**Util Fwk**

Phenomenal introspection is reliable and proves that util is true. **Sinhababu[[1]](#footnote-1)**:

**We** can **form** a variety of **beliefs** on the basis of **[through] phenomenal introspection.** For example, we can judge that we are having sound experiences of particular noises and visual experiences of different shades of color. As we look upon a lemon and consider the phenomenal states that are yellow experiences, we can make some judgments about their intrinsic features. We can judge, for example, that they are bright experiences. And **[A]s we consider** our experiences of **pleasure, we** can make some judgments about their intrinsic features. We can **judge that** they are **[it is] good** experiences. **Just as one can look** inward **at** one’s **yellow** experiences **and appreciate** their **[its] brightness**, one can look inward at one’s pleasure and appreciate its goodness. Just as things are brighter as black is replaced by yellow in my visual field. And when I have a sudden experience of intense pain, it seems to me that things are much worse than they were before. What **we discover through introspection** is **that pleasure** is the sort of thing that **makes a positive contribution to** the goodness of a **state[s] of affairs**, just as **[and] pain detracts** from this sort of goodness. We cannot discover, just by introspecting on a pleasant experience, that we are in a total state of affairs that is better overall, because there are many other things going on in the world outside our phenomenology that may also contribute to the goodness of the total state of affairs we are in.

Thus the standard is maximizing expected well-being. Prefer:

1. Collective actions will inevitably lead to trade-offs between citizens since they benefit some and harm others; the only justifiable way to resolve these conflicts is by benefitting the maximum possible number of people since anything else would unequally prioritize one group over another. Several impacts:  a. side constraint theories are useless for states since they’ll inevitably violate some constraint  b. Answers util indicts since non-consequentialist moral theories prevent any action which is worse than not being able to use util c. Takes out indicts about calculability since governments already use util which proves it is possible to do so
2. **Psychological Preference** – people view consequentialism as an appropriate way to judge actions. **Gino ‘8**[[2]](#footnote-2)

**The** present **studies provide strong evidence of** the existence of **outcome effects** in ethically-relevant contexts, **when people** are asked to **judge the ethicality of others’ behavior.** It is worth noting that what we show is not the same as the curse of knowledge or the hindsight bias. The curse of knowledge describes people’s inability to recover an uninformed state of mind (Camerer, Loewenstein, & Weber, 1989). Likewise, the hindsight bias leads people to misremember what they believed before they knew an event’s outcome (e.g., Fischhoff, 1975; Fischhoff & Beyth, 1975). By contrast, we show that that **outcomes** of decisions **lead people to see the decisions** themselves **in a different light,** and that this effect does not depend on misremembering their prior state of mind. In other words, **people will see it as** entirely **appropriate to allow a decision’s outcome to determine** their assessment of **the decision’s quality.**

**Impacts:**

A. makes the standard more probable – we presume peoples reasoning has some ability to track moral truth in any moral reasoning, so the fact that people agree on consequentialism is proof for it.

B. delinks indicts of consequentialism since people use it – even if it may be imperfect, that doesn’t indicate that consequentialism as a way to derive truths is false. Also proves calculation is possible since we do it.

1. Only consequences are morally relevant: A. They determine the degrees of rightness and wrongness for an action. Deontology holds all lies are wrong but certain lies are worse than others because they harm more people. My lie that your shirt looks nice is less wrong than my lie that I’ll pick you up from the airport. B. Intuitions—strong deontology holds we couldn’t save the entire human race if it violated one persons rights which is an absurd conclusion. Prefer intuitions: Reasons can’t override intuitions- that’s a false premise. The basis of logic isn’t justified by more logic; logic is just intuitive. You can’t ever abandon intuitions. C. the impact of the action tells you what an action is, for example you don’t know something is murder to someone dies
2. Ground. Util includes all impacts and compares them based on objective weighing standards meaning 0 ground loss while other frameworks excludes certain impacts on a normative level and skew ground towards one side even if these positions are structurally turnable. Empirically confirmed-people bastardize ethical theories to arbitrarily exclude arguments in order to avoid having to engage in a topical discussion. Ground key to fairness because it determines access to the ballot and controls the internal link to all other fairness standards because they all appeal to some conception of unequal offense which ground determines. Also better for phil ed since they can go for why side-constraints are utility maximizing or why fostering virtue maximizes utility, which promotes better philosophical clash on specific issues rather than just generic 10 point dumps that yield 0 phil ed.

**Oppression Fwk**

Ethics shouldn’t begin with philosophy but reality – this is standpoint epistemology. Otherwise some views are excluded and knowledge can’t be found **Mills 5[[3]](#footnote-3)**

I suggest that this spontaneous reaction, far from being philosophically naïve or jejune, is in fact the correct one. **If we start from** what is presumably the uncontroversial premise that **the ultimate point of ethics** is to guide our actions and make ourselves better people and the world a better place, then **the framework** above **will** not only **be** unhelpful, but will in certain respects be **deeply antithetical to the proper goal of** theoretical **ethics** as an enterprise. **In modeling** humans, human capacities, human interaction, human institutions, and human **society on** ideal-as-**idealized-models**, in **never exploring how deeply different this is** from ideal-as-descriptive-models, **we are abstracting away from realities crucial to our comprehension of the actual workings of injustice** in human interactions and social institutions, **and thereby guaranteeing that the ideal**-as-idealized-**model will never be achieved.**” (170)

This means we should use non-ideal theory - it’s too late to try and fix history, but we should do what’s right based on material concerns **Mills 2[[4]](#footnote-4)**

Now how can this ideal ideal—a society not merely without a past history of racism but without races themselves—serve to adjudicate the merits of competing policies aimed at correcting for a long history of white supremacy manifest in Native American expropriation, African slavery, residential and educational segregation, large differentials in income and huge differentials in wealth, nonwhite underrepresentation in high-prestige occupations and overrepresentation in the prison system, contested national narratives and cultural representations, widespread white evasion and bad faith on issues of their racial privilege, and a corresponding hostile white backlash against (what remains of) those mild corrective measures already implemented? Obviously, it cannot. As Thomas Nagel concedes: “**Ideal theory enables you to say when a society is unjust,** because it falls short of the ideal. **But it does not tell you what to do if,** as is almost always the case, **you find yourself in an unjust society, and want to correct that** injustice” (2003a, 82). **Ideal theory represents an unattainable target that would require us to roll back the clock and start over.** So in a sense **it is** an ideal **with** little or **no practical worth**. **What is required is the nonideal** (rectificatory) ideal **that starts from the reality** of these injustices **and** then **seeks some** fair **means of correcting** for them, recognizing that in most cases the original prediscrimination situation (even if it can be intelligibly characterized and stipulated) cannot be restored. Trying to rectify systemic black disadvantage through affirmative action is not the equivalent of not discriminating against blacks, especially when there are no blacks to be discriminated against. Far from being indispensable to the elaboration of nonideal theory, ideal theory would have been revealed to be largely useless for it. But the situation is worse than that. As the example just given illustrates, it is not merely a matter of an ideal with problems of operationalization and relevance, but of an ideal likely to lend itself more readily to retrograde political agendas. If the ideal ideal rather than the rectificatory ideal is to guide us, then a world without races and any kind of distinctiondrawing by race may seem to be an attractive goal. One takes the ideal to be colorblind nondiscrimination, as appropriate for a society beginning from the state of nature, and then—completely ignoring the nonideal history that has given whites a systemic illicit advantage over people of color—conflates together as “discrimination” all attempts to draw racial distinctions for public policy goals, no matter what their motivation, on the grounds that this perpetuates race and invidious differential treatment by race. In the magisterial judgment of Chief Justice John Roberts in the June 2007 Supreme Court decision on the Seattle and Louisville cases where schools were using race as a factor to maintain diversity, “The way to stop discrimination on the basis of race is to stop discriminating on the basis of race,”6 a statement achieving the remarkable feat of depicting not merely as true, but as tautologically true, the equating of Jim Crow segregation and the attempt to remedy Jim Crow tion! What is ideally called for under ideal circumstances is not, or at least is not necessarily, what is ideally called for under nonideal circumstances. Claiming that all we need to do is to cease (what is here characterized as) discrimination ignores the differential advantages and privileges that have accumulated in the white population because of the past history of discrimination. So the defense in terms of ideal theory is doubly problematic. In the first place, ideal theory was never supposed to be an end in itself, but a means to improving our handling of nonideal matters, and the fact that Rawls and his disciples and commentators have for the most part stayed in the realm of the ideal represents an evasion of the imperative of dealing with what were supposed to be the really pressing issues. And in the second place, it is questionable in any case how useful the ideal ideal in the Rawlsian sense is or ever would have been in assisting this task. So it is not merely that ideal theory has not come to the aid of those dealing with nonideal injustice but that it was unlikely to have been of much help when and if it ever did arrive.

Thus, the standard is resisting oppression

**Prefer additionally**

1. **Epistemology**. The starting points of ethics and politics are ultimately uncertain but constrain human rationality – laws of reason and foundational assumptions shape what conclusions are thinkable. We can’t assume our perspective is correct and impose that on others. What matters is the possibility of dialogue with others with different experiences. Nondomination is the only conclusion, since it allows us to engage with the perspectives of the dominated.

