



A History of Censorship in the United States

Author _ Jennifer Elaine Steele (jennifer.e.steele@usm.edu), Assistant Professor, School of Library and Information Science, The University of Southern Mississippi

Censorship is a centuries-old issue for the United States. The importance of intellectual freedom and the freedom of speech is particularly evident in libraries, organizations dedicated to the access and spread of information. Issues regarding censorship and intellectual freedom have even reached the US Supreme Court. The following essay serves as a history of censorship in the United States, particularly in its libraries, and how the same issues of censorship have now transitioned into the digital age.

Throughout the history of the United States, there are many examples of censorship and censorship attempts. Censorship is often viewed as a violation of the First Amendment and the right to free speech. Freedom of speech is particularly pertinent to libraries, as it “encompasses not only a right to express oneself, but also a right to access information” (Oltmann 2016a, 153). The First Amendment is a common argument made by advocates against the act of censorship (Lambe 2002). As Pinnell-Stephens (2012) writes, “The basis of intellectual freedom in libraries lies in the First Amendment” (xi). However, interpretation of the First Amendment is not concrete, and throughout US history, courts have attempted to decide what freedoms are actually protected under the First Amendment. At the highest level, the US Supreme Court has heard many cases dealing with the First Amendment and the freedom of speech, which can also be relevant to libraries since they attempt to provide an environment of free expression and accessibility.

Many definitions of censorship have been proposed over the years. The American Library Association (ALA) defines censorship as a “change in the access status of material, based on the content of the work and made by a governing authority or its representatives. Such changes

include exclusion, restriction, removal, or age/grade level changes” (ALA 2016). According to Prebor and Gordon (2015), censorship is “an action utilized in order to prohibit access to books or information items because their content is considered dangerous or harmful to their



readers” (28). Knox (2014) describes censorship as “an amalgamation of practices, including the redaction of text in a document, cutting pages out of a book, or denying access to materials” (741). While many definitions of censorship have been used, according to Oppenheim and Smith (2004), “the general sentiment behind most definitions is that something is withheld from access by another” (160).

Nineteenth-Century Beginnings: Obscenity and the Censorship of the US Postal Service

One of the oldest, and most commonly cited, reasons behind many book challenges and censorship attempts in the United States is that the book or other material contains obscenity. As Wachsberger (2006) writes, “The history of books censored for depicting sexual acts—whether the chosen word was ‘pornography,’ ‘erotica,’ or ‘obscenity’—is a fascinating ride through our country’s court system” (vii). An early case dealing with the issue of obscenity is *Rosen v. United States* (1896), in which the defendant allegedly used the US Postal Service to send material that was deemed “obscene, lewd, and lascivious” (*Rosen v. United States* 1896, at 43). In their ruling, the Supreme Court adopted the same obscenity standard as had been articulated in the notable British case *Regina v. Hicklin* (1868). The *Hicklin* test defined material as obscene if it tended “to deprave or corrupt those whose minds are open to such immoral influences, and into whose hands a publication of this sort may fall” (*Rosen v. United States* 1896, at 43). The Supreme Court upheld the conviction.

In 1873, the US Congress passed the Comstock Act (1873), which made it a crime to knowingly mail obscene materials or advertisements and information about obscene materials, abortion, or contraception (de Grazia 1992). It is notable that while it has roots dating back to 1775 and an original intention of supporting the concept of intellectual freedom, the Comstock Act (1873) is just one of many examples of the Postal Service enacting laws and acting as a censor throughout its history (Darling 1979; Paul and Schwartz 1961).¹

1. In 1945, the Postmaster General of the United States, Frank Comerford Walker, filed suit against the author and publisher of a pamphlet, called “Preparing for Marriage” (*Walker v. Popenoe* 1945), which he withheld from the mail on the grounds of the Comstock Act (1873). The pamphlet contained “detailed information and advice regarding the physical and emotional aspects of marriage” (*Walker v. Popenoe* 1945, at 512). However, the Court ruled that the

One seminal example of censorship on the grounds of obscenity involves James Joyce’s most famous work, *Ulysses* (1922). Prior to the novel’s US publication, the work was serialized in the literary magazine *The Little Review*. Following this first publication of *Ulysses*, three issues of *The Little Review* were seized and burned by the US Postal Service on the grounds that its content was deemed “obscene.” A complaint was made regarding a particular chapter that was published in the magazine, and after a trial the publishers were convicted and fined (Baggett 1995). Publication of *Ulysses* in the United States stopped for more than a decade (Gillers 2007). It was not until the federal district court case *United States v. One Book Called Ulysses* in 1933 that the novel could legally be published in the United States (Gillers 2007). In the ruling for the case, Judge John M. Woolsey established the important notion that an entire work, rather than just a portion of it, should be considered for the work to be declared obscene (*United States v. One Book Called Ulysses* 1933).

The Supreme Court ruled in the case *Roth v. United States* (1957) that obscenity was not protected under the First Amendment. It also developed what came to be known as the *Roth* test for obscenity, which was “whether to the average person, applying contemporary community standards, the dominant theme of the material, taken as a whole, appeals to the prurient interest” (*Roth v. United States* 1957, at 489). However, the *Roth* test definition of obscenity proved difficult to apply. In the Supreme Court case *Jacobellis v. Ohio* (1964), which addressed whether states had the right to ban films they deemed obscene, Justice Potter Stewart famously stated that while he could not precisely define pornography, “I know it when I see it” (*Jacobellis v. Ohio* 1964, at 197).

The *Roth* test was eventually expanded with the case *Miller v. California* (1973). Under the *Miller* test, a work is obscene if

“(a) . . . ‘the average person, applying contemporary community standards’ would find the work, as a whole, appeals to the prurient interest . . . (b) . . . the work depicts or describes, in a patently offensive way, sexual conduct specifically defined by the applicable state law, and (c) . . . the work, taken as a whole, lacks serious literary, artistic, political, or scientific value.” (*Miller v. California* 1973, at 39)

Many people confuse obscenity, which is not protected under the First Amendment, with pornography, which is

order barring the pamphlet from the mail without a hearing was “a violation of due process” (*Walker v. Popenoe* 1945, at 513).



protected under the First Amendment (Pinnell-Stephens 1999). The exception to this would be child pornography. The First Amendment is a common argument for those against censorship, and many challenges and censorship attempts involve materials targeted toward children and young adults. However, the First Amendment argument is not as strong when the censorship pertains to young children (Magnuson 2011), as many laws are in place for the purpose of protecting children. The Supreme Court ruled in the cases *New York v. Ferber* (1982) and *Osborne v. Ohio* (1990) that child pornography is not subject to the *Miller* test and that the government's interest in protecting children from abuse was crucial.

Censorship in the United States began with both the Postal Service and public libraries, gaining traction throughout the nineteenth century.

Censorship in Public Libraries

In the history of public libraries, censorship is “as old as the public library movement itself” (Thompson 1975, 1). As Wiegand (2015) put it, “Censorship was never far from public library practices” (36). In his 1973 article “The Purpose of the American Public Library: A Revisionist Interpretation of History,” Michael Harris gives a history of the American public library, with the Boston Public Library beginning the public library movement in the 1850s. Since their inception, American public libraries have faced censorship issues (Wiegand 2015).

Censorship and Race

Race and ethnic background have been factors in censorship since the beginning of the public library movement. For the earliest public libraries in the 1850s, librarians and library trustees were often white, upper class, educated males, who were often the public library's target demographic (Harris 1973). However, the 1890s saw a huge influx of immigrants into the United States (Harris 1973). Between 1893 and 1917, 7 million immigrants arrived from southern and eastern Europe (Wiegand 2015). This caused people to fear for the “American way of life.” In response, public libraries began to offer programs and classes for immigrants with the purpose of “Americanizing” them (Harris 1973).

