

Oiling the Dangerous Engine of Arbitrary Government

Newspaper Coverage of the Military Commissions Act

by Andrew L. Roth, with Sarah Maddox and Kaitlyn Pinson

The suspension of habeas corpus for “any person” by the 2006 Military Commissions Act (MCA), as reported by Robert Parry and Thom Hartman, was Project Censored’s top-ranked story of 2006-2007.¹ Habeas corpus protects individuals against unlawful exercises of state power. It is so fundamental to the United States that the Framers wrote it into the Constitution, establishing that it could only be suspended “in cases of rebellion or invasion.”² Identifying habeas corpus as the greatest security to “liberty and republicanism” contained in the Constitution, Alexander Hamilton drew insight from the eighteenth-century British legal scholar Blackstone, who championed habeas as a protection against the “dangerous engine of arbitrary government.”

Civil rights activists, constitutional law experts, and the public have been outspoken in their criticisms of the MCA. For example, in analyzing how it “purports to confer rights that, upon close inspection, prove illusory,” one legal scholar concludes that the Act is “an exercise in misdirection. It is, in a word, ‘Orwellian.’”³ Deceptive though its language may be, the Act’s political significance is straightforward, as Michael Dorf concludes: “It is difficult to imagine a greater denial of individual liberty than the prospect of indefinite executive detention without recourse to the judiciary.”⁴

To what extent have corporate media done an adequate job of informing the public about the MCA? William Parry and Thom Hartman’s stories earned the #1 spot in Project Censored’s 2006-2007 rankings precisely because corporate media were not adequately covering the MCA and, in particular, its suspension of habeas corpus.

Parry and Hartman’s reportage reveals both (a) how little the corporate media did to inform the public about the Act’s sweeping implications and that (b) good reporting can convey the necessary understanding to a lay public, despite the Act’s Orwellian logic. Furthermore, in reporting on the Act’s suspension of habeas corpus, Parry noted that “the public’s lack of a clear understanding of the law’s scope has undercut efforts to build a popular movement for repeal or revision of the law” (*Censored 2008*, p. 39).

Inspired by Parry and Hartman’s work, and committed to the belief that habeas corpus for all persons is a cornerstone of democratic government, we examined subsequent newspaper coverage of the MCA to determine how adequately corporate news media fulfills its inter-connected functions as: (1) a watchdog against abuse by those in positions of power, (2) a source of substantial information for citizens about social and political issues, and, (3) a forum in which diverse opinions are communicated to others.⁵ In this chapter, we examine three fundamental causes for the public’s lack of understanding and consequent inaction:

- (1) a continued deficit in coverage of the MCA by corporate news media, compounded by
- (2) reliance on a narrow range of sources in stories that do report on the MCA, resulting in
- (3) the framing of public discourse about the Act as legitimate controversy, rather than the unconstitutional, counter-democratic law that it is.

MEDIA STANDING AND SPHERES OF CONSENSUS, CONTROVERSY, AND DEVIANCE⁶

Media scholars pay attention to the role that news sources play in the construction—and slant—of news stories. Following the research of sociologist William Gamson, we use the term media standing to refer to those who gain status as a regular media source, especially those whose claims and views journalists quote directly. According to Gamson, media standing is “a measure of achieved cultural power.” Journalists grant media standing to individuals and organizations because these sources are understood to “speak as, or for, serious play-

ers in any given policy domain. In other words, individuals or groups who have enough political power to make a potential difference in what happens.”⁷

Typically journalists bestow the cultural power of media standing on sources whose official, bureaucratic statuses already establish them as “serious players” due to their political power. Thus, sociologists who study news production typically conclude that elites are both “the sources and subjects of most political stories”⁸ because, for journalists, ‘news’ is about what those in power say and do.⁹

By treating news as primarily, if not exclusively, a matter of what the powerful elite say and do, corporate news media provide the public with distorting perspectives on crucial issues in at least two ways. First, and most obviously, by affording media standing to a partial range of sources, news media can convey a false sense of consensus. Second, and perhaps less obviously, by presenting a narrow range of competing perspectives, news media can convey a sensation of robust debate—even as such coverage functions to define narrowly the limits of acceptable political debate.¹⁰

