quarter and the aesthetics of the quarter semiotically frame the constitutive relationship between law and culture in three ways. The first way articulates the notion of folk legality as the cultural text of law, which is illustrated through icons of cultural relevance selected by local executive government officials. The second way concerns the nostalgic jurisprudence of the legal landscape in which colonial foundations and westward expansion engender a particular remembrance of American historical foundations. The third way examines the legal aesthetic of public memory through the paradoxical containment of indigeneity depicted on quarters through indigenous artifacts and mottos in languages other than English. Each of these three semiotic frameworks articulates the Americanized representations of place and semio-geographic constructions of identity. Jurisprudentially, these images materially represent the construction and reception of law symbolized by the culturally crafting of quarters as physical emblems of national values and public memory.

I. Folk Legality and the Cultural Text of Law

On December 1, 1997, Public Law 105-124 (111 Stat. 2534) was enacted by the United States Congress with Sections 1–3 known as the “50 States Commemorative Coin Program Act.” This law called for the reissuing of quarters over a ten-year period in which each of the 50 United States would be individually commemorated on the “tails” side of the quarter. In addition to honoring the federal republic of the United States and modernizing circulating coinage, the purpose of the act was “to promote the diffusion of knowledge among the youth of the United States about the individual States, their history and geography, and the rich diversity of the national heritage” (Sec. 2). Additionally, each quarter would show the date of entry into the union. On December 26, 2007, Public Law 110-16110 was enacted. Section 622, known as the “Redesign and Issuance of Circulating Quarter Dollar Honoring the District of Columbia and Each of the Territories,” declares “the design on the reverse side of each quarter dollar issued during 2009 shall be emblematic of one of the following: the District of Columbia, the Commonwealth of Puerto Rico, Guam, American Samoa, the United States Virgin Islands, and the Commonwealth of the Northern Mariana Islands.”

Both laws stipulated a design process for the quarters. This process included design review by the Treasury-appointed Citizens Commemorative Coin Advisory Committee following each member’s selection to the committee by the appropriate governor or executive officer from each state or territory (and mayor from the District of Columbia) with final approval reserved for Secretary of the U.S. Treasury. In terms of generating the initial designs for the quarter, the vast majority of governors/executive officers solicited artistic entries from their respective jurisdictions, with many schoolchildren participating in the process. Design criteria mandated the “broad appeal to the state’s citizens” and

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the avoidance of “controversial subjects or symbols likely to offend.”11 State landmarks, landscapes, symbols of state resources, state flowers and trees, and state icons were encouraged as “suitable subject matter.” A variety of images were presented with a select few chosen for the final cut. Designs chosen appear on these quarters, which have circulated widely since the beginning of the program in 1997 and are gradually replacing earlier quarters, which have the same obverse image of the first U.S. President George Washington but with different reverse images. According to the Mint’s Report, 50 State Quarters Report: 10 Years of Honoring Our Nation’s History and Heritage, an “estimated 3.5 million people participated in the design process for their state quarter either through concept submission or voting.”12

Approximately 34.8 billion commemorative quarters honoring the 50 states were produced and after ten years of production, the program is said to have generated $470.1 million in revenue from coin sales and numismatic products.13 The original conception for the idea of commemorative state quarters was based upon a similar program instituted by the Royal Canadian Mint in honoring its provinces. Interestingly, and perhaps even comically, in the United States, Kermit the Frog served as the “official ‘Spokesfrog’” for the 50 State Quarters Program. While this program received much fanfare, including coin collecting programs for children, commemorative collecting books for adults, and popular celebration of the new coins, the District of Columbia and the United States Territories Quarter Program received much less recognition and statistical attention by the U.S. Mint. The contrast between the promotion and reception between these two quarter programs reflects the general lack of attention paid by American culture to the five United States territories, or to the fact that the United States even has such quasi-colonial jurisdictions.

