

# Skim, Quote, List

## The Censorship of *All Boys Aren't Blue*

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### **ABSTRACT**

*All Boys Aren't Blue: A Memoir-Manifesto* by George M. Johnson is currently one of the most frequently challenged books in United States libraries. This article takes the opposition to Johnson's Young Adult memoir-manifesto as a case study to interrogate the reading practices and rhetoric of organized activist groups that operate at scale and drive the removal of books from school libraries. These efforts are amplified by the chilling effects of new laws that address a distorted caricature of Critical Race Theory and 'sexual' material in schools, and that disproportionately affect books that speak frankly and critically about Black history, sexual abuse, and the experiences of LGBTQI+ youth. The challenger playbook analysed in this article is characterized by a reading practice that involves skim-reading for key words, decontextualization of abbreviated quotations, 'slick' and shareable reports, generated book lists, and a forum for challenging that is both online and hyperlocal. Key to justifying the removal of books from libraries is the concept of obscenity, which is misconstrued to cast Johnson's memoir as pornography. Resistance to censorship is considered at local, state and federal level. The treatment of Johnson's memoir by challengers and defenders reveals old and novel censorship mechanisms, emerging anti-censorship coalitions, divergent reading practices, and fracturing constitutional norms. Mapping attacks on and defenses of *All Boys Aren't Blue* complicates our understanding of censorship in modern America.

### **KEYWORDS**

Censorship, Reading, School libraries, Obscenity

In 2023, the Senate Committee on the Judiciary held a hearing to examine ‘book bans.’ Among those who defended the challenging of schoolbooks was Max Eden, a research fellow from the American Enterprise Institute, who concluded his testimony by reciting quotes, taken from a website that identifies and collates objectionable excerpts from challenged books. These included a passage from George M. Johnson’s *All Boys Aren’t Blue: A Memoir-Manifesto* (henceforth *ABAB*), depicting the author’s abuse by an older male cousin, which Eden presented, devoid of context, as an account of “underage incest,” and as an example of the kinds of “explicit passages” that, he claimed, “a politically significant contingent” of journalists, NGOs, and Democratic politicians deem “very good for kids” (Eden 3-4). The rhetorical strategies Eden adopted in his testimony exemplify those of the modern book challenger discourse, which casts conservative activist researchers as “moms” alarmed by the distribution of “inappropriate materials” to (hypothetical, age-unspecified) “kids” and represents the book only by an isolated quotation taken from a conservative activist resource (4). The act of censorship is minimized, and any deliberation on the work as a whole is notable for its absence. The book itself is present only as a trace fragment.

This article takes the opposition to *ABAB*, one of the most frequently challenged books in the US of the last three years, as a case study to interrogate the reading practices and rhetoric of organized activist groups that operate at scale to cast specific topics and texts as obscene and pornographic and instigate the removal of books from libraries. These efforts are amplified by the chilling effects of new laws that address a distorted caricature of Critical Race Theory and ‘sexual’ material in schools, and that disproportionately affect books that, like *ABAB*, speak frankly and critically about Black history, sexual abuse, and the experiences of LGBTQI+ youth. *ABAB*’s treatment by challengers and defenders reveals old and novel censorship mechanisms, emerging anti-censorship coalitions, divergent reading practices, and fracturing constitutional norms. Mapping attacks on and defenses of *ABAB*, and attending to strategies that have received little attention by either scholars or the press, complicates our understanding of censorship in modern America.

Aimed, according to the publisher, at readers aged 14-18, *ABAB*

blends the essay form with autobiography. Its vocabulary and syntax are age-appropriate, but Johnson introduces advanced terminology and concepts, either defining terms or demonstrating their meaning through storytelling, dialogue, and extradiegetic reflection. Personal memories are linked to wider social issues, particularly hostility towards difference, which is, Johnson explains, “where the manifesto part comes in”: their life illustrates “some of the universal experiences of Black and/or queer people,” so that memoir prompts social commentary (6). If the vividly-drawn portrait of the young George’s struggles and triumphs appeals to older adolescent readers, then the adult narrator, who frames and interprets each memory fragment, models joy, survival, and mature understanding. Young queer readers’ need for representation, warnings, and guidance motivates the text’s frankness. The preface explains that *ABAB* covers subjects – sexual assault, homophobia and transphobia, anti-Black racism – that “many reading this book will encounter or have already encountered” but that “are often kept away” from those their age (vii); elsewhere, they conclude an account of a distressing sexual experience by remarking, “I went through that and have shared it so maybe you won’t have to” (275). Though anticipating critical “pushback” (276) for speaking honestly to teens on these topics – as Johnson noted in interview, “for me to not only exist, but have the audacity to tell my story” would provoke conservative critics to “try and shut it down” (qtd. in Carlisle n. pag.) – the text refuses to be silenced by fear (Johnson 276).