In his influential study of US media during the Vietnam war, Daniel Hallin conceptualized three spheres of news coverage, (1) the sphere of legitimate controversy, in which journalists seek conscientiously for balance and objectivity, (2) the sphere of consensus, in which journalists take for granted shared values and assumptions, and (3) the sphere of deviance, in which journalists understand themselves as authorized to treat marginal figures or positions without regard for professional commitments to balance and objectivity.¹¹

Where journalists adhere most closely to professional norms of balance and objectivity, they contribute to the definition of the story, or the issues the story addresses, as a matter of legitimate controversy. One way journalists accomplish this is by quoting multiple, often competing sources to represent “both sides” of an issue, a standard practice for achieving “balance.”¹² In doing so, journalists contribute to the framing of the issue as one outside of shared consensus, but worthy of serious news coverage.

Though this might seem to exemplify how a free press ought to function in a democratic society, this scenario is not always ideal. Most relevant for the purposes of this study, if individuals or groups come to (re)frame the protections afforded by habeas corpus as subject to political debate, then the suspension of habeas corpus is repositioned as a (potentially) legitimate legal and political act.

Informed by Gamson's and Hallin's research, we examined newspaper coverage of the Military Commission Act in order to determine the breadth of perspectives concerning the Act. We reviewed the *Los Angeles Times*, *New York Times*, and *Washington Post*, and analyzed whether these papers treated the Act as a matter of consensus, legitimate controversy, or deviance.

DATA AND METHODS

Our data consist of news stories in the *Los Angeles Times*, *New York Times*, and *Washington Post* between September 17, 2006 and November 17, 2007. We selected these three newspapers as exemplars of corporate news media. The date range was chosen to span the time between the month before the MCA became law (on October 17, 2006) and one month after the first anniversary of its passage.

Using Lexis/Nexis Academic and Proquest Newstand, we searched for all print news references to the MCA in the three newspapers during that period. Our search generated 189 records, comprised of seventy-six items from the *New York Times*, sixty-two from the *Washington Post*, and fifty-one from the *Los Angeles Times*. We excluded a number of these items from analysis because they were not news stories (such as editorials, opinion pieces, and letters to the editor) or they were news stories that made only passing reference to the MCA. This left us with a data collection of seventy-five relevant news stories (thirty-six from the *Los Angeles Times*, twenty-one from the *Post*, and eighteen from the *New York Times*).

Following prior work on "media standing," we were most interested in how each article identified its news sources and whom journalists quoted directly. Thus our unit of analysis is the individual quotation. The seventy-five stories in our data collection include 237 direct quotations. We coded each quotation for its source identification using the following categories: *legal* (with subcategories for lawyers, judges, constitutional rights advocacy organizations, and professors), *congress*, *executive*, *military*, *other government officials*, *human rights advocacy groups*, and *other source types*, a residual category.

We also coded each quotation for its position toward the Act (pro, con, or neutral) and whether it made explicit reference to habeas corpus or not. In determining each quote's position toward the Act, which

involves some subjective judgment on the coder's part, we sought to minimize ambiguity by restricting use of the "pro" and "con" categories to quotations that clearly took one position or the other. All other quotations were treated as "neutral." We only coded quotations as making reference to habeas corpus if the source referred to it by name, synonym (e.g., "the great writ" or "the writ") or pronoun.

Finally, we coded for the location within the newspaper of the story in which each quotation appeared. This last coding category gives an imprecise but useful measure of the quotation's prominence. The measure is 'imprecise' because we cannot determine the exact location of specific quotations based on electronic reproductions of the original newsprint stories. The measure is useful, nonetheless, because front-page stories are more likely to attract the reader's attention.

