

**THE PITFALLS OF PORNOGRAPHY AT THE PUBLIC LIBRARY**

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## **I Know It When I See It**

--Justice Potter Stewart, *Jacobellis v. Ohio*

A library employee reports an alleged child pornography incident to the police; two days later, she is dismissed from her job. Was she fired for reporting a crime? Brenda Biesterfield, a library assistant at the Lindsay branch of the Tulare County Library in California, called her supervisor, Judi Hill, to inform her that she observed a patron viewing images of child pornography. Hill told Biesterfield to warn the patron, Donny Chrisler, that he would be banned if another incident occurred, but that she should not call the police. However, Biesterfield later called the police anyway, who then advised her to call them when Chrisler returned to the library. When the police then arrived, they found him again looking at child pornography. Chrisler was arrested, and when the police attempted to confiscate the computer, Hill told the police that the matter was being handled internally and that the police were interfering where they did not belong. The police did not provide Biesterfield's name to Hill when she demanded to know who reported the incident; however, the library assistant was fired two days later. The incident erupted into public confrontations involving Biesterfield, Hill, law enforcement, the City Manager, the Lindsay City Council members, the Tulare County Board of supervisors, and County Librarian Brian Lewis.<sup>1</sup>

When asked, Lewis told Library Journal that Biesterfield had a right to call law enforcement on her own time, and that in hindsight, the library would agree to provide better guidance to patrons and staff. He further clarified that the library "policy did not directly deal with child pornography," so changes will reflect this definition. Lewis further states that "the

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<sup>1</sup> "Was Probationary Tulare County Staffer Fired for Reporting Child Porn?", n.d., <http://www.libraryjournal.com/article/CA6541688.html>, (accessed March 17, 2013).

lessons are to review all of your policies on a regular basis to make sure that they're up to date and germane to whatever situation might arise...<sup>2</sup>

Could this apparent misunderstanding and ensuing drama could have been avoided? As County Librarian Lewis acknowledged, this library's policy was not clear about what circumstances would require staff to take action, or what those actions should be. This incident should serve as an example of how the simple action of a patron can escalate out of control when library staff do not have or follow clear and legally defined protocols for handling incidents related to pornography. Library directors, staff, volunteers, and boards must all be prepared to react appropriately in response to this type of controversial behavior to prevent overreaction and well as a lack of a lack of action.

### **What is the law?**

Many of us are familiar with the expression "I know it when I see it" as it is often used to describe an event or set of facts that lack clearly defined parameters. United States Supreme Court Justice Potter Stewart famously used the phrase in an attempt to describe a threshold test for obscenity in *Jacobellis v. Ohio (1964)*. In this decision, Justice Potter sided with the majority in further defining *hard-core pornography* by stating:

I shall not today attempt further to define the kinds of material I understand to be embraced within that shorthand description, and perhaps I could never succeed in intelligibly doing so. But I know it when I see it, and the motion picture involved in this case is not that.<sup>3</sup>

It should be noted that Justice Potter did NOT define the term pornography, but rather acknowledged that the term is indefinable.

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<sup>2</sup> "After Child Porn Incident, Tulare County Librarian Says Policy Change Coming", n.d., <http://www.libraryjournal.com/lj/community/intellectualfreedom/860921-269/story.csp>, (accessed March 17, 2013).

<sup>3</sup> "I know it when I see it," *Wikipedia, the free encyclopedia*, March 15, 2013, [http://en.wikipedia.org/w/index.php?title=I\\_know\\_it\\_when\\_I\\_see\\_it&oldid=544494581](http://en.wikipedia.org/w/index.php?title=I_know_it_when_I_see_it&oldid=544494581), (accessed March 17, 2013).