2. Gutcheck on oppression bad - abstracting from real world consequences makes it impossible to find solutions to oppression. **Curry 14[[5]](#footnote-5)**

**Despite the pronouncement of debate as** an activity and intellectual exercise **pointing to** the **real world consequences** of dialogue, thinking, and (personal) politics **when addressing** issues of racism, sexism, economic **disparity**, global conflicts, and death, many of the **discussions** concerning these ongoing challenges to humanity are fixed to a paradigm which **sees** the adjudication of material disparities and **sociological realities as the conquest of** one **ideal theory** over the other. In “Ideal Theory as Ideology,” Charles Mills outlines the problem contemporary theoretical-**performance style**s **in** policy debate and value- weighing in **L**incoln-**D**ouglass are confronted with in their attempts to get at the concrete problems in our societies. At the outset, Mills concedes that “ideal theory applies to moral theory as a whole (at least to normative ethics as against metaethics); [s]ince ethics deals by definition with normative/prescriptive/evaluative issues, [it **is** set] against factual/descriptive issues.” 4 At the most general level, **the conceptual chasm between** what emerges as **actual problems** in the world (e.g.: racism, sexism, poverty, disease, etc.) **and how we frame** such **problems theoretically**—the assumptions and shared ideologies we depend upon for our problems to be heard and accepted as a worthy “problem” by an audience—**it** **is the most obvious call for an anti-ethical paradigm,** since such a paradigm insists on the actual as the basis of what can be considered normatively. Mills, however, describes this chasm as a problem of an ideal-as-descriptive model which argues that for any actual-empirical-observable social phenomenon (P), an ideal of (P) is necessarily a representation of that phenomenon. In the idealization of a social phenomenon (P), one¶ “necessarily has to abstract away from certain features” of (P) that is observed before abstraction occurs.5

3. Political philosophy is inherently practical, so a deep metaphysical principle is not relevant. The goal of the state’s axiomatic grounding is not pure truth but the ability to motivate individuals to act together. A theory that allowed domination can’t be political philosophy since the individuals it allowed the domination of wouldn’t endorse it. Even if it can be justified ethically, it can’t be justified politically.

**Costumes**

**Core**

**CP Text: Public Colleges and universities in the United States ought not restrict any constitutionally protected speech except they should ban costumes that are deemed cultural appropriation. Solves the aff—because it’s a specific manifestation of speech that can’t be coopted.**

**Clark 06** Clark, Sean. "Offensive Halloween Costumes and Censorship." *FIRE*. N.p., 02 May 2014. Web. 15 Mar. 2017. <https://www.thefire.org/offensive-halloween-costumes-and-censorship/>.

Halloween is upon us and college students all across the country will be celebrating this day by dressing up in a wide array of costumes. While some students will probably stick to classic costumes such as ghosts and vampires, some others may be thinking about slipping into scarier, more politically incorrect costumes this Halloween. For instance, in 2005, at the University of Chicago [a group of students found themselves in trouble for holding a “Straight Thuggin’ Party”](http://abclocal.go.com/wls/story?section=local&id=3596423) where students listened to rap music and dressed in hip-hop attire. **Should students be afraid of disciplinary action for wearing potentially offensive Halloween costumes?** **As far as the law is concerned, students at public colleges shouldn’t be afraid of official punishment even if their costumes are in poor taste.** **Federal courts have consistently held that symbolic speech** and entertainment performances (**such as wearing a costume**) **enjoy First Amendment protection.** Although the Supreme Court has never dealt with this issue directly, **at least one appellate court has directly addressed the topic of offensive costumes on college campuses.**In Iota Xi Chapter of **Sigma Chi Fraternity v. George Mason University,** 993 F.2d 386, the **4th Circuit Court of Appeals upheld a district court decision that invalidated sanctions against** a fraternity which held an “ugly woman contest” that featured a **performer who dressed as an offensive caricature of an African American woman by donning black face and wearing a wig** with long stringy black hair and curlers. In affirming the district court, the appeals **court reasoned that even low-grade entertainment is protected by the First Amendment** and a university cannot punish speech based solely on its perceived offensiveness. Despite the clear indication from courts that even offensive costumes are protected, the censoring of costume parties has becomes something of a yearly ritual at both private colleges that promise free speech and public colleges bound by the First Amendment. In fact, the latest incident seems to be coming from the persistently problematic administration at [Johns Hopkins University](http://www.thefire.org/index.php/schools/2493). Stay tuned for more on that today.

**It competes--Costumes are constitutionally protected. Volokh 15** Volokh, Eugene. "Kemper County (Miss.) Bans Clown Costumes, Likely Violates the First Amendment." *The Washington Post*. WP Company, 21 Oct. 2016. Web. 15 Mar. 2017. <https://www.washingtonpost.com/news/volokh-conspiracy/wp/2016/10/21/kemper-county-miss-bans-clown-costumes-likely-violates-the-first-amendment/?utm\_term=.eddc87ebc780>.

But this likely violates the First Amendment. **Wearing costumes is constitutionally protected, as the Supreme Court held in** [*Schacht v. United States* (1970)](https://scholar.google.com/scholar_case?case=13855180049738230403)**,** a case dealing with actors who were prosecuted for wearing a military uniform as part of political street theater; and the court has long protected speech engaged in for entertainment purposes as much as speech engaged in for overtly political purposes (e.g., [*Winters v. New York* (1948); *Brown v. Entertainment Merchants Ass’n* (2011), the violent video game case).](https://scholar.google.com/scholar_case?case=16314089118204976902) Now some restrictions on wearing uniforms might be upheld if limited to situations where the uniform is dangerously deceptive, e.g., when people wear police uniforms without authorization and in a context where they would be perceived as real police officers; but that obviously doesn’t apply here. And courts have upheld content-neutral anti-mask laws, which ban the wearing of masks on the grounds that obscuring your identity can make it easier for you to get away with crimes and can thus be understandably frightening precisely because of that greater ease of committing crimes. But this isn’t a content-neutral ban on all masks; it goes beyond masks, and it also covers only one particular kind of mask. **Just as a city can’t ban wearing Confederate uniforms or Klan outfits** (again, setting aside a content-neutral ban on masks, which wouldn’t apply to the robes and hoods) or dressing in other ways that people find offensive or even frightening, **it can’t ban wearing** clown **costumes.**

These costumes cause psychological violence and restrictions don’t inhibit expression. Costumes are donned without much thought and are not methods of political expression. **Caldwell 16** Caldwell, Jenna. "Culture Is NOT a Costume: How Not To Culturally Appropriate Halloween." *Theblackprint*. N.p., 28 Oct. 2016. Web. 17 Apr. 2017.

I recently visited Party City and was horrified by what I found there. It was not the franchise, location or service that horrified me, but the merchandise inside the store itself. As I searched the aisles for a pair of “I’m a Mouse, Duh!” ears inspired by Karen Smith of “Mean Girls,” I instead came across the **“Native American Princess,” “Hey Amigo Mexican”** and “Homeboy”costumes. Halloween should be a time where we trick and treat (or attend a frat party and have major regrets on Nov. 1), whilst wearing our ghoul and goblin suits – not someone else’s culture. Definitively, cultural appropriation is the adoption of one’s culture by members of another culture. Different than cultural appreciation, **cultural appropriation can** often **strip a minority group of their identity because they are not given the recognition they deserve from the groups who appropriate them.** For instance, let’s take the Kardashians. African-Americans have been ridiculed for wearing cornrows for years, often being painted as “thugs” or “ghetto” for wearing the protective hairstyle. Yet, **when the Kardashian clan began to sport the same hairdo, cornrows turned into the new**, creative and trendy **“boxer braids.” It is** certainly **a slap in the face** to those who have suffered the scrutinization of a style **that is praised on someone of another culture.** Furthermore, it is problematic when those who culturally appropriate do not understand the significance of the culture they are copying, but do it to look fashionable. When you decide to stick a feather in your hair and slip on a pair of moccasins for Halloween, this isn’t a celebration of Native American culture; it’s an insult. American society has systematically eradicated our indigenous populations. **Purchasing a Pocahontas costume** because she is your favorite Disney princess, **and proceeding to attend a frat party and get wasted, is a** further **mockery of their culture.** Dressing as a Geisha, Samurai or your second favorite Disney princess, Mulan, is not you “just having fun,” but further helping to oppress a minority group. When you decide to wear a poncho and stick a sombrero on top of your head, you are not a Mexican, but an inaccurate stereotype of another ethnic group we continue to oppress. It is also important to note that **you can dress like** specific celebrities and significant **figures** in history **of a different culture,** if done **in a respectable manner.** Want to be Kim Kardashian and Kanye West for Halloween? No problem. **Just stay away from blackface** by all means. You can continue to convey that you are dressed like Kanye West through fashion, accessories or a fake North West doll, but you do not need to look in the “Dark and Lovely” aisle for a foundation 10 shades darker than your complexion. Feel free to dress as Frida Kahlo, emphasizing her creative style, thick eyebrows and career as a painter. But imaginary characters like Mulan and Pocahontas are inseparable from the average Native or Japanese woman costume. If you have the privilege to wear something safely, but others do not, don’t wear it. **Minorities continue to suffer from** discrimination, exploitation and **violence because of their culture. Do not further violate** and insult **them by dressing as a stereotypical version of their cultural group.** Culture is not a costume.