During the Carnegie era (1889–1917), Scottish-American businessman Andrew Carnegie gave \$41 million to construct 1,679 public library buildings in 1,412 US communities (Bobinski 1968; Wiegand 2015). However, some communities rejected Carnegie grants, with varying justifications. Sometimes it was pride, sometimes it was class, and sometimes it was race (Wiegand

2015). This was particularly at issue in the segregated, Jim Crow-era South, where many Carnegie grants were rejected because community leaders believed a Carnegie Free Library would have to admit Black people (Wiegand 2015).²

One southern public library that did accept a Carnegie grant was the Colored Branches of the Louisville Public Library in Louisville, Kentucky, which opened its first branch for Black patrons in 1905 (Wiegand 2015). The branch then moved into a new Carnegie building in 1908, followed by a second Black neighborhood receiving a Carnegie library in 1914 (Wiegand 2015). Largely because they were among the few places in segregated Louisville that welcomed and allowed Black people to gather, the public library at this time took on the role of the neighborhood social center (Wiegand 2015).

Another example of censorship in public libraries with racial influences came in 1901, when the H. W. Wilson Company began publishing its *Readers' Guide to Periodical Literature*. The *Readers' Guide* was an index of periodicals public libraries would often use as suggestions for their collections. However, periodicals issued by marginalized groups such as African or Hispanic Americans could not be indexed in the *Readers' Guide*. This put them at a distinct disadvantage, as then public libraries tended to not subscribe to them (Wiegand 2015).

An important point in the history of public libraries is their integration. After World War II, efforts began to integrate public libraries in the American South (Wiegand 2015). In response to these efforts to integrate, “librarians across the country were mostly silent, and largely absent” (Wiegand 2015, 172). In 1954, the Supreme Court ruled in *Brown v. Board of Education* that “separate but equal” was no longer legal. During this time, public libraries in the South were frequent sites of racial protests. Examples include a 1960 sit-in at the Greenville Public Library in South Carolina led by a teenage Jesse Jackson, and, in 1961, a peaceful protest led by members of the National Association for the Advancement of Colored People (NAACP) at the public library in Jackson, Mississippi (Wiegand 2015). While these protests were predominant in the South, they occurred at public libraries all across the country, including the North (Wiegand 2015), making

2. While the segregation of libraries might not be considered censorship by all definitions, it does involve the exclusion of information from people of particular races. Under the American Library Association's definition of censorship (ALA 2016), exclusion is considered to be a form of censorship.



desegregation a pivotal point in the history of American public libraries.

Racial and ethnic background continues to be an influencer on censorship in libraries, with multiple researchers exploring public views regarding the inclusion of racially charged materials in a library's collection. From 1976 to 2006, the General Social Survey asked randomly selected national samples of US adults age eighteen and older whether they would support removing a book spouting racist beliefs targeted at African Americans from the public library, with multiple researchers using statistical tests to analyze the data collected from the survey (Burke 2011; Bussert 2012).

In their analysis of the survey results, researchers found an overwhelming majority of the survey's participants did not support removing the racist book from the library (Burke 2011), and the most influential predictors of support for book removal from the public library were found to be education level, religious affiliation, and race (Bussert 2012). Regarding education level, Bussert (2012) found that "the lower one's education level, the higher their support for removal of the racist book from the public library" (117). Regarding religious affiliation, Protestants showed the highest level of support for removal, followed by Catholics, Jews, and respondents unaffiliated with religion (Bussert 2012). Regarding race, Bussert (2012) found that "while half of African American respondents supported removing a racist book, only one-third of white respondents did" (117).

Throughout the history of public libraries, censorship stemming from racial or ethnic background has been present. This censorship has come in various forms, including segregated library branches in the first part of the twentieth century, or the suppression of books or other materials spouting racist beliefs that occurs even to this day. When faced with a censorship challenge of this nature, it is important for librarians to remember the *Library Bill of Rights* and other ethical codes that guide them as a profession and encourage them to refrain from censoring such materials and ideas from their library.

Censorship and Religion

Censorship can also stem from religious beliefs (Wiegand 2015). According to Prebor and Gordon (2015), "Religiously motivated censorship is one of the most prevalent forms of censorship and has existed since antiquity" (28). Religious texts such as the Bible, the Talmud, and the Quran have all been censored at some time (Prebor and Gordon 2015). Even popular releases such as J. K. Rowling's Harry Potter series have been censored on religious

grounds due to the books' portrayal of witchcraft (Bald 2011).

In the history of public libraries, censorship due to religious reasons can be predominantly seen at the turn of the twentieth century with the tension between public libraries and the Roman Catholic Church. In 1895, Catholics in Portland, Oregon, complained that their public library subscribed to no Catholic magazines (Wiegand 2015). In addition, of the 1,400 books at that time that the Dewey Decimal System classified as religion, none were by a Catholic author. This eventually led to a priest in Fort Wayne, Indiana, to say that because Catholics paid taxes to support the library, they should be represented on the library board and that any books attacking the church should be removed (Wiegand 2015).

In 1938, a Catholic organization known as the National Organization for Decent Literature (NODL) was established to combat the publication and sale of lewd magazines and brochure literature (Wiegand 2015). In fact, the Roman Catholic Church has a long history with censorship. In 1559 the first index of forbidden books was published by Pope Paul IV. The index was used for hundreds of years, with the final edition being published in 1948 and officially being abolished in 1966 (Prebor and Gordon 2015).

Another example of censorship challenges grounded in religious beliefs involves the book *The Last Temptation of Christ* by Nikos Kazantzakis, a novel many people consider to be sacrilegious. The book was first published in English in 1960 and regularly appears on banned book lists (Bald 2006). In Santa Ana, California, a patron checked out the book and then renewed it. As soon as the book was returned, it was promptly checked out and then renewed by a friend of the original patron. The librarian soon discovered they were members of a group determined to keep the book out of circulation (Wiegand 2015). Protests of the book also occurred in Long Beach, Pasadena, Fullerton, and Newport Beach. In San Diego, several citizens claimed that the book was pornographic, defamed Christ, and was part of a Communist conspiracy (Wiegand 2015).

Libraries will often serve a patron base with differing religious views. This is something for librarians to be mindful of when making selection decisions. While the ALA's values would support having materials in the collection from a variety of differing religious viewpoints, it is important to note that there are Christian libraries and other faith-based library institutions with unique user needs that the collection development policy should address (Gehring 2016; Hippenhammer 1993; Hippenhammer 1994). It is important for the collection



development policy of any library to support the representation of differing religious viewpoints as well as the needs of the community it serves.

Censorship of Fiction

Public libraries began with the purpose of serving an aristocratic class as elitist centers for scholarly research (Harris 1973). However, this changed toward the end of the nineteenth century, when public libraries began to cater to the “common man.” Libraries began to strive to assist the poor with educating themselves and pulling themselves up to a higher socioeconomic class (Harris 1973). While public libraries have historically encouraged “self-improvement reading” (Wiegand 2015, 38), this did not always align with the desires of the public. Since the beginning of the public library movement, trends have shown the public’s taste for the current, popular fiction of the time (Wiegand 2015).