In order to understand the context in which the controversy about pornography resides, one must begin with the First Amendment to the Constitution of the United States of America:

Amendment I: Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof; or abridging the freedom of speech or of the press; or the right of the people peaceably to assemble, and to petition the Government for a redress of grievances.<sup>4</sup>

The First Amendment does not specifically address the issues of pornography or of obscenity, however, the interpretation of this amendment is the backbone of all laws and legal arguments invoked in these legal challenges. The courts, educators, parents, politicians, and the general public have long struggled to find the balance between protected free speech and harmful material. The term “pornography” has no well-defined meaning or legal definition because it is subject to an individual’s own judgment. Because of this lack of consensus, how, then, can the law decide what may be viewed in a library, and what is a criminal act? This is partly due to confusing terminology about a number of related terms such as “pornography,” “obscenity,” “child pornography,” “virtual pornography,” “prurient,” and “sexually explicit.” For example, these terms will likely mean different things to different people depending upon their community, family background, religious beliefs, experience, and other variables that exist among humanity. In addition, perceptions about what these words mean has changed over time to reflect a higher level of tolerance.

Since the 1950s, the U.S. courts have struggled to balance civil rights with moral and safety concerns as several cases were decided by Supreme Court rulings. In one of the first cases, *Roth V. United States (1957)*, the Supreme Court declared that obscenity is “material which deals

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<sup>4</sup> “Bill of Rights Transcript Text”, n.d., [http://www.archives.gov/exhibits/charters/bill\\_of\\_rights\\_transcript.html](http://www.archives.gov/exhibits/charters/bill_of_rights_transcript.html), (accessed March 18, 2013).

with sex in a manner appealing to prurient interest” and, that because it is “utterly without redeeming social importance,” it is not protected by the First Amendment.<sup>5</sup>

The courts continued to struggle with the lack of clarity for the next several years. In *Miller v. California (1973)*, the Supreme Court redefined the test for obscenity by providing a three-part standard. The Miller Test, as it came to be known, consists of the following:

1. Whether the average person, applying contemporary community standards, would find that the work, taken as a whole, appeals to the prurient (lascivious) interest.
2. Whether the work depicts or describes, in a patently offensive way, sexual conduct specifically defined by the applicable state law.
3. Whether the work, taken as a whole, lacks serious literary, artistic, political, or scientific value.

The Court further stated that the “standard that prevails in the forum community,” and not a “national standard” should apply, in understanding that different communities have different levels of tolerance for pornography. At that time, internet pornography was clearly not a consideration in determining community standards.<sup>6</sup>

It was not until 1982 that the Supreme Court made an exception to the Miller Test in ruling that even though the material might meet the three-part standard, the First Amendment will not protect the use of minors in sexually explicit material. For example, the work itself may have artistic value, but involvement of children renders the work illegal. In *New York v. Ferber (1982)*, the Court ruled that possessing and viewing child pornography, that is, sexual content that includes images of minors, is a federal crime. The overriding intent of the Court was to protect and further prevent the sexual exploitation of children by criminalizing the market, to

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<sup>5</sup> “FindLaw | Cases and Codes”, n.d., <http://caselaw.lp.findlaw.com/cgi-bin/getcase.pl?navby=case&court=us&vol=354&invol=476>, (accessed March 22, 2013).

<sup>6</sup> “FindLaw | Cases and Codes”, n.d., <http://caselaw.lp.findlaw.com/scripts/getcase.pl?court=us&vol=413&invol=15>, (accessed March 17, 2013).

include the production, manufacture, sale, publication, or any other type of commercial activity.<sup>7</sup>

This case defined the difference between obscenity, determined by ambiguous community standards, and child pornography, which does not allow ambiguity. In upholding *Osborne v. Ohio* (1990), the Supreme Court concurred that possession and viewing of child pornography can also be criminally prosecuted.

Congress has enacted numerous laws, with varying degrees of effectiveness, in an attempt to control the pornography and obscenity markets:

- 1977: Protection of Children Against Sexual Exploitation Act
- 1984: Child Protection Act
- 1988: Child Protection and Obscenity Enforcement Act
- 1990: Child Protection Restoration and Penalties Enhancement Act
- 1996: Child Pornography Prevention Act (CPPA)
- 1996: Communications Decency Act (CDA) - struck down in 1997
- 1998: Protection of Children from Sexual Predators Act
- 1998: Child Online Protection Act (COPA) - struck down in 2008?
- 2000: Children's Internet Protection Act (CIPA)
- 2000: Neighborhood Internet Protection Act (NCIPA)
- 2003: Prosecutorial Remedies and Other Tools to end the Exploitation of Children Today Act (PROTECT)

The proliferation of these laws underscores the controversies that surround pornography and the growing development of the internet as a tool for production and dissemination of sexual content. As several of these laws were almost immediately deemed unconstitutional or ineffective, another would rise in its place.

