
Reality Bites: The Collision of Rhetoric, Rights, and Reality and the Library Bill of Rights

SHIRLEY A. WIEGAND

ABSTRACT

THIS ARTICLE SUGGESTS THAT THE LIBRARY PROFESSION examine the Library Bill of Rights and remove from it those statements which do not represent current legal principles. Library professionals and their patrons must have available a clear statement of those First Amendment principles which receive legal support. A carefully edited document would serve as that statement. The material culled from the Library Bill of Rights may contribute to the creation of a second document which would represent the profession's aspirational and inspirational creed. This creed, albeit lacking in legal support, might provide inspiration to library professionals and would provide them with a standard which goes beyond First Amendment mandate. It might be incorporated into the employment contract for library professionals, but it would not represent the current state of legal principles. This proposal separates rhetoric from rights to produce a set of principles which reflect reality.

INTRODUCTION

Because this article focuses on three distinct but related issues—rhetoric, rights, and reality—it is in one sense a series of expanded “sound bites.” But the term “bite” has a more significant meaning here. When examining the Library Bill of Rights, it becomes clear that the rhetoric of rights often clashes with reality; reliance upon the rhetoric will, in the final analysis, lead to the conclusion that reality *bites*. This article proposes a realistic approach to the rhetoric of rights.

Shirley A. Wiegand, University of Oklahoma, College of Law, 300 Timberdell Road, Norman, OK 73019

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RHETORIC

"Religious sect"—"pro-life"—"feminist"—"radical"—"far left"—"far right"—"political correctness." Readers will probably agree these are "buzzwords"—i.e., shorthand hot button terms and phrases that often produce a visceral emotional reaction. But the same can be said for words like "rights" and "censorship." These words are frequently bandied about within the library and legal communities, yet they end up meaning different things to different people. The Library Bill of Rights is rife with examples of rhetoric unsupported by the legal principles that usually undergird "rights." Baldwin addresses these in his article in this issue of *Library Trends*. This article, however, focuses primarily on just one example—censorship.

When a library patron requests a particular book that is not included in the library collection, is expensive, and has not been requested by anyone else, the librarian may refuse to order the book, believing she or he is simply exercising good judgment and responding in the community's best interest. The patron, however, believes the library has engaged in censorship.

Amy Hielsberg, a graduate student at the University of Wisconsin-Madison's School of Library and Information Studies, complained publicly about "censorship" in her intellectual freedom class in the fall of 1993 (Hielsberg, 1994, p. 768). As her class presentation, she had decided to focus on the controversial novel *American Psycho* by Bret Easton Ellis (1991). She was well aware of the criticism directed at the book. Simon and Schuster had reneged on a decision to publish it; the Los Angeles chapter of the National Organization for Women had called it "misogynist" and a "manual on the mutilation of women" (p. 768). As Hielsberg began reading a passage she described as "a gruesome scene about the electrocution of a prostitute by means of jumper cables and the dismemberment and decapitation of a female acquaintance," one student objected. "I will not listen to another word of this!" she shouted. "You are verbally abusing me." Hielsberg claims she was shocked: "The last thing I had expected was to be 'challenged' in an intellectual freedom class," she said. "I didn't expect a fight" (pp. 768, 769).

Why not? Why didn't she expect a fight? And why was the challenge viewed so unfavorably? Why didn't she expect some students to speak out? In fact, the challenge gave Hielsberg an opportunity to defend her selection of topics and to formulate arguments supporting her decision to read the controversial selection. Yet she believed the student who spoke out was engaging in the sin of censorship rather than exercising *her* right to object. Criticism is not censorship.

Another writer, a public library trustee, related his experience at an American Library Association (ALA) Conference in June 1990 (Sheerin, 1991, p. 440). A self-described "First Amendment purist," speaking to

the crowd, condemned a series of censorship attempts by various right-wing groups. During a question and answer period, the library trustee spoke up. A state-funded library agency had refused to accept as a donation the film *The Silent Scream* (1985), which claims to show, through ultrasound imaging, the destruction of a fetus during abortion. He also noted that a citizen had complained that community libraries failed to stock *anti-abortion* materials. Did the speaker believe such an act also constituted censorship? The ALA speaker responded only with a “bemused shrug of the shoulders” (Sheerin, 1991, p. 440).