One example of fiction dominating a library’s circulation happened at the Boston Public Library. In 1859, the Boston Public Library found out firsthand that if the library did not provide the popular stories the public valued, whether or not they were deemed valuable by librarians or other cultural authorities, then circulation would decrease (Wiegand 2015). In 1875, *The Literary World* reported on the circulation of the different Boston Public Library branches. According to *The World*, fiction accounted for 79% of the East Boston branch circulation, 78% for South Boston, and 81% for Roxbury (Wiegand 2015).

While late-nineteenth-century American public libraries carried popular fiction in their collections to keep people coming back, this did not stop censorship attacks against it (Wiegand 2015). One tactic used by librarians around the turn of the century to limit access to fiction was through the use of closed versus open stacks. In the beginning of the public library movement, library stacks were closed and a patron would have to go to the desk to ask the librarian or other staff member to retrieve the book for which they were looking. After 1893, libraries began to open their stacks to the public. However, librarians would regularly put nonfiction out in the open stacks but keep fiction in the closed stacks as a way to get the public to read more nonfiction and less fiction (Wiegand 2015).

Another tactic libraries used to encourage the reading of nonfiction as opposed to fiction was moving from a one-book-per-visit rule to a two-book-per-visit rule that allowed patrons to check out only one fiction book as one of their two books (Wiegand 2015). This tactic continued

even after World War I. Prior to the war, the Los Angeles Public Library permitted patrons to check out three books at a time, and all could be fiction. After the war, the library extended the limit to five books, but only two of the books could be fiction (Wiegand 2015). However, this rule had little effect. While nonfiction circulation did increase by 7%, fiction still accounted for 74% of the library’s total circulation (Wiegand 2015).

While some libraries used tactics such as placing fiction in closed stacks or enforcing limits on the number of fiction books a patron could borrow at a time, other public libraries would outright ban fiction from their collections (Wiegand 2015). The public library in Germantown, Pennsylvania, refused to stock any fiction (Wiegand 2015). The Groton (Connecticut) Public Library moved into new quarters in 1867, and the librarian declared “there would be no fiction at all in the Library” (Wiegand 2015, 41). Whether libraries utilized closed versus open stacks to limit the public’s access to fiction, placed limits on how many fiction books a patron could borrow from the library at one time, or outright banned fiction from their collections altogether, the war against fiction is a pivotal example of censorship in the history of public libraries.

Censorship of Paperbacks

After World War II, to maximize sales, book publishers began to issue more paperbacks with alluring covers (Wiegand 2015). Merchants would then place these paperbacks on newsstands with their often suggestive covers out to attract customers (Wiegand 2015). Some people at this time claimed that the suggestive covers affected the moral standards of the country and led to increased juvenile delinquency. Some even argued it was a Communist conspiracy to take over the country (Wiegand 2015).

Several groups got involved in the issue, including the NODL. In the early 1950s, the NODL targeted paperbacks and comic books, even publishing lists it disapproved of in its monthly publication, *The Priest* (Wiegand 2015). NODL committees would even monitor newsstands and pressure the owners to stop selling these popular paperbacks (Wiegand 2015). Many librarians at the time either agreed with or were intimidated by the NODL and often refused to carry paperbacks in their collections (Wiegand 2015).

Wiegand (2015) says of this refusal by libraries in the 1950s to carry paperback books, which were significantly cheaper than hardbacks, “The library profession identified with that part of the publishing industry that favored hardbounds over the softcovers that newsstands and drugstores sold largely to working-class readers” (169). This



period marks an important point in the history of public libraries and the profession of librarianship in regards to censorship, particularly as it is an example of a large portion of the librarianship profession acting as censors themselves.

Censorship of Communist Materials

Public libraries in the 1950s faced pressure to censor materials believed to be spreading Communist ideas and beliefs (Wiegand 2015). Wisconsin senator Joseph McCarthy capitalized on America's Cold War fears about the Soviet Union and the Communist movement. He accused multiple civic agencies and institutions, including libraries, of spreading Communist ideas. He specifically targeted libraries that the recently established US Information Agency had opened at US embassies abroad. He claimed that these libraries had 30,000 Communist books, and the effects of his claims were felt throughout the American library community (Wiegand 2015).

Many librarians at this time proceeded to withdraw controversial materials from their libraries whether it was because they believed in McCarthy's message, or they simply wanted to save their jobs. However, some librarians did resist McCarthy and his message (Wiegand 2015). When the *Boston Herald* attacked the Boston Public Library for stocking books it claimed promoted Communism, a local Catholic newspaper in Boston as well as numerous citizens joined the librarians in a successful protest (Wiegand 2015). While some librarians adhered to the principles set forth in the *Library Bill of Rights* and some succumbed to pressure, the fear of Communism in America in the 1950s greatly impacted the entire American library community.

While censorship has always been a part of the history of American public libraries, it also has a long history of being present within the schools educating the nation's children.

Censorship in Schools

The Supreme Court has heard many cases regarding the First Amendment rights of students. In *West Virginia Board of Education v. Barnette* (1943), two students whose religion, Jehovah's Witnesses, forbade them from saluting or pledging to symbols, were expelled from school for refusing to salute the American flag and say the Pledge of Allegiance. In a 6-3 vote, the Court ruled in favor of the students (*West Virginia Board of Education v. Barnette* 1943).

In *Tinker v. Des Moines Independent Community School District* (1969), three students, including siblings John F. Tinker and Mary Beth Tinker, as well as their friend

Christopher Eckhardt, were expelled after they wore black armbands to school as a symbolic protest of the Vietnam War (ALA 2006). The Supreme Court held that students "do not shed their constitutional rights at the schoolhouse gate" (*Tinker v. Des Moines Independent Community School District* 1969, at 506) and that "the First Amendment protects public school students' rights to express political and social views" (ALA 2006, para. 25).

A pivotal Supreme Court ruling regarding First Amendment rights and censorship in school libraries was *Board of Education, Island Trees Union Free School District No. 26 v. Pico* (1982). In 1975, members of the school board from the Island Trees School District ordered that certain books be removed from high school and junior high school libraries on the grounds that the books were "anti-American, anti-Christian, anti-Semitic, and just plain filthy" (*Board of Education, Island Trees Union Free School District No. 26 v. Pico* 1982, at 857). Some of the books to be removed were *Slaughterhouse Five*, *Best Short Stories of Negro Writers*, *Go Ask Alice*, and *Down These Mean Streets* (Molz 1990). A high school student named Steven Pico led a group of students who sued the board, claiming a denial of their First Amendment rights. The case made its way to the Supreme Court, where a closely divided Court ruled 5-4 in favor of the students (ALA 2006).

In the ruling for the case, Justice William Brennan cited both *Tinker v. Des Moines School District* (1969) as well as *West Virginia Board of Education v. Barnette* (1943) and stated that "local school boards may not remove books from school library shelves simply because they dislike the ideas contained in those books and seek by their removal to 'prescribe what shall be orthodox in politics, nationalism, religion, or other matters of opinion'" (*Board of Education, Island Trees Union Free School District No. 26 v. Pico* 1982, at 872).

In the case *Counts v. Cedarville School District* (2003), the school board of the Cedarville, Arkansas, school district voted to restrict students' access to the popular Harry Potter book series on the grounds that the books promoted "disobedience and disrespect for authority" (*Counts v. Cedarville School District* 2003, at 1002) and dealt with "witchcraft" (at 1002) and "the occult" (at 1002). After the vote, students in the Cedarville school district were required to obtain a signed permission slip from a parent or guardian before they would be allowed to borrow any of the Harry Potter books from school libraries (ALA 2006). The district court overturned the board's decision and ordered the books returned to unrestricted circulation on the grounds that "the restrictions violated students'



First Amendment right to read and receive information” (ALA 2006, para. 23).