In 2003, after benefitting from years of trial and error with regard to constitutional and technology issues, Congress enacted the PROTECT Act. Its purpose was to comprehensively strengthen law enforcement's ability to pursue perpetrators of child abuse. In addition to providing increased penalties for sexual exploitation of children for pornography, it eliminated the statute of limitations for crimes involving the abuse of children. Its provisions include

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<sup>7</sup> "FindLaw | Cases and Codes", n.d., <http://caselaw.lp.findlaw.com/scripts/getcase.pl?court=us&vol=458&invol=747>, (accessed March 17, 2013).

stronger laws to minimize constitutional challenges by increasing prohibitions against 'virtual' child pornography, prohibition of obscene materials that depict children, and, to encourage voluntary reporting of suspecting child pornography by internet service providers when found on their systems.<sup>8</sup> The PROTECT Act is also defines child pornography to include pictures that are "virtually indistinguishable" from actual children; however, drawings such as anime or manga (Japanese art forms which often depict adult content) are excluded from this definition and are not considered illegal.<sup>9</sup> However, **obscene** child pornography in any form, such as cartoons, including manga and anime that appear to depict minors in sexual situations — is still unlawful and not entitled to any First Amendment protection.

In May 2009, manga collector Christopher Handley faced obscenity charges for possession of child pornography<sup>10</sup> under the PROTECT ACT which stipulates that "Any person who...knowingly produces, distributes, receives, or possess with intent to distribute, a visual depiction of any kind, including a drawing, cartoon, sculpture, or painting that ...depicts a minor engaging in sexually explicit conduct" and falls under the definition of obscenity can be prosecuted.<sup>11</sup> This legal distinction between child pornography and obscenity is particularly confusing in assessing virtual depictions of child-like images, and will likely continue to result in further prosecutions as the digital world expands.

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<sup>8</sup> “#266: 04-30-03 FACT SHEET PROTECT ACT”, n.d., [http://www.justice.gov/opa/pr/2003/April/03\\_ag\\_266.htm](http://www.justice.gov/opa/pr/2003/April/03_ag_266.htm), (accessed March 23, 2013).

<sup>9</sup> “BILLS-108s151enr.pdf”, n.d., S.151–30, <http://www.gpo.gov/fdsys/pkg/BILLS-108s151enr/pdf/BILLS-108s151enr.pdf>, (accessed March 26, 2013).

<sup>10</sup> “Manga Collection Ruled ‘Child Pornography’ By US Court,” *io9*, n.d., <http://io9.com/5272107>, (accessed March 26, 2013).

<sup>11</sup> “BILLS-108s151enr.pdf,” s.151–32.

The Children's Internet Protection Act (CIPA) (2000) requires schools and libraries install pornography-blocking software if they receive federal funds for computers or internet access. The statute requires the implementation of a policy "that includes the operation of a technology protection measure" that blocks internet access to obscenity, child pornography, or depictions that are harmful to minors; however, in many libraries the technology may be disabled at the specific request of an adult for "bona fide research or other lawful purpose."<sup>12</sup> The American Library Association challenged the constitutionality of this law as it applies to libraries, but the Supreme Court upheld in 2003 because the filters could be disabled upon request. The decision further states "that that CIPA does not deny a benefit to libraries that do not agree to use filters; rather, the statute simply insists that public funds be spent for the purposes for which they were authorized,"<sup>13</sup> that is, to purchase computers and services to access the internet with filtering enabled technology. Opponents of filtering state that these filters amount to censorship and encroach on freedom of speech as they block access to legitimate resources of art, political information, and scientific research. Because of this, many libraries have chosen to forgo federal funding assistance to minimize exposure to First Amendment challenges.