**Hate Speech**

CP Text: Public colleges and universities ought not restrict any constitutionally protected speech except hate speech. **McConnell**[[6]](#footnote-6) **12:**

**Our nation is obsessed with the concept of freedom. The majority of U.S. citizens seem to think of theirs as the freest of all countries, and any perceived attack on this freedom is seen as a sacrilegious desecration of the Constitution, America’s holy book. However, laws, including those in the Bill of Rights, exist for a reason—to protect citizens. The provision of freedom of speech serves, accordingly, to protect people from being punished for their ideas and beliefs. However, this freedom can backfire and end up punishing people not for their ideas but for their identities when hate speech comes into play. There must be a carefully thought-out balance between freedoms and restrictions of speech in order to create a society where citizens not only feel free to express themselves, but also are free from fear and violence. The most common argument I have encountered for unrestricted free speech on college campuses is that if we prohibit people from saying certain things, they will simply never talk about them. As a result, their prejudice and oppression—the problems that we are trying to stamp out in the first place with restrictions on speech—will continue quietly, unchecked. However, the argument goes, if we allow people to express these thoughts openly, then there will be discussion about them that leads to greater understanding. This was the view expressed by the member of the Harvard Libertarian Forum quoted in the article, and one that I think is fundamentally misguided. There certainly should be dialogue around issues of racism, sexism, homophobia, and other forms of oppression. If someone has prejudices, a good way to erase these prejudices can indeed be to engage in dialogue with that person in order to understand where their attitude is coming from and educate them about the moral and logical fallacies of their prejudice. But there is also a need to protect people** from having violence perpetrated against them. When someone calls a black person the “n” word out of hatred, he or she is not expressing a new idea or outlining a valuable thought. They are committing an act of violence. **Speech has great power.** It can—and often does—serve as a tool to marginalize and oppress people. **Laws that restrict hate speech simply seek to prevent violence against marginalized, oppressed groups in order to prevent them from becoming further marginalized** and oppressed. There are freedoms to do things, and there are freedoms from things. When our freedom to speak our mind impinges on someone’s freedom from fear, or on someone’s right to feel safe in their community, then that freedom should not stand unregulated in any group that wishes to create a safe and respectful society for its members. **We cannot create a respectful learning environment at our university if students from marginalized groups feel that their administration condones acts of violence against them. University regulations against hate speech are entirely necessary for maintaining respect and dignity** among the student body, and Harvard’s policies to this end are well thought-out and fair—and certainly not worthy of protest.

**Hate Speech should be banned – the harms are cumulative, physical and transgenerational – it hurts its victims and primes society for mass oppression.**

**Delgado and Stefancic 9** Richard Delgado University Professor, Seattle University School of Law; J.D., 1974, University of California, Berkeley. Jean Stefancic – Research Professor, Seattle University School of Law; M.A., 1989, University of San Francisco. “FOUR OBSERVATIONS ABOUT HATE SPEECH.” WAKE FOREST LAW REVIEW. 2009. <http://wakeforestlawreview.com/wp-content/uploads/2014/10/Delgado_LawReview_01.09.pdf> GZ

II. OBSERVATION NUMBER TWO: THE EVALUATION OF HARMS HAS BEEN INCOMPLETE One way, of course, to end the current standoff is for one of the parties to defer to the other’s point of view. Indeed, by pursuing an aggressive campaign of litigation, the free-speech camp has been implicitly urging that the other side do just that.58 One could also argue that a host of campus administrators, by enacting successive versions of hate-speech codes, are attempting to do the same thing, namely, wear the other side down.59 Ordinarily, though, it is the free-speech faction, with a string of lower-court victories to its credit, who urge the other side to “get over it” and toughen its collective hide.60 Yet, a careful weighing of the costs and benefits of speech regulation suggests that the case for it is closer than the ACLU and some courts seem ready to acknowledge. Before addressing the costs of hate-speech regulation versus the opposite, it is advisable to arrive at an understanding of what hate speech is. A Types of Hate Speech Hate speech, including the campus variety, can take a number of forms—direct (sometimes called “specific”) or indirect; veiled or overt; single or repeated; backed by power, authority, or threat, or not.61 One can also distinguish it in terms of the characteristic— such as race, religion, sexual orientation, immigration status, or gender—of the person or group it targets.62 It can isolate a single individual (“Jones, you goddamned X.”) or group (“The goddamned Xs are destroying this country.”). It can be delivered orally, in writing, on the Internet, or in the form of a tangible thing, such as a Confederate flag, football mascot, or monument.63 It can be anonymous, as with graffiti or a leaflet surreptitiously placed on a bulletin board or under a dormitory door, or its author can be plainly identified.64 The object of the speech may be free to leave, or trapped, as in a classroom or workplace.65 B. The Harms of Hate Speech The various forms of hate speech present different kinds and degrees of harm. The face-to-face kind is the most immediately problematic, especially if the target is not in a position to leave and the one delivering it possesses the power to harm. 1. Direct or Face-to-Face Hate Speech Although some courts and commentators describe the injury of hate speech as mere offense,66 the harm associated with the face-to-face kind, at least, is often far greater than that and includes flinching, tightening of muscles, adrenaline rushes, and inability to sleep.67 **Some victims may suffer psychosocial harms**, including **depression, repressed anger, diminished self-concept, and impairment of work or school performance.**68 Some may take refuge in drugs, alcohol, or other forms of addiction, compounding their misery.69 2. Hate Speech and Children With children, the harms of hate speech may be even more worrisome. A child victimized by racial taunts or browbeating may respond aggressively, with the result that he or she is labeled as assaultive.70 Or, the child can respond by internalizing the harm and pretending to ignore it. Robbed of self-confidence and a sense of ease, such a child can easily become introspective and morose.71 If the child’s parents suffer the same fate at work, they may bring these problems home so that the parents retain even less energy for their families than before.72 **Recent scholarship points out how the pathologies** associated with social subordination **may be transgenerational, lasting for centuries**, if not millennia, **and include pain, fear, shame, anger, and despair.**73 3. General Hate Speech With general hate speech, such as anonymously circulated flyers or speeches to a crowd, the harms, while diffuse, may be just as serious.74 Recent scholarship shows how practically every instance of genocide came on the heels of a wave of hate speech depicting the victims in belittling terms.75 For example, before launching their wave of deadly attacks on the Tutsis in Rwanda, Hutus in government and the media disseminated a drumbeat of messages casting their ethnic rivals as despicable.76 The Third Reich did much the same with the Jews during the period leading up to the Holocaust.77 When the United States enslaved African Americans and killed or removed the Indians, it rationalized that these were simple folk who needed discipline and tutelage, or else bloodthirsty savages who resisted the blessings of civilization.78 When, a little later, the nation marched westward in pursuit of manifest destiny, it justified taking over the rich lands of California and the Southwest on the ground that the indolent Mexicans living on them did not deserve their good fortune.79 Before interning the Japanese during World War II, propagandists depicted the group as sneaky, suspicious, and despotic.80 It is possible that **the connection between** general **hate speech and** instances of **mass oppression may** not **be** merely statistical and contingent, but conceptual and **necessary.**81 **Concerted action requires a**n intelligible intention or **rationale** capable of being understood by others. One cannot mistreat another group without first articulating a reason why one is doing it—otherwise, no one but a sadist would join in.82 Without a softening-up period, early steps toward genocide, such as removing Jews to a ghetto, would strike others as gratuitous and command little support. Discriminatory action of any kind presupposes a group that labors under a stigma of some kind.83 **The prime mechanism for the creation of such stigma is hate speech.**84 **Without it, genocide, imperialism, Indian removal, and Jim Crow could gain little purchase.**85 C. The Harms of Speech Regulation If the harms of hate speech are sobering, what lies on the other side? What happens to the hate speaker forced to hold things in? Will he or she suffer psychological injury, depression, nightmares, drug addiction, and a blunted self image?86 Diminished pecuniary and personal prospects?87 Will hate-speech regulation set up the speaker’s group for extermination, seizure of ancestral lands, or anything comparable?88 The very possibility seems far-fetched. And, indeed, regimes, such as Europe’s and Canada’s, that criminalize hate speech exhibit none of these ills.89 Speech and inquiry there seem as free and uninhibited as in the United States, and their press just as feisty as our own.90 What about harm to the hate speaker? The individual who holds his or her tongue for fear of official sanction may be momentarily irritated. But “bottling it up” seems not to inflict serious psychological or emotional damage.91 Early in the debate about hate speech, some posited that a prejudiced individual forced to keep his impulses in check might become more dangerous as a result.92 By analogy to a pressure valve, he or she might explode in a more serious form of hate speech or even a physical attack on a member of the target group.93 But studies examining this possibility discount it.94 Indeed, the bigot who expresses his sentiment aloud is apt to be more dangerous, not less, as a result. The incident “revs him up” for the next one, while giving onlookers the impression that baiting minorities is socially acceptable, so that they may follow suit.95 A recently developed social science instrument, the Implicit Association Test (“IAT”), shows that many Americans harbor measurable animus toward racial minorities.96 Might it be that hearing hate speech, in person or on the radio, contributes to that result?97 III. OBSERVATION NUMBER THREE: INTEREST BALANCING MUST TAKE ACCOUNT OF RELEVANT FEATURES OF HATE SPEECH If all types of hate speech are apt to impose costs,98 large or small, how should courts and policymakers weigh them? Not every victim of hate speech will respond in one of the ways described above. Some will shrug it off or lash back at the aggressor, giving as good as they got.99 The harm of hate speech is variable, changing from victim to victim and setting to setting.100 By the same token, it is impossible to say with assurance that the cost of hate-speech regulation will always be negligible. Some speakers who might wish to address sensitive topics, such as affirmative action or racial differences in response to medical treatments, might shy away from them.101 The interplay of voices that society relies on to regulate itself may deteriorate. In balancing hate speech versus regulation, two benchmarks may be helpful: a review of current freespeech “exceptions” and attention to the role of incessancy. A. Current Free-Speech Exceptions Not all speech is free. The current legal landscape contains many exceptions and special doctrines corresponding to speech that society has decided it may legitimately punish. Some of these are: words of conspiracy; libel and defamation; copyright violation; words of threat; misleading advertising; disrespectful words uttered to a judge, police officer, or other authority figure; obscenity; and words that create a risk of imminent violence.102 If speech is not a seamless web, the issue is whether the case for prohibiting hate speech is as compelling as that underlying existing exceptions. First Amendment defenders often assert that coining a new exception raises the specter of additional ones, culminating, potentially, in official censorship and Big Brother.103 But our tolerance for a wide array of special doctrines suggests that this fear may be exaggerated and that a case-by-case approach may be quite feasible. How important is it to protect a black undergraduate walking home late at night from the campus library?104 As important as a truthful label on a can of dog food or safeguarding the dignity of a minor state official?105 Neither free-speech advocates nor courts have addressed matters like these, but a rational approach to the issue of hate-speech regulation suggests that they should.106 B. Incessancy and Compounding Two final aspects of **hate speech** are incessancy—the **tend**ency **to recur repeatedly** in the life of a victim—**and compound**ing.107 A victim of a racist or similar insult is likely to have heard it more than once. In this respect, a racial epithet differs from an insult such as “You damn idiot driver” or “Watch where you’re going, you klutz” that the listener is apt to hear only occasionally. Like water dripping on stone, racist speech impinges on one who has heard similar remarks many times before.108 **Each episode builds on the last, reopening a wound** likely still to be raw. The legal system, in a number of settings, recognizes the harm of an act known to inflict a cumulative harm. Ranging from eggshell plaintiffs to the physician who fails to secure fully informed consent, we commonly judge the blameworthiness of an action in light of the victim’s vulnerability.109 When free-speech absolutists trivialize the injury of hate speech as simple offense, they ignore how it targets the victim **because of a condition** he or she cannot change and that is **part of the victim’s** very **identity. Hate speakers “pile on,”** injuring **in a way in which the victim has been injured several times before**. The would-be hate speaker forced to keep his thoughts to himself suffers no comparable harm. A comparison of the harms to the speaker and the victim of hate speech, then, suggests that a regime of unregulated hate speech is costly, both individually and socially. Yet, even if the harms on both sides were similar, one of the parties is more disadvantaged than the other, so that Rawls’s difference principle suggests that, as a moral matter, we break the tie in the victim’s favor.110 Moreover, the magnitude of error can easily be greater, even in First Amendment terms, on the side of nonregulation. Hate speech warps the dialogic community by depriving its victims of credibility. Who would listen to one who appears, in a thousand scripts, cartoons, stories, and narratives as a buffoon, lazy desperado, or wanton criminal? Because one consequence of hate speech is to diminish the status of one group vis-à-vis all the rest, it deprives the singled-out group of credibility and an audience, a result surely at odds with the underlying rationales of a system of free expression.111

