


2016

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## Citation of this paper:

Roberts, Sarah T., "Commercial Content Moderation: Digital Laborers' Dirty Work" (2016). *Media Studies Publications*. 12.  
<https://ir.lib.uwo.ca/commpub/12>

## Commercial Content Moderation: Digital Laborers' Dirty Work

Sarah T. Roberts

### What Is CCM?

Social media platforms are essentially empty vessels that need user-generated uploads to fuel visits to and participation in their sites. Other companies whose specialties are not in the social or digital media arena at all may simply have an interactive portion of their website to monitor, a Facebook page to maintain, or a Twitter account to contend with. For all of these companies, online brand and reputation management is a key part of their business practice. To guard against digital damage to their brand that could be caused by lewd, disturbing, or even illegal content being displayed and transmitted on their sites, companies use the services of commercial content moderation (CCM) workers and firms, who screen the content. They may screen the content before it gets posted or deal with it after, when another user flags something as being in violation of site guidelines, local tastes or norms, or even the law.

Yet CCM is not an industry unto itself, *per se*. Rather, it is a series of practices with shared characteristics that take place in a variety of worksites (e.g., in-house at large tech firms; online via microlabor websites such as Amazon Mechanical Turk). Workers are dispersed globally (Chen, 2014), and the work is almost always done in secret for low wages by relatively low-status workers, who must review, day in and day out, digital content that may be pornographic, violent, disturbing, or disgusting. The workers act as digital gatekeepers for a platform, company, brand, or site, deciding what content will make it to the platform and what content will remain there. In this sense, and despite their relatively low status wherever they toil, they play a significant role in crafting the flavor of a site and deciding what is permissible and what crosses lines into removable territory.

CCM workers are therefore indispensable to the sites for which they labor. They curate site content and guard against serious infractions contained in user-generated content (UGC) that might do harm to a social media platform or a company's digital presence. This often includes content rife with racist, homophobic, or misogynist imagery, language, or violence. CCM workers are the arbiters and adjudicators of which content violates taste, rules, or sociocultural norms, and which content should be kept up on a site. These tasks often involve complicated matters of judgment and thus require a moderator be steeped in the social norms and mores of the places in the world for which the content is destined, frequently a place and an audience different from the worker himself or herself. For many workers, this typically requires a reliance on presuppositions about an imagined audience, taking on or embodying a set of values, and making judgments that may vary from their own moral codes and personal and cultural values. It is a phenomenon of cultural and linguistic embodiment familiar in related kinds of work, such as that of the outsourced and globalized call center (Huws, 2009; Mirchandani, 2012; Poster, 2007).

In this chapter, I will introduce both the concept of CCM work and workers, as well as the ways in which this unseen work affects how users experience the Internet of social media and user-generated content. I will tie it to issues of race and gender by describing specific cases of viral videos that transgressed norms and by providing examples from my interviews with CCM workers. The interventions of CCM workers on behalf of the platforms for which they labor

directly contradict myths of the Internet as a site for free, unmediated expression, and highlight the complexities of how and why racist, homophobic, violent, and sexist content exists, and persists, in a social media landscape that often purports to disallow it.

### **Doing a Good Job in the CCM World**

Moral and ethical codes of individual CCM workers are superseded by the mandates and dictates of the companies that hire them and/or the platforms for which the content is destined. The sign of a good CCM worker is invisibility—a worker who leaves no trace. This makes it seem as though content just magically appears on a site, rather than there being some sort of curation process and a set of logics by which content is determined to be appropriate or inappropriate. When the content contains racist, homophobic, or sexist aspects, this invisibility is particularly problematic. It can appear that such content just naturally exists, and should exist, in the digital ecosystem, rather than it often being the result of a decision-making process that has weighed the merits of making it available against the results of removing it, or a system that simply has not been able to deal with it yet. When those in-house processes are kept from users, as they almost always are, the logic for the existence of the material on a site becomes opaque and the content becomes normalized.

While egregious or obvious racist, homophobic, or threatening content is typically prohibited, or at least limited, on more mainstream sites, this does not mean that the sites are not still rife with such material. On many UGC-reliant platforms, the sheer volume of uploaded content means that CCM reviewers will only view content once it has been flagged by a user as inappropriate. This means that the default state for such content is to be on the site; it takes free user labor, in the form of filing a report or flagging content, for the review process to even begin. In other words, the content goes up first, is flagged, and then comes down, which means it existed on a given site for some period of time where people accessed, viewed, and experienced it.