### **The American Library Association Stance**

The American Library Association (ALA) grants permission to libraries to reproduce its *Guidelines and Considerations for Developing a Public Library Internet Use Policy* which can be found on the ALA website. According to the website, these guidelines were issued June 1998 and revised November 2000, but it should be noted that the document includes the statement that

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<sup>12</sup> "95-406 - child\_pornography.pdf", n.d., 18, [http://www.policyalmanac.org/culture/archive/child\\_pornography.pdf](http://www.policyalmanac.org/culture/archive/child_pornography.pdf), (accessed March 23, 2013).

<sup>13</sup> Ibid., 19.



the ALA urges any library using mandatory filtering software to consult with legal counsel to reevaluate their Internet Use Policy and assess the risk of future litigation.<sup>14</sup> In spite of the federal statutes meant to clarify and strengthen laws governing pornography, the library must also be aware that state laws can vary. Thus, even though federal compliance may be achieved, it the library director and the board of trustees must still implement policies and procedures that are appropriate in their communities. The material provided by the ALA consists mainly of formal language that restates the law; however, the individual library should not expect that the mere presence of this content in their policy will provide sufficient guidance.

### **What Should Your Library Patrons Know?**

At a minimum, library patrons must be informed about what they may view on the computer. This includes information about age limits, use of library filters, whether filters can be removed at their request, how they may request filter removal, and what is generally illegal under the First Amendment. Some libraries provide this information on their computer screensavers. Staff members must also be prepared to provide information to patrons about these guidelines, as well as consequences for any violations, including law enforcement involvement.

Heated public debate continues to surround the availability of pornography and obscenity on library websites as First Amendment advocates do battle with those who wish to protect morality. In particular, libraries are often touted as family-oriented centers, and many feel that a library must respond community demands to limit access.

In a typical situation which demonstrates this conflict between community and library, a parent writes to the editor of a community newspaper Glen Rock, New Jersey, in which she

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<sup>14</sup> “ALA | Guidelines and Considerations for Developing a Public Library Internet Use Policy”, n.d., <http://www.ala.org/template.cfm?section=otherpolicies&template=/contentmanagement/contentdisplay.cfm&contentid=13098>, (accessed March 13, 2013).

requests "a stronger stance on access to viewing obscene and pornographic materials online."<sup>15</sup>

The parent states that she investigated other local libraries' policies; and explains that the other libraries have a "no tolerance" approach in which offenders will be asked to cease or leave, but that at her library, nothing is done unless another patron complains. She asks for a "no tolerance" policy for viewing pornography, installation of filters, and "more specific and prominent notice on how computers may be used and the consequences if regulations are ignored."<sup>16</sup>

In response to this letter and other reports, the library board acknowledged that it is a challenge to provide policy that balances First Amendment rights and the protection of patrons and children. They stated that if a patron is viewing illegal material, the law enforcement will be called immediately, but although "staff cannot take it upon themselves to define what is appropriate, ... they can respond to the complaints from other patrons" by asking them to cease or move to another computer.<sup>17</sup> Although legally correct, this response appears to be ambiguous as it does not differentiate between First Amendment protected material and the viewing of illegal images. The library also stated that they have not placed filters on their computers due to "issues with first amendment rights," and that filters also may prevent access to legitimate research material.<sup>18</sup>

In reading both the parent's letter and the library board's response, this author feels that there is a lack of understanding about what is illegal material, and what may be offensive but still

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<sup>15</sup> "Letter: GR Library's Pornography Policy Not Strong Enough," *Ridgewood-Glen Rock Patch*, n.d., <http://ridgewood.patch.com/articles/letter-gr-library-s-pornography-policy-not-strong-enough>, (accessed March 16, 2013).

<sup>16</sup> *Ibid.*

<sup>17</sup> "Libraries Seek Balance Over Porn on Public Computers - Ridgewood, NJ Patch", n.d., <http://ridgewood.patch.com/articles/libraries-seek-balance-over-porn-on-public-computers#c>, (accessed March 24, 2013).

<sup>18</sup> *Ibid.*

legal. In her letter, the author seems to place equal emphasis on both obscenity and pornography as she asks for a "no tolerance" policy for viewing pornography without distinction between legal and illegal content. However, this distinction is at the crux of the battle. There is no question in the eyes of the law that child pornography is illegal. But does the general public understand this distinction as they ask for content to be banned?

