PORNOGRAPHY AND CIVIL RIGHTS

By Dianne Post

A Feminist Analysis of the Law on Pornography

The law treats pornography differently than it treats other First Amendment rights issues. The way pornography is treated by the court constitutes discrimination against women. Thus the legal challenges to pornography are being improperly viewed as free speech issues rather than discrimination issues. Sufficient law exists to stop pornography if it were treated as other comparable speech. What is missing is the political will to address issues of violence and discrimination against women.

Introduction

Whenever feminists argue that pornography should be prohibited, the shrill cry of "censorship" is raised from all sides. The Right equates pornography to a need for repression of sexuality. The Left equates it to expression of sexuality. Both have carved out the legitimate voices of women and women's sexuality.

Discrimination and violence against women is the issue not censorship. Yet another study has confirmed the harm of pornography: "In a meta-analysis (a statistical integration of all existing scientific data), researchers have found that using pornographic materials leads to several behavioral, psychological and social problems."[1] The researchers state that one of the most common problems is a deviant attitude toward intimate relationships such as sexual dominance, submissiveness, sex role stereotyping or viewing persons as sexual objects. Behavioral problems include fetishes and excessive or ritualistic masturbation. Sexual hostility and violent behavior are social problems linked to pornography as well as the rape myth (that women cause and enjoy rape). Dr. Claudio Violato calls his findings very alarming since pornography is so easily accessible on the Internet, television, videos and print material. Studies show that almost all men and most women have been exposed to pornography. More and more children are also being exposed. The authors argue that the rise in sexual crimes, sexual dysfunction and family breakdown may be linked to increased availability of pornography. Certainly there has been an explosion in Internet sex sites, and sex trafficking has re-emerged as an international scandal.

Some object to any classification of pornography claiming that present unorthodox sexual behaviors including homosexuality will be found to be pornographic. But a civil rights definition of pornography removes the power of the majority to impose their alleged moral standards on the minority. Feminist objections to pornography lie not with its erotic content but with its violent content and its results. While torturing, dismembering, and murdering women may be sexually arousing to some males, laws prohibit such behavior in any case. A definition focused on the illegal behavior and secondary effects better defines the prohibited conduct.

Pornography is a Civil Rights Violation

In a 1991 law review article, Catherine MacKinnon argues, as she has all along, that pornography is discrimination not defamation.[2] After giving extensive proof of pornography's negative and violent impact on women, she concludes that pornography itself IS sex discrimination. Pornography illustrates an ideology about women that is defamatory. But the injury of pornography is not what it says but what it does. What it does is coercion, force, assault and trafficking of women. These are not ideas but crimes. Pornography is not the idea of sex; pornography is sex. The enjoyment of pornography is not the idea of doing it but seeing it done. Thus pornography bypasses rational thought and adds nothing to political discourse.

MacKinnon argues that anti-Black and anti-Jewish material can be and is produced and distributed in the U.S. But real Blacks and real Jews are not used to produce it. In pornography, real women are used to produce it. The anti-Black and anti-Jewish materials are representations. Pornography is not a representation, but the real thing - abuse. The First Amendment protects expression of anti-woman views, as it should. Misogynist attitudes, along with anti-Semitic and anti-Black attitudes, are fair game in the U.S. You can express them; you just can't practice them. Pornography is the practice.

If a photo appeared in a magazine of a Black person lynched, the FBI, state and local police would begin an investigation to find out who the victim was, track down the person(s) who committed the crime, and bring them to justice. When an Asian woman is tied up in chains and hung upside down over a meat grinder, do the FBI, state and local police begin an investigation to find the victim, track down the person(s) who committed this crime, and bring them to justice? No. They say it's an expression protected by the First Amendment. That's discrimination.

In a case against the Los Angeles fire department in 1989, the court found that the women firefighters were not shocked enough by the Playboy magazine at work as a swastika would shock a Jew or a racial epithet an African-American. In other words, because pornography is so common, it is no longer shocking. Therefore we can't ban it. They have set up the perfect trap. Because the courts have refused to regulate pornography, it has proliferated until it is ubiquitous. Because it is ubiquitous, we can't regulate it. How convenient. The perfect "grooming" for women to continue to be abused. Had the plaintiffs in the case screamed and cried, had they fainted or thrown up, they would have been labeled hysterical, overly sensitive, "egg shell" plaintiffs and certainly not appropriate to be firefighters. Either way, they lose.