Working as a team to code the data, we sought to develop coding categories that required a minimum of subjective interpretation. We met regularly to compare coding decisions and to refine our shared sense of how to code ambiguous, "borderline" cases. When tested, this effort paid off with a high degree (93.5 percent) of inter-coder reliability. Even our most difficult, subjective category—position toward the MCA—yielded a solid 82.2 percent inter-coder reliability score. Thus, we report the findings that follow with strong confidence in their reliability.

WHO'S QUOTED?

The range of sources quoted in stories concerning the MCA is typical of conventional news coverage: It reflects the strong journalistic bias for sources with official, bureaucratic statuses. Table 1 summarizes our findings regarding whom the three newspapers treated as newsworthy sources of quotations. The legal category accounts for nearly a majority (49 percent) of the 237 quotations in our data collection. Government officials (including representatives of the executive and congressional branches) constituted the next largest (28 percent) source category. Within this category, Congress accounted for 14 percent, the executive branch accounted for 5 percent, and other government officials (e.g., State Department officials) accounted for 9 percent of the total quotations in our data. Spokespersons for human rights advocacy groups—such as Human Rights Watch, Amnesty International,

Human Rights First, and the International Council of the Red Cross—contributed 9 percent of the quotations.

TABLE 1. Distribution of Quotations by Source Type

| Source Type | Quotes | Total (%) |
|--------------|------------|------------|
| Legal | 115 | 49 |
| Government* | 67 | 28 |
| Military | 23 | 10 |
| Human Rights | 22 | 9 |
| Other | 10 | 4 |
| TOTAL | 237 | 100 |

* *Government* category excludes military sources

Notably, in the *Other* category, we found just a single instance of a direct quotation attributed to a detainee: Describing Salim Hamdan as an “ambassador of sorts for frustrated detainees,” the *New York Times* quoted him as saying, “There is no such thing as justice here,” during a war crimes court hearing.

The preponderance of quotations by legal sources warrants a closer look at this category, as provided in Table 2.

TABLE 2. Distribution of Quotations by Legal Sources

| Source Type | Quotes | Total (%) |
|----------------------|------------|------------|
| Detainee Lawyer | 28 | 24 |
| Judge (non-military) | 26 | 23 |
| Professor | 23 | 20 |
| ACLU/CCR* | 12 | 10 |
| Military Lawyer | 10 | 9 |
| Other Lawyer | 6 | 5 |
| Attorney General | 5 | 4 |
| Military Judge | 3 | 3 |
| Other | 2 | 2 |
| TOTAL | 115 | 100 |

* CCR refers to the Center for Constitutional Rights

Detainees' legal counsel were the most frequently quoted subcategory of legal sources (24 percent), followed closely by non-military judges (23 percent) and law professors (20 percent). Spokespersons for the CCR and the American Civil Liberties Union accounted for 10 percent of the legal category.

Though detainees almost never achieved media standing in our data, journalists frequently quoted their lawyers. Notably, a majority of the quotations attributed to judges, and many of the quotations attributed to lawyers, derived from transcripts of legal proceedings.

The preceding distributions give a clear picture of who achieved media standing. Overwhelmingly, the three newspapers we examined treated legal experts and political officials as the most frequently quoted source types. Next we turn to examine the positions of these quoted sources toward the MCA itself.

WHAT POSITIONS DO SOURCES TAKE ON THE MCA?

We were initially surprised to find that most of the quoted sources (43 percent) in our data collection expressed opposition to the MCA in one way or another; and just 22 percent of the quoted sources expressed support for the Act, as summarized in Table 3:

TABLE 3. Distribution of Quotations by Position on MCA

| Position | Quotes | Total (%) |
|--------------|------------|------------|
| Opposes MCA | 102 | 43 |
| Neutral | 82 | 35 |
| Supports MCA | 53 | 22 |
| TOTAL | 237 | 100 |

We had expected that quoted sources would split evenly between support for and opposition to the Act, reflecting journalists' commitment to the objectivity norm of "balance." Instead, by nearly a 2-1 ratio, quoted sources spoke in opposition to the Act, which might be interpreted as evidence of the newspapers fulfilling their "watchdog" role. This interpretation is complicated by a more in-depth study of the variation in the degree of criticism expressed in the oppositional

quotations. To exemplify this point, consider the similarities and differences between the following two quotations:

“Navy Lt. Cmdr. Charles Swift, Hamdan’s defense attorney, said the Military Commissions Act ‘demonstrates once again that if you put a statute together in three weeks and rush it through . . . you end up with a process that doesn’t work’” (*Los Angeles Times*, June 5, 2007, ellipses in the original).