**Also answers their counterspeech and protrest arguments – physical and psychological harms mean that victims don’t have the energy and ability to participate in them.**

**Public tolerance is bad and official affirmation that they deserve equal treatement matters.**

**Matsuda 89** Matsuda, Mari. Associate Professor of Law, University of Hawaii “Public Response to Racist Speech: Considering the Victim’s Speech.” Michigan Law Review, Volume 87, August 1989 GZ

Racist hate messages are rapidly increasing and are widely distributed in this country using a variety of low and high technologies.82 The negative effects of hate messages are real and immediate for the victims.83 **Victims of vicious hate propaganda have experienced physiological symptoms and emotional distress** ranging from fear in the gut, rapid pulse rate and difficulty in breathing, nightmares, post-traumatic stress disorder, hypertension, psychosis, and suicide.84 Professor Patricia Williams has called the blow of racist messages "spirit murder" in recognition of the psychic destruction victims experience.85 **Victims are restricted in their personal freedom.** In order **to avoid receiving hate messages, victims have had to quit jobs, forgo education, leave their homes**, avoid certain public places, **curtail their own exercise of speech rights**, and otherwise modify their behavior and demeanor.86 The recipient of hate messages struggles with inner turmoil. One subconscious response is to reject one's own identity as a victimgroup member.87 As writers portraying the African-American experience have noted, the price of disassociating from one's own race is often sanity itself.88 **As much as one may try to resist a piece of hate propaganda, the effect on one's self-esteem and sense of personal security is devastating**.89 To be hated, despised, and alone is the ultimate fear of all human beings. However irrational racist speech may be, it hits right at the emotional place where we feel the most pain. **The aloneness comes not only from the hate message** itself, **but** also **from the government response of tolerance**. When hundreds of police officers are called out to protect racist marchers,90 **when the courts refuse redress for racial insult, and when racist attacks are officially dismissed** as pranks, **the victim becomes** a stateless person. Target**-group members can either identify with a community that promotes racist speech, or they can admit that the community does not include them.** The effect on non-target-group members is also of constitutional dimension. Associational and other liberty interests of whites are curtailed by an atmosphere rife with racial hatred.91 In addition, **the process of dissociation can affect their mental health**. Dominant-group members who rightfully, and often angrily, object to hate propaganda share a guilty secret: their relief that they are not themselves the target of the racist attack. While they reject the Ku Klux Klan, they may feel ambivalent relief that they are not African-American, Asian, or Jewish. Thus they are drawn into unwilling complacency with the Klan, spared from being the feared and degraded thing. Just as when we confront human tragedy a natural disaster, a plane crash we feel the blessing of the fortunate that distances us from the victims, the presence of racist hate propaganda distances right-thinking dominant-group members from the victims, making it harder to achieve a sense of common humanity. Similarly, racist propaganda forces victim-group members to view all dominant-group members with suspicion.92 It forces well-meaning dominant-group members to use kid-glove care in dealing with outsiders.93 This is one reason why social relations across racial lines are so rare in America. **Research in psychosocial**94 **and psycholinguistic**95 **analysis of racism suggests a related effect of racist hate propaganda**: at some level, no matter how much both victims and well-meaning dominant-group members resist it, racial inferiority is planted in our minds as an idea that may hold some truth.96 The idea is improbable and abhorrent, but it is there before us, because it is presented repeatedly. "Those people" are lazy, dirty, sexualized, money-grubbing, dishonest, inscrutable, we are told.97 We reject the idea, but the next time we sit next to one of "those people" the dirt message, the sex message, is triggered.98 We stifle it, reject it as wrong, but it is there, interfering with our perception and interaction with the person next to us.99 For the victim, similarly, the angry rejection of the message of inferiority is coupled with absorption of the message. When a dominant-group member responds favorably, there is a moment of relief **the victims of hate messages do not always believe in their insides that they deserve decent treatment.** This obsequious moment is degrading and dispiriting when the self-aware victim acknowledges it.100 Psychologists and sociologists have done much to document the effects of racist messages on both victims and dominant-group members.?10 Writers of color have given us graphic portrayals of what life is like for victims of racist propaganda.102 From the victim's perspective103 racist hate messages cause real damage.1

**Means that your solvency turns are irrelevant: Matusda cites psychological evidence to prove that people believing they deserve equal standing and that the community cares is a prior question.**

**Even if the CP doesn’t solve, it empowers targeted groups and spills over to larger antidiscrimination efforts. Multiple international empirics prove.**

**Parekh 12** [Parekh, Bhikhu, political theorist and Labour member of the House of Lords, (2012) ‘Is There a Case for Banning Hate Speech?’, in Herz, M. and Molnar, P. (eds.) The Content and Context of Hate Speech: Rethinking Regulation and Responses. Cambridge: Cambridge University Press, pp. 37–56.] [16]

**It is sometimes argued that a ban on hate speech can** easily **become an end in itself and** an **excuse to avoid well-conceived antidiscrimination policies.** Although this can happen, as arguably it has in France,” **there is no obvious reason** why **it should.** As the cases of **Britain, Netherlands, Germany, and Australia show, the ban on hate speech has gone hand in hand with a wider campaign to address the causes of racism, sexism, or homophobia by pressing for a** well-worked-out **strategy to tackle discrimination and disadvantage. This is not accidental** and has a complex internal logic. **Once people realize that ban** on hate speech **has made only a marginal difference** in their lives, **they look for** the **deeper causes and see the need for** an antidiscrimination **struggle in other areas** of life. **The ban** on hate speech **alerts the target groups to other goals** to aim at **and gives it the conﬁdence to ﬁght for them by actively participating in public life.**

**Putting the government on the side of equality is valuable – it affects public values and private action.**

**Parekh 12** [Parekh, Bhikhu, political theorist and Labour member of the House of Lords, (2012) ‘Is There a Case for Banning Hate Speech?’, in Herz, M. and Molnar, P. (eds.) The Content and Context of Hate Speech: Rethinking Regulation and Responses. Cambridge: Cambridge University Press, pp. 37–56.] [32]

Sixth, there is a body of interrelated practical objections to bans on hate speech. Law, it is argued, cannot by itself change people’s attitudes and eliminate hatred. This is true, but it does not entail the required conclusion. Because **law throws the society’s collective moral and legal weight behind a particular set of norms** of good behavior, **it does have some inﬂuence** on attitudes; its role is limited but nonetheless important. Besides, our concern is not so much to change attitudes in the ﬁrst instance as to deny some of them public expression, and law is best equipped to achieve that. As Aristotle observed, ethics is a matter of **social ethos**, and the latter **is shaped by habits developed through acting in certain ways.** On the conventional liberal view, our beliefs are the ultimate determinants of our behavior and are, or should be, a result ofrational reﬂection. As Aristotle argued, the relationship between belief and conduct is reciprocal and complex. Our beliefs shape our conduct, but they are also in turn inﬂuenced by it. **By acquiring the habit of acting in certain ways, we build up an appropriate character and develop certain attitudes** and ways of thinking. **Law** is primarily concerned with conduct, but it also **shapes citizens' character, attitudes, and beliefs.**