Twentieth-Century Changes: Movies, Music, and More

Throughout the twentieth century, technological advances changed the way Americans enjoyed their entertainment, whether through films, music recordings, or even the rise of new literary genres such as comic books. As each new form of entertainment rose in popularity, the censorship attempts became more prevalent.

Censorship of the Motion Picture Industry

Censorship of the motion picture industry became prevalent with the Motion Picture Production Code in the 1930s. The Motion Picture Production Code was the set of moral guidelines for the industry that was applied to most motion pictures released by major studios in the United States from 1930 to 1968. It was also known as the Hays Code, after Will H. Hays, who was the president of the Motion Picture Producers and Distributors of America (MPPDA) from 1922 to 1945 (Miller, 1994). Hays was the Chairman of the Republican National Committee from 1918 to 1921, and served as the US Postmaster General from 1921 to 1922, under President Warren G. Harding (Allen 1959). Several studios in Hollywood recruited Hays in 1922 to help rehabilitate Hollywood’s image after several risqué films and a series of off-camera scandals involving Hollywood stars tarnished the motion picture industry image (Miller 1994). Hays resigned as Postmaster General on January 14, 1922, to become president of the newly formed MPPDA (AP 1922).

The MPPDA, which later became known as the Motion Picture Association of America (MPAA), adopted the Production Code in 1930 and began strictly enforcing it in 1934 (Miller 1994). The Production Code clearly spelled out what content was acceptable and what content was not acceptable for motion pictures produced in the United States. Content restricted by the Production Code included “scenes of passion” unless essential to a film’s plot, “sex perversion,” adultery, “indecent” dancing, and white slavery (AP 1930, 3). The Production Code was adhered to well into the 1950s, and then with the emergence of television, influence of foreign films, and directors who would push the envelope,³ the Code began to

weaken. In 1968, the Production Code was replaced with the MPAA film rating system (Miller 1994).

Censorship of the Comic Book Industry

Controversy regarding comic books and their content surfaced shortly after their debut in the 1930s. The first group to object to comics was educators, who saw comics as a “bad influence on students’ reading abilities and literary tastes” (Nyberg n.d., para. 3). Church and civic groups objected to “immoral” content such as scantily clad women and the glorification of villains. The NODL added comics to the materials it evaluated (Nyberg n.d., para. 4).

After World War II, there was a rise in the popularity of horror comics, bringing a third group into the comic book debate: mental health experts. With a focus on juvenile delinquency, noted New York City psychiatrist Dr. Fredric Wertham campaigned to ban the sales of comics to children, arguing that “children imitated the actions of comic book characters” and that “the content desensitized children to violence” (Nyberg n.d., para. 5).

In September 1954, the Comics Magazine Association of America (CMAA) was formed in response to a widespread public concern over the gory and horrific content that was common in comic books of the time (“Horror” 1954). This led to the Comics Code Authority (CCA) and regulations on content published in comic books. Comic book publishers that were members would submit their comics to the CCA, which would screen them for adherence to its Code. If the book was found to be in compliance, then they would authorize the use of their seal on the book’s cover (Hajdu 2008). Pressure from the CCA and the use of its seal led to the censorship of comic books across the country.

Even before the adoption of the CCA, some cities had organized public burnings and bans on comic books (Costello 2009). The city councils of both Oklahoma City



Figure 1. The Comics Code Seal. Courtesy of the Comic Code Authority.

3. An example of a director pushing the envelope and working around Production Code guidelines was Alfred Hitchcock with his 1946 film *Notorious*. In the film, he worked around a three-

second-kissing-only rule by having the actors break off every three seconds, while the entire sequence actually lasts two and a half minutes (McGilligan 2004, 376).



and Houston passed city ordinances banning crime and horror comics (“Horror” 1954). The movement against comics even infiltrated public libraries, with the Charlotte (North Carolina) Public Library system refusing to carry them in its collections in 1951 (Wiegand 2015).

These regulations were devastating for the comic book industry. According to Hajdu (2008), work for comic book cartoonists dried up, with more than 800 creators losing their jobs. The number of comic book titles published dropped from 650 titles in 1954 to 250 in 1956 (Hajdu 2008). Over time, the industry was able to recover as publishers left the CCA one by one. In January 2011, Archie Comics, the last remaining publisher still participating, announced they were leaving the CCA, rendering the CCA and its Code defunct (Rogers 2011).

Censorship of the Recording Industry

The music recording industry has faced censorship stemming from the use of Parental Advisory labels. The labels are placed on music and other audio recordings if the recording uses excessive profanities or inappropriate references. The intention of the labels is to alert parents of material that is potentially unsuitable for younger children (Cole 2010).

The idea for the labels was first outlined by Tipper Gore, wife of Al Gore and eventual Second Lady of the United States, and her advocacy group the Parents Music Resource Center (PMRC) in a 1984 letter to the Recording Industry Association of America (RIAA) and sixty-two record labels (Schonfeld 2015). The PMRC initially proposed a rating code: “Violent lyrics would be marked with a ‘V,’ Satanic or anti-Christian occult content with an ‘O,’ and lyrics referencing drugs or alcohol with a ‘D/A’” (Schonfeld 2015). With little response, the PMRC then proposed a generic label warning of lyric content. The RIAA eventually gave in and agreed to put warning stickers on albums, with early versions of Parental Advisory labels first used in 1985 (Schonfeld 2015). In 1990, “Banned in the USA” by the rap group 2 Live Crew became the first album to bear the “black and white” Parental Advisory label (Schonfeld 2015, para. 10).

Parental Advisory labels were originally affixed on physical cassettes and then compact discs. Now, with the rise of digital music through online music stores and music streaming, the label is usually embedded in the digital artwork of albums that are purchased online (Cole 2010). While the evolution of digital music has reduced the Parental Advisory label system’s efficacy, use of the labels has nevertheless impacted the recording industry, in some cases leading to censorship of the recordings. Many

major retailers that distribute music, including Walmart, have enacted policies that do not allow the selling of any recordings containing the label in their stores (Cole 2010).

Censorship of LGBTQ Materials

Censorship of lesbian, gay, bisexual, transgender, queer and/or questioning (LGBTQ) materials has occurred throughout the twentieth century and continues to face censorship today. The American Library Association has seen an increase in organized, coordinated challenges to LGBTQ materials and services in libraries (ALA 2020), and homosexuality was cited as a reason for censorship in many analyses of censorship trends over the last several decades (Woods 1979; Harer and Harris 1994; Sova 1998; Doyle 2000; Foerstel 2002; Karolides, Bald, and Sova 2005). In addition, some state legislatures even limit state funding for libraries that do not agree to restrictions on certain controversial LGBTQ materials (Barack 2005; Oder 2006).

Censorship of LGBTQ materials in libraries has been a common area of research, both for school libraries (Coley 2002; Garry 2015; Hughes-Hassell, Overberg, and Harris 2013; Maycock 2011; Oltmann 2016b; Sanelli and Perreault 2001) and public libraries (Burke 2008; Cook 2004; Curry 2005; Stringer-Stanback 2011). Research has shown that while gay-themed materials are often the subject of censorship, the country as a whole is becoming less conservative and is more open to finding such materials in their libraries (Burke 2008). Furthermore, a supportive community and administration is of utmost importance when building a quality, inclusive library collection (Garry 2015).