The Biesterfeld case presented at the beginning of this paper is an example of a situation in which a library patron is observed viewing questionable material on a computer. The reactions of the library employee and her supervisor resulted in both professional and personal exposure as the media sensed a story and drama ensued. It is likely that this situation could arise at any time at any public library, so staff must be fully prepared to appropriately react in a manner consistent with a well-prepared library policy.

### **Policy Considerations**

In developing or revising a policy, the library board of trustees should envision the difficulty of the staff member who might be thrust into an uncomfortable position. With this in mind, the policy and related procedures should be prepared to provide specific guidance to the questions of a library staff member who has become aware of a possibly inappropriate use of a computer in the library. The questions may include:

- What did I actually observe the patron doing?
- Do I know whether the images are illegal?
- Can I describe the images?
- How long should I have observed the patron?
- Is there a record of what the patron has been viewing?
- Is the patron exhibiting other inappropriate behavior?
- What if the patron is using his or her own computer?
- What should I tell the patron?
- Am I allowed to exercise judgment?
- Do I have a legally mandated obligation to report the patron?
- To whom am I supposed to report? In what order?
- How do I make sure I have my facts straight?

The United States Department of Justice advises that one should:

report an incident involving the production, possession, distribution, or receipt of child pornography, file a report on the National Center for Missing & Exploited Children (NCMEC)'s website at [www.cybertipline.com](http://www.cybertipline.com), or call **1-800-843-5678**. Your report will be forwarded to a law enforcement agency for investigation and action. You may also wish to report the incident to federal, state, or local law enforcement personnel.<sup>19</sup>

It may not be enough for a library to simply provide a copy of a policy for its staff, or to depend upon broad policy that merely restates legal jargon. Discussion and training should be considered to increase understanding of issues and expected responses.

In fairness to library patrons, they, too, should be made well aware of the conduct expected of them in the library. Unless one has specifically researched the legal definitions of obscenity and child pornography, it is very possible for one to accidentally stumble upon material not protected under the First Amendment. Or, in other possible examples, what happens if children draw sexually suggestive pictures, or, if a staff person sees "sexting" images on a minor's cellphone? As a service to its patrons, the library should find a means to communicate the basic legal differences between protected and non-protected content, preventing or minimizing a situation that result in unintended public, personal, or legal consequences.

### **Are Library Staff Under a Federal Mandate to Report Child Pornography?**

The PROTECT Act (2003) provides "that a person who, while engaged in a specified professional capacity or activity on federal land or in a federally operated or contracted facility, learns of facts that give him or her reason to suspect child abuse, and fails to make a timely report of it, shall be guilty of a Class B misdemeanor." The specific professionals ... include, among others:

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<sup>19</sup> "USDOJ: CRM: Child Exploitation and Obscenity Section", n.d., <http://www.justice.gov/criminal/ceos/report/report.html#reportcp>, (accessed March 24, 2013).

- medical personnel
- social workers
- teachers
- law enforcement personnel
- foster parents
- commercial film and photo processors.<sup>20</sup>

The language contained in *Child Welfare Information Gateway*<sup>21</sup>, a publication recommended by the U.S. Department of Health & Human Services, includes reference to other state mandated professions which may include "directors, employees, and volunteers at entities that provide organized activities for children, such as camps, day camps, youth centers, and recreation centers, are required to report in 11 States."<sup>22</sup> One could interpret this description to include library staff. The report also provides specifics with regard to disclosure of the reporters' identity. Libraries should consult legal counsel to determine specific state reporting requirements and whether that may include library staff.

### **Can the Library Staff Make Sexual Harassment Claims Against the Library?**

Library leadership must also be aware that protection of patrons' rights can also lead to the discomfort of the library employees, to the extent that they may allege a hostile work environment from to sexual harassment. Twelve staff members of the Minneapolis Public Library librarians filed the sexual harassment claims with the federal Equal Employment Opportunity Commission (EEOC) in 2001, alleging that patrons were printing large amounts of pornographic images that were easily seen by employees, and patrons, in various locations throughout the library. The EEOC supported the claims, and, after the employees filed suit in

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<sup>20</sup> "95-406 - child\_pornography.pdf," 20.