**Cyber Bullying**

CP Text: Public colleges and universities in the United States ought not restrict any constitutionally protected speech, except they ought to restrict Cyber Bullying. Cyber-Bullying restrictions at colleges and universities are in the status quo. **Eskey**  (Eskey Dpa, Michael T. Eskey Jr. "Cyber-Bullying in the Online Classroom: Faculty as the Victims." Cyber-Bullying in the Online Classroom: Faculty as the Victims (n.d.): n. pag. Web. 16 Feb. 2017., NYU)

Even though most states are in the process of enacting legislation to protect school-age children from cyber-bullying, these may not always protect adults. As most state cyber-bullying lawsand school districts have laws that focus on K-12, **the majority of colleges and universities have their own handbook of student conduct**. There are ways for colleges and universities **to** help **prevent** incidents of **cyber-bullying. It is** very **important** in formal and informal discussions and lectures “**to try to make sure the students understand that** number one, it is against the law; number two, **it’s against school policy** (Breitenhaus, 2010). Beyond legal protection, many universities have student codes of conduct or policies on cyber bullying that would protect instructors or rely on the Human Resources office. **Instructors should report cyber bullying to the university as soon as it occurs**, often with a level of ambiguity of “exactly” what should be reported and when it should be reported. As part of the current research the student handbooks and codes of conduct for 15 colleges and universities (a mix of private and public, for profit and not-for profit) were reviewed. The specific focus was on specific types of behavior that constituted student misconduct. This typically addressed harassment, intimidation, and disruption to the learning environment but do not specifically address cyber-bullying or electronic harassment (or limited activities or behavior related to electronic devices).These codes vary to the extent in which they define inappropriate behavior and the degree in which those found in inappropriate behavior and the degree in which those found in violation of these codes will be punished. While the terms 'disrupt', 'disruptive', and 'harassment' appear numerous times in many of the institution's codes of conduct, 'bullying' only appears in three of the selected institutions' handbooks. 'Stalking' is generally included in the institutions' sexual harassment policies, althoughValdosta State University actually using the term "cyber-stalking" to define one of the prohibited practices, implying that the transmission of virtual unwanted advances or other forms of harassment warrant similar punishments as those made in person. Kennesaw State University employs the term “cyberbullying” to differentiate between traditional bullying, harassment, and intimidation and bullying done with electronic device, but does not designate an alternative punishment, either more or less severe. However, the use of this modern term implies an awareness of both the practice and protocol of online harassment by the institution’s administration. Excelsior, a private institution with over 35,000 online students has forbidden and how perpetrators will be punished upon being found in violation of the non- permissible action. Some of the student conduct policies include prohibited activities, but provide little in terms of repercussions. Other codes of conduct provide little specifics in prohibited activity, but are very detailed when describing punishments, often providing multiple classifications and varying levels of severity for particular actions. However, without consistently providing explicit details in regards to appropriate and inappropriate conduct as well as specific detailing of repercussions when perpetrators are found in violation, institutions may be leaving themselves open to possible scrutiny.

It competes--Cyberbullying is constitutionally protected speech **Miller and Zoeller 16** Vanessa Miller and Mary Zoeller, "Supreme Court of North Carolina Finds Cyberbullying Law Violates First Amendment," Foundation for Individual Rights in Education, 6/15/2016 AZBut last week, the state’s highest court agreed with Bishop and reversed the appellate court, finding that the statute indeed “violates the First Amendment” because it regulates speech rather than conduct. Content-based statutes must withstand strict scrutiny, the most rigorous constitutional standard. Strict scrutiny is a two-pronged analysis inquiring whether (1) the regulation furthers a compelling state interest and (2) the means to accomplish the state interest are narrowly tailored. The state Supreme Court, quoting Reed v. Town of Gilbert (2015), found the cyberbullying statute is content-based because it “defines regulated speech by its particular subject matter.” However, the state Supreme Court found the statute was not narrowly tailored to “serve the state’s asserted interest in protecting children from the harms resulting from online bullying.” **Rather, it unconstitutionally “prohibits a wide range of online speech,” including speech protected by the First Amendment**. FIRE has previously noted that North Carolina’s cyberbullying statute is part of a worrying trend of online speech regulations that fail to properly define cyberbullying—a term that, unlike “hostile environment harassment,” does not have a consistent legal definition. While the statute may have been drafted with the laudable intent to protect children from online harassment, it encompasses protected speech. That means, as Creeley cautioned, it “can be used by administrators to censor unwanted speech.” **The Supreme Court** of North Carolina got it right when it **struck down the cyberbullying statute as unconstitutional.** And states seeking to enact their own cyberbullying laws should emulate the narrow, speech-protective standard for student-on-student harassment set forth by the Supreme Court of the United States in Davis v. Monroe County Board of Education (1999). In Davis, the nation’s highest court defined student-on-student harassment as behavior that is “so severe, pervasive, and objectively offensive that it effectively bars the victim’s access to an educational opportunity or benefit.” Adopting this definition would ensure the protection of First Amendment rights, while simultaneously insulating children from the harms of online bullying.

Cyberbullying in college includes online sexual harassment, outing, and insults that contribute to depression, substance abuse, and suicide **Selkie and Moreno 16** Ellen Selkie (certified psychiatrist and pediatric doctor), and Megan Moreno, "Cyberbullying and College Students: What Can Be Done?," Psychiatric Times, 4/28/2016 AZ **Cyberbullying among college students** may represent a continuation of behaviors from middle and high school but in new contexts. Aggressors may use more subtle attacks that are meant to exclude or leverage power over others rather than being overtly aggressive. Prominent components of cyberbullying in college **can include electronic criticisms of identity, sexual harassment, and “outing”** of private information such as sexual orientation or health diagnoses without consent (eg, sexually transmitted infections, psychiatric conditions). These behaviors are considered in the context of a spectrum of aggressive behaviors that are typical concerns on college campuses, such as intimate partner violence and physical and sexual assault. In addition, the alarming issue of students bullying faculty members has been anecdotally described.1 Several campuses have debated banning the location-based, anonymous app Yik Yak following postings of abusive content about faculty and students. College students are an important population on which to focus regarding cyberbullying because older adolescence can be formative for habits that persist into young adulthood. Promotion of open dialogue and free speech is a hallmark of the college experience; however, **heated online debates have the potential to devolve into personal attacks and harassment.** Bullying behaviors that attack college students’ identities may have a considerable impact, given that the **undergraduate years are critical for adult identity formation.** Psychiatric correlates of cyberbullying The most concerning potential **negative consequence of cyberbullying is suicide**, which has been reported in mainstream media but not empirically studied in college students. One notable example is that of Tyler Clementi, a young man who died of suicide following the spread of derogatory content regarding his sexuality through social media by his college roommate.2 There is no current research published about actual suicide attempts or completion among college students involved in cyberbullying. A few studies have examined the negative health sequelae of cyberbullying among college students. In a study of college students who were members of fraternities or sororities, behavioral characteristics of those involved in cyberbullying included callous, unemotional traits (reflective of sociopathy).3 Moreover, both perpetrators and victims had increased depressive symptoms and fewer social skills. Two other studies suggest **increased depression, anxiety, and suicidality in victims of cyberbullying and depression and alcohol abuse in perpetrators.**4,5 Among younger adolescents, cyberbullying has been associated with suicidality, depression, substance abuse, somatic symptoms, and school problems.6 **Reactions to cyberbullying can include feelings of depression and suicidality or feelings that may be less** extreme, such as transient distress, embarrassment, and sadness.7 In addition, bullying in college may be either electronic or face to face. Regardless, it is important to consider potential negative sequelae of cyberbullying because depression and alcohol use are already among the most common and consequential health concerns for college students.8 Given the high prevalence of depression and alcohol abuse in this population, examination of risk factors is crucial for prevention of morbidity and mortality.  
It solves the aff—people can express themselves just not through this forum which is uniquely conducive to impersonal experiences that is more likely to include serious acts of bullying.

**Tobacco**

**Counterplan: Public colleges and universities in the United States ought not restrict freedom of speech, except for prohibiting the tobacco industry from sponsoring social events held by any organization that receives university funding.**

**Rigotti et al 05** Nancy A. Rigotti, MD, Susan E. Moran, MD, MSCE, and Henry Wechsler, PhD “US College Students’ Exposure to Tobacco Promotions: Prevalence and Association With Tobacco Use” American Journal of Public Health 2005 January; 95(1): 138–144 https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1449866/

Our findings have implications for universities, states, and communities. Colleges and universities should be alert to tobacco industry sponsorship of events on their campuses. As the American College Health Association and American Cancer Society recommend, colleges should ban the free distribution of tobacco products on campus, including distribution to fraternities and sororities, and **prohibit tobacco industry sponsorship of social events held by any organization that receives college funds**.10,24 States and communities already have a good reason for adopting smoking bans in bars and nightclubs: eliminating exposure to secondhand smoke.25,26 Our findings provide an additional rationale for adopting these policies: tobacco promotions are likely to be less successful in a smoke-free bar or nightclub, because smoking would not be modeled as an integral part of this social activity. Decoupling smoking and drinking will likely be an effective way to counteract the tobacco industry’s marketing strategies.