Published just prior to the escalation of censorship cases that this special issue examines, *ABAB* has encountered challenges on an unprecedented scale, some in apparent defiance of existing law, others utilizing new statutes and policies. Both the American Library Association (henceforth ALA) and PEN America (henceforth PEN), which use distinct but overlapping methodologies and terminology (‘challenges’ and ‘bans’) to record attempts to restrict or change access to books, identify 2021-2022 as the point when book challenging escalated in the United States (see Campbell’s article in this volume). This change is driven by a shift in book challenger behavior.

Book challenge whack-a-mole; crowd-sourced book list databases; copy-paste legislation; viral circulation of ‘sexual’ quotes; rituals of

outrage at all levels of government; intimidation and defamation; and on the horizon, the mobilization of the far right, a warning and a promise of more censorship to come: this is the context in which *ABAB* became one of the most frequently challenged books in the United States. The logic of its censorship in turn becomes clear when one considers the other titles that topped the ALA's list of the most frequently banned texts of 2022 – Maia Kobabe's *Gender Queer*, a graphic autobiography about non-binary, queer, and asexual experience, and Toni Morrison's *The Bluest Eye*, which explores anti-Black racism, colorism, sexual abuse, and trauma, through the perspectives of both adults and children. Blackness, queerness, sexuality: Johnson's memoir-manifesto shares the themes of frequently challenged books (Friedman and Johnson, "Banned in the USA: Rising" n. pag.). It is also in the category of texts whose challenging is likely to result in removal: the *Washington Post* found that challenged schoolbooks about LGBTQ lives were 30% more likely to be removed than others; 41% of "fully banned books" had LGBTQ themes (Natanson, "The Post" n. pag.).

In PEN's analysis, the escalation of censorship is driven by two related issues: novel legislation at state level and coordinated challenges brought or supported by organized groups. While prior to 2021 challenges were commonly made against one book, by one individual, it has since become customary for them to involve multiple titles (ALA, "Book" n. pag.), and to be brought by a prolific group of 'serial filers', which according to the *Post* comprised 60% of challenges in the 2021-22 school year (Natanson, "The Post" n. pag.). PEN puts this figure at around half, and notes that 40% are linked to "proposed or enacted state legislation" and "political pressure" (Friedman and Johnson, "Banned in the USA: The Growing" n. pag.). For Richard Price, such trends indicate a shift from challenges being "episodic and ad hoc" to a favored tactic of "national conservative activist groups" (26). This shift can be understood as a product of the peculiar confluence of political causes that emerged from the Covid-19 pandemic around 2021: anti-vaccination and anti-mask movements, the backlash against Black Lives Matter, Critical Race Theory, and DEI initiatives generally, and the proliferation of legislation constricting transgender people's rights and access to healthcare. As PEN puts it, challenger groups have varied "aims," but share "common cause in advancing an effort to

control and limit what kinds of books are available in schools” (Friedman and Johnson, “The Growing” n. pag.).

## **The Book Challenge Playbook**

Tracing *ABAB*'s progress through the procedures of a challenger group, Moms for Liberty (henceforth MFL), illustrates how challenges operate at scale. Founded in 2021, MFL describes its mission as “fighting for the survival of America by unifying, educating and empowering parents to defend their parental rights at all levels of government” (MFL, “Who” n. pag.); the Southern Poverty Law Centre has designated it an anti-government extremist group. Having emerged, by its own account, from activism against Covid-19 measures in schools, a cause that is still prominent on its website, MFL has swiftly attained influence in part by developing an infrastructure to support book challenge cases. Other concerns include sex education, Critical Race Theory, and “gender ideology” (MFL, “Resources” n. pag.). Maurice Cunningham’s analysis of tax filings, declared donations, and conservative and radical right media coverage led him to conclude that MFL’s rapid rise was propelled by substantial financial and practical support from conservative donors and institutions, rendering implausible its claims to be a non-partisan grassroots organization that has grown solely due to its resonance with conservative moms (9-13).