Nat Hentoff (1992), author of *Free Speech for Me, But Not for Thee*, recalls a trip he took to Idaho to give a speech on the First Amendment. At the time, Coeur d’Alene, a town of 20,000 people, had been keenly divided over a series of textbooks in the schools. “Opponents of the texts claimed that the books proselytized for witchcraft, satanism, and the occult,” he writes. When a local minister came to see Hentoff: “We went over a couple of volumes, and he pointed out what he saw as the satanism, the violence, the subliminal preaching of witchcraft” (p. 4). Hentoff disagreed with the minister about the dangers of the texts, but he wasn’t the only one. Advocates of the new texts “were spreading the word that [the minister] and his followers were not only censors but kooks, zealots, obviously unable to take part in any meaningful dialogue on school curriculum.” Furthermore, the text advocates complained: “These are the people ...who are trying to impose *their* values on us.” But the minister astutely observed to Hentoff: “Surely...we have a right to protest, a right to fight for our beliefs” (pp. 4-5). Hentoff agreed and so do I.

When citizens of any persuasion engage in censorship rhetoric, what do they mean? Do they mean that any attempt to question or challenge them is itself censorship? Does it mean that silencing a particular viewpoint is not censorship but merely good judgment? At least one librarian has acknowledged “the simple truth that libraries not only gather and dispense information; they also select and screen it. The librarian is, by the very nature of his role in society, a censor...” (Swan, 1979, p. 2042).

The state agency that refused to accept the donation of *The Silent Scream* justified its decision by asserting that some of the points in the film are “medically questionable” (Sheerin, 1991, p. 444, n.1). That argument might be plausible if a library book poses an immediate medical danger. Take, for example, a mushroom encyclopedia Baldwin discusses in his article, which erroneously identifies a poisonous mushroom as harmless.¹ But the argument is not as compelling in the circumstances mentioned above when it begins to suggest viewpoint censorship. Although the term “censorship” is often misused or abused, it is *not* the case that the term cannot be defined. It can be. And it is of utmost importance that library professionals examine the definition before using such an incendiary word.

Black's Law Dictionary defines censorship as: "Review of publications, movies, plays, and the like for the purpose of prohibiting the publication, distribution, or production of material deemed objectionable as obscene, indecent, or immoral" (1990, p. 224). Under this definition, the student who objected to the gruesome readings in Hielsberg's class was making no attempt to censor but was merely expressing a personal objection to having to listen to extremely offensive speech. On the other hand, a library which refuses to "distribute" a work based on particular grounds other than financial may in fact be engaging in censorship.

Black's Law Dictionary (1992) refers to the prohibition of works which are "obscene, indecent, or immoral" as an event which implicates censorship. The *Random House Dictionary of the English Language* points out that a censor is "an official who examines books, plays, news reports . . . etc., for the purpose of suppressing parts deemed objectionable on moral, political, military, or other grounds" (Flexner, 1987, p. 334). Under either definition, criticism of, or a challenge to, particular books or other works does not constitute censorship. Prohibition or suppression does constitute censorship, but only if the work is prohibited or suppressed because of its objectionable content. Thus, a library may refuse to stock a particular book because the library has only limited funds and it believes, in good faith, that the community it serves would not use such a book.

But when a library refuses to stock an entire type of book despite public demand, then a charge of censorship becomes more compelling. Why, for example, would a library refuse to stock any of the wildly popular Nancy Drew books?² Public demand—or not—may dictate whether a library is engaging in censorship. When a library refuses to purchase (or even accept a gift of) Madonna's (1992) book, *Sex*, despite public demand, an assertion that it is engaging in censorship also seems sound. Contrast two approaches to this now-dated controversy.

One librarian, while initially relishing the publicity and media attention he received, quickly backed down. When the mayor asked him to cancel the order for Madonna's book, he complied: "He's the boss; these are public funds"—i.e., funds collected from the tax-paying public, not from the mayor personally. Within days, citizens had donated three copies to the library, and the mayor thereafter left the decision to the library board. Still, the librarian responded, "I will recommend that the board not accept the gift, and they will probably take my advice." The book, he says, is "pure trash, not even well designed" (Kniffel, 1992, p. 902). Another librarian ordered the book despite the mayor's public statement that the book was pornographic and did not belong in the public library. She stated: "We are trying to get people to understand the concept of freedom of information and the dangers of censorship" (p. 903). From these examples in the library community, it would appear that one man's rhetoric (of censorship) is another (wo)man's reality.