**It competes—advertisement of commercial products is protected by the constitution. ACLU summarizes** ACLU. "Statement for the Record to the Senate Health, Education, Labor and Pensions Committee on FDA Regulation of Tobacco." *American Civil Liberties Union*. N.p., n.d. Web. 22 Apr. 2017.

**The right of free expression** guaranteed by the First Amendment is not limited to social or political commentary, books, newspapers, and rallies. It also **extends to** symbolic speech, non-verbal expression, artistic, and **commercial speech**. While the **current tobacco restrictions are being discussed as ""commercial speech""** issues**, the proposed restrictions govern far more than advertising**. Ultimately, these restrictions are aimed at swaying the debate about tobacco's health effects, individual choice, and government responsibility by limiting one side of the public discourse and the flow of consumer information. Even if such restrictions were challenged solely on the basis that they inhibit commercial speech, there is a strong argument **under current Supreme Court precedent** that **they infringe on the First Amendment rights of advertisers and adult consumers**. **Advertising restrictions, including** (1) restricting all advertising to a black-and-white format; (2) restricting labeling and advertising in an audio format to words without music and video formats to static black text on a white background; and (3) **banning tobacco industry corporate sponsorship of non-tobacco related events are not permissible under the First Amendment**. For the restrictions under consideration to pass constitutional muster, the government must prove the measures are no more extensive than necessary and that they directly advance the government's objective in reducing smoking by youths. *44* ***Liquormart, Inc. v. Rhode Island,*** *517 U.S. 484 (1996) (plurality opinion, applying a strengthened test for constitutional review of commercial speech violations). We do not believe that the FDA studies and legislative findings would be sufficient to provide the direct causal relationship necessary to sustain such regulations under current Supreme Court precedent.*

**Tobacco companies use social events at universities to promote smoking—causes more regular tobacco use.**

**Rigotti et al 05** Nancy A. Rigotti, MD, Susan E. Moran, MD, MSCE, and Henry Wechsler, PhD “US College Students’ Exposure to Tobacco Promotions: Prevalence and Association With Tobacco Use” American Journal of Public Health 2005 January; 95(1): 138–144 https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1449866/

**Tobacco use among young adults in the U**nited **S**tates **is a growing public health concern**. Cigarette smoking rates declined between 1993 and 2000 among all US adults except those aged 18 to 24 years.1 Among US college students, the prevalence of smoking rose dramatically during the 1990s before it declined slightly between 1999 and 2001.2–4 Smoking rates among young adults who do not attend college are higher than smoking rates among college students.4 Several factors account for young adults’ increased tobacco use. One factor is the aging of the cohort of adolescents whose smoking rates increased after 1991, but it does not explain all of the change.2–5 Another factor may be that young adults are initiating regular tobacco use in larger numbers.5 **Young adults** (aged 18–24 years) **are the youngest legal targets of tobacco industry marketing**. Internal tobacco industry documents show that tobacco marketing targets young adults.6–9 **The industry envisions** the uptake of **smoking as a process that extends into young adulthood, during which** time **adolescents’ experimental** or occasional **smoking becomes solidified into a** regular smoking **habit**.9 The **tobacco** industry **has developed novel marketing strategies** to promote this transition. **A well-documented strategy is to sponsor** social events at bars and nightclubs where free cigarettes and promotional items are distributed.6,7,9 Similar **promotions take place at college social events sponsored by** organizations such as **fraternities and sororities**.10 Bars and nightclubs have assumed greater importance for tobacco marketing since the 1998 Master Settlement Agreement between the tobacco industry and 46 states’ attorneys general, because the agreement limits the distribution of free cigarette samples to facilities that do not admit minors.6,9,11 Bars and nightclubs also are smoker-friendly environments for the tobacco industry, because they are among the few places where smoking is not generally restricted by clean-air laws.7 Promotional events at bars, nightclubs, and **college social** **events aim to link alcohol with tobacco use and** to **make tobacco** products **a visible part of young adults’ social lives**.6,7 **The events reinforce brand visibility, allow the industry to reach** specific **target groups, and generate names for** future **marketing efforts**.6,7,9 **Promotions** at social events **have the potential to increase tobacco use by encouraging nonsmokers to try** cigarettes, by **encouraging experimental smokers to develop regular use, and** by **discouraging current smokers from quitting**. There is no information about the extent of young adults’ exposure to these new tobacco promotions or about the impact of these promotions on young adults’ tobacco use. The potential impact could be substantial, because young adults are more susceptible to tobacco marketing than adults in older age groups.12 **Colleges and universities provide a key channel** for reaching young adults, because approximately one third of young adults attend college.13 Our study used data from a large nationally representative random sample of US college and university students to assess the prevalence of students’ exposure to tobacco promotions at bars, nightclubs, and campus social events and to explore the association between that exposure and smoking behavior. We hypothesized that students’ tobacco use before entering college might modify this association, because students who did not smoke regularly before college would be more susceptible to bar/nightclub promotions than students who entered college as regular smokers.

**Empirics prove—college tobacco marketing increases the chance of tobacco use.**

**Rigotti et al 05** Nancy A. Rigotti, MD, Susan E. Moran, MD, MSCE, and Henry Wechsler, PhD “US College Students’ Exposure to Tobacco Promotions: Prevalence and Association With Tobacco Use” American Journal of Public Health 2005 January; 95(1): 138–144 https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1449866/

To our knowledge, this is the first study that measured young adults’ exposure to a tobacco industry marketing strategy that has assumed greater prominence since the 1998 Master Settlement Agreement**. During the first 6 months of the 2000–2001** school year, 8**.5% of US college students attended a tobacco industry–sponsored social event** where free cigarettes were distributed. Students at all but one of the 119 colleges surveyed reported attending these events. Bars and nightclubs were the most common settings, but s**tudents** also **reported attending events on college campuses**, a site that has received less attention and that provides direct access to students. Our study shows that **there is an association between attendance at these** promotional **events and tobacco use**. It has been hypothesized that the tobacco industry’s new promotional strategies have contributed to the observed increase in young-adult tobacco use. To date, however, the evidence is only indirect; the introduction of these strategies corresponds temporally with the increase in smoking among young adults.5–7,9 We add to the evidence by showing an association between exposure to the new tobacco promotional events and current smoking. **The association remained strong after we adjusted for potential confounding factors,** such as the fact that smokers drink more alcohol and are more likely to go to bars. Furthermore, the effect of tobacco promotions on smoking behavior was modified by a student’s history of tobacco use before entering college. Nearly 80% of the students had not smoked regularly before 19 years of age. Among this group, **students exposed to a tobacco** promotional **event had higher odds of being a current smoker at the time of our study.** In contrast, students who were already smoking regularly when they entered college continued to smoke at high rates, and attending a tobacco promotional event had no effect on their smoking prevalence. This finding suggests that the tobacco industry sponsorship of social events may be encouraging the initiation or the progression of smoking among young adults.

**Tobacco use causes massive negative health effects.**

**Saha et al 07** Sibu P Saha, MD MBA FICA, Deepak K Bhalla, PhD, Thomas F Whayne, Jr, MD PhD FICA, and CG Gairola, PhD “Cigarette smoke and adverse health effects: An overview of research trends and future needs” Int J Angiol. 2007 Autumn; 16(3): 77–83 <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2733016/> JW