According to the website of the United States Mint entitled “Connecting America through Coins,” the mission of the Mint is to produce currency that “connects us with the core values of America” [accessed Oct. 2, 2013; http://www.usmint.gov/about_the_mint/]. These core values semiotically appear as legal aesthetics, or images that are sanctioned by law on the quarters discussed in this article. Because these image-based values are sources of constructed meaning authored by the U.S. Department of the Treasury under Congressional authority granted by the U.S. Constitution, coins, in this sense, illustrate national identity through imagery. Moreover, these coins communicate a symbolic meaning that is culturally tethered to their design14 as phenomenologically complex semiotics of law.15 In this way, the coins symbolize law’s meaning in American cultural identity. Similarly, quarters engender territorial jurisdiction as enacted through

the visual making of memory; these coins perpetuate a culturally specific architecture that maps jurisdictional understandings\(^\text{16}\) of what it means to be American.

Through a Peircean semiotic framework, we can view the quarter through a tripartite designation, where the signified is the image on the quarter, the signifier is the quarter itself, and the referent is the reception of that coin.\(^\text{17}\) Insofar as Barthes\(^\text{18}\) suggests, “all images are polysemous,” the interpretation of the quarter conveys a symbolic message in which normative national images of identity nostalgically foster a utopic image of what America should look like. Barthes however cautions about the “utopian character of denotation,” which in this example, serves to transmit understandings of American identity through selectively chosen images. Through numismatic memorialization, the public understanding of these memories is paradoxically presented and codified. Just as codes are often underexplored, or even dismissed for their import, the idyllic images on these American quarters represents the officially sanctioned ‘code’ of what America looks like. These quarters materially engage cultural understandings of law and aesthetically provide keen insight into the banal undercurrent of constitutive legal frameworks that semi-otically focus on the ordinary.\(^\text{19}\)

II. Images of Folk Legality

Images of cultural relevance illustrate the public memory associated with American identity as represented on a variety of state quarters. Through images of animals, eating, leisure activities, and statues, American identity takes on the quality of everyday familiarity, or what is referred to here as folk legality, or the variety of ways in which law is translated through culture. Animal depictions such as the grizzly bear (Alaska), the salmon (Alaska and Washington), the Peregrine Falcon (Idaho), the buffalo (Kansas and North Dakota), and thoroughbred horses (Kentucky) promote understandings of power and prowess as cultural icons of strength and fortitude. Eating is a fundamental activity to most cultures, including the United States. Images of corn, cows, cheese wheels (Wisconsin for these three images), a peach (Georgia), and maple trees (Vermont) are texts of American identity insofar as each conveys a type of food particular to discourses of eating and culture in the United States (i.e. “she’s such a peach!”; “grilled cheese sandwiches”; “what could be more American than maple syrup?”). Leisure activities also represent what can be framed as folk legality. Country music (Tennessee), jazz music (District of Columbia and the image of Duke Ellington), sailing (Rhode Island) and fishing (Minnesota and Maine via the lighthouse image), reading (Alabama and the image of Helen Keller and Braille), and driving fast (Indiana and the image of the

Indianapolis 500 racecar) are activities that are constructed as American pastimes. Lastly, popular identities residing in the faces of four favored U.S. Presidents at Mount Rushmore (South Dakota), President Abraham Lincoln (Illinois), and Lady Liberty at the Statue of Liberty (New York) frame a folk-based understanding of cultural representations about American political history. These icons connote a framework of law that engenders stereotypical notions of American culture and lifestyle through the images represented.

The design process of coins is the crafting of folk legality. In this way, law constitutionally reacts with the surrounding cultural text to reveal a method of seeing how law works through everyday banality. In this way, folk legality is crafted according to the articulations of that which is numismatically constructed as core American values, such as eating and driving fast. Additionally, the design process of these images purports democratic contribution through the images that normatively symbolize American life. Walter Benjamin characterizes this reproduction of culture through art as a phenomenological statement of endurance through space and time and reminds us that “by close-ups of the things around us [and] by focusing on hidden details of familiar objects [we can] extend our comprehension of the necessities which rule our lives.”20 Heritier further adds to Benjamin’s sentiment by suggesting “contemporary legal theory, in a semiotic perspective, cannot be referred solely to the concepts of text and norm, but must take into account the connection between image and law.”21 Hence, quarters serve to remind us of the numismatic connection between image and law that is crafted through the quarters’ design process, which carefully omits the recognition of not only key social movements that expanded the rights of citizenship in American culture on the basis of race, ethnic background, disability, and sexual orientation, but historically defining struggles of organized labor against corporate power.