RIGHTS

The rhetoric of "rights" creates confusion and is often unrealistic. Again a definitional analysis will prove helpful. A "bill of rights," according to a standard dictionary, is "a statement of the rights belonging to or sought by any group" (Flexner, 1987, p. 207). *Black's Law Dictionary* defines it as a "formal and emphatic legislative assertion and declaration of popular rights and liberties..." (Black, 1990, p. 164).

As a first step, it is obvious that any effective statement of rights must at least be understandable. Baldwin (1996) has discussed at length in his article the problems of ambiguity and vagueness which mar the Library Bill of Rights. But, it can be argued, the U. S. Bill of Rights suffers from the same problems. After all, what does it mean to say that: "A well regulated Militia, being necessary to the security of a free State, the right of the people to keep and bear Arms, shall not be infringed" (U.S. Constitution, amendment II)? Or that "[t]he right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated" (U.S. Constitution, amendment IV)?

But for over a period of 200 years, the *national* document, unlike the *library* document, has benefitted from scrutiny by thousands of scholars, along with federal and state judges alike. Judicial interpretive opinions have been reduced to writing and distributed to the offices of every lawyer in the country. The First Amendment *is* the law of the land.

But such is not the case with the library's document. "The LBR [Library Bill of Rights] is nobody's law; it is a declaration of guiding principles" (Swan, 1979, p. 2043). Although numerous pages of interpretation serve to flesh out some of the skeletal six articles, the document remains rhetoric mixed with reality. It is, therefore, all the more important that the document be worded clearly, carefully, and, as Baldwin has noted, more realistically.

This article will not repeat Baldwin's criticism. Of course he is correct in asserting that "the legal basis for the Library Bill of Rights is weak." He is also correct when he notes that it "promises more than the First Amendment guarantees."

How can one possibly reconcile the Library Bill of Rights with current legal principles concerning minors? The library policy would give free unrestricted use of the library and library materials to minors to the same extent that it gives adults. But the legal system recognizes a clear distinction between the two groups, refusing to provide to minors the same rights guaranteed to adults. No matter how strongly the library profession believes in the minor's right of access, no matter how strongly worded the Library Bill of Rights, an argument in favor of providing minors with the full panoply of rights would fail in a court of law.

But the fact that the library's document promises more than it can deliver should not be condemned for that reason alone. After all,

governmental actions can certainly provide more protection than the Constitution requires; they simply cannot provide less. The Constitution serves as a floor, not a ceiling. What may legitimately be condemned, though, is the false representation that the Library Bill of Rights serves as a legal guarantee or as an accurate reflection of current legal doctrine.

Before examining more closely the issue of "rights," however, an initial set of questions must be addressed. Who is the audience? For whom is the Library Bill of Rights drafted? For the profession generally? For library patrons? For individual library administrators? Isn't a bill of rights drafted to inform a particular group of its protected rights? If so, then the audience for the Library Bill of Rights consists of library patrons. Do they ever read it? Do they know it exists? Is it accurate and helpful? Can they enforce it?

Assume that a patron does have access to the Library Bill of Rights and reads Article 2: "Libraries should provide materials and information presenting all points of view on current and historical issues" (ALA, 1992, p. 3). The patron wishes the library to order an expensive book or movie, which documents an obscure historical event. Because of the low demand and high price, the library refuses. Can the patron, armed with her "bill of rights," march into court to enforce it? Probably not.

Assume also that a patron reading the Library Bill of Rights encounters Article 3: "Libraries should challenge censorship in the fulfillment of their responsibility to provide information and enlightenment" (ALA, 1992, p. 3). The patron wishes to file a lawsuit against a magazine which refused to publish an article of his, calling it "incendiary separatist tripe." Can the patron demand his "right" to have the *library* challenge this act of censorship (even if his work is of great value and is denied publication solely because of its content)? Of course not.

So, if the Library Bill of Rights is at times unhelpful to library patrons, what good does it serve? More likely than not, it is designed for an audience of professional librarians. But if all they read is the six-article Bill of Rights along with the interpretations, they too may find it at times unhelpful and at other times downright misleading. It will not offer much protection in the midst of a First Amendment dispute.

It seems clear that the Library Bill of Rights seeks to serve two very different communities for two very different purposes. How can a document inform library patrons of their actual rights and still inspire library professionals to strive for something more, to reach beyond the mere letter of the law, to serve as a "bulwark of our constitutional republic" (ALA, 1992, p. ix)?