In the case which tested the MacKinnon-Dworkin ordinance in 1985, the blatant discrimination against women was made clear. The court ignored secondary effects, ignored the violence done to women, ignored the civil

rights aspects, ignored the proof requirements, ignored the fact that it was a civil action not criminal, and ignored Supreme Court jurisprudence. They shot from the hip in the most broad and sweeping language to silence women. They claimed grandiose values for themselves e.g. "The Constitution forbids the state to declare one perspective right and silence opponents." (p. 325) but that is precisely what they did. They gave women no remedy, no forum to speak out against pornography. The ordinance no more silences the pornographers than anti-discrimination ordinances silence employers. Racists can think all they like they just can't act on their thoughts. Why are pornographers allowed to act on theirs?

Pornography is a Tort

Pornography is group defamation, a tort. Vilification is an utterance that directly or by innuendo holds up the target to public contempt, hatred, shame, disgrace, or obloquy or that causes the target to be shunned, avoided, or injured, in business, profession or occupation. If the listeners are already prejudiced against such a group, then they are not rational listeners and will assume that libel applies to each individual in the group. That clearly has happened in pornography with the research that shows that men who use pornography believe the rape myth.

Pornography is Subject to Criminal Regulation by the State

Illegal behavior occurs in the making of pornography, the use of pornography and the effects of pornography. Many crimes are committed in the making of pornography e.g. aiding and abetting a crime, conspiracy to commit a crime, physical assault, kidnapping, false imprisonment, sexual assault, and Racketeering Influenced Corrupt Organization (RICO) violations that involve criminal acts of a group such as a gang or criminal syndicate. Clearly when making pornography, crimes are occurring and being filmed. Women often report that while using pornography, men commit crimes of violence toward them. Studies show that men influenced by pornography believe rape myths and have less empathy for women. A focus on the harm in production and the repercussions of the exploitation (photos last forever) would result in many criminal convictions. The circulation of the material increases the harm caused in production, thus aiding and abetting and the economic motive is an integral part of the organized crime scheme violating RICO laws.

The purpose of RICO is to destroy the enterprise that perpetuated the predicate criminal acts. In one case, the government confiscated nine million articles because the business sold seven obscene works. So using RICO allows the government to put the pornographer out of business. That is what the MacKinnon-Dworkin ordinance sought to allow the victim to do in the civil context i.e. sue the pornography makers and distributors and put them out of business by awarding huge penalties. But the ordinance was declared unconstitutional. Thus the government is allowed to do in a criminal action (sue pornographers) what women are not allowed to do in the civil context. When the government does it, it's valid. When women seek to do it on our own, it's called censorship. That turns legal reasoning on its head as previously "censorship" meant the government was seeking to silence someone, not when an individual citizen took action against a harm. Again, the discrimination against women, especially women taking action on their own, is evident.

Even if Pornography is not Subject to Criminal Regulation by the State, it is Subject to Civil Regulation by the Individual

Marianne Wesson argues that we don't need any new laws to attack pornography; we can do it right now.[3] She argues that under existing tort doctrine the client was harmed, a willing lawyer can prove the harm, can show foreseeability, and can show causal link. She believes the First Amendment argument can be overcome. It wasn't the words that caused the harm; it was the encouragement or enabling others that allowed the harm to be inflicted.

When asbestos was shown to have harmed thousands of citizens, lawyers took up the class action lawsuit. When tobacco was shown to result in serious harm to massive numbers of people, lawyers sued. The connection between the harm of tobacco and the harm of pornography is no less tenuous. Today there is discussion of lawsuits against fast food outlets for the health problems caused by their food. If that causal link is sufficient, what's stopping the class action against pornography's harm to 53% of the population? There is a multitude of research to show that the availability and prevalence of pornography, in the absence of a public suggestion that the scenes it depicts are wrong or objectionable, assuage any questions of guilt that sex criminals may have. The litigation alone would be public education and a great public service. Under the tort approach, there is no censorship issue, no fighting with a marketplace of ideas. As in other tort cases, pornographers can increase the costs of their product to pay the tort claims.

A civil RICO action could also be maintained. The civil RICO statute contains no exceptions for materials allegedly artistic so it could be used when criminal RICO could not. Given the harm to women nationwide, getting a class would be no problem. The suit would have to show that the pornographers conspired together at some time, they used violence in the making of pornography, and they prevent women from availing themselves of their constitutional rights, of which there are many such instances and arguments.