As part of the Global Burden of Disease Study carried out by the Harvard University School of Public Health in 1997 (4), it was projected that mortality and morbidity from tobacco use will increase by almost threefold worldwide in20 to 25 years**.** Similar predictions have been made by the Oxford University Center headed by Sir Richard Doll, who was one of the first researchers to link cigarette smoking with lung cancer in the 1950s (5,6). Cancer, cardiovascular diseases and chronic obstructive pulmonary disease continue to be the main health problems associated with cigarette smoking. An extensive database has accumulated, which has consistently documented a relationship between smoking and these specific diseases. The strength of the association is further demonstrated by measuring the RR and the presence of a dose-response relationship (ie, direct relationship between the intensity of exposure to cigarette smoke and the risk of disease). According to a 2004 Centers for Disease Control and Prevention report (3), approximately 2600 people die of cardiovascular disease in the United States every day, which translates into one death every 33 s. Furthermore, the likelihood of dying from heart disease increases fourfold as a result of smoking. The cost of heart disease and stroke in terms of health care expenses and lost productivity was estimated at US$351 billion in the United States alone in 2003**.** An analysis by European health experts (7) determined that in developed countries as a whole, tobacco is responsible for 24% of all male deaths and 7% of all female deaths; these figures rise to over 40% in men in some countries of central and eastern Europe and to 17% in women in the United States**.** The average decreased life span of smokers is approximately eight years**.** Among United Kingdom doctors followed for 40 years, overall death rates in middle age were approximately three times higher among physicians who smoked cigarettes than in nonsmokers. In those United Kingdom physicians who stopped smoking, even in middle age, a substantial improvement in life expectancy was noticed. These same experts found that worldwide, smoking kills three million people each year and this figure is increasing. They predict that in most countries, the worst is yet to come, because by the time the young smokers of today reach middle or old age, there will be approximately 10 million deaths per year from tobacco use. Approximately 500 million individuals alive today can expect to be killed by tobacco and 250 million of these deaths will occur in the middle age group. Tobacco is already the biggest cause of adult death in developed countries. Over the next few decades tobacco is expected to become the biggest cause of adult death in the world. For men in developed countries, the full effects of smoking can already be seen. Tobacco causes one-third of all male deaths in the middle age group (plus one-fifth in the old age group) and is the cause of approximately one-half of all male cancer deaths in the middle age group (plus one-third in the old age group). Of those who start smoking in their teenage years and continue smoking, approximately one-half will be killed by tobacco. One-half of these deaths will be in middle-aged individuals (35 to 69 years of age) and each will lose an average of 20 to 25 years of nonsmoker life expectancy. In contrast, the total mortality is decreasing rapidly and cancer mortality is decreasing slowly in nonsmokers in many countries. Throughout Europe in the 1990s, tobacco smoking caused three-quarters of a million deaths in the middle age group. In the Member States of the European Union in the 1990s, there were over one-quarter of a million deaths in the middle age group directly caused by tobacco smoking, which included 219,700 deaths in men and 31,900 in women. There were many more deaths caused by tobacco at older ages. In countries of central and eastern Europe, including the former Union of Soviet Socialist Republics, there were 441,200 deaths in middle-aged men and 42,100 deaths in women. Several epidemiological studies examining the factors responsible for the interindividual differences in the susceptibility to tobacco-related cancers and cardiovascular diseases are being performed in the United States, Europe and Japan. Although still not common practice, many of the newer studies are employing molecular genetic assays in conjunction with epidemiology to identify genotypes susceptible to disease development and select suitable biomarkers of tobacco smoke exposure. The frequency of investigations in the area of cigarette smoke composition and chemistry decreased during the last decade. Nonetheless, there are ample data to suggest that cigarette smoke is a highly complex mixture that contains approximately 4800 different compounds (8). Approximately 100 of these compounds are known carcinogens, cocarcinogens and/or mutagens. The complex mixture also contains gases such as ozone, formaldehyde, ammonia, carbon monoxide, toluene and benzene, and about 1010 particles of different sizes in each mL of mainstream smoke. In addition, a number of other toxic, mutagenic, tumour promoter and/or cocarcinogenic substances have been identified in both mainstream and sidestream cigarette smoke over the years. Many chemical and biological assays of smoke condensates have also documented the presence of potent inhibitors of carcinogenesis in smoke. Such a complex chemical composition of smoke has made it difficult to determine the active constituent(s) responsible for the tobacco-related health risks of smoking and has led to studies of individual constituents of smoke such as polycyclic aromatic hydrocarbons (PAH), nitrosamines and nicotine. Thus, over the years, various individual groups of smoke constituents have been the focus of research at different times. For example, studies of PAH were in vogue during the 1970s and 1980s, followed by nitrosamines in the 1990s. Tobacco alkaloids have long been studied because of their pharmacological activity and have attracted increased attention because of their suspected role in addiction, smoking behaviour and cessation. However, it is also being realized now that the health effects of this complex mixture are likely to result from a combined effect of these chemicals through multiple mechanisms rather than as result of the effects of a single smoke constituent. The mixture contains compounds belonging to almost every class of chemicals that are toxic and protective, agonist and antagonist, carcinogenic and anticarcinogenic, and exists in the gaseous as well as the particulate phase. Extensive studies on the chemical constituents of tobacco smoke and their relationship to disease were published by Hoffmann and Hoffmann of the American Health Foundation (8). Newer studies have largely focused on the comparative chemistry of mainstream and sidestream smoke. Interest in the free radical chemistry of smoke has resurfaced due to the realization that smoke-induced oxidative injury may play an important role in the etiology of a variety of tobacco-related diseases. Pioneering studies on the free radical chemistry of tobacco smoke, performed in the laboratory of William Pryor at the Louisiana State University (9), identified short- and long-lived radicals in mainstream and sidestream cigarette smoke, and implicated them in various smoking-associated disease etiologies. Go to: TOBACCO-RELATED CARDIOVASCULAR DISEASE Cardiovascular diseases, and atherosclerosis in particular, are the leading causes of death in industrial societies. The predominant underlying cause of coronary artery disease (CAD) is atherogenesis, which also causes atherosclerotic aortic and peripheral vascular diseases. Cigarette smoking**,** independently and synergistically with other risk factors such as hypertension and hypercholesterolemia, contributes to the development and promotion of the atherosclerotic process. Various studies have shown that the risk of developing CAD increases with the number of cigarettes smoked per day, total number of smoking years and the age of initiation, thus indicating a dose-related response. In contrast, cessation of smokingis reported to reduce mortality and morbidity from atherosclerotic vascular disease. The mechanisms through which smoking influences the development and progression of atherosclerosis are poorly understood at present, but recent studies point to an adverse effect of smoking on endothelial and smooth muscle cell functions as well as thrombotic disturbances produced by tobacco smoke (10,11). With the use of modern ultrasonographic techniques, three independent studies performed in the United States, Europe and Australia have demonstrated that both active and passive smokers exhibit impaired endothelium-dependent vasoregulation (12–14). Some degree of recovery of endothelial function in ex-passive smokers who have stayed away from smoke-contaminated environments further supported a secondary role of smoke in endothelial dysfunction (15). Evidence has been presented that tobacco-related impairment of endothelial function may be related to its adverse effects on endothelial nitric oxide (NO) synthase (16,17). An association between a genetic polymorphism of the endothelial NO synthase gene and the predisposition of smokers to CAD was reported (18,19). Additionally, studies report that smoke interferes with L-arginine and NO metabolism, resulting in reduced NO formation (20). Upregulation of the expression of endothelial cell adhesion molecules (CAMs) such as vascular CAM-1 and intercellular CAM-1 by smoke condensates, and stimulation of leukocyte and endothelium attachment by exposure to cigarette smoke was demonstrated (21). Cigarette smoke extract has been shown to induce expression of CAMs (22). However, the expression of a specific adhesion molecule is determined in vivo and the relationship between various events is poorly understood. Exposure to tobacco smoke is known to increase oxidative stress in the body by various mechanisms, including depletion of plasma antioxidants such as vitamin C. At least two studies have been performed to determine the role of oxidative stress in increasing leukocyte-endothelial interactions that precede the development of atherosclerosis in smokers. One study showed that a high intake of vitamin C by smokers significantly reduced the adhesiveness of their monocytes to endothelial cells (23). However, in a second study, sera from young smokers was collected before and after a single oral supplementation with vitamin C and L-arginine (a substrate for NO production). The sera were tested for promotion of the adherence of human monocytes to human umbilical vein endothelial cell monolayers. It was shown that while oral L-arginine caused reduction in such leukocyte adherence, no reduction was seen with vitamin C supplementation (24). This suggested that the NO levels may be important in smoking-induced leukocyte-endothelial interactions, at least during the early stages. Neither NO nor any other markers of oxidative stress were measured in either of these studies. The levels of 8-hydroxydeoxyguanosine, an oxidized DNA product, and F2-isoprostane, an oxidative arachidonic acid product, were found to be elevated in passive smokers (25,26). Oxidation of low-density lipoprotein (LDL), which is a gold standard risk factor of the atherosclerotic process, was also found to be elevated in smokers, as determined by the presence of increased levels of autoantibodies against oxidized LDL. It was further demonstrated that dietary supplementation with a lipid-soluble antioxidant, α-tocopherol, significantly reduced plasma levels of oxidized LDL autoantibodies (27). Similarly, intake of a mixture of antioxidants was found to increase the resistance of smoker LDL to oxidative modification (28) and reduce the plasma levels of 8-hydroxydeoxyguanosine in passive smokers (25). These studies have thus identified newer, more specific markers of oxidative stress that can be used as biomarkers of oxidant injury and used for the development of dietary and/or pharmacological interventions against disease development. Relatively few studies related to cardiovascular effects of cigarette smoke have been performed in rodent models. Such animal studies are, however, needed to delineate the role of different mechanisms in promoting atherosclerotic disease and for developing appropriate interventions. Go to: TOBACCO-RELATED CANCERS Tobacco carcinogenesis has remained a focus of research during the past 10 years, and various epidemiological and experimental studies have not only confirmed the major role of tobacco smoke exposure in lung and bladder cancers**,** but have also reported on its association with cancers of various other sites, such as the oral cavity, esophagus, colon, pancreas, breast, larynx and kidney. It is also associated with leukemia, especially acute myeloid leukemia.