REALITY

Consider a proposal that provides a realistic approach to library policy and legal principles. Perhaps the library community would benefit from

two documents. Certainly a statement of principles which satisfy First Amendment requirements would be helpful—e.g., a bill of rights which reflects First Amendment analysis and sets forth clearly the narrow legal rights which belong to library patrons. Librarians must know precisely what conduct will trigger First Amendment protections, and library patrons must know when such conduct is actionable—i.e., when a court of law will intervene to enforce patrons' legal rights.

But it might also be helpful to view a document like the current Library Bill of Rights as an additional aspirational creed, something which provides more than minimal protection to library patrons and serves a purpose other than a bill of rights. It would serve as guidance for private libraries as well, which are not subject to the same constitutional stricture as public libraries. And it would go beyond the minimal protection offered by the First Amendment. As mentioned previously, governmental actors can certainly provide more protection than the constitution requires.

Baldwin's constitutional critique would certainly contribute to the document of legal principles—i.e., the accurately titled "bill of rights" with the First Amendment serving as its foundation. The second document would operate aspirationally and inspirationally and focus not on the rights of library patrons but on the institutional behavior of librarians. The second document could be titled "A Call to Arms" or the "Library Manifesto" or the "Librarian's Code of Ethics." The latter, of course, will have a familiar ring. The ALA Council adopted a Code of Ethics years ago, which, surprisingly, is not well-known. Its current form, substantially amended from the 1981 version, was adopted by the ALA Council on June 28, 1995 (see Appendix).

The *ALA Code of Ethics* (ALA, 1995) consists of a preamble and eight principles. It marks a substantial improvement over its predecessor and, at the same time, acknowledges its limited value as a framework only. It speaks in general terms about the profession's commitment to: (1) equitable service and access; (2) intellectual freedom and resistance to "all efforts to censor"; (3) privacy and confidentiality; (4) intellectual property rights; (5) fair treatment in the workplace; (6) subordinating one's personal interest and convictions to one's professional responsibilities; and (7) professional growth.

In its current form, the *ALA Code of Ethics* is laudable, but it suffers from a lack of specificity. Its aspirational and inspirational functions should not be ignored. But what will make it a workable, helpful document is the addition of commentary designed to demonstrate the circumstances under which the document will operate and to suggest ethical responses to real situations. It might more accurately be titled a Statement of Philosophy.³

At the same time, librarians must be advised that the document—the Statement of Philosophy—goes beyond legal mandate. Unlike the now streamlined Bill of Rights suggested earlier, this statement would reflect a

belief in more protection than the law requires. It is in this statement that much of the rhetoric now culled from the current Library Bill of Rights might be reinstated. In this document, librarians can set as their goal the advocacy of minors' rights, a strengthening of First Amendment protection, and advocacy against censorship, recognizing that, although the legal system might not support such a position, the library profession favors it nevertheless. The great difficulty of adopting such an aspirational statement is that, unlike the proposed "bill of rights," the statement will not have the force of law.⁴ A comparison to the lawyer's code of ethics might prove helpful here.

The legal community in all fifty states is governed by Rules of Professional Conduct. These rules are initially drafted as "model" rules by a national legal organization, the American Bar Association (similar in its role to the American Library Association). "Comments" accompany the rules themselves. They "provide guidance for practicing in compliance with the rules [but] do not add obligations to the rules" (Wisconsin Supreme Court Rule Ch. 20 Preamble, hereinafter Wis. SCR). The comments generally employ specific examples of ethical dilemmas lawyers face and offer clear interpretations of the rules that govern resolution of the dilemma.

The Model Rules of Professional Conduct and Comments have no force in and of themselves. But the Model Rules, once adopted by the American Bar Association, then become the subject of discussion and amendment by each of the separate state legal communities. Judges and lawyers in each state discuss and evaluate the model rules and occasionally suggest minor changes. The state supreme court then adopts the model rules, as amended, as state supreme court rules. The result is that lawyers in all fifty states are governed by the Rules of Professional Conduct adopted for their particular state, but which bear a remarkable similarity to the original model rule.