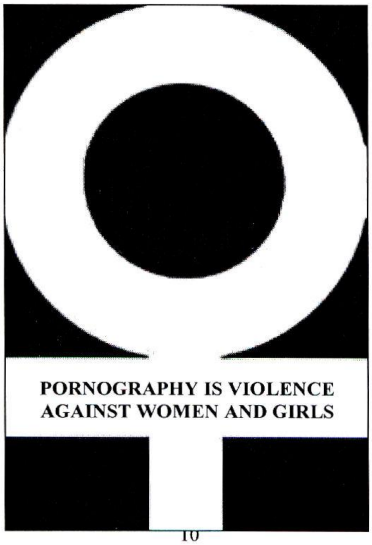
Civil rights suits based on the First, Fifth and Fourteenth Amendments as well as Title VII of the Civil Rights Act of 1964 can be brought to address the discrimination in right to travel, public accommodations, due process and equal protection. Thirteenth Amendment claims might be brought on slavery grounds especially for the women trapped in sexual exploitation and trafficking.

Group defamation suits can be brought with careful factual preparation. Such defamation suits do not violate

the First Amendment. Obviously the media has not been "chilled" by cries for censorship of pornography. Rather the opposite is true, victims of pornography have been chilled from bringing suit. The media have plenty of protection from defamation suits: actual malice is required if the person is a public figure, truth is a complete defense, opinion is usually a defense, and the court engages in incremental harm or balancing only a small portion of the story versus the complete story.

In a case against the FCC in 1968, the court required radio and television stations that carry cigarette ads to devote significant time to cigarette harms. The decision was premised on the harm of cigarettes and the fact that the anti-smoking campaigns are not so well funded as are the cigarette companies. That is certainly true for anti-pornography campaigns. The court said, "Where a controversial issue with potentially grave consequences is left to each individual to decide for himself, the need for an abundant and ready supply of relevant information is too obvious to need belaboring." Every regulation is not censorship. The public interest includes public health and the court found that cigarettes pose a danger to health and even life in their normal use. They threaten a substantial body of the public not a fringe. The danger does not have to be beyond all doubt, only established by compelling compilations of statistical evidence. It was not an abuse to require the other side be heard because product advertising falls outside First Amendment interests. "The difficulty with this negative approach is that not all free speakers have equally loud voices, and success in the marketplace of ideas may go to the advocate who can shout the loudest or more often". A contest where one party has all the resources is no contest. Instead the court must use a balancing mechanism because where one side has money and compelling economic interest in presenting only one side, and where public health and life is at stake on the other side, the purpose of the debate is helped, not hindered, by balance. Balancing does not repress information but provides more information.

Substitute pornography for cigarettes and the exact same arguments apply. It can no longer be challenged that pornography is harmful not only to women but to all society. Pornography poses a danger to public health and life in its normal use. It threatens the entire public not just a fringe. It is merchandizing a product – women's bodies – and thus is simply product advertisement that falls outside the First Amendment. One party, the pornographer, has all the money and has a huge economic incentive in presenting only their side. Balancing rights would enhance rather than repress information.



Pornography Should Not Receive First Amendment Protection

The Supreme Court never adopted absolute First Amendment protection for all speech. One of the primary values underlying the First Amendment is the market place of ideas. But in order for a true marketplace to exist, equality in the marketplace is necessary. Capitalism's marketplace does not work without regulation. Left alone, power and greed overtake common sense and the robber barons, old and new, steal common citizens blind and bring the entire system crashing down. Or as Alan Greenspan said, "infectious greed" takes over.

Just as the government cannot abdicate its role in the financial marketplace, it cannot abdicate its role in the "marketplace of ideas" either. Equality and free speech are both integral parts of the democratic heritage. Free speech is a negative government right i.e. stay out of it. Equality, on the other hand, is a positive government right i.e. do something to make it happen. A democracy cannot function without free speech. But a democracy also cannot function, nor call itself a democracy, without equality. But today, there is no marketplace of ideas; pornographers have bought the marketplace. Government's abdication in the face of the pornographers monopoly of the marketplace is government acquiescence to denial of women's speech.

Obscenity receives no First Amendment protection. The *Miller* case subjected obscenity to the following test: a) Whether the average person, applying contemporary community standards would find the work, taken as a whole, appeals to prurient interest; b) whether the work depicts or describes, in a patently offensive way, sexual conduct specifically defined by the applicable state law; and c) whether the work, taken as a whole, lacks serious literary, political or scientific value. *Miller* is still the law today. So why isn't what is called "hard core" pornography today obscene under *Miller*?