<sup>21</sup> Child Welfare Information Gateway, "Mandatory Reporters of Child Abuse and Neglect," *U.S. Department of Health & Human Services*, 2012, [https://www.childwelfare.gov/systemwide/laws\\_policies/statutes/manda.cfm](https://www.childwelfare.gov/systemwide/laws_policies/statutes/manda.cfm), (accessed March 24, 2013).

<sup>22</sup> Ibid.

federal court, the library settled the case with the employees. The library also agreed to impose greater penalties on patrons for violations, to implement a pay-to-print system to limit printed material produced by patrons, to consider filters, and to review the locations of terminals used by children in an effort to prevent a future recurrence.<sup>23</sup>

### **Has the Library Staff Passed Background Checks?**

As libraries are viewed as community resources, patrons should be able to expect that they, and their children, will be in a safe environment. Children often wander the library, unobserved or out of sight of parents or caregivers as they wander through the shelves. Background checks should be performed on all potential employees to minimize the risk of employing a convicted sex offender. One can only imagine the terrible repercussions of having a convicted sex offender commit another crime in the library.<sup>24</sup>

### **Summary**

As stated in the Biesterfield case, the head librarian acknowledged that their policies should have been more clear. Public libraries have a duty to take reasonable measures to protect their patrons, staff, reputations, and budgets, as well as the taxpayers who provide the funding to operate the library. These are some of the issues for library leadership to consider:

- Know the difference between legal and illegal material
- Consult with an attorney who is well-versed in First Amendment rights
- Know the state laws that pertain to the library
- Craft a comprehensive Internet Use Policy that includes:
  - Easily understood guidelines about expected behaviors and consequences of patrons and staff such as "If you view child pornography, we will call the police."

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<sup>23</sup> "EBSCOhost: Minneapolis PL Settles Porn Suit", n.d., <http://web.ebscohost.com.ezproxy.dom.edu/ehost/detail?vid=10&sid=f870a7a4-4d35-426c-977b-85f6745957b4%40sessionmgr112&hid=120&bdata=JnNpdGU9ZWZWhvc3QtbGl2ZSZzY29wZT1zaXRl#db=lih&AN=10825913>, (accessed March 24, 2013).

<sup>24</sup> "Man indicted for child pornography continued working at Md. library", September 7, 2012, <http://www.wtop.com/41/3027100/Man-indicted-for-child-pornography-continued-working-at-Md-library>, (accessed March 17, 2013).

- Definitions of legal and illegal content, especially with regard to drawings
- Provide a list of offenses which will be reported to law enforcement
- Information on filters - whether they are used and why and how they can be disabled
- Guidelines for printing out questionable material
- Using one's own computer to view pornography
- Design procedures for staff to follow the Internet Use Policy
- Provide a method, such as a form to complete, that will give clear guidance to staff for reporting an incident to law enforcement
- Provide training for staff to encourage appropriate responses to different situations
- Be sure that the Internet Use Policy is highly visible for patrons and staff
- Perform background checks on all employees
- Be prepared to report criminal activity to law enforcement
- Provide privacy screens and review locations of computers to minimize inadvertent views by minors
- Provide a protocol for preserving evidence of a crime such as confiscation of computers, server files, printed material
- Clarify whether library staff are federally mandated to report child pornography or obscenity

Clearly, it is not possible to anticipate all controversial situations. However, libraries must take a proactive and meaningful approach to professionally handle the reality that pornography exists at the library.

The content of paper is provided for informational purposes only. Please consult with an attorney to obtain legal advice.