Though formally non-partisan, MFL is nevertheless influencing Republican politics. MFL school board candidates are encouraged to skip the training provided by state School Board Associations that it claims “foster[s] the same woke propaganda Moms for Liberty is fighting against” (MFL, “Welcome” n. pag.) in favor of courses provided by the The Leadership Institute, which trains conservative activists on topics including Critical Race Theory (in a module delivered by Ted Cruz), legal and procedural issues, and campaigning, which was originally delivered by Bridget Ziegler (the Institute’s former Director of School Board Programs and MFL co-founder) and her husband Christian Ziegler (former chairman of the Florida Republican Party) (Leadership Institute, “School” n. pag.; “Final” n. pag.). Its 2023 summit featured five Republican presidential

candidates, including Donald Trump and Ron DeSantis (Knowles and Natanson n. pag.). As Governor of Florida, DeSantis has associated himself with MFL causes: most notably, Florida HB 1557, the 2022 Parental Rights in Education Act – more widely known as Florida’s “Don’t Say Gay” or “Don’t Say Trans” state law – which prohibits classroom discussion of gender and sexual identity. HB 1557 built on the Parents’ Bill of Rights drafted by Bridget Ziegler in 2019 (“Governor” n. pag.; McKinnon n. pag.).

Book challenges have featured prominently in MFL’s messaging and campaigns both prior to HB 1557’s passage and in the aftermath – and whether a means to a legislative and electoral end, or an end in themselves, they are integral to MFL’s activism. *ABAB* is one of MFL’s preferred case studies. Characteristically quoted selectively, choice passages or sentences are clipped, decontextualized and circulated as textual fragments at school board meetings, in social media viral videos and TV interviews.

This treatment of the part as a reliable proxy for the whole is a feature, not a bug. MFL’s “Books” site links to two book review websites created in early 2022: BookLook.info, which traces its origins to a MFL library committee (BookLook.info, “Plan” n. pag.), and BookLooks.org, which denies affiliation with any group but was founded by a former MFL member (BookLooks.org, “About” n. pag.). Both sites feature book reports and ratings that are almost identical. However, BookLook.info also hosts a model challenge methodology whose admonishments to challengers, “DO NOT take quote out of context or eliminate words to ‘prove’ [sic] your point,” and “DO thoroughly read the entire novel” (“Report” n. pag.), are contradicted by its book reviewing guide, which emphasizes skimming and swift judgments based on intuitive responses to keywords, thereby ensuring that the activist’s first encounter with the text will entail taking quotes out of context. This is made explicit in the explanation, “I skim a book looking for violations [...] I scan about 1 page/5 seconds. Look for key words [...] Try not to be tempted into reading the book and ‘get into’ the story. Do that on your own time ;)” (BookLook.info, “How To” 2). Predicated on a shared understanding of the difference between conventional reading and the reviewer’s practice of scanning, the joke makes clear that this is not an intellectual exercise. As do the ensuing

instructions, which outline a labor-intensive logging process involving converting digital photographs of printed book pages or snipped images from eBooks into text, then pasting them into a Google docs spreadsheet that indexes quotations to statutes. No guidance is given on how to answer questions that invite holistic judgements of the book: for instance, “[t]aken as a whole, is this material without serious literary, artistic, political, or scientific value for minors” (8). The extent to which this guidance has shaped challenger practice since 2022 makes it surprising that BookLook.info has received little attention to date from journalists, and none from scholars.

BookLook.info also suggests that activists send presentations on “the worst offenders” to school boards, “brave volunteers” read passages aloud at school board meetings and ask if “this is OK for minors,” and book reports be circulated on social media to “[get] people engaged with outrage” (BookLook.info, “Plan” n. pag.). Reports, which can be found on both sites, take two forms: a summary table of unredacted, and often long, quotations from all the objected-to passages, and for “worst offenders” such as *ABAB*, a brief document called a “slick sheet” comprising a numerical rating and some quotations, which can be radically abridged. A simple “Book Report” interface makes reports freely downloadable (BookLooks.org, “Book” n. pag.). *ABAB*’s summary report on the BookLooks.org site contains a profanity count, a content warning, and fourteen pages of tabulated quotations, most referencing race or racism, queerness, sexuality, or police violence. Instead of engaging with literary aspects of the text – how it might convey judgement through characterization, narrative voice or tone – the summary lists a series of concerns: “This book contains sexual nudity; sexual activities including sexual assault; alternate gender ideologies; profanity and derogatory terms; alcohol and drug use; and controversial racial commentary” (BookLooks.org, “All Boys” 1). The word “contains” suggests that the mere presence of a theme, word, or topic is reason for alarm, helping rationalize the condemnatory judgement: 4 out of 5: “Not For Minors”.