“‘Habeas corpus was recklessly undermined in last year’s legislation,’ said Sen. Patrick J. Leahy (D-VT.), the [Judiciary] committee’s chairman, referring to the Military Commissions Act. ‘I hope the new Senate will reconsider this historic error and set the matter right’” (*Los Angeles Times*, June 8, 2007).

Both quotations identify the sources in terms of their official statuses, quote those sources directly, and the quotations themselves express criticisms of the Act. By contrast, however, the first quotation expresses what might be understood as a *limited* criticism: The “process doesn’t work” because it was put together hastily. Though this comment registers a criticism of the Act, it is one with a relatively ready remedy, namely slower, more careful revision of the statute. By contrast, the second quotation assesses “last year’s legislation” (i.e., the MCA) as having “recklessly undermined” “habeas corpus. Furthermore, Leahy’s call for the Senate to “set the matter right” can only be understood, in context, as a call to fundamentally revise the Act by restoring habeas corpus. The second quote is, in sum, a more *fundamental* criticism of the Act.

Qualitative analysis of the quotations that referenced habeas, such as the previous quotation from Senator Leahy, led us to employ references to habeas corpus as indicators of more fundamental critiques of the MCA. We sought to determine how often quoted sources invoked habeas corpus. Table 4 summarizes our findings on the frequency with which quoted sources invoked habeas corpus.

TABLE 4. Distribution of Quotations by Invocation of Habeas Corpus

| Invocation | Quotes | Total (%) |
|----------------------|------------|------------|
| No Mention of Habeas | 193 | 81 |
| Mentions Habeas | 44 | 19 |
| TOTAL | 237 | 100 |

Overwhelmingly the sources quoted in our data do not mention habeas corpus (81 percent): Just 19 percent of the quotations refer to it, by name, synonym, or pronoun.

Does the position of the quoted source toward the MCA bear any significant relationship to the source's likelihood of mentioning habeas corpus explicitly? Based on qualitative analysis, we expected that the MCA's opponents would be more likely than supporters to mention Habeas. The data (summarized in Table 5) confirm our expectation of a strong correlation between position on the MCA and reference to habeas corpus.

TABLE 5. Position on Military Commissions Act and Invocation of Habeas Corpus

| Position on MCA | Mention Habeas | No Mention | Total |
|-----------------|----------------|------------|------------|
| Support MCA | 6 (11%) | 47 (89%) | 53 (100%) |
| Oppose MCA | 26 (25%) | 76 (75%) | 102 (100%) |

$\chi^2 (1, N=155) = 3.45, p < 0.031$

We found a 14 percent difference between mentions of habeas corpus by position on the MCA; a difference of considerable importance. (A chi-square test yields a p -value of 0.031, well within the conventional standard [0.05] of statistical significance.)

Quoted sources' invocations of habeas corpus typically represented the strongest critiques of the MCA. (Recall, for example, Leahy's characterization of it as "reckless"). These quotations raised fundamental questions about the counter-democratic consequences of the Act and its questionable constitutionality.

By contrast, supporters of the MCA seldom referenced habeas corpus. The following two instances may be treated as exemplary. The first comes from a news story that recalled an exchange in January 2007, between President Bush's nominee for Attorney General, Alberto Gonzales and Senator Arlen Specter, during Gonzales' confirmation hearing:

"Gonzales responded by suggesting the Constitution does not protect habeas corpus at all. "The fact that the Constitution—again, there is no express grant of habeas in the Constitution. There is a prohibition against taking it away.'" (*Los Angeles Times*, January 30, 2007).