Despite these findings, LGBTQ individuals do often face harassment, discrimination, and even violence in society as a whole. Many LGBTQ young adults have learned to be secretive about their sexual identity for fear of rejection from their peers or even their families (Rauch 2011). This is particularly true for young adults who attend schools in small, less diverse, rural communities and communities with limited financial resources (Kosciw, Greytak, and Diaz 2009). Those limited resources can be a particular drawback for public libraries, as they prevent them from circulating relevant, up-to-date materials



Figure 2. Parental Advisory Label. Courtesy of Recording Industry Association of America, Inc.



(Van Buskirk 2005) that might increase awareness and tolerance of LGBTQ individuals and issues. While “partisan or doctrinal disapproval” (ALA 2010, 49) plays a large role in these materials not being available where they are most needed, the fact remains that many librarians and information professionals in these areas simply do not have the funds to provide these materials, either to LGBTQ students or to those who surround them.

Much of the controversy over LGBTQ-themed literature and materials deals with their dissemination to children (Naidoo 2012). Kidd (2009) writes how the “censorship of children’s books has accelerated in the twentieth century, as the censorship of adult materials became less acceptable and as childhood was imagined more and more as a time of great innocence and vulnerability” (199). DePalma and Atkinson (2006) write that oftentimes children are considered to be innocent asexual beings, and therefore many believe they must be “protected from the dangerous knowledge of homosexuality” (DePalma and Atkinson 2006, 339). Parents frequently challenge books with LGBTQ themes, claiming they are not suitable for the child’s age group. This makes it difficult for families with LGBTQ members to access these materials. According to Wolf (1989), “Homophobia . . . still keeps most gay families hidden and accounts for the absence of information about them. It also keeps what information there is out of the library, especially the children’s room, and makes it difficult to locate through conventional research strategies,” (52).

One example of this occurred in Wichita Falls, Texas, and led to the federal case *Sund v. City of Wichita Falls, Texas* (2000). Residents of Wichita Falls, Texas, who were members of a church sought removal of the two books *Heather Has Two Mommies* and *Daddy’s Roommate*. The residents sought removal of the books because they disapproved of the books’ depictions of homosexuality. The City of Wichita Falls City Council then passed a resolution to restrict access to the books if a petition was able to get three hundred signatures asking for the restriction. A different group of citizens then filed suit after copies of the two books were removed from the children’s section of the library and placed on a locked shelf in the adult area (*Sund v. City of Wichita Falls, Texas* 2000). The District Court ruled that the city’s resolution permitting the removal of the two books improperly delegated governmental authority regarding selection decisions of books carried in the library and prohibited the city from enforcing the resolution (ALA 2006; Steele 2017; Steele 2019b).

As school libraries are often not safe spaces for LGBTQ teens, they will often seek out public libraries for resources

related to their issues and identity questions (Curry 2005). However, as Curry’s study showed, not all reference librarians were even aware of relevant terminology—for example, “gay-straight alliance”—and were therefore unable to address the questions posed to them by the researchers regarding their LGBTQ collections. Some also seemed nervous or uncomfortable with the questions being posed to them (Curry 2005, 70). This not only hindered the search, but also raised the question of whether the librarians were maintaining objectivity about the nature of the materials (Curry 2005, 72).

Alvin M. Schrader’s 2009 article, “Challenging Silence, Challenging Censorship, Building Resilience: LGBTQ Services and Collections in Public, School and Post-Secondary Libraries,” discusses the importance of including LGBTQ materials in libraries so that young people can turn to these materials for support. Schrader explains that librarians are avoiding building these collections and are claiming that their libraries do not serve people who need, or want, LGBTQ materials or that the library cannot afford to purchase those materials (107). Schrader challenges librarians to “foster diversity and resilience. They can create safe places. They can turn pain into opportunity, tolerance into celebration, despair into hope” (109). This message should empower librarians to resist the pressure to censor these materials in their libraries.

While some adults may feel that censoring certain materials from young people is a way of protecting them, it is in direct opposition of the ALA’s *Freedom to Read Statement*. Section 4 of the *Freedom to Read Statement* states, “There is no place in our society for efforts to coerce the taste of others, to confine adults to the reading matter deemed suitable for adolescents, or to inhibit the efforts of writers to achieve artistic expression” (ALA 2010, 203). Parents, teachers, and librarians all have a responsibility to prepare young people for the diversity of experiences that they will be exposed to in life. Through both the *Library Bill of Rights* and the *Freedom to Read Statement*, the ALA places the professional responsibility on librarians to provide the population with information that meets their needs, including the LGBTQ community.

The Internet and Twenty-First-Century Censorship

The question of what forms of communication are or are not protected under the First Amendment becomes even more complicated with the move into the digital age. The arrival of the internet brought a wave of new concerns, particularly about the safety of children. The



Communications Decency Act (CDA) was passed by Congress on February 1, 1996, and signed by President Bill Clinton on February 8, 1996. The CDA imposed criminal sanctions on anyone who knowingly

(A) uses an interactive computer service to send to a specific person or persons under 18 years of age, or (B) uses any interactive computer service to display in a manner available to a person under 18 years of age, any comment, request, suggestion, proposal, image, or other communication that, in context, depicts or describes, in terms patently offensive as measured by contemporary community standards, sexual or excretory activities or organs. (CDA 1996)

The CDA marked Congress's first attempt to regulate pornography on the internet. Parts of the law were eventually struck down by the landmark case *Reno v. American Civil Liberties Union* (1997). In the case, the American Civil Liberties Union (ACLU) filed suit against Janet Reno in her capacity as attorney general of the United States, claiming that parts of the CDA were unconstitutional. In the ruling on the case, a unanimous Supreme Court specifically extended the First Amendment to written, visual, and spoken expression posted on the internet (*Reno v. ACLU* 1997). This case was significant as it was the first to bring the First Amendment into the digital age.

Another prominent case dealing with censorship and the internet was *Mainstream Loudoun v. Board of Trustees of the Loudoun County Library* (1998). In this case, a group of adult library patrons and individuals in Loudoun County, Virginia, brought a suit against library trustees, board members, and the director of the county's public library, claiming that the library's use of internet blocking software to block child pornography and obscene material was an infringement on their First Amendment rights (*Mainstream Loudoun v. Board of Trustees of the Loudoun County Library* 1998). The library's internet policy was highly restrictive in that it treated adults the same as children. The court ruled that, because the library decided to provide internet access, the First Amendment limited the library board's discretion in placing content-based restrictions on access to the internet, therefore declaring the Loudoun County internet policy invalid (ALA 2006; Steele 2017; Steele 2019a).

In 1998, Congress passed its second attempt to regulate internet pornography, the Child Online Protection Act (COPA), which restricted access by minors to any material defined as harmful to such minors on the internet (COPA 1998). On June 29, 2004, in *Ashcroft v. American Civil Liberties Union*, the Supreme Court ruled that the law

was likely to be unconstitutional. The Court wrote, "filtering software may well be more effective than COPA is confirmed by the findings of the Commission on Child Online Protection, a blue-ribbon commission created by Congress in COPA itself. Congress directed the Commission to evaluate the relative merits of different means of restricting minors' ability to gain access to harmful materials on the Internet" (*Ashcroft v. ACLU* 2004, at 668).

On December 21, 2000, Congress passed into law the Children's Internet Protection Act (CIPA). The law requires K-12 schools and libraries in the United States to use internet filters to be eligible to receive e-rate federal funding (CIPA 2000). The law was later challenged by the ALA as unconstitutional, but the Supreme Court ruled that public libraries' use of internet filtering software does not violate their patrons' First Amendment free speech rights and that CIPA is constitutional (*United States v. ALA* 2003).