The problem is that the jury is to define contemporary community standards. But the proliferation of pornography has contaminated the jury pool. Pornography is so common; even if they themselves don't accept it, people think others do. A second problem with "community standards" is that absent a civil rights analysis of pornography, the use of community standards allows the powerful majority to define the civil rights of a powerless minority.

Internet technology also makes "community standards" a meaningless concept. With the web, the whole world is one community and the standard could be the most repressive or the most reprehensible or something in between. On the Internet, it is impossible to avoid pornography. Sites are highjacked so that going to what one thought was a site about breast cancer could take you to violent pornography. Pornography arrives unwanted in spam on the home and work computers.

The use of the "average person" standard also poses a problem. The average woman has a different point of view about pornography than the average man. Most pornography is consumed by men. Many studies have shown the negative impact on men's behavior. The woman is the one being portrayed as an object and is the one who suffers the well-documented secondary effects of pornography. Thus who is the "average person"?

Whether the item is "patently offensive" is also a question for the jury. But again the jury pool is poisoned. Research shows that those who use pornography do in fact believe the rape myth. Even some exposure to pornography decreases men's empathy toward women and their belief in women's equality. What is not offensive to the male, the actor, may very well be offensive to the acted upon, the woman. So whose viewpoint is heard? Now, the only viewpoint heard is that of the pornography, that of the actor, that of the male. Women's viewpoint is silenced, censored.

The Supreme Court analysis confuses pornography and erotica. Representations that do not import a debasing, shameful or morbid quality are not obscene. Erotica is not obscene. Pornography, which does present women in a debasing, shameful or morbid way, is obscene. That is precisely what the MacKinnon-Dworkin ordinance focused on – the manner in which women were portrayed. Yet that ordinance was declared unconstitutional.

The last legal test is that obscenity has no political, literary or scientific value. Those who cry censorship claim that pictures of naked women in medical textbooks will be banned. How ridiculous. Doesn't that have scientific value? Pornography is also not art. Art stimulates the imagination; pornography leaves nothing to the imagination. Is the law a meat ax that cuts away slabs of information or a lazer that focuses on the manner of the depiction? The law is all about drawing lines. Why would it be so impossible to draw this one?

Certain speech does not receive First Amendment protection because of the reaction to it. Speech that the Court has held to be unprotected because it elicited from the hearer an automatic, unliberated response likely to lead to a breach of the peace. The speech threatens harm to some substantial public interest. The speech bypasses the conscious faculties of the hearer in some way.

The debate about "hate speech" as a category of "fighting words" has been fierce. Internationally, many countries, including the United States, have ratified the International Covenant on Civil and Political Rights (ICCPR). The ICCPR has a section prohibiting hate speech, as do most European democracies. The provisions only apply to national, racial or religious hatred, but, I would argue, could be extended to sex hatred as well. Pornography is hate speech about women. Women are called cunt, whore and slut, treated as an object and as subordinate. It's absurd to think that individual women alone can "speak" back to this multimillion dollar hate industry

Pornography is an industry and thus commercial speech that should not receive full First Amendment protection. Though research is hard to find, one estimate is from $4 billion to $7 billion a year in U.S. sales alone. In 1985, the profits from pornography were estimated to exceed the $6.2 billion combined gross of ABC, CBS, AND NBC. In 1986, the head of one pornography empire ran up $4 billon in sales. Playboy now has over 100 competitors. Rentals and sales of videos alone reached $3 billion in 1995. Hard-core books released rose to 5,575 in 1995, up from 1,275 in 1990.[4]

Even if Pornography is Entitled to First Amendment Protection, It is Not Entitled to Full Protection

Political speech i.e. speech attacking the government or addressing controversial societal issues always receives full First Amendment protection. Other speech granted full First Amendment protection involves additional protected rights such as religion or the press. Political speech may also be about a "matter of public concern".

Speech can be restricted when significant government interests are involved and no more burden than necessary is imposed. Those interests include public safety and order and may include protection of other constitutional rights. In the pornography cases, proof exists of physical abuse and violent conduct toward women and many other constitutional rights would be protected by prohibiting pornography including First Amendment freedom of speech and association, right to travel, 5th Amendment due process and 14th Amendment equal protection.

An illustrative comparison between women's nudity as erotic dancing and women's nudity as political protest shines light on the discrimination against women. In a case in Pennsylvania in 2000, the defendant was Pap, a corporation owned by a 72 year-old man. The court held that prohibiting nude dancing violated Pap's right to free expression. When did you last see a corporation, or a 72 year-old male, dancing nude? The corporation, not the female dancer, was sending the "message" of eroticism. The woman was invisible. She was silenced. Why does a corporation have more First Amendment rights to send a message of eroticism than a woman does to oppose the message?