The article went on to report Specter's challenging response (e.g., "Now wait a minute,' Specter interrupted, 'The Constitution says you can't take it away except in case of rebellion or invasion. Doesn't that mean you have the right of habeas corpus?'"") and to report other legal scholars' positions on Gonzales'" assertion (e.g., "He is completely wrong on the history,' said Eric freedman, a Hofstra law professor and expert on habeas corpus.").

A second case: In December 2007, Solicitor General Paul Clement urged the Supreme Court to uphold the federal appeals court's February 2007 decision that detainees had no constitutional rights in the first place. Clement argued that the MCA provided detainees more access to judicial review than afforded by habeas corpus:

"This is the remarkable liberalization of the writ, not some retrenchment or suspension of the writ,' Mr. Clement declared" (*New York Times*, December 6, 2007).

To describe the tribunals established by the MCA as a "liberalization" of habeas corpus echoes the Orwellian "doublespeak" of the Act itself.

In sum, we proceeded by treating invocations of habeas corpus as indicators of the strongest critiques of the MCA. Their relative scarcity in our data, despite the preponderance of quotations expressing opposition to the MCA suggest that the newspapers we studied were not providing their readers with as full a range of the critical perspectives on the Act as existed. Subsequent analyses build on this finding.

HOW PROMINENTLY PLACED ARE CRITIQUES OF THE MCA?

We hypothesized that quotations expressing support for the MCA would be more likely to appear in prominently located stories (front-page stories) while quotations expressing opposition to the Act would be more likely to appear in less prominently located stories. However, our data does not support this hypothesis. Of forty-nine quotations from stories originating on a newspaper's front page, 53 percent expressed opposition to the MCA, and 27 percent voiced support for it. (The remaining 20 percent were neutral.) Of 188 quotations from stories not originating on the front page, 41 percent expressed opposition to and 21 percent voiced support for the Act (with 38 percent neutral).

Three aspects of these findings are important. First, stories originating on the front page are more likely to feature quotations that take a definite position, accounting for 80 percent of the “front-page” quotes. In contrast, just 62 percent of the quotes in stories not originating on the front page took a definite position. This correlation makes sense in the context of news values, where the clash of competing views on a contentious social issue probably contributes to an editor’s sense of the story’s appeal to readers and, hence, it’s deserving more prominent placement. Second, as previously noted, quotations expressing opposition to the Act appear more frequently in stories that originate on the front page, than on other pages by a difference of 12 percent (i.e., the percentage difference of 53 percent and 41 percent).

Third, and finally, before concluding that the prevalence of oppositional quotes in prominently positioned stories constitutes evidence of the newspapers’ oppositional stance, note that (a) quotations supporting the MCA are also more likely to appear in stories originating on the front page, by a difference of 6 percent, and (b) we found little difference between front-page and other stories in the frequency with which quotations invoked habeas corpus. Of quotations from front-page stories (N=49), we found 16 percent that mentioned habeas, compared with 19 percent of the quotations from stories not originating on the front page (N=188). The slight difference (3 percent) in mentions of habeas corpus by story location is most likely a product of random variation. What is significant, though, is that the greater proportion of oppositional quotes in prominently placed stories did not yield an increase in the frequency with which quoted sources invoked habeas corpus. Since we understand references to habeas as indicative of more fundamental criticisms of the MCA, this finding suggests that, although the newspapers in our data gave prominent placement to quotations critiquing the MCA, those critiques were not the most fundamental ones. This dynamic contributes to the overall frame established by the papers in covering the Act: namely, the appearance of healthy debate, including frequent—albeit relatively superficial—criticism of the Act and its consequences.