Not all content is simple or easy for CCM workers to spot or to adjudicate, either. For example, workers reported that hate speech is difficult to deal with, because they have to listen to or view a potentially lengthy video to make a determination about the user's intent and the content it contains—content that may be only a small portion of the whole. When CCM work is outsourced to other parts of the world, it creates an additional challenge, in that those workers must become steeped in the racist, homophobic, and misogynist tropes and language of another culture. Finally, as one longtime CCM worker (and now manager) told me, working in CCM means putting aside one's personal belief system and morality. It also means that workers are exposed to content that is personally deleterious or damaging, including content that may impugn the CCM worker's own identities.

There are additional pressures on CCM workers beyond finding and removing objectionable content. For instance, there are real monetary and other kinds of value that can be assigned to content that is sensationalistic, often on the grounds of being prurient, disturbing, or distasteful. In other words, it is this content that can often be a hit, driving eyeballs and clicks to a site or platform. For this reason, CCM workers find themselves in a paradoxical role, in which they must balance the site's desire to attract users and participants to its platform—the company's profit motive—with demands for brand protection, the limits of user tolerance for disturbing material, and the site rules and guidelines.

The existence of CCM workers and the necessity of their work to the social media production chain disrupt comfortable myths about the Internet as a site of one-to-one relationships between user and platform. As one CCM worker put it to me bluntly and succinctly, to experience an Internet without CCM would be to experience it as “a cesspool.” It is in this digital cesspool that CCM workers spend their shifts every day. The daily immersion in this environment has tangible effects on the platforms where workers labor, in the curation and decision-making processes through which content is made available, and on the CCM employees themselves, who do the dirty work of social media.

### **Content Goes Viral**

CCM workers are uniquely positioned as gatekeepers, weighing numerous complex issues at once: What is the nature of this content? What meaning does the language, symbols, or images it contains convey? What is the content’s cultural context at its point of origin, at the locale and Internet site for which it is destined, and in the locale where it is being moderated? What are the policies that their company or the platform for which the content is destined have set out, regarding tolerance for controversial, disturbing, racist, sexist, homophobic, or sexually or violently graphic content?

These questions are juxtaposed with other issues, including the popularity of a video or particular piece of content. CCM workers must deal with its popularity as they weigh the merits of keeping content up or taking it down, particularly in cases when the content is flagged for review after it has already circulated in a significant way. Additionally, in the world of social media platforms, this user-generated and uploaded content is a commodity to which financial and other kinds of value can be assigned. The value to the host site, and possibly to the content creator (who may be a professional engaged in attempting to create popular content), is generated when users visit a site and interact with advertising associated with the content they are viewing. Popular content drives viewers to a site or platform to view it, and its value as a lure to attract viewers increases. Once content, such as a video on a site such as YouTube, becomes a hit, attracting millions of views, likes, reposts, and imitations or homages, it is called “viral.” Digital media scholar Jean Burgess (2008) describes the characteristics that such viral hits share, including the impetus to extend their reach and meaning by others repurposing them:

there is much more going on in viral video than “information” about a video being communicated throughout a population. Successful “viral” videos have textual hooks or key signifiers, which cannot be identified in advance (even, or especially, by their authors) but only after the fact, when they have been become prominent via being selected a number of times for repetition. . . . Because they produce new possibilities, even apparently pointless, nihilistic and playful forms of creativity are contributions to knowledge. This is true even if (as in the case of the “Chocolate Rain” example) they work mostly to make a joke out of someone. (p. 105)

In many cases, the joke and conceit of such content is predicated on distasteful humor. In the case of “Chocolate Rain” (Zondag, 2007), the video cited by Burgess above, the racially politicized, yet amateurish, lyrics and theme of his original song, in combination with the persona of the singer (Tay Zondag) and his unconventional physical appearance, exceptionally deep voice, and unorthodox delivery, turned his anthem about racial injustice into spectacle, and

spectacle into viral video. Burgess goes on to describe the outcome of “Chocolate Rain” and its subsequent uptake in the social media world:

It is arguably the combination of oddness and earnest amateurism that made “Chocolate Rain” such a massive YouTube hit. . . . But the *uses* of “Chocolate Rain” as part of participatory culture ended up far exceeding the intentions of either the original producer or the original disseminators. There was a relatively brief but highly creative flurry of parodies, mashups and remixes as Chocolate Rain’s popularity spiked. These derivative works reference “Chocolate Rain” by imitating or re-using parts of it, and frequently combining them with many ideas from other sources, building on layers of knowledge built up in previous Internet “phenomena” as well as broadcast media fandom (like Star Wars). (pp. 104–105)

Although the humor that rocketed “Chocolate Rain” into viral status may have been only partially due to its racialized themes and its creator’s unexpected presentation of his Black identity, a great deal of other popular UGC trades directly on its disturbing racist, homophobic, or misogynist tropes and images. While social media platforms perpetuate the myth that such content may simply arrive on a site and become a hit due to serendipity or other intangible factors, the reality is much more complex and is predicated on a long tradition in American popular culture of capitalizing on media content that degrades and dehumanizes.

### **Digitizing Minstrelsy: Racist Content Sells**

There is a long history in the American context of racialized and racist material used as humor, in which punchlines are predicated on the denigration of people based on characteristics ascribed to them by virtue of their racial or ethnic identities (Ferris State University, n.d.). In popular culture, this brand of humor has appeared across numerous media, including popular music, theater, literature, and cinematic representations. The participatory Internet, perhaps once seen as a potential site of escape from the racist tropes or sexism and misogyny (Light, 1995) embedded in American popular culture, has largely failed to deliver on foregrounding mass critical engagement with these issues at all. Rather, it has served as another outlet for much of the same kinds of racist imagery, simultaneously providing new technological avenues for its production, dissemination, and consumption. As critical race and digital scholar Jessie Daniels (2013) puts it:

The Internet has not provided an escape route from either race or racism, nor has the study of race or racism proven to be central to the field of Internet studies. Instead, race and racism persist online in ways that are both new and unique to the Internet, alongside vestiges of centuries-old forms that reverberate both offline and on. (p. 696)

The empirical research I conducted with CCM workers in a major Silicon Valley social media firm<sup>1</sup> touched on these issues. An employee described the ways in which internal policy regarding racially charged, misogynist, or homophobic content was enacted and deployed:

It was a meeting with my team (the Enforcement team), and SecPol,<sup>2</sup> the team above us. And SecPol is only like 4 or 5 people. . . . So we would all sit in one of the bigger conference rooms and basically there were, we would go to quite a few meetings throughout the week, and sometimes it would be specific meetings on,

you know, the blackface policy, or whatever policy. But then weekly we had, what did we call it? I don't remember. But as [CCM employees] were in the queue during the week they could send videos to SecPol saying "I don't know why this is ok" or "why this video is not ok" or "this doesn't fall under a policy specifically but I don't think it should be up" or vice versa. (M. Breen, MegaTech CCM Worker)

In conversations with the workers, a number of them expressed the frustration that arose when they had to allow content that featured notorious racist imagery, such as blackface, to stand. Max Breen, a White male worker, age 24, explained:

We have very, very specific itemized internal policies . . . the internal policies are not made public because then it becomes very easy to skirt them to essentially the point of breaking them. So yeah, we had very specific internal policies that we were constantly, we would meet once a week with SecPol to discuss, there was one, blackface is not technically considered hate speech by default. Which always rubbed me the wrong way, so I had probably ten meltdowns about that. When we were having these meetings discussing policy and to be fair to them, they always listened to me, they never shut me up. They didn't agree, and they never changed the policy but they always let me have my say, which was surprising. (Max Breen, MegaTech CCM Worker)

The MegaTech example is an illustration of the fact that social media companies and platforms make active decisions about what kinds of racist, sexist, and hateful imagery and content they will host and to what extent they will host it. These decisions may revolve around issues of "free speech" and "free expression" for the user base, but on commercial social media sites and platforms, these principles are always counterbalanced by a profit motive; if a platform were to become notorious for being too restrictive in the eyes of the majority of its users, it would run the risk of losing participants to offer to its advertisers. So MegaTech erred on the side of allowing more, rather than less, racist content, in spite of the fact that one of its own CCM team members argued vociferously against it and, by his own description, experienced emotional distress ("meltdowns") around it.