III. Nostalgic Jurisprudence of the Legal Landscape

The spatial imaginary of the quarter appears as a tangible, portable, and easily recognized material form. As a neologic representation of power, the quarter signifies a particular notion of belonging imagined through depictions of the present and omissions of the past. In this way, the space of expression on quarters represents a type of nomospheric technique that manifests a national image of identity that intentionally pictures certain actions, people, and environments while simultaneously forgetting others in a project of constructed identity.22 This construction tethers public memory to seemingly innocuous American cultural artifacts and becomes a legal emblem of public memory as illustrated by the U.S. Mint. As legal emblems, coins are tokens of law that can be picked up, lost, or even, as mentioned earlier, thrown in the fountain for good luck. In this way, the coin

serves as a mirror for normative and positivist approaches to an Americanized thinking, living, and remembering. This mirror contributes to Sherwin’s work on visual jurisprudence, which reminds us “law lives differently in a visual expressive system than is one exclusively made up of words.” Following from Sherwin’s insight, the quarter is a site of visual jurisprudence as these two public law coin programs have numismatic craftings that appear and jurisprudentially influence constructions of identity, memory, and cultural value through carefully defined legal imagery.

Althusser notes that “ideology has a material existence” and through the quarter, we can see the material manifestation of what it means to be American (as described in Section 2). We are also reminded of Goodrich’s insight into the legal subjectivity of visual texts insofar as “a reading of the legal text which ignores the power of its imagery or the aesthetic of its reception is a reading which is in many senses beside the point in that it ignores precisely that dimension of the text and its effect.” Because quarters are so ordinary, they are constantly in the public gaze. Therefore, the social crafting of national identity on the faces of such coins is the construction of meaning according to the particularized presentation of images representing the public interest. In this way, the public’s interest is constructed through the design of numismatic imagery out of nostalgic concern for the innocent, if not culturally pleasing reminders of who we are through the romanticized hindsight of whence we came. The quarter is then a built form of public architecture as coins are crafted in ways that reflect as well as constitutively shape the public interest. As Kim Dovey notes, “The public interest does not exist pre-formed but is constructed in the design process.” Peter Goodrich echoes this sentiment as perpetuated by the legal framework insofar as “the legal emblem is most simply the legitimate image of law as a mixed knowledge and practice.” Lastly, Neal Feigenson speaks of “naive realism” in terms of the surface impression of the visual image and “visual common sense” that often disregards careful consideration pertaining to the construction of an image. Feigenson cautions against ignoring the “framing” of the image as well as “the prior knowledge and expectations that viewers themselves bring to the viewing” as well as the “overconfidence” and resulting bias of thinking that we know fully what we see and why we see it.

Such concern is the foundation for this article’s numismatic examination that frames culture through the legal iconography of public memory and national identity. Nostalgic jurisprudence is therefore the notion that through semiotic imagery, a particular picture of identity is sculpted as legal landscape intentional in its communication of meaning through the presence of some visual cues and absence of others.

IV. Images of Nostalgic Jurisprudence and the Legal Landscape

On the 50 State Quarters, the colonial foundations of the United States are represented by trees, ships, and masculine images that signify the nation’s early patriarchy. Connecticut’s quarters depict a white oak, the “Charter Oak,” as the tree in which the state charter was successfully hidden from the British. The South Carolina quarter depicts the Palmetto Tree from which logs were used to build a small fort that impeded the intruding British fleet. On Virginia’s quarter, three large masted ships are pictured in order to represent the early colonization of the New World, as the American colonies are self-referenced. Masculine images appear on the quarters of Delaware, Massachusetts, and New Jersey in which the image is riding on a horse (Delaware) to symbolize a delegate riding to Independence Hall to attend the Continental Congress, holding a gun (Massachusetts) to represent the “Minutemen” early colonial militia, and riding in a boat (New Jersey) to signify George Washington and members of his colonial army successfully navigating and crossing the Delaware River during the Revolutionary War.