Also related to censorship and the internet is the censorship of social media content. Companies like Facebook and Twitter rely on a growing team of employees to remove offensive material—a practice known as "content moderation"—from their sites (Chen 2014). While the content being removed, such as pornography and gore, can be disturbing, it is censorship nonetheless. In addition, with the public becoming increasingly reliant on social media for their access to news, some social media sites have come under fire for censoring their trending news stories. Facebook has been accused of censoring its trending news sidebar and purposely omitting stories from conservative news sites, though research contradicts these claims (Bowles and Thielman 2016). With the rise of social media, the censoring of social media content is an issue that is becoming increasingly relevant to today's world.

As stated in the eighth edition of ALA's *Intellectual Freedom Manual* (2010), "Freedom to express oneself through a chosen mode of communication, including the Internet, becomes virtually meaningless if access to that information is not protected" (xvii). For some librarians, it made them question the very ideals and core values that the profession stands for. Bosseller and Budd (2015) write, "The Internet's entrance into the library changed (and challenged) many librarians' commitment to intellectual freedom" (34). Regardless, the internet and its ability to more quickly and easily provide access to information like never before has ushered in a new era for librarianship.

Whether dealing with the issue of obscenity, the evolution of technology and the internet, or other free speech controversies, the question of what is protected under an individual's First Amendment rights is an issue that is



highly debated. First Amendment rights and the right to free speech is also of particular concern for libraries when dealing with issues of censorship.

Conclusion

Foucault writes in *The History of Sexuality* (1978) how “instances of muteness which, by dint of saying nothing, imposed silence. Censorship” (17). Censorship has been, is, and will continue to be one of the single most important issues for librarians. This silencing has kept society from talking about many issues, particularly issues that some find controversial or uncomfortable to discuss. While some people may find it hard to allow these controversial materials to continue to take up residency in their

libraries, it is not up to them to decide how people should live their lives or what they should read.

Many librarians are not always in a position to take a proactive stance in enacting the *Library Bill of Rights*. This is sometimes caused by an inability to affect change, whether because of legislation, political and social norms, or financial shortcomings. However, in some cases, this is due to a lack of awareness of the extent, exact nature, and possible solutions to problems. By upholding professional guidelines set in the ALA’s *Library Bill of Rights*, *Code of Ethics*, and *Freedom to Read Statement*, librarians and information professionals can refrain from censorship and assist library users with their information needs to the best of their abilities.

References

- Allen, Frederick Lewis. 1959. *Only Yesterday: An Informal History of the 1920's*. New York: Harper & Row.
- American Library Association (ALA). 2006. “Notable First Amendment Court Cases.” <http://www.ala.org/advocacy/intfreedom/censorshipfirstamendmentissues/courtcases>.
- . 2010. *Intellectual Freedom Manual* (8th ed.). Chicago: ALA.
- . 2016. “Challenge Support.” <http://www.ala.org/tools/challengesupport>.
- . 2020. “State of America’s Libraries 2020: Issues and Trends.” <http://www.ala.org/news/state-americas-libraries-report-2020/issues-trends>.
- Ashcroft v. American Civil Liberties Union*, 542 U.S. 656, 124 S. Ct. 2783, 159 L. Ed. 2d 690 (2004). https://scholar.google.com/scholar_case?case=5352124576782659763&q=Ashcroft+v.+American+Civil+Liberties+Union&hl=en&as_sdt=206.
- Associated Press (AP). 1922. “Hays to be Mogul in Silver Screen Realm.” *San Antonio Express*, January 15, p. 4.
- . 1930. “Producers Adopt Code of Conduct for Screen Shows.” *Calgary Daily Herald*, April 1, p. 3. <https://news.google.com/newspapers?id=WyRkAAAAIIBAJ&sjid=WHsNAAAAIIBAJ&dq=motion%20picture%20producers%20and%20distributors%20of%20america&pg=3606%2C4315324>.
- Baggett, Holly. 1995. “The Trials of Margaret Anderson and Jane Heap.” In Susan Albertine, ed., *A Living of Words: American Women in Print Culture* (pp. 169–88). Knoxville: University of Tennessee Press.
- Bald, Margaret. 2006. *Banned Books: Literature Suppressed on Religious Grounds*, rev. ed. New York: Facts on File.
- . 2011. *Banned Books: Literature Suppressed on Religious Grounds*, 3rd ed. New York: Facts on File.
- Barack, Lauren. 2005. “AL Lawmaker to Ban Pro-Gay Books.” *School Library Journal* 51(1): 24.
- Board of Education, Island Trees Union Free School District No. 26 v. Pico*, 457 U.S. 853, 102 S. Ct. 2799, 73 L. Ed. 2d 435 (1982). https://scholar.google.com/scholar_case?case=11432514393725128521&q=Board+of+Education,+Island+Trees+Union+Free+School+District+No.+26+v.+Pico&hl=en&as_sdt=206.
- Bobinski, George S. 1968. “Carnegie Libraries: Their History and Impact on American Public Library Development.” *ALA Bulletin* 62(11): 1361–67.
- Bossaller, Jenny S., and John M. Budd. 2015. “What We Talk About When We Talk About Free Speech.” *Library Quarterly* 85(1): 26–44. <https://doi.org/10.1086/679024>.
- Bowles, Nellie, and Sam Thielman. 2016. “Facebook Accused of Censoring Conservatives, Report Says.” *Guardian*, May 9. <https://www.theguardian.com/technology/2016/may/09/facebook-newsfeed-censor-conservative-news>.
- Brown v. Board of Education*, 347 U.S. 483, 74 S. Ct. 686, 98 L. Ed. 873 (1954). https://scholar.google.com/scholar_case?case=12120372216939101759&q=Brown+v.+Board+of+Education&hl=en&as_sdt=6,25.
- Burke, Susan K. 2008. “Removal of Gay-Themed Materials from Public Libraries: Public Opinion Trends, 1973–2006.” *Public Library Quarterly* 27(3): 247–64. <https://doi.org/10.1080/01616840802229552>.
- Burke, Susan K. 2011. “Social Tolerance and Racist Materials in Public Libraries.” *Reference & User Services Quarterly* 49(4): 369–79. <https://doi.org/10.5860/rusq.49n4.369>.
- Bussert, Leslie. 2012. “Americans’ Tolerance of Racist Materials in Public Libraries Remained Steady Between 1976–2006.” *Evidence Based Library and Information Practice* 7(1): 116–19. <https://doi.org/10.18438/B83313>.