These rules govern the behavior of all lawyers practicing within the state, subjecting those lawyers to sanctions for violation of the rules, even when such behavior is otherwise legal. For example, in Wisconsin, the rules provide that "[a] lawyer shall provide competent representation to a client" (Wis. SCR 20:1.1); "[a] lawyer shall act with reasonable diligence and promptness in representing a client" (Wis. SCR 20:1.3); and "[a] lawyer shall keep a client reasonably informed about the status of a matter and promptly comply with reasonable requests for information" (Wis. SCR 20:1.4(a)). Another Rule requires that:

[A] lawyer shall not reveal [attorney-client] information . . . except . . . to the extent the lawyer reasonably believes necessary to prevent the client from committing a criminal or fraudulent act that . . . is likely to result in death or substantial bodily harm or in substantial injury to the financial interest of another.. (Wis. SCR 20:1.6)

The persuasiveness of these rules, that which makes them more than aspirational, lies in their enforcement. Because lawyers cannot practice law without a license, they are subject to such licensing requirements as each state supreme court chooses to adopt. That same court enforces the requirements through state bar disciplinary boards. Violation of the Rules of Professional Conduct may result in public or private reprimands, monetary penalties, or even revocation of the license to practice law (Wis. SCR 21.06). Without that license, a lawyer, like a doctor, cannot practice his or her profession.

A review of recent state court proceedings reveals the seriousness with which the Rules of Professional Conduct are taken. For example, in just one month—June 1995—the Wisconsin Supreme Court considered whether three different attorneys had failed to act with reasonable diligence in representing their clients. In all three cases, the court suspended the attorneys' licenses for periods ranging from sixty days to eighteen months.⁵ A few months later, the court suspended another attorney's license for nine months on the same grounds.⁶ And in October 1994, the court revoked the license of an attorney for misappropriating client funds.⁷ Despite public criticism of attorney conduct, it is clear that the legal code of ethics is capable of enforcement.

But the library community has no such authority. In August 1994, Rose Beushausen, a resident of Mokena, Illinois, placed an exhibit in the local public library display window after receiving permission from the library's "window organizer" (Stevens, 1994, p. 1). The controversial "Baby Richard" court decision concerning the conflicting rights of adoptive and birth parents had recently evoked widespread public sentiment, and the library window display focused on adoption rights. When the library director ordered it removed, Beushausen, who even cited the Library Bill of Rights, unsuccessfully sought assistance from the American Library Association. Although ALA appeared to agree that Beushausen's interpretation of the Bill of Rights was correct and that her exhibit should not have been removed, an ALA official could only respond that "the association has no authority over library administrations" and that "Beushausen's only recourse would be to file a lawsuit on constitutional grounds" (p. 1).

If librarians were required to obtain a license to practice their trade, states (or other licensing bodies) could place restrictions upon the license, as the legal system has done for attorneys and the medical profession for doctors. Without the licensing requirement, any code which the library community adopts—the Library Bill of Rights, the ALA Code of Ethics, a Statement of Principles—lacks the disciplinary weight of the lawyer's Professional Rules of Conduct.

Clearly, if the Library Bill of Rights were stripped of the rhetoric which currently is unsupported by legal doctrine, the remaining document would have the First Amendment as its foundation. But the second

document which this article proposes—the Statement of Principles—would continue to lack such authority. But that does not mean it is superfluous.

Such a document can play a vital role in the library profession. It can provide a basis for the myriad controversial decisions which librarians must make. It can serve as a philosophical framework within which goals and objectives might be set. It can serve as an ideal and provide an exciting vision for the future.

And such a document does not entirely lack enforceability. Obviously, librarians are accountable for their conduct to their supervisors, their supervising agencies and, in many cases, to the public at large. Compliance with library rules and regulations—including the Statement of Principles—could well be part of their employment contracts, and violation could result in dismissal. But this kind of enforcement cannot be uniform and national in scope. Unless the American Library Association becomes a licensing body, it will not play a significant role in the enforcement of its policies. Its role will remain that of a policy-issuing body—and that, in fact, may be its proper role.

One thing is clear. Without the dissection of the current Library Bill of Rights, librarians and library users are left with a document that is at times merely aspirational and inspirational, at times unrealistic, and at times absolutely mandatory under the First Amendment. Such a document simultaneously requires librarians to fall short of the mark because of ambiguous and unrealistic statements, and yet to comply with First Amendment principles in order to avoid a lawsuit. Baldwin is correct in suggesting that the document be redrafted. But doing so might sacrifice the truly laudable goals in the document. For the sake of clarity, it would be preferable for librarians—and their patrons—to know the difference between First Amendment mandate and aspirational rhetoric.