THE 2006 ELECTION AS REFERENDUM

Many pundits, and perhaps also the American public, oriented to the

November 2006 mid-term elections as a referendum on the Bush administration's policies in general and its "Global War on Terrorism" in particular. Thus, we sought to determine whether corporate media were more likely to afford media standing to critical perspectives on the MCA after the Democrat Party's convincing November victories. We found this to be true, as Table 6 documents:

TABLE 6. Position on MCA Before and After 2006 Election

| Time Period | Support MCA | Oppose MCA | Total |
|-----------------|-------------|------------|------------|
| Before Election | 16 (46%) | 19 (54%) | 35 (100%) |
| After Election | 37 (31%) | 83 (69%) | 120 (100%) |

$$\chi^2 (1, N=155) = 2.67, p < .051$$

When compared with the period before the election, quotations expressing opposition to the Act increased by 15 percent in the period after the election. Before the election, the newspapers in our data presented an almost evenly divided spectrum of expert opinion on the merits of the MCA, with a slight tilt toward critique (54 percent opposed versus 46 percent supportive). After the election, the 15 percent increase in sources critical of the Act shifted the balance strongly toward opposition (69 percent opposed versus 31 percent supportive).¹³ Consistent with our prior findings, this post-election increase in the percentage of quotations opposing the MCA might be interpreted as evidence that the newspapers, spurred by public opinion, roused to fulfill their role as "watchdogs" against governmental abuses of authority. Unfortunately, a secondary analysis cautions against any hasty embracing of this conclusion. As before, we use explicit references to habeas corpus as our indicator of more serious critiques of the MCA. Comparing mentions of habeas, before and after the election, reveals no significant change, as evident in Table 7:

TABLE 7. Mentions of Habeas Corpus Before and After 2006 Election

| Time Period | Mention Habeas | No Mention | Total |
|-----------------|----------------|------------|------------|
| Before Election | 10 (20%) | 41 (80%) | 51 (100%) |
| After Election | 34 (18%) | 152 (82%) | 186 (100%) |

In fact, there was a very small (2 percent) decrease in the frequency of quotations that referenced habeas corpus after the 2006 election. This difference is much too small to rule out the possibility of random variation as the best explanation.

Combining the findings summarized in Tables 6 and 7, we conclude that although the newspapers in our data did increase the number of quotations opposing the MCA after the 2006 elections, this did not result in an equivalent increase in fundamental critiques of the Act. Consistent with our prior findings, the coverage gives the appearance of healthy, legitimate political debate, with the balance shifting toward an oppositional perspective after the elections—but with no more room for critiques that frame the Act, with its unconstitutional suspensions of habeas corpus, as beyond the pale of legitimate political debate.

CONCLUSIONS

The patterns of corporate newspaper coverage identified in this study provide an important contribution to understanding why the US public continues to lack a strong grasp of the MCA's significance. Our examination of 237 direct quotations regarding the Act, drawn from three major newspapers over a fifteen-month period, leads us to conclude that, although the papers present critical perspectives on the Act:

- (1) these oppositional quotations only infrequently invoke the most fundamental criticisms against it, including especially its suspension of habeas corpus for “any person,” and,
- 2) ironically, in this context, the relative balance of supportive and critical quotations contributes to the framing of public discourse about the MCA as a matter of *legitimate* controversy.

Should the suspension of habeas corpus, historically a pillar of western democratic government, be subject to the type of political debate—not to mention journalistic coverage—usually reserved for mundane partisan politics? Does presenting it that way fulfill the functions of a free press in a democratic society, including the media's responsibility as watchdog, information source, and forum of diverse public opinion?

Blackstone warned against secret, indefinite government detention without recourse to judicial review as “a dangerous engine of arbitrary government.” Extending his metaphor, we understand news coverage of the type analyzed in this chapter as oiling the dangerous engine. Incomplete coverage of the (full range of critical) perspectives on the MCA, framed in a context of legitimate controversy, keeps the public inadequately informed and thus aids the powerful elite in their efforts to extend governmental authority at the expense of individual liberties.