A second question is how did the court come to the conclusion that the message of nude dancing was eroticism? Who's viewpoint are they taking, the speaker or the hearer? In that case it is clear that the dancer is not sending the message, the corporation is. How can a corporation be erotic? In most cases, the court argues that the rights of the speaker trump the rights of the hearer. But in

nude dancing, is the dancer really sending a message of eroticism or is that what the hearer imagines? Taking a subjective view of the message sender, the dancer, she most likely is not feeling erotic at all. She's bored, she scared, she's tired, she's high, she's thinking about what to cook for dinner, or whether to allow her child to go to summer camp.

Not only is pornography *per se* discrimination against women, but the Court's treatment of pornography cases shows the Court's inability to deal with this issue without being infected by its own bias against women.

The court could just as easily have concluded that the message being sent by nude dancing was objectification of women, degradation of women, or product sales. Why did the court decide it was erotic? Because they took the view of the listener, the men watching, not the view of the speaker contrary to most First Amendment cases. Their own bias prohibits the Court from treating pornography cases with the same analysis as other First Amendment cases.

Contrast that to another case when women protesting in the nude to send a message opposing women's inequality are denied First Amendment protection. In a case brought by Nikki Craft, the women argued that refusing to allow nude bathing in a national park violates the First Amendment right of free expression and the Fifth Amendment right of equal protection. The court held that public nudity cannot be understood to convey a message to those who view it. In other words, nude dancing in a bar conveys a message. But nude protest on a public beach conveys no message. This stands First Amendment jurisprudence on its head. Protest is political speech and should be protected. Money making activities in a bar should not be protected. The court opined that public nudity was offensive so the public needed to be protected. But it's all right in a bar? In fact, the court made a viewpoint distinction. When the message was women's erotic appeal to men, it was permissible. When the message was women's opposition to men, it was banned. Very simply, the government censored women's speech based on viewpoint and content.

Craft argued that if she were to protest exploitation clothed, she would not get as much attention. The court replied that there is no right to effective speech. Later in the Hudnut *supra* decision, the court claims that pornography has protection precisely because it is effective. So pornographers have a right to be effective, but women don't. The court further said they must protect the rights of all users of public places. Since pornography proliferates in public places from the sides of buses to billboards to magazine ads, why isn't the public protected from pornography?

Pornography is speech plus conduct that has lesser protection under the First Amendment and can be regulated. When speech and nonspeech are intertwined, the court can regulate the nonspeech even if speech is impacted. Pornography is more than speech expressing and advocating a belief. Rather, it is speech plus unlawful conduct urging others to similarly break the law. As MacKinnon says, pornography is not an idea but the practice like segregation is not an idea but the practice. Pornography glorifies violence against women as sexual satisfaction. Women are raped, beaten, burned, slashed, tied up, carved, hung upside down from meat hooks, mutilated, dismembered, and actually murdered in the celebrated snuff films. The First Amendment grants no license to practice and advocate violence.

Even if Pornography Gets First Amendment Protection, That Protection Must Be Balanced With the Harm Done

When two constitutional rights collide, the Court must use a balancing approach. Pornography violates women's right to due process. Women are harmed by pornography, but they are denied the right to seek redress or petition the government for their grievances. They have no access to the courts. When they protest, it is found to be unprotected activity. When they sue, they lose. When they legislate, it's declared unconstitutional. Where's the balance?

Pornography also violates women's right to equal protection. The court acknowledges that gender discrimination is a serious social and personal harm and stereotypes do not relate to actual abilities. The court agrees that it is important to remove barriers to economic advancement and political and social integration. The proliferation of pornography is a huge barrier to women in every sphere. So long as we are perceived as sexual objects with no other value, we cannot advance nor be integrated into the political and social fabric of the community.

Hostile environment sexual harassment cases recognize the harm done to women by harassing speech, name calling, and sexual references. The victim does not have to wait until she is totally incapacitated from the abuse. If it is recognized in those cases, why isn't it recognized that pornography has the same effect? Some circuit courts have held that pornographic material in the workplace is evidence of a hostile work environment. And because pornography is so ubiquitous and violent, its impact on women is even worse. Sexual harassment analysis focuses on speech that is unwanted, would offend the reasonable woman, and did in fact offend this woman and cause harm. Thus, it has a subjective focus. It depends on whether this person wanted that conduct, whether this person was offended, and whether this person was harmed. Why not apply that to pornography, which is exactly what the MacKinnon-Dworkin ordinance did? The

victim still has to prove that the pornography harmed her. The only difference is workplace conduct versus public conduct.