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## BIBLIOGRAPHY

- “#266: 04-30-03 FACT SHEET PROTECT ACT”, n.d.  
[http://www.justice.gov/opa/pr/2003/April/03\\_ag\\_266.htm](http://www.justice.gov/opa/pr/2003/April/03_ag_266.htm). (accessed March 23, 2013).
- “95-406 - child\_pornography.pdf”, n.d.  
[http://www.policyalmanac.org/culture/archive/child\\_pornography.pdf](http://www.policyalmanac.org/culture/archive/child_pornography.pdf). (accessed March 23, 2013).
- “After Child Porn Incident, Tulare County Librarian Says Policy Change Coming”, n.d.  
<http://www.libraryjournal.com/lj/community/intellectualfreedom/860921-269/story.csp>. (accessed March 17, 2013).
- “ALA | Guidelines and Considerations for Developing a Public Library Internet Use Policy”, n.d.  
<http://www.ala.org/template.cfm?section=otherpolicies&template=/contentmanagement/contentdisplay.cfm&contentid=13098>. (accessed March 13, 2013).
- “Bill of Rights Transcript Text”, n.d.  
[http://www.archives.gov/exhibits/charters/bill\\_of\\_rights\\_transcript.html](http://www.archives.gov/exhibits/charters/bill_of_rights_transcript.html). (accessed March 18, 2013).
- “BILLS-108s151enr.pdf”, n.d. <http://www.gpo.gov/fdsys/pkg/BILLS-108s151enr/pdf/BILLS-108s151enr.pdf>. (accessed March 26, 2013).
- Child Welfare Information Gateway. “Mandatory Reporters of Child Abuse and Neglect.” *U.S. Department of Health & Human Services*, 2012.  
[https://www.childwelfare.gov/systemwide/laws\\_policies/statutes/manda.cfm](https://www.childwelfare.gov/systemwide/laws_policies/statutes/manda.cfm). (accessed March 24, 2013).
- “EBSCOhost: Minneapolis PL Settles Porn Suit”, n.d.  
<http://web.ebscohost.com.ezproxy.dom.edu/ehost/detail?vid=10&sid=f870a7a4-4d35-426c-977b-85f6745957b4%40sessionmgr112&hid=120&bdata=JnNpdGU9ZWhvc3QtbGl2ZSZZY29wZT1zaXRl#db=lih&AN=10825913>. (accessed March 24, 2013).
- “FindLaw | Cases and Codes”, n.d. <http://caselaw.lp.findlaw.com/cgi-bin/getcase.pl?navby=case&court=us&vol=354&invol=476>. (accessed March 22, 2013).
- “FindLaw | Cases and Codes”, n.d.  
<http://caselaw.lp.findlaw.com/scripts/getcase.pl?court=us&vol=413&invol=15>. (accessed March 17, 2013).



- “FindLaw | Cases and Codes”, n.d.  
<http://caselaw.lp.findlaw.com/scripts/getcase.pl?court=us&vol=458&invol=747>.  
(accessed March 17, 2013).
- “I know it when I see it.” *Wikipedia, the free encyclopedia*, March 15, 2013.  
[http://en.wikipedia.org/w/index.php?title=I\\_know\\_it\\_when\\_I\\_see\\_it&oldid=544494581](http://en.wikipedia.org/w/index.php?title=I_know_it_when_I_see_it&oldid=544494581).  
(accessed March 17, 2013).
- “Letter: GR Library’s Pornography Policy Not Strong Enough.” *Ridgewood-Glen Rock Patch*, n.d. <http://ridgewood.patch.com/articles/letter-gr-library-s-pornography-policy-not-strong-enough>. (accessed March 16, 2013).
- “Libraries Seek Balance Over Porn on Public Computers - Ridgewood, NJ Patch”, n.d. <http://ridgewood.patch.com/articles/libraries-seek-balance-over-porn-on-public-computers#c>. (accessed March 24, 2013).
- “Man indicted for child pornography continued working at Md. library”, September 7, 2012.  
<http://www.wtop.com/41/3027100/Man-indicted-for-child-pornography-continued-working-at-Md-library>. (accessed March 17, 2013).
- “Manga Collection Ruled ‘Child Pornography’ By US Court.” *io9*, n.d. <http://io9.com/5272107>.  
(accessed March 26, 2013).
- “USDOJ: CRM: Child Exploitation and Obscenity Section”, n.d.  
<http://www.justice.gov/criminal/ceos/report/report.html#reportcp>. (accessed March 24, 2013).
- “Was Probationary Tulare County Staffer Fired for Reporting Child Porn?”, n.d.  
<http://www.libraryjournal.com/article/CA6541688.html>. (accessed March 17, 2013).