Virality that trades on racialized and other kinds of stereotyped content can make a subject of the content an instantly recognizable celebrity. Such was the case for Antoine Dodson, a young Black man from Huntsville, Alabama, whose appearance on a local news program (Crazy Laugh Action, 2012) was taken up, remixed, and set to an R&B soundtrack by the Gregory Brothers, a team of young White males who created content on YouTube under the brand of "Auto-Tune the News" (Gregory Brothers, 2010). The subsequent song and video, entitled "Bed Intruder," became a viral hit, attracting millions of views and shares and spurring volumes of other content and media featuring his likeness or the song (e.g., ringtones; iTunes downloads). While Dodson entered into a partnership with the Auto-Tune producers that would provide him financial remuneration for his participation and use of his likeness and video (Mackey, 2010), his videos nevertheless caused controversy, as many alleged that the "humor" of the video traded on the linking of perceived attributes of Dodson's to upsetting racial and gay stereotypes; critics argued that, whatever Dodson's intent, it was in effect a case of YouTube minstrelsy—and as history has shown, racist popular culture can indeed be lucrative.

Dodson's instant ascent to Internet celebrity status even gave rise to Halloween costumes ("Bed Intruder Costume," n.d.) intended to convey his likeness, via a headscarf (or "do-rag") and wig mimicking a natural Black hairstyle, and numerous people uploaded content to various social media platforms showcasing themselves in Dodson costumes, complete with blackface (Rivas, 2010). That the entire situation was predicated on sexual violence toward women was also lost in the subsequent shuffle; the original local news item was a report on the fact that Dodson's sister had been attacked in her bedroom by a man attempting to rape her. The humor that traded on Dodson's identity markers of Blackness, poverty, and effeminate gender presentation reduced the complexities of those intersectional identities into pastiche and erased Dodson's own agency in both the protection of his family and the subsequent negotiation of his business dealings with Auto-Tune.

Digital media scholar Amber Johnson (2013) offered this nuanced critique of Dodson's media portrayals that lauded his subversive identity, suggesting that his popularity opened up a space to challenge dominant, negative assumptions:

Antoine Dodson is both a celebrity and target for exploitation because of the specific ways his identities intersect. His Black, gay, southern, lower-class, seemingly unintelligent identities create space for media to exploit him as a homo coon, a sexualized form of the zip coon that frames Black, homosexual masculinity negatively, and appropriates a stereotype that denies it authenticity by reducing it to coonery. However, if we see Dodson through a critical lens, his story complicates notions of class, education, access, femininity, and masculinity. His business-savvy marketing moves and self-promotion challenge stereotypical notions of poor, undereducated people. His feminine performance coupled with his ability to care for his family physically, emotionally, and financially complicate gender roles. (p. 156)

Johnson's assessment is indeed compelling, but the uptake of Dodson's image and its reappropriation in overtly racist presentations (e.g., blackface) suggest that it is a critique lost on many. Further, the viral success of the Dodson remix inspired numerous copycats, similar in tone to the Dodson footage, in which the humor came at the expense of the video's racialized subjects. In one such case that closely mimicked the Dodson trajectory, a middle-aged Black woman named Sweet Brown was interviewed on a local news program after escaping an apartment fire in her building. Remixers latched onto the footage, which was again set to music, and used her statement, "Ain't nobody got time for that," as the song's refrain. The tune and video played out over a thumping drumbeat and against the backdrop of a variety of racist video and still images, including dancing gorillas and an amateur Photoshop mashup of Don King and Antoine Dodson barbecuing together. In this way, this cruder, more crass, and more overtly racist video was directly tied to that of "Bed Intruder." Indeed, one begat the other: without Antoine Dodson there would have been no Sweet Brown. Without "Bed Intruder," there would have been no "Ain't Nobody Got Time for That." As Daniels (2013) asserts, "The Internet is a site of political struggle over racial meaning, knowledge and values" (p. 704), where well-worn racist tropes still have a great deal of purchase in highly circulated and extremely popular content.