The abridged and decontextualized quotes in *ABAB*’s “slick sheet” similarly distort the book, reducing, for example, Johnson’s account of childhood sexual abuse to a litany of sexual acts in which little of the

child's distress remains. "*This story is complicated,*" Johnson writes in the original, with italics for emphasis, "*but I don't want it to be confusing {...} I want to reiterate his actions were wrong, and I was a victim*" (212). To omit this commentary is to distort the testimony of a survivor. Johnson's original account of losing their virginity at university, a complex memory of mixed pleasure and pain, undergoes a similar transformation. The original juxtaposes the lovers' mutual generosity and the psychological impact of pain:

I can say that he was gentle. His aim wasn't to hurt me, and my aim was for him to be pleased, too. He didn't last long inside of me, thankfully. He gave me a kiss before he pulled out. I didn't stay long, nor did I masturbate after. I was in a state of shock. I just wanted to get back home. (272)

While *ABAB*'s summary report reproduces this passage in its entirety, all that remains of it in the shorter slick sheet is a formulaic pornographic conclusion: "[h]e didn't last long inside of me, thankfully. He gave me a kiss before he pulled out. I didn't stay long, nor did I masturbate after" (BookLooks.org, "Slick Sheet" n. pag.). Body parts, position, sensation, and motion are retained; commentary on the way the encounter was structured by the conventions of pornography, and the young George's anxiety, are cut. The bittersweet quality of a formative experience is lost, as is the force of the word 'shock', which in the original opens up reflection on inclusive sex education, queer trauma, and consent.

First implemented in Florida, BookLook procedure is now model challenger practice nationwide. In two typical cases involving *ABAB* in Brevard and Indian River Counties, Florida, MFL members cited Florida pornography statutes, Critical Race Theory, and "alternate gender ideologies" in bringing their challenges. In response, Brevard County updated its policy so that challenges could apply to the whole district, which would increase the impact of challenges beyond individual schools; Indian River County removed *ABAB* and withdrew 216 books pending review (Stroshane, "Censorship" 7.1 42-45; "Censorship" 7.2 47). Such cases recall *Board of Education v. Pico*, the 1982 Supreme Court case that guides school library cases today. The case originated from a book list

featuring decontextualized excerpts of “objectionable” titles circulated at a conservative parents’ conference; of these, Island Trees school board members ordered the removal of eleven, mostly by Black writers, against the ruling of a committee (Fellion and Inglis 220-23). The plurality opinion argued that the removal of books from school libraries is unconstitutional if done in a “narrowly partisan or political manner,” and that the “right to receive information and ideas” is a necessary corollary of the First Amendment, which, for civil liberties organizations, supports the idea of a right to read (US Supreme Court, *Board of Educ. v. Pico* 867; 854). As with *Pico*, current challenges often involve book lists, but their distribution is now accelerated by social media and digital tools. A “list” of objectionable books today might take the form of a social media meme, viral video, photo of pages shared in a group chat, spreadsheet, or downloadable report, while generative AI has been used to determine which books on a BookLooks.org list should be removed (Pendharkar n. pag.). Sometimes the origins and methodology of a list are obscure, as was the case with the 16-page table Matt Krause (Chair of the Texas House Committee on General Investigating) sent to the Texas Education Agency, attached to a demand for information on copies held in Texas schools and funds spent on them. For Danika Ellis, though the dominance of material on rights, sex education, and LGBTQ+ topics in Krause’s list indicate an attempt to identify books on these topics, the apparent absence of a filter for content and inclusion of evidently accidental entries suggest it was generated by a keyword search of a library catalogue.

Krause’s letter also illustrates the chilling effect of today’s volatile legislative environment. In addition to the specified books, he demanded information about any other books that “address or contain,” *inter alia*, HIV, sexuality, or anything that “might make students feel discomfort [...] because of their race or sex,” this last phrase taken from Texas HB 3979 – a 2021 law that prohibits teaching the *1619 Project* and specific concepts (CRT, as it is misrepresented by its critics) in the social studies curriculum. While the legal basis for Krause’s demand was uncertain, the letter prompted action.