The theme of westward expansion illustrates the land acquisition of the United States on a variety of state quarters. From the mountains to the prairie to the desert, images of exploration, development, and taming represent the Atlantic to the Pacific Ocean. The taming of natural resources is shown on the Arkansas quarter in which a lake, mountains, a duck, rice stalks, and a diamond are pictured. Exploration is symbolized in the Grand Canyon (Arizona), the image of Yosemite Valley and explorer John Muir (California), a pioneer wagon (Nebraska), a settler schoolhouse (Nebraska), the image of explorers Lewis and Clark on the Missouri River (Missouri), the joining of east and west coasts via the linking of the Central Pacific and Union Pacific railroads at Promontory Point (Utah), the “New” associated with the nation’s expansion is depicted in the image of the star (Texas), the cowboy riding a bucking bronco (Wyoming), and wild mustangs against the backdrop of the setting sun (Nevada). The acquisition of new landscapes can also be viewed in the image of Crater Lake (Oregon) and the Great Lakes (Michigan). Additionally, the nearly doubling of growth of the national geographic scope of the emerging United States is depicted by the map of the Louisiana Purchase in 1803 from Napoleon Bonaparte by Thomas Jefferson (Louisiana). Lastly, the image of the Space Shuttle (Florida) represents American exploration into space.

The process of westward expansion is a second theme in the nostalgic jurisprudence of the legal landscape. As an extension of what Karen Petroski describes as “visual legal
commentary,”31 images on quarters communicate a legal framework of cultural iconography that connotes a framework of relevance in the American public memory. Memory and memorialization are what Farid Samir Benavides Vanegas refers to as a “field of symbolic dispute: meanings and interpretations about the past are part of the discussion.”32 As such, the legal landscape detailed on quarters intentionally constructs notions of American expansion and land acquisition that ignore the realities of imperialist conquest, obliteration of native peoples, a history of chattel slavery, and the restrictive framework of citizenship that preferred wealthy, white men who owned property.

V. Legal Aesthetics of Public Memory and the Paradoxical Containment of Indigeneity

Images on quarters aesthetically frame American identity through the presence as well as absence of indigenous artifacts and mottos in languages other than English. A variety of indigenous visuals appear on state quarters. Native American images are shown, such as the bison skull (Montana), the Zia sun symbol (New Mexico), and the Gaillardia, or Indian Blanket, flower (Oklahoma). Each of these images is intended to represent Native American indigenous heritage in that state. On the Hawai‘i state quarter, King Kamehameha I, former Hawaiian monarch, is depicted. Images of the ava bowl (“tanoa”) and ava ceremony whisk and staff are depicted on the American Samoa quarter. On the quarter of the Northern Mariana Islands, architectural remnants of ancient Chamorro structures, a canoe, and the native bird MWAR are shown. On the Guam quarter, a Chamorro boat and latte housing stone appear. The correlation between the limited recognition of Native American tribal heritage, the Native Hawaiian monarchy, overthrown, many say overthrown by the U.S. at the end of the nineteenth century, and the heritage of Pacific Islanders, strikes a paradoxical representation of indigeneity that is acknowledged, yet contained through quasi-colonial jurisdictions of sovereignty. Furthermore, while many Native American elements were considered for state quarter designs, only a few were included in the final design selection. Examples of these absent Native American images include Mesa Verde National Park with cliff dwellings (Colorado), Chief Little Turtle (Indiana), an American Indian archer (Kansas), Chief Standing Bear (Nebraska), and Native American artifacts and petroglyphs (Nevada). “The Great Land” is on the Alaska coin, a phrase in English that comes from the Aleutian word “Alyeska” (Alaska). In this way, the indigenous elements which do appear seem to be a form of cultural tokenism in which native cultures are Americanized through their selective visual markings on quarters. No mention is made of the colonial conquest of the United States, or its history of domination of nations and their cultures throughout the Pacific or the continuing harm inflicted upon the Native American nations of the continental United States. Additionally, the numismatic recognition of indigeneity is aesthetically relegated