If the American public is to mount an effective, popular movement for repeal of the MCAt, it must first understand the Act. As this chapter shows, two crucial steps in that direction are, first, to expand the scope of sources whom journalists treat as worthy of media standing, to include more frequently those who will voice fundamental critiques of the Act; and, second, drawing on Hallin’s theoretical model, to reposition public discourse about the Act’s suspension of habeas from the sphere of legitimate controversy to the sphere of deviance, because habeas corpus is a cornerstone of American law. Its affirmation as such is all the more important in the context of the current administration’s unconventional, unlimited “Global War on Terrorism.”

Notes

1. See Chapter Two, “Censored Déjà Vu,” in this volume for an update on “No Habeas Corpus for ‘Any Person.’”
2. See, for example, Jonathan Hafetz, “Ten Things You Should Know about Habeas Corpus,” Brennan Center for Justice, New York University School of Law, White Paper, 2007, <http://www.nimj.org/documents/HabeasPaperFinal.pdf>.
3. Michael C. Dorf, “The Orwellian Military Commissions Act of 2006,” *Journal of International Criminal Justice*, 5 (2007): 10–18.
4. *Ibid.*, 18.
5. For a critical discussion of the functions of the free press, see David Croteau and William Hoynes, *By Invitation Only: How the Media Limit Political Debate* (Monroe, ME: Common Courage, 1994), 10–22.
6. This section extends prior work by Andrew Roth and Emilie Vander Haar, “Media Standing of Urban Parkland Movements,” *City & Community*, vol. 5, no. 2 (June 2006):129–151.
7. William Gamson, “Media and Social Movements,” in N.J. Smelser and P.B. Baltes, *International Encyclopedia of the Social Sciences*, (Amsterdam: Elsevier Science, 2001), 9468–9472.
8. Robert Entman and David Paletz, “Media and the Conservative Myth,” *Journal of Communication*, vol. 30, no. 4 (1980):154–165.
9. Croteau and Hoynes, *By Invitation Only*, 177.
10. *Ibid.*

11. Daniel Hallin, "*The Uncensored War*": *The Media and Vietnam* (New York: Oxford University Press, 1986); see also Stuart Hall, "A World at One with Itself," in S. Cohen & J. Young, *The Manufacture of News* (Beverly Hills, CA: Sage, 1973), 85–94.
12. See, e.g., Robert Entman, "Objectivity, Bias, and Slant in the News," in Entman, *Democracy without Citizens* (New York: Oxford University Press, 1989), 30–38.
13. A chi-square test of this distribution yields a p -value of .051, a hair's breadth short of the conventional standard (.050) of statistical significance. Put another way, it is extremely unlikely that the observed distribution is the product of random variation in the data.

CENSORED2009

The Top 25 Censored Stories

**Edited by PETER PHILLIPS,
ANDREW ROTH, and
PROJECT CENSORED**

INTRODUCTION BY CYNTHIA MCKINNEY

CARTOONS BY KHALIL BENDIB

Seven Stories Press

New York / London / Melbourne / Toronto

Copyright © 2008 by Peter Phillips and Andrew Roth
Introduction © 2008 by Cynthia McKinney

A Seven Stories Press First Edition

All rights reserved. No part of this book may be reproduced, stored in a retrieval system, or transmitted in any form, by any means, including mechanical, electric, photocopying, recording or otherwise, without the prior written permission of the publisher.

Seven Stories Press
140 Watts Street
New York, NY 10013
www.sevenstories.com

In Canada: Publishers Group Canada, 559 College Street, Suite 402, Toronto, ON M6G 1A9

In the U.K.: Turnaround Publisher Services Ltd., Unit 3, Olympia Trading Estate, Coburg Road, Wood Green, London N22 6TZ

In Australia: Palgrave Macmillan, 15–19 Claremont Street, South Yarra, VIC 3141

College professors may order examination copies of Seven Stories Press titles for a free six-month trial period. To order, visit www.sevenstories.com/textbook/ or fax on school letterhead to 212.226.1411.

ISSN 1074-5998

9 8 7 6 5 4 3 2 1

Book design by Jon Gilbert

Printed in the U.S.A.