HB 3979 is an example of what PEN calls “Educational Gag Orders” (EGOs) (Friedman and Tager n. pag.). In 2017, Matthew Fellion and I discussed precursors to the current wave of EGOs – bills like Arizona’s HB

2281, which closed Mexican American Studies in Tucson, and Virginia's "Beloved Bill" (HB 516), a parental rights bill – and suggested that they had "potential to produce more widespread, indiscriminate, and partisan forms of censorship than the more common practice of school boards making judgements about the educational suitability of particular books" (Fellion and Inglis 374). It is too simple to say that EGOs simply "ban" a book or a topic in schools (though some, like HB 3979, name specific texts), but in practice, as Friedman and Tager put it, they "chill academic and educational discussions" (4). HB 2281 did not explicitly prohibit the book *Critical Race Theory*, but when the new law was applied, it was removed from Tucson classrooms; the *Beloved Bill*, which targeted sexually explicit material in broad terms, did not name Toni Morrison's *Beloved*, but the Senate debates treated it as the kind of 'sexually explicit' book for which the legislation was designed (Fellion and Inglis 372-74; 381-99). The removal of *ABAB* from several school district libraries a month after the release of Krause's list (Stroshane, "Censorship" 7.1 67-8; 75-6) despite not actually appearing on it can be seen as another instance of this.

At the time of writing, PEN records 30 new EGOs signed into law since 2021, of which 23 explicitly target K-12 education. Gender, sexuality, pronouns, Critical Race Theory, and Marxism are recurring terms, and the same forms of words are reproduced across bills brought in different states. Such legislation can energize specific conservative constituencies. The Virginia governor who vetoed HB 516 lost his re-election campaign, defeated by a Republican opponent who posted an attack ad starring the parent who lobbied for the *Beloved Bill* (Vozzella and Schneider n. pag.; see Youngkin).

## The Return of Obscenity

Modern book challenger discourse asserts an idiosyncratic understanding of obscenity that sidesteps the consensus on constitutionality. Obscenity, in a legal sense, describes an exception to the First Amendment's protection of speech. Since the case of *Miller v. California*, federal and state laws have adopted a three-part test of obscenity. The plurality opinion in *Miller* held that obscenity cases must test:

(a) whether the average person, applying contemporary community standards would find that the work, taken as a whole, appeals to the prurient interest [...] (b) whether the work depicts or describes, in a patently offensive way, sexual conduct specifically defined by the applicable state law, and (c) whether the work, taken as a whole, lacks serious literary, artistic, political, or scientific value. (US Supreme Court, *Miller v. California*, 24-25)

The last of these applies even to modified *Miller* tests, such as those adapted for the special case of minors.

But as Todd Pettys notes, current book challenger discourse asserts “that some of the recently targeted books are obscene in the constitutional sense of the term, such that distributing those books to children falls beyond the First Amendment’s protection” (1007). For Price, the current wave “challenges the basic definition of obscenity itself and seeks to return to an earlier era of criminalized literature” (35) via rhetoric that “equate[s] sexual conduct” in books with pornography, and that treats obscenity and pornography as “interchangeable” (37). Thus BookLook.info’s pledge, “first, we are going after porn in the school libraries” (“Plan” n. pag.), leaves unstated what qualifies as porn. Challengers often justify such imprecision by “invok[ing] formal legal ideas” and “mix[ing] legal and popular notions of obscenity and porn in a way that ignore [sic] the key elements of the law” or, commonly, deploying one element of an obscenity statute but not the whole tripartite test (Price 38). For instance, BookLooks.org attempts to both incorporate and circumvent legal understandings of obscenity:

Some astute critics have opined on the fact our definition for “obscene” mirrors the definition from the *Miller* test but leaves out the wording “taken as a whole.” This is because we are only applying the word “obscene” to instances contained within the work (evaluated in context), not the work as a whole. Again, our rating system is not evaluating obscenity (in the legal sense) for the overall work. (“About” n. pag.)

While BookLooks.org is right to say their rating system is not a measure of the obscenity of a work, they should not imply that it is possible to apply a portion of *Miller*’s language to define obscenity, when all that is

evaluated is a decontextualized quotation. The *Miller* test is predicated on an assessment of the whole work; without assessment of the whole, the obscenity of the work cannot be determined. There is also no justification given for the claim that “most works we rate as ‘No Minors’ (4) or ‘Aberrant [sic] Content’ (5) would likely be considered obscene by most standards” (“About” n. pag.).