- Chen, Adrian. 2014. "The Laborers Who Keep Dick Pics and Beheadings Out of Your Facebook Feed." *Wired*, October 23. <https://www.wired.com/2014/10/content-moderation/>.
- Child Online Protection Act, Pub. L. 105-277, Div. C, Title XIV, 112 Stat. 2736 (1998). <https://www.gpo.gov/fdsys/pkg/PLAW-104publ104/pdf/PLAW-104publ104.pdf>.
- Children's Internet Protection Act, Pub. L. 106-554, Div. B, Title XVII, 114 Stat. 2763A-335 (2000). <https://www.gpo.gov/fdsys/pkg/PLAW-106publ554/pdf/PLAW-106publ554.pdf>.
- Cole, Tom. 2010. "You Ask, We Answer: 'Parental Advisory' Labels—The Criteria and the History." *NPR*, October 29. <http://www.npr.org/sections/therecord/2010/10/29/130905176/you-ask-we-answer-parental-advisory---why-when-how>.
- Coley, Ken P. 2002. "Moving Toward a Method to Test for Self-Censorship by School Library Media Specialists." *School Library Media Research* 5.
- Communication Decency Act of 1996, Pub. L. 104-104, Title V, 110 Stat. 133 (1996). <https://www.gpo.gov/fdsys/pkg/PLAW-104publ104/html/PLAW-104publ104.htm>.
- Comstock Act, Ch. 258, § 2, 17 Stat. 599 (1873), repealed with amended provisions at 18 U.S.C. § 1461. <https://memory.loc.gov/cgi-bin/ampage?collId=llsl&fileName=017/llsl017.db&recNum=640>.
- Cook, Jennifer Chance. 2004. "GLBTQ Teen Literature: Is it Out There in Indiana?" *Indiana Libraries* 23(2): 25-28.
- Costello, Matthew J. 2009. *Secret Identity Crisis: Comic Books and the Unmasking of Cold War America*. New York: Continuum.
- Counts v. Cedarville School District*, 295 F. Supp. 2d 996 (W.D. Ark. 2003). https://scholar.google.com/scholar_case?case=4899935302137642081&q=counts+v+cedarville+school+district&hl=en&as_sdt=206.
- Curry, Ann. 2005. "If I Ask, Will They Answer? Evaluating Public Library Reference Service to Gay and Lesbian Youth." *Reference & User Services Quarterly* (1): 65-75.
- Darling, Richard L. 1979. "Access, Intellectual Freedom and Libraries." *Library Trends* 27: 315-26.
- de Grazia, Edward. 1992. *Girls Lean Back Everywhere: The Law of Obscenity and the Assault on Genius*. New York: Random House.
- DePalma, Renée, and Elizabeth Atkinson. 2006. "The Sound of Silence: Talking About Sexual Orientation and Schooling." *Sex Education* 6(4): 333-49. <https://doi.org/10.1080/14681810600981848>.
- Doyle, Robert P. 2000. *Banned Books: 2000 Resource Book*. Chicago: ALA.
- Foerstel, Herbert N. 2002. *Banned in the U.S.A.: A Reference Guide to Book Censorship in Schools and Public Libraries*. Westport, CT: Greenwood Press.
- Foucault, Michel. 1978. *The History of Sexuality. An Introduction*. New York: Random House.
- Garry, Candi Pierce. 2015. "Selection or Censorship? School Librarians and LGBTQ Resources." *School Libraries Worldwide* 21(1): 73-90.
- Gehring, Denise Rachel. 2016. "Faith-Informed Intellectual Freedom: An Annotated Bibliography." *Collection Building* 35(2): 48-53. <https://doi.org/10.1108/CB-12-2015-0020>.
- Gillers, Stephen. 2007. "A Tendency to Deprave and Corrupt: The Transformation of American Obscenity Law from *Hicklin* to *Ulysses*." *Washington University Law Review* 85(2): 215-96.
- Gorman, Michael. 2000. *Our Enduring Values*. Chicago: ALA.
- Hajdu, David. 2008. *The Ten-Cent Plague: The Great Comic-Book Scare and How It Changed America*. New York: Picador.
- Harer, John B., and Steven R. Harris. 1994. *Censorship of Expression in the 1980s: A Statistical Survey*. Westport, CT: Greenwood Press.
- Harris, Michael. 1973. "The Purpose of the American Public Library: A Revisionist Interpretation of History." *Library Journal* (1876) 98: 2509-14.
- Hippenhammer, Craighton. 1993. "Patron Objections to Library Materials: A Survey of Christian College Libraries, Part I." *Christian Librarian* 37(1): 12-17.
- . 1994. "Patron Objections to Library Materials: A Survey of Christian College Libraries, Part II." *Christian Librarian* 37(2), 40-47.
- "Horror on the Newsstands." 1954. *Time*, September 27, 64(13): 79.
- Hughes-Hassell, Sandra, Elizabeth Overberg, and Shannon Harris. 2013. "Lesbian, Gay, Bisexual, Transgender, and Questioning (LGBTQ)-Themed Literature for Teens: Are School Libraries Providing Adequate Collections?" *School Library Research* 16: 1-18.
- Jacobellis v. Ohio*, 378 U.S. 184, 84 S. Ct. 1676, 12 L. Ed. 2d 793 (1964). https://scholar.google.com/scholar_case?case=15356452945994377133&q=Jacobellis+v.+Ohio&hl=en&as_sdt=206.
- Joyce, James. 1922. *Ulysses*. Paris, France: Sylvia Beach.
- Karolides, Nicholas J., Margaret Bald, and Dawn B. Sova. 2005. *120 Banned Books: Censorship Histories of World Literature*. New York: Checkmark Books.
- Kidd, Kenneth. 2009. "Not Censorship but Selection: Censorship and/as Prizing." *Children's Literature in Education* 40(3): 197-216. <https://doi.org/10.1007/s10583-008-9078-4>.
- Knox, Emily. 2014. "'The Books Will Still Be in the Library': Narrow Definitions of Censorship in the Discourse of Challengers." *Library Trends* 62(4): 740-49. <https://doi.org/10.1353/lib.2014.0020>.
- Kosciw, Joseph G., Emily A. Greytak, and Elizabeth M. Diaz. 2009. "Who, What, Where, When, and Why: Demographic