CONCLUSION

This article proposes that the library profession reexamine the current Library Bill of Rights, remove from it those statements that represent mere rhetoric, those that are ambiguous and unrealistic, and those that represent laudable aspirational and inspirational principles. What is left—a true Bill of Rights—would include only those principles demanded by the U. S. Constitution. This document would provide library professionals and patrons with clear, legitimate principles. Material culled from the document could then be fine-tuned, clarified, and integrated with the principles set forth in the current Code of Ethics. This code—perhaps to be renamed a Statement of Philosophy—would be directed at library professionals only, would serve as a statement of aspiration and inspiration, and, if the profession so chose, would form a part of the employment relationship. By doing so, librarians and library patrons could separate rhetoric from rights; by doing so, the library profession would be left with principles that reflect reality.

APPENDIX

ALA CODE OF ETHICS

AS MEMBERS OF THE AMERICAN LIBRARY ASSOCIATION, we recognize the importance of codifying and making known to the profession and to the general public the ethical principles that guide the work of librarians, other professionals providing information services, library trustess, and library staffs.

Ethical dilemmas occur when values are in conflict. The American Library Association Code of Ethics states the values to which we are committed, and embodies the ethical responsibilities of the profession in this changing information environment.

We significantly influence or control the selection, organization, preservation, and dissemination of information. In a political system grounded in an informed citizenry, we are members of a profession explicitly committed to intellectual freedom and the freedom of access to information. We have a special obligation to ensure the free flow of information and ideas to present and future generations.

The principles of this Code are expressed in broad statements to guide ethical decision making. These statements provide a framework; they cannot and do not dictate conduct to cover particular situations.

I. We provide the highest level of service to all library users through appropriate and usefully organized resources; equitable service policies; equitable access; and accurate, unbiased, and courteous responses to all requests.

II. We uphold the principles of intellectual freedom and resist all efforts to censor library resources.

III. We protect each library users' right to privacy and confidentiality with respect to information sought or received and resources consulted, borrowed, acquired, or transmitted.

IV. We recognize and respect intellectual property rights.

V. We treat co-workers and other colleagues with respect, fairness, and good faith, and advocate conditions of employment that safeguard the rights and welfare of all employees of our institutions.

VI. We do not advance private interests at the expense of library users, colleagues, or our employing institutions.

VII. We distinguish between our personal convictions and professional duties and do not allow our personal beliefs to interfere with fair representation of the aims of our institutions or the provision of access to their information resources.

VIII. We strive for excellence in the profession by maintaining and enhancing our own knowledge and skills, by encouraging the professional development of co-workers, and by fostering the aspirations of potential members of the profession.

—Adopted by ALA Council,
June 28, 1995

NOTES

- 1 Two Californian women nearly died when they ate a poisonous mushroom identified in *The Encyclopedia of Mushrooms* as harmless. "Publisher off Hook in Mushroom Poisoning." *Orlando Sentinel Tribune*, July 14, 1991, p. A18.
- 2 The author raised such a question after taking her nine-year-old daughter to the Kalamazoo, Michigan, public library many years ago. In response to the author's inquiry about the Nancy Drew books, the librarian responded haughtily, "We don't carry such books." Clearly, the librarian considered the books too "low culture" for such an institution.
- 3 Dianne Hopkins, University of Wisconsin-Madison School of Library and Information Studies, has used this term to describe the current Library Bill of Rights. The term properly reflects those portions of the Bill which serve legitimate aspirational, inspirational goals, but which are not supported by current legal doctrine.
- 4 Of course, the current ALA Code of Ethics lacks such force for the same reasons.
- 5 See *In re Gerald M. Schwartz*, 532 N.W.2d 450, 193 Wis.2d 157 (1995) (eighteen months); *In re William J. Schmitz*, 532 N.W.2d 716, 193 Wis.2d 279 (1995) (sixty days); *In re Larry J. Barber*, 194 Wis.2d 279 (1995) (six months).
- 6 See *In re Jeffrey J. Tefelske*, 1995 Wisc. LEXIS 107 (1995).
- 7 See *In re Robert P. Rudolph*, 522 N.W.2d 219, 187 Wis.2d 323 (1994). The attorney was also ordered to pay full restitution to the clients within sixty days.

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