Governmental speech is also amplifying the book challenger notion of obscenity. For example, Florida Department of Education media specialist training attends equally to pornography and obscenity when attempting to explain what materials are prohibited in Florida school libraries. The training specifies that materials must be free from pornography (6), but that term not being defined in Florida law, the training turns to the broad Merriam-Webster definition (7). In explaining what kinds of sexual material are considered harmful to minors according to Florida statute 847.001, and therefore prohibited, the training outlines the state’s adapted *Miller* obscenity test, but inserts a note of caution that is not present in the test: trainees are warned that “[t]o protect librarians and media specialists from felony charges, *it must be clear* [emphasis added] that a book depicting nudity, sexual conduct, or sexual excitement does not meet the tenets of ‘Harmful to minors’” (10) and so trainees are encouraged to “[e]rr on the side of caution” (11) when selecting library materials. Trainees should also “carefully” consider any books that have already been “removed or restricted” (26) in other districts and consult “crowd-sourced reviews” (25); without naming challengers explicitly, such guidance directs professionals to their obscenity standards. If Florida’s training nudges librarians towards a broadened standard of obscenity, the message elsewhere is more direct and absolute. Governor Greg Abbott of Texas referred to “pornography” in school libraries and Governor Henry McMaster of South Carolina claimed that specific images in Maia Kobabe’s *Gender Queer* met the statutory definition of obscenity (Price 40). Such statements carry weight.

Confident pronouncements on obscenity encourage claims that librarians, media specialists and educators are distributing pornography. A febrile discourse reduces the complex balancing of students’ First Amendment rights and pedagogical judgements to morality tales. Those who argue the case for texts like *ABAB* face incendiary accusations of

promoting pedophilia and sexual abuse. When MFL supporters read excerpts from *ABAB* and other texts at a North Penn School District board meeting, they made highly charged accusations: was it the Board's intention to "groom" children? If board members found *ABAB* acceptable then they belonged on "a national registry" (Stroshane, "Censorship" 6.4 31). At a Flagler County Florida school board meeting, where protestors with white supremacist and anti-LGBTQ+ banners shouted slurs and, according to observers, intimidated students, one school board member attempted to bring criminal charges, alleging that it was a crime to have *ABAB* in media centers, because schools must be "free from pornography" and not distribute material harmful to minors (Stroshane, "Censorship" 7.1 41-42). Such attempts to bring criminal cases are increasingly common: Price records similar cases brought since 2019 against distributors of *Howl*, *Fun Home*, *Gender Queer*, *Lawn Boy*, and *ABAB* (39-42). The legal process for determining the obscenity of books for children should apply an adapted *Miller* test, as demonstrated in Pettys' recent consideration of *ABAB* as a hypothetical case, which emphasized that "no reasonable reader could say that, taken in its entirety, Johnson's book provokes sexual desire" (1038). So far, when criminal charges have been entertained, the tripartite test has been properly applied. In the case of the criminal complaint against *ABAB*, the Sheriff's counsel referred to the memoir's discussion of social and political issues and advised there was no basis for proceeding (Price 41).

There may be no real prospect of criminal prosecutions in the near future, but how secure would the legal consensus on obscenity be under sustained political pressure? If the Heritage Foundation's Project 2025 *Mandate for Leadership* playbook represents the plan for the first 180 days of a new Republican presidency, then the discourse of book challengers will have a prominent place in the government's program. The foreword by Heritage Foundation President Kevin Roberts sketches the problems facing modern America – inflation, drug abuse, the Chinese Communist Party, the "Great Awakening" (citation not given) – and concludes with a breathless clause that conjures the book challenger's nightmare: "children suffer the toxic normalization of transgenderism with drag queens and pornography invading their school libraries" (Roberts 1). His assertion

that pornography is “manifested today in the omnipresent promotion of transgender ideology and sexualization of children,” and “[e]ducators and public librarians who purvey it should be classed as registered sex offenders” pointedly makes no distinction between sexualizing children and acknowledging the existence of young trans people (5). Justice Potter Stewart’s famous refusal to define hard-core pornography in an obscenity case – “I know it when I see it” – will not serve in a context where legislators and those who regulate obscenity are, unlike Stewart, eager to see pornography where there is none. That the parents’ rights movement and its intellectual foundations can so easily construe texts like *ABAB* as pornography demonstrates that the emerging ideas of obscenity and censorship in conservative discourse operate far outside the conventions and legal tests established in twentieth-century obscenity cases.