- and Ecological Factors Contributing to Hostile School Climate for Lesbian, Gay, Bisexual, and Transgender Youth.” *Journal of Youth and Adolescence* 38(7): 976–88. <https://doi.org/10.1007/s10964-009-9412-1>.
- Lambe, Jennifer L. 2002. “Dimensions of Censorship: Reconceptualizing Public Willingness to Censor.” *Communication Law & Policy* 7(2): 187–235. https://doi.org/10.1207/S15326926CLP0702_05.
- Magnuson, Marta L. 2011. “Perceptions of Self and the ‘Other’: An Analysis of Challenges to *And Tango Makes Three*.” *School Library Media Research* 14: 1–9.
- Mainstream Loudoun v. Board of Trustees of Loudoun*, 24 F. Supp. 2d 552 (E.D. Va. 1998). https://scholar.google.com/scholar_case?case=13796536557265673818&q=mainstream+loudoun&hl=en&as_sdt=206.
- Maycock, Angela. 2011. “Issues and Trends in Intellectual Freedom for Teacher Librarians: Where We’ve Come from and Where We’re Heading.” *Teacher Librarian* 39(1): 8–12.
- McGilligan, Patrick. 2004. *Alfred Hitchcock: A Life in Darkness and Light*. New York: Harper Perennial.
- Miller, Frank. 1994. *Censored Hollywood: Sex, Sin, and Violence on Screen*. Atlanta, GA: Turner Publishing.
- Miller v. California*, 413 U.S. 15, 93 S. Ct. 2607, 37 L. Ed. 2d 419 (1973). https://scholar.google.com/scholar_case?case=287180442152313659&q=miller+v+california&hl=en&as_sdt=206.
- Molz, R. Kathleen. 1990. “Censorship: Current Issues in American Libraries.” *Library Trends* 39(1/2): 18–35.
- Naidoo, Jamie Campbell. 2012. *Rainbow Family Collections: Selecting and Using Children’s Books with Lesbian, Gay, Bisexual, Transgender, and Queer Content*. Santa Barbara, CA: ABC-CLIO.
- New York v. Ferber*, 458 U.S. 747, 102 S. Ct. 3348, 73 L. Ed. 2d 1113 (1982). https://scholar.google.com/scholar_case?case=1226851723986989726&q=new+york+v+ferber&hl=en&as_sdt=206.
- Nyberg, Amy Kiste. n.d. *Comics Code History: The Seal of Approval*. <http://cblidf.org/comics-code-history-the-seal-of-approval/>.
- Oder, Norman. 2006. “Oklahoma Targets Gay Books.” *Library Journal* (1976) 131(7): 20.
- Oltmann, Shannon M. 2016a. “Intellectual Freedom and Freedom of Speech: Three Theoretical Perspectives.” *Library Quarterly* 86(2): 153–71. <https://doi.org/10.1086/685402>.
- . 2016b. “‘They Kind of Rely on the Library’: School Librarians Serving LGBT Students.” *Journal of Research on Libraries and Young Adults* 7(1): 1–21.
- Oppenheim, Charles, and Victoria Smith. 2004. “Censorship in Libraries.” *Information Services & Use* 24(4): 159–70. <https://doi.org/10.3233/ISU-2004-24401>.
- Osborne v. Ohio*, 495 U.S. 103, 110 S. Ct. 1691, 109 L. Ed. 2d 98 (1990). https://scholar.google.com/scholar_case?case=4775063558409617777&q=Osborne+v.+Ohio&hl=en&as_sdt=206.
- Paul, James C. N., and Murray L. Schwartz. 1961. *Federal Censorship: Obscenity in the Mail*. New York: Free Press of Glencoe.
- Pinnell-Stephens, June. 1999. “Libraries: A Misunderstood American Value.” *American Libraries* 30(6): 76–81.
- Pinnell-Stephens, June. 2012. *Protecting Intellectual Freedom in Your Public Library: Scenarios from the Front Lines*. Chicago: ALA.
- Prebor, Gila, and David Gordon. 2015. “Collection Development and Censorship in Torah Studies Libraries in Israel.” *Collection Management* 40(1): 27–55. <https://doi.org/10.1080/01462679.2014.965862>.
- Rauch, Elisabeth W. 2011. “GLBTQ Collections are for Every Library Serving Teens!” *Teacher Librarian* 39(1): 13–16.
- Regina v. Hicklin*, L.R. 3 Q.B. 360 (1868).
- Reno v. American Civil Liberties Union*. 521 U.S. 844, 117 S. Ct. 2329, 138 L. Ed. 2d 874 (1997). https://scholar.google.com/scholar_case?case=1557224836887427725&q=Reno+v.+American+Civil+Liberties+Union&hl=en&as_sdt=206.
- Rogers, Vaneta. 2011. “Archie Dropping Comics Code Authority Seal in February.” *Newsarama*, January 21. <http://www.newsarama.com/6892-archie-dropping-comics-code-authority-seal-in-february.html>.
- Rosen v. United States*, 161 U.S. 29, 16 S. Ct. 434, 40 L. Ed. 606 (1896). https://scholar.google.com/scholar_case?case=835112669579863938&q=Rosen+v.+United+States&hl=en&as_sdt=206.
- Roth v. United States*, 354 U.S. 476, 77 S. Ct. 1304, 1 L. Ed. 2d 1498 (1957). https://scholar.google.com/scholar_case?case=14778925784015245625&q=Regina+v.+Hicklin&hl=en&as_sdt=206.
- Sanelli, Maria, and George Perreault. 2001. “‘I Could Be Anybody’: Gay, Lesbian, and Bisexual Students in US Schools.” *NASSP Bulletin* 85(622): 69–78. <https://doi.org/10.1177/019263650108562209>.
- Schonfeld, Zach. 2015. “Does the Parental Advisory Label Still Matter?” *Newsweek*, November 10. <http://www.newsweek.com/does-parental-advisory-label-still-matter-tipper-gore-375607>.
- Schrader, Alvin M. 2009. “Challenging Silence, Challenging Censorship, Building Resilience: LGBTQ Services and Collections in Public, School and Post-Secondary Libraries.” *Feliciter* 55(3): 107–9.
- Sova, Dawn B. 1998. *Banned Books: Literature Suppressed on Social Grounds*. New York: Facts On File.
- Steele, Jennifer E. 2017. “Censorship in Public Libraries: An Analysis Using Gatekeeping Theory.” PhD diss., University of Alabama, Tuscaloosa, Alabama.
- Steele, Jennifer E. 2019a. “Cases of Censorship in Public Libraries: Loudoun County, VA.” *Public Library Quarterly*. <https://doi.org/10.1080/01616846.2019.1660755>.



- . 2019b. “Cases of Censorship in Public Libraries: Wichita Falls, TX.” *Public Library Quarterly*. <https://doi.org/10.1080/01616846.2019.1692324>.
- Stringer-Stanback, Kynita. 2011. “Young Adult Lesbian, Gay, Bisexual, Transgender, and Questioning (LGBTQ) Non-Fiction Collections and Countywide Anti-Discrimination Policies.” *Urban Library Journal* 17(1): 1–27.
- Sund v. City of Wichita Falls, Texas*, 121 F. Supp. 2d 530 (N.D. Texas 2000). https://scholar.google.com/scholar_case?case=5196691822154706461&q=sund+v+city+of+wichita+falls+tex&hl=en&as_sdt=206.
- Thompson, Anthony Hugh. 1975. *Censorship in Public Libraries in the United Kingdom During the Twentieth Century*. Epping, England: Bowker.
- Tinker v. Des Moines Independent Community School District*, 393 U.S. 503, 89 S. Ct. 733, 21 L. Ed. 2d 731 (1969). https://scholar.google.com/scholar_case?case=15235797139493194004&q=Tinker+v.+Des+Moines+Independent+Community+School+District&hl=en&as_sdt=206.
- United States v. American Library Association, Inc.*, 539 U.S. 194, 123 S. Ct. 2297, 156 L. Ed. 2d 221 (2003). https://scholar.google.com/scholar_case?case=7891716025089102487&q=United+States+v.+American+Library+Association,+Inc&hl=en&as_sdt=206.
- United States v. One Book Called “Ulysses,”* 5 F. Supp. 182 (S.D.N.Y. 1933). https://scholar.google.com/scholar_case?case=5544515174778878625&q=United+States+v.+One+Book+Called+%E2%80%9CUlysses%E2%80%9D&hl=en&as_sdt=206.
- Van Buskirk, Jim. 2005. “Out of the Closet?” *Library Journal* 130(6): 62–65.
- Wachsberger, Ken. 2006. Preface to Dawn B. Sova, *Banned Books: Literature Suppressed on Sexual Grounds*, rev. ed. (pp. vii–viii). New York: Facts on File.
- Walker v. Popenoe*, 149 F.2d 511 (D.C. Cir. 1945). https://scholar.google.com/scholar_case?case=1236221801164736269&q=Walker+v.+Popenoe&hl=en&as_sdt=206.
- West Virginia Board of Education v. Barnette*, 319 U.S. 624, 63 S. Ct. 1178, 87 L. Ed. 1628 (1943). https://scholar.google.com/scholar_case?case=8030119134463419441&q=West+Virginia+Board+of+Education+v.+Barnette&hl=en&as_sdt=206.
- Wiegand, Wayne A. 2015. *Part of Our Lives: A People’s History of the American Public Library*. New York: Oxford University Press.
- Wolf, Virginia L. 1989. “The Gay Family in Literature for Young People.” *Children’s Literature in Education* 20(1): 51–58. <https://doi.org/10.1007/BF01128040>.
- Woods, L. B. 1979. *A Decade of Censorship in America: The Threat to Classrooms and Libraries, 1966–1975*. Metuchen, NJ: Scarecrow Press.