within the American context. Paradoxically, however, it must be noted, as Christine Black, indigenous Australian scholar suggests, that because indigenous elements are present is a statement of recognition that expands the American cultural umbrella that reaches beyond the legal landscape of European-derived Americanism. Without such images, the process of Americanization would be in complete ignorance, even denial, of a host of native cultures, which prevail even on, and especially on, the face of American money. Citizenship and statements of sovereignty have been semiotically crafted to include and celebrate indigeneity in the territories as well as in the states through these images and mottos.

The appearance of non-English words and phrases that appear on quarters linguistically challenge the presumption of English-only Americanism. For example, the Hawaii state motto in Hawaiian reads “UA MAU KE EA O KA AINA I KA PONO” (“The life of the land is perpetuated in righteousness”) (Hawaii). Another is the American Samoan territorial motto “SAMOE MUAMUA LE ATUA” (“Samoa, God is First”) that appears on the American Samoan quarter. The Puerto Rico quarter has the Spanish phrase ISLA DEL ENCANTO (“Isle of Enchantment”) and the Guam quarter, the phrase GUANNO I TANO MANCHAMORRO (“Guam – Land of the Chamorro”) can be read. What is of particular concern here is the history of language-based discrimination that impacted the speaking of these non-English languages. In Hawai’i for example, the use of the Hawaiian language, was not allowed to be taught in educational instruction until 1978 when it was officially recognized by the Hawai’i State Constitution as one of two state languages (with English as the other language). With so much tension involving language, particularly the usage of Spanish in the southwestern United States, the appearance of non-English languages in former and present territorial areas of the U.S. could perhaps be celebrated, but also problematically be viewed as cultural tokenism. Interestingly, the non-English phrase engraved on these coins, e pluribus unum, which is Latin for “out of many, one,” presents a linguistic hierarchy in which Latin is linked historically to the foundations of the United States. According to Douzinas, “the task of legal iconology is to explain how power and normative systems frame what and how we see, to develop a critique of regimes of visuality that will complement the critique of ideology.”33 If we then look beyond the image on the coins, we can see an ideology of nationalist identity that is legally responsible to the construction of cultural texts as illustrations of a prescribed American identity. Here, the relationship between design and image are linked in such a way as to promote a particular legal aesthetic of cultural normativity. In her study of the legal aesthetics of copyright, Hilde Hein examines the relationship between “law and art [as] vehicles of and contributory to cultural values.”34 The art on coins is the legal aesthetic of cultural value and American identity. Art is significant on coins as the designs depicted are intentionally and politically chosen to represent a particular agenda, in this

VI. Concluding Remarks: Crafting of Law and the Coining of Culture

So, how do quarters constitute us? What do the images on quarters tell us about the relationship between law and culture? How do the legal aesthetics of the quarter coin inform a jurisprudential inquiry into how law works in the everyday? Easily trivialized, the quarter is a coin of cultural medium and national identity and public memory. The quarter is durable and numismatically legitimized as a constructed emblem of a triumphant democratic iconography of post-colonial power. The quarter visually communicates the relentlessly figurative nature of legal meaning amidst the jurisprudential backdrop of individualized, local mythology in a self-sustained national identity. Through the two public laws described in this article, legal images carved onto the medium of the coin celebrate, yet regulate creativity, indigeneity, and public memory. Through the innocuity of images portrayed on coins, law acts as a filter in political discourse, constitutive engagements, and socio-legal normative frameworks that numismatically sculpt who we are as Americans and seek to engender the implications of Americanization for the wide variety of people and places under such labeling.

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