**The tobacco industry is one of the most oppressive institutions in the world—they directly target disadvantage groups to enhance addiction. There has been no greater mass killing of disadvantaged persons in human history. Ames ‘15**

"The poor, the young, the black and the stupid": Inside Big Tobacco's plans to kill a billion people.By Mark Ames , written on June 30, 2015. https://pando.com/2015/06/30/tobacco-industry-will-kill-billion-people-century-read-how-they-plan-do-it/

“The world’s most widespread, serious infection is purposely spread by its vector: the tobacco industry. Rather than a tiny insect, this vector has economic resources rivaling those of many of the world’s largest governments. Its spread is mapped out in mahogany-lined boardrooms; it breeds its resistance to countermeasures in political backrooms; and it seizes its victims in adolescent bedrooms.” —Eric LeGresley, World Health Organization. The Legacy Tobacco Documents Library (LTDL) at the University of California, San Francisco is a digital House of Corporate Horrors; an open black box offering the public access to nearly 15 million searchable documents -- over [88 million pages](https://industrydocuments.library.ucsf.edu/tobacco/about/data/) in total -- direct from the private vaults of the Big Tobacco companies. These documents offer an unvarnished view into the deadliest and most outrageous business conspiracy in history. Tens of millions of people dead, for tens of billions in Big Tobacco profits. Most of those deaths were easily preventable and might actually have been prevented but for this conspiracy. It’d be hard to believe if it weren’t all there in black and white: Secret programs to spike and freebase cigarettes in order to hook smokers for life, massive marketing campaigns aimed at hooking underage smokers and at confusing and tricking the public, and untold billions more spent bribing the media, science, academics, and politicians in order to keep the tobacco profits rolling on. You also find the names of all sorts of respectable journalists, political figures and nonprofit charities who cut secret deals with Big Tobacco to help them continue profiting off mass-death. The newest [3.0 version](https://industrydocuments.library.ucsf.edu/tobacco/) of the digital Tobacco Library has just gone live, the most advanced version yet of its online collection—and the most important collection of leaked secrets anywhere in the world. There are a lot of things I like about the Tobacco Library story—it’s one of those rare stories in which good really does triumph over evil, in which the work of heroes will save the lives of literally tens of millions of people, and for me it’s a rare story in which I get to talk up the good that tech can do. It’s thanks to technology that tens of millions of these company documents are open to researchers and journalists—a raw look into the bowels of corruption. These documents have helped shaped anti-smoking laws around the world and saved countless people from a painful, drawn-out death in the process. Before getting into the tech side of this story, it’s important to understand the stakes in the tobacco conspiracy: Every year, cigarettes still kill roughly 480,000 Americans. Worldwide, tobacco kills six million people per year. In all, tobacco killed over 100 million people in the 20th century, and cigarettes are expected to kill 1 billion people worldwide this century. There is nothing to compare to that death toll in all of human history**,** not even guns or nukes or the deadliest wars. Whereas tobacco brings nothing but misery for profit, at least you can say that some wars have achieved a greater good—defeating fascism, liberating oppressed groups. The one persistent argument made in tobacco’s defense -- an argument heavily funded and promoted by Big Tobacco -- is the false idea that those millions killed by smoking did so by their own “choice.” Leaving aside the billions spent by Big Tobacco over the years to distort and conceal the medical science on tobacco, there are a few problems with that rationale, many of them helpfully revealed by the LTDL documents. Murder, They Wrote In America, 50,000 people die a year from second-hand smoke; worldwide over 500,000 people die a year from second-hand smoke, which obviously wasn’t their choice. Many of those who develop second-hand smoke diseases were exposed as infants or children, or in their workplaces; Tobacco documents reveal that the companies focused their efforts on getting “presmokers” under the age of 18 addicted, because “presmokers” are far more likely to become addicted for life to nicotine than people who start smoking later in life. Tobacco documents reveal that this target demographic is called “learners,” “replacement smokers,” “starters,” and “tomorrow’s cigarette business”; American Tobacco’s undercover operative proposed publishing articles to discredit an anti-tobacco scientist in a newspaper that no one would trace to the tobacco industry. Up to 90 percent of smokers are addicted, meaning they have no choice. By comparison, only 3 percent of those who drink alcohol are addicted. 81 percent of smokers say they regret having started smoking and cannot quit. Most addicted smokers started smoking between the ages of 13 and 15. Philip Morris conducted secret pharmacological studies about children and smoking in reports titled “Aggressive Monkeys” and “Hyperkinetic Child as Prospective Smoker”; Tobacco companies spike cigarettes with ammonia to create “crack nicotine” in order to maximize addiction; Tobacco companies also targeted disadvantaged communities, including African-Americans and other minorities, and the mentally ill, because they too were more vulnerable to becoming lifelong cigarette addicts. RJR Reynolds once ran a marketing campaign for Camel cigarettes in San Francisco code-named “Project Scum**”** targeting the homeless, alcoholics, and drug addicts; By the 1970s, tobacco companies started heavily targeting lower-income groups. A 1978 Philip Morris marketing memo argued for pouring more money into sponsoring NASCAR races over sponsoring the arts: “The most important problem I see with sponsorship of the arts is that it reaches the wrong target group. In the main the arts are more of interest to the A/B class than to the lower social classes C and D. Smoking is becoming more and more a C/D class habit... sport sponsorship fits the class and mass exposure criteria much better, and therefore sells more cigarettes per $ spent”; A Lorillard Tobacco Company memo from 1978 reads, "we must continually keep in mind that Newport is being heavily supported by blacks and the under 18 smokers". In the late 50s, Lorillard pushed menthols on African-Americans by driving trucks full of Newports into urban housing projects and distributing them to blacks for free “like ice-cream trucks.” Other code words for targeting minority communities with tobacco included “BHM” (Black + Hispanic market); A 1970 Lorillard memo titled “Why Menthols?” explains how menthol cigarettes were marketed to exploit racist myths for profit: Negroes, as the story goes, are said to be possessed by an almost genetic body odor. Now whether or not this is real is irrelevant. More importantly, Negroes recognize the existence of this “myth.” And they realize that “Whitey” does too. Now what does this have to do with menthol cigarettes? Here’s the theory: Negroes Americans smoke menthols to make their breath feel fresh. To mask this real/mythical odor. Let’s examine this theory a little... Jews, according to an RJR memo, “tend to gravitate towards lower tar brands”; while a 1973 Lorillard memo divided female smokers into eight segments on a sliding scale, from “Emotional Bra-Burning Extremists” and “Blatant Lesbians” to “traditional Women” and “Anti-Libbers.” A 1978 Lorillard memo to the company president about its best-selling brand, Newport, reads: The success of NEWPORT has been fantastic during the past few years. Our profile taken locally shows this brand being purchased by black people (all ages), young adults (usually college age), but the base of our business is the high school student. Lorillard’s biggest worry was the possibility that these fickle youngsters might quit, despite being the most prone to becoming addicts until death: “I think we must continually keep in mind that Newport is being heavily supported by blacks and the under 18 smokers. We are on somewhat thin ice should either of these two groups decide to shift their smoking habits.” Reynolds, maker of Marlboros and Camel, made explicit in their memos the need to hook young teens. A 1975 Reynolds memo, stamped “SECRET,” concluded, To ensure increased and longerterm growth for Camel Filter, the brand must increase its share penetration among the 14-24 age group which have a new set of more liberal values which represent tomorrow’s cigarette business. These are not accidents, as the tobacco library reveals, but rather carefully plotted designs by some of the most profitable corporations in history. It is a profit model that is like a dream come true for the most bloodless capitalists. Warren Buffett, the second richest man in the world and darling to some of the more gullible liberals, [explained why](http://articles.baltimoresun.com/1994-05-30/business/1994150090_1_tobacco-rjr-nabisco-cigarette) he purchased a large 5 percent stake in RJR Reynolds and took a board seat at the tobacco giant: I’ll tell you why I like the cigarette business. It costs a penny to make. Sell it for a dollar. It’s addictive. New York Times columnist Bob Herbert in 1993 thrashed some of the leading African-American charities that took Philip Morris’ blood money to help launder the tobacco giant’s reputation—NAACP, the Urban League, and the United Negro College Fund were among those he named. (More recently, the United Negro College Fund sparked controversy when it took [$25 million](http://www.salon.com/2014/07/25/koch_brothers_new_racial_gambit_whats_really_behind_a_quiet_battle_with_afscme/) from the [Koch brothers](http://www.salon.com/2014/09/04/exclusive_new_secret_koch_tape_reveals_united_negro_college_fund_plot/), longtime allies of Big Tobacco and leading funders of climate change deniers). Herbert quoted the once-ubiquitous Winston Man from the magazine ads, David Goerlitz, who recounted what a Reynolds executive told him during a photo shoot: Goerlitz asked the executive during a break if he or his Reynolds colleagues smoked, to which the Reynolds exec shook his head, and [replied](http://www.nytimes.com/1993/11/28/opinion/in-america-tobacco-dollars.html), Are you kidding? We reserve that right for the poor, the young, the black and the stupid.

1. The Epistemic Argument For Hedonism Neil Sinhababu National University of Singapore http://philpapers.org/archive/SINTEA-3 [↑](#footnote-ref-1)
2. Gino et al 2008 [Francesca Gino Kenan-Flagler Business School, University of North Carolina at Chapel Hill, Don Moore Tepper Business School, Carnegie Mellon University, Max H. Bozman Harvard Business School, Harvard University “No harm, no foul: The outcome bias in ethical judgments” http://www.hbs.edu/research/pdf/08-080.pdf] AT [↑](#footnote-ref-2)
3. Mills, Charles [Caribbean philosopher from Jamaica. He is known for his work in social and political philosophy, particularly in oppositional political theory as centered on class, gender, and race] “Ideal Theory as Ideology” Hypatia, Volume 20 (Number 3). Summer 2005. RP [↑](#footnote-ref-3)
4. Mills, Charles [Caribbean philosopher from Jamaica. He is known for his work in social and political philosophy, particularly in oppositional political theory as centered on class, gender, and race] “Ideal Theory as Ideology” Hypatia, Volume 20 (Number 3). Summer 2005. RP [↑](#footnote-ref-4)
5. Curry, Tommy J. [Ph.D., Associate Professor of Philosophy, Texas A & M University] “The Cost of a Thing: A Kingian Reformulation of a Living Wage Argument in the 21st Century.” Victory Briefs, January/February 2015. [↑](#footnote-ref-5)
6. Reed [*Reed E. McConnell ’15 is an editorial comper in Greenough Hall*], Why Harvard’s Hate Speech Policies are Necessary, *The Harvard Crimson,* April 2012 [↑](#footnote-ref-6)