### **“Return the books to our library shelves”**

Those who contest book censorship are beginning to develop an equivalent response at all levels of government to book challengers’ multi-modal strategy. At local level, groups such as “Defense of Democracy” and “Parenting with Pride” might not have the national profile, funds, or political connections of the parental rights movement, but they are shaping the composition of school boards. In 2022 and 2023, liberal groups such as “Campaign for our Shared Future” trained school board election candidates, with the majority succeeding; candidates endorsed by MFL and the 1776 Project were less successful, so that the anticipated local government ‘red wave’ failed to materialize – leading the *New York Times* to suggest that the culture war “era of education politics is, increasingly, in the rearview mirror” (Stanford n. pag.; Goldstein n. pag.). State governors who especially embraced book challenging, notably Youngkin and DeSantis, have not profited in key elections: in 2023, Republicans lost control of the Virginia state legislature, and DeSantis withdrew from the presidential primaries.

The continued high rates of challenges however motivate an organized response. Among these is the ALA’s new “Unite Against Book Bans” website: an inverted image of a book challenger resource that hosts school

board meeting guidance, a censorship report portal, and toolkits for novice anti-censorship activists, and whose counterpart of the “slick sheet” database collates summaries of challenged books, professional reviews that evidence texts’ significance and educational value, and digital archives of successful resistance to challenges (see ALA, “Unite”; “Résumés”).

One report on *ABAB* in the archive illustrates how library policies and competent reading practices interact to give serious consideration to both challenger concerns and the text. Rockwood Missouri’s Challenged Materials Committee’s evaluation of *ABAB* was structured by an inclusive collections management policy, which considered students’ First Amendment rights and the role of diverse collections: echoing Rudine Sims Bishop’s argument for diversity in children’s publishing, the policy holds that the library “should provide literature that serves as both mirrors, windows, and sliding glass doors so students are exposed to books and characters that reflect their own experiences as well as experiences of others” (Rockwood 1). The Committee was required to consider this principle, the whole book, and the challenger’s specific stated concerns (1). Having read *ABAB* in full, the committee members noticed when the challenger’s objections took quotations out of context: “[t]he challenger talked about the abuse, but the disclaimer on this page makes it clear that it was wrong” (4). Prompted by the call for books as mirrors, Rockwood readers noted the value of *ABAB*’s commentary on the lack of Black and queer voices in school libraries, describing Johnson’s message, “You sometimes don’t know you exist until you realize someone like you existed before,” as a “constant throughout the book” that “reflected representation” and could “help the reader become more understanding” (4). Explaining their decision to retain the book without restriction, they wrote collectively: “[j]ust because stories are painful doesn’t mean they should be wiped from the record. [...] We have kids in our school that might need this book” (5). Operating as representative members of their community, the Rockwood readers considered the literary and social merits of the text as a whole, applying their own reasoned judgement of its value for minors.

Following in the footsteps of the students who initiated the Island Trees case and protested Arizona’s dismantling of Mexican American Studies (Fellion and Inglis 223, 390-91), students are in turn developing

a coherent anti-censorship position that considers constitutional rights, the pedagogical value of censored texts, and the disproportionate targeting of books by and about marginalized people. The analysis was expressed succinctly by three Nixa, Missouri students after their school board removed *ABAB* and Alison Bechdel's *Fun Home*. Noting that the restricted books were by “non-white and/or LGBTQ+ authors,” they called for “exposure to complicated issues and the amplification of diverse perspectives” (Three n. pag.). In an implied rebuttal of the parental rights movement’s silence on children’s constitutional rights, they insisted: “it is our right to choose what we read. We demand that the school board remove all restrictions and return the books to our library shelves” (n. pag.). Elsewhere, students have used social media, banned book clubs, online wish lists of banned books, and mass distribution drives of challenged texts to organize against censorship (Samuels n. pag.; Natanson, “Teens” n. pag.). Many have testified to the pedagogic and social value of censored texts for minoritized students at school board meetings (Samuels n. pag.; Three n. pag.) and at the House of Representatives Oversight Committee hearings on book bans, where Adunni L. Noibi conveyed the scale of student mobilization:

We fought daily by calling, emailing, and showing up at our state capitol to protest and speak to our representatives. We spent our evenings writing pieces, trying to tell our stories and advocate for books that we found value in. We shouldn’t have to do this, but we will continue fighting for our right to learn, grow, and thrive in our schools. (qtd. in “Student Statements” 2)

Such testimonies convey more than a principled opposition to censorship: they make the impact of censorship concrete and chart an emerging anti-censorship student movement.