### **Advocacy for the Marginalized: When UGC Breaks the Rules**

In 2004, a White teenager in a small Texas town was caught by her parents accessing content online for which she hadn't paid, an act that enraged her father and prompted her to turn on a camera she had hidden in her room to capture just such an event (apparently the beating caught on video in this incident was not without precedent). Several years later, an adult Hillary Adams used YouTube to post the 2004 video she captured of her own savage beating at the hands of her father, a family court judge. Just two days after she posted it, the video had received more than two million views on YouTube alone.<sup>3</sup>

In it, Judge Adams unleashes a torrent of verbal and physical abuse so profoundly violent and disturbing that I was unable to take any more after only 70 seconds. Hillary Adams endured the beating for seven minutes. According to published reports across the Web, the video captures the entirety of that beating, during which Judge Williams threatens to hit his daughter in the face with a belt, enlists his now ex-wife to assist in the abuse (this is common behavior in those family abuse situations in which a tyrannical adult holds an entire family hostage), and actually leaves the room only to come back for a second round with another belt and possibly a board.

And while this tragic and sickening event may not have been an unusual occurrence in the Adams home—by all accounts, an upper-middle-class, suburban household in a town on Texas's Gulf Coast—the fact that Adams herself posted the video to expose her father's abuse highlighted YouTube's potential as an outlet for advocacy for marginalized and abused people of all sorts. Of particular note was the fact that the video itself seemed to contravene a number of YouTube's "Community Guidelines" ("YouTube Community Guidelines," n.d.), which prohibit shocking and disgusting content and content featuring dangerous and illegal acts or violence against children. After becoming a viral hit, for the content to stay up, Hillary Adams must have had someone in YouTube's CCM group on her side.

Hillary Adams's video upload is just one example of the ways in which people have used disturbing and shocking content—UGC that would otherwise seem to be in violation of many sites' policies—for advocacy purposes. Actor, hip-hop star, and social justice activist Yasiin Bey (formerly known as Mos Def) willingly endured a nasal tube force-feeding of the type used on prisoners at Guantánamo Bay (The Guardian, 2013). The highly shocking, upsetting, and violent outcome of that video, uploaded to YouTube by the *Guardian* newspaper, has remained on the site for almost two years and been viewed more than 6.3 million times. By subjecting his racialized Black body to the forced feeding, using his Muslim name, and appearing in the orange jumpsuit worn by prisoners at the "Gitmo" prison, Bey offered up the spectacle of his own abuse as advocacy to draw attention to the plight of prisoners, humanizing them through his own dehumanization and degradation.<sup>4</sup> Again, based on the site's published guidelines, this video could well have been flagged for deletion and may well have been at times. It nevertheless remains on the site, available for viewing, circulated via links and tweets on other platforms, and has been written about in news and other reports, achieving the advocacy and attention it sought.

User-uploaded video distributed via social media platforms has also been used to point blame at the police in several cases of racially motivated shootings of unarmed citizens by police officers. The violent deaths of Black men and youth, such as Oscar Grant at Oakland's Fruitvale BART station (Los Angeles Times, 2010), of Eric Garner on a Staten Island street (POETIC, 2014), and



of 12-year-old Tamir Rice (WEWS NewsChannel5, 2015), killed by police at a playground in Cleveland, as captured by surveillance cameras or by bystanders, have circulated on YouTube and elsewhere. In many cases, these types of videos directly contradict police claims about the circumstances of the deaths of the victims (Cleveland Plain Dealer Editorial Board, 2014). Indeed, without the video evidence, any accounts contradicting those official police claims would likely have received little to no traction, especially when victims have been young men and even children of color killed by White police officers who claimed that the victims were engaged in wrongdoing.

While it may seem that the ubiquity of mobile video and image-capturing devices, coupled with the distribution power of massive social media platforms, would serve as a slam-dunk for justice seekers of all kinds, reality is much murkier. Have Hillary Adams and those like her brought to light an empowering new mechanism for victims of abuse, who may be able to capture evidence that could later be used to charge and convict those responsible for their torment? Or does this capturing of abuse by the powerful suggest a new burden to be placed on the shoulders of those abused (think “pix or it didn’t happen”)? In a world where an abused person’s word is frequently not enough to free him or her from the abuser, could capturing video evidence offer a way for victims to equalize power in a decidedly imbalanced situation? Or is the risk so great that there is too much potential danger—especially in the cases of minors—to suggest to them that they must be responsible for having to document their own abuse in this way if they are to have any hope of being believed and/or being freed? And what of those young people who don’t have the access to the equipment or the knowledge of how to use it to document their torment? How many children use computers that are also used and monitored by the adults in their homes?