Pornography also interferes with the right of an entire class of citizens – women - to travel safely on the streets contrary to constitutional law. The freedom to travel has been upheld as a constitutional right under the Commerce Clause. It is a constitutional concept of personal liberty, a fundamental right. The right to travel can be asserted against private companies as well as public. Women must fear for our safety walking down the street, in a cab, in a street car, in a train or plane, in a hotel or motel, in a public park, in a theatre, while jogging or swimming or grocery shopping or in fact any public activity. We face discrimination in obtaining travel arrangements, contracts, and business deals. Thus the extent to which pornography makes it unsafe or impossible for women to travel freely, pornographers can be held accountable for violating the fundamental rights of women.

Women are also prohibited their right to use public accommodations. The court has found that racial discrimination in refusing hotel accommodations had a negative impact on interstate travel and can be legislated against. The court focused on the difficulties in travel and the disruptive effect racial discrimination had on commercial intercourse. Likewise, women do not have equal access to public accommodations, women have difficulty in travel, and discrimination against women has a disruptive effect on commercial intercourse.

The secondary effects of pornography can also be a basis for prohibiting it. When the present line of Supreme Court obscenity decisions started in 1973 (Miller v. CA supra), the research submitted by the Commission on Obscenity and Pornography in l970 stated that patterns of sexual behavior were unaltered by exposure to what the commission defined as erotica, that erotica was not a cause of sex crime and that exposure left sexuality or sexual morality unchanged. Many disagreed with the findings and the language led to the court's confusion between erotica and obscenity. Many studies establish that exposure to pornography makes men less cognizant of violence to women and indeed makes them more prone to participate in such violence themselves.[5]

The secondary effects of an activity can allow restriction without looking at the content. The Wisconsin hate crimes scheme was constitutional because it punished conduct not thought or speech. If the pornographers said, "women are only to be used as sexual objects", that would be protected speech. But pornography goes far beyond that with photos, videogames, and movies, which function as textbooks on how to use and abuse women as sexual objects. Many battered women testify that their partners literally used pornography as a "cookbook" on what to do. The most violent batterers are common users of pornography. Thus the conduct of pornographers can be punished. To do that, we can look at their words to prove motive. We do that in crimes, in discrimination cases, to differentiate first-degree murder from manslaughter, in conspiracy, price fixing and treason. Why not pornography? Looking at the words does not make it a violation of the First Amendment. The deterrence of gender-motivated violence is a legitimate interest of the State; indeed, it is an obligation.

Conclusion

Not only is pornography *per se* discrimination against women, but the Court's treatment of pornography cases shows the Court's inability to deal with this issue without being infected by its own bias against women. Given the research proving that viewing pornography results in increased violence and decreased acceptance of women as equal partners in society, a civil rights approach follows logically. Decades of studies demonstrating the negative effects of pornography establish sufficient justification for regulation as a civil rights issue. However, the court would have to be committed to civil rights and equality for women. It is not. The refusal of other civil rights organizations to support regulation of pornography illustrates the deep sexual bias in our society. This bias prevents clear analysis of issues affecting women's subordination in the patriarchal system.

Endnotes

[1] Study proves "Pornography is harmful. Findings are Alarming, 12,000 Participants in Study, 13-Mar-2002—LifeSite News, Calgary, Canada, Violato, Oddone-Paolucci, Genuis, National Foundation for Family Research and Education, Mind, Medicine and Adolescence Journal.

[2] Catherine A. MacKinnon, Pornography as Defamation and Discrimination, 71 B U L Rev 793 (1991).

[3] Girls Should Bring Law Suits Everywhere: Nothing will be Corrupted: Pornography as Speech and Product, Marianne Wesson, 60 U. Chi. L. Rev. 845 (1993).

[4] Dines, Jensen, Russo, Pornography: The Production and Consumption of Inequality, Routledge, NY, 1998.

[5] Attorney General's Commission on Pornography, Final Report (U.S., 1986), vol. 1, at pp. 938-1035; Metro Toronto Task Force on Public Violence Against Women and Children, Final Report (1984), at p. 66; Report of the Joint Select Committee on Video Material (Australia, 1988), vol 1, at pp. 185-230; Pornography: Report of the Ministerial Committee of Inquiry into Pornography (New Zealand, 1988), at pp. 380-45.

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