Meanwhile, what is the social media platforms’ role in the vetting and hosting of this content? How did Adams’s video, and the others discussed, pass the YouTube screening process? Assuming they were, in fact, directly vetted (and not just missed by CCM eyes trained to catch unsuitable content), it would seem that YouTube has at least tacitly accepted an advocacy role by hosting these videos in some cases. Yet things are not quite so simple; questions remain about the moral and ethical implications of videos with this kind of content driving millions of views to a commercial, profit-driven site. As I rewatched some of the upsetting videos described in this article in preparation for its writing, I noted that a number of them were preceded by commercial advertising. Views for some of them are in the hundreds of millions, and Google, the parent company of YouTube, is currently trading at more than \$535 per share (“NASDAQ:GOOG: 537.01 -5.86 (-1.08%) - Google Inc.,” 2015). Simply put, the decision for what stays up and what comes down must, at some level, be a monetary one.

## **Conclusion**

The hidden labor of CCM workers is a critical component to the curation and creation of social media sites and the content they disseminate. CCM workers view and deal with material that is racist, homophobic, sexist, and disturbing as a regular part of their daily work. In many cases, content of this type does not just end up on a site without any intervention; when it has been reviewed and deemed fit to post, it is, in essence, curated.

The Internet as racialized space is not a new concept; scholars have been demonstrating the functions and manifestations of race online for decades now. But the practices of CCM offer special insight into the ways in which racist, homophobic, and misogynist language and imagery

are deployed in contemporary social media, and how that deployment is predicated on a series of factors, including the palatability of that content to some imagined audience and the potential for its marketability and virality, on the one hand, and the likelihood of it causing offense and brand damage, on the other. In short, it is evaluated for its potential value as commodity.

My own research into CCM shows that the CCM process at large social media firms is governed by policies meant to strike a balance among attracting user-participants and advertisers, responding to jurisdictional norms and legal demands, and remaining profitable and appealing to shareholders. Internal policies regarding permissible content therefore serve these purposes, first and foremost, rather than responding to, say, social justice or advocacy-related goals.

Because of the secrecy and invisibility surrounding CCM policies and practices, however, the presence of racist or racially charged, provocative content on a site typically appears to reflect something other than the results of weighing those demands. In this way, racist, homophobic, and misogynist imagery and content becomes reified as a norm, and the structures that abet it are cloaked and invisible, suggesting that the existence of content is just some kind of natural order of things and not, for example, potentially hugely profitable. Companies' desire to keep CCM work in the shadows therefore gives the impression that such content is just what is out there in the culture in some kind of natural, organic way and hides the human decision-making processes and curation work from the view of their user-participants. Further, as long as CCM work and workers remain hidden from view, the ramifications of spending a work life in the squalid sectors of the Internet, sifting through its detritus and its most disturbing content, will remain unknown. When the sign of being an effective CCM worker is to be able to stomach the content without complaint and to endure it day in and day out, it is unlikely that this paradigm will change anytime soon.

In a recent essay, Oxford Internet Institute head William Dutton (2012) lamented the increasingly fleeting potential of the Internet to serve as a sort of "fifth estate" and underlined its potential to offer a site of pushback on powerful institutions. Yet to come anywhere near to what Dutton believes is possible—that the Internet can serve as a site of pressure significant enough to qualify as a "fifth estate"—a true accounting of all of the actors involved must be rendered and their motives (e.g., profit-seeking; brand protection) more completely understood. In unveiling CCM workers' practices and the mandates and pressures under which they labor, we can apprehend a more realistic and fuller view of the social media landscape and how content makes its way to it, and to us.

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## Notes

1. The firm's name, MegaTech, as well as other names referenced from interviews I conducted, are pseudonyms used to protect participant privacy.
2. "SecPol," or Security and Policy, was the department above the CCM workers at MegaTech whose purview it was to set policy and make ultimate decisions about what content could stand and what had to be removed.
3. The original video, posted by Adams herself, now seems to have disappeared from YouTube, but there are numerous other videos that show either portions of it or the video in its entirety, often with accompanying commentary.
4. It bears mentioning that the capturing of a man's forced feeding on film or video for advocacy purposes has precedence; the American documentary filmmaker Frederick Wiseman shot disturbing scenes of a patient in a mental hospital being force fed in a similar way. Those scenes from his film *Titicut Follies* (Wiseman, 1967) led to a censorship battle when the state of Massachusetts attempted to enjoin him from showing the film, which Wiseman intended as a document of the deplorable conditions in state homes for the mentally ill.