Students can seek legal remedies, but legal tactics are not without risk. Should a case reach the current Supreme Court, which has recently overturned decisions that were held to be settled law, most notably *Roe v. Wade*, the library’s status as a space of free inquiry might be undermined. At the time of writing, students of Escambia County and their parents are joined as plaintiffs with PEN, Penguin Random House, and authors,

including Johnson. One plaintiff's 10<sup>th</sup>-grade son is interested in books about race and racism, and wants to check out *ABAB*, but the book has been removed from his school library; the original challenge to *ABAB* had objected to sexual content, as is conventional, but also, specifically, "LGBTQ content" (US District Court for the Northern District of Florida, ECF 27, 36). The complaint notes the Escambia removal list's narrow focus on books by and about "people of color and LGBTQ people" and argues that the Escambia School Board has "sided with a challenger expressing openly discriminatory bases for the challenge" (ECF 27, 2). Guided by *Pico*, plaintiffs argue that the Board's "restrictions and removals" of library books "have prescribed an orthodoxy of opinion" that is unconstitutional (ECF 27, 3). In response, the State of Florida has, in effect, argued against the consensus that the library is a space of free inquiry. It questioned *Pico*'s standing and argued that viewpoint-based restrictions are constitutionally permissible in libraries and particularly school libraries, because "public school systems, including their libraries, convey the government's message," so the question of access to these books should be judged "at the ballot box," not in court; school libraries are "a forum for government, not private speech" (ECF 31-1, 2-3). First Amendment specialists have described this argument as an "aggressive, unprecedented interpretation of the government speech doctrine [...] to justify the politically motivated manipulation of the contents of public school libraries" (ECF 42-2, 2). Should this case proceed to a higher court, the stakes would be high.

Other cases do not have direct bearing on *Pico* but are unpicking elements of new laws. Texas book vendors, who were burdened with the impossible task of assigning sexual content ratings for all books they sold to public schools under HB 900, won at the Fifth Circuit Court of Appeals, which disagreed with the state's argument that the mandatory ratings were government speech and functioned like cigarette packet informational labels (Albanese n. pag.). In Arkansas, the Central Arkansas Library System (CALs) is the lead plaintiff challenging Arkansas Act 372, which makes librarians criminally liable for distributing content that is harmful to minors. Taking *ABAB* as an example, CALs's executive director posited a scenario in which a sixteen-year-old sought the book outwith the children's section of the library: how would librarians prevent that reader

accessing the book? (Vrbín n. pag.). The Act does not differentiate between younger children and older adolescents, which could prove relevant: if, as Pettys argues, the relevant test of obscenity is whether a reasonable minor would find serious value in a book, by “virtue of the First Amendment overbreadth doctrine,” the hypothetical minor must be “a reasonable older teenager”: their First Amendment rights should not be infringed because a young child would not understand the book the teenager might want to read (1055).

Children’s civil rights were also emphasized in a recent federal initiative against LGBTQI+ discrimination to “address the growing threat that book bans pose for the civil rights of students” (“Biden-Harris” n. pag.). A Department of Education civil rights investigation into Forsyth, Georgia found the school district may have created a hostile environment when it removed books with LGBTQ+ and Black characters, which was the first time the Civil Rights division had made such a finding regarding book removals (Jacobson n. pag.). But at the time of writing, *ABAB* has not been returned to the shelves of Forsyth school libraries. The Department has only directed the school district to explain to students that the books were removed because of sexually explicit content, not the identities of their authors or characters (1). If the federal government is beginning to move against book bans, it is taking only precise and limited action.

## Conclusion

A recurring rhetorical move in modern challenger discourse is to deflect accusations of censorship by arguing that library book removals and restrictions are not book bans. Emily Knox argues that challengers “narrowly” define censorship “as the total removal of materials [:] as long as the books are available through some method, no censorship has taken place” (749). Thus, BookLooks.org insists “[w]e do not support ‘banning’ books” because “[a]ny books that may be excluded from school libraries would still be available in public libraries or in stores for interested students to procure with parental consent” (“About” n. pag.). At the US Senate Committee on the Judiciary hearing on book bans, Max Eden of

the American Enterprise Institute ventured an (uncited) “common usage” definition of “banned” as “made unavailable,” implying that because *Gender Queer* was still available on Amazon, it had not been banned, concluding “[b]ooks aren’t being banned, and it’s good that they are [sic]” (Eden 4). At the Congress Subcommittee on Civil Rights and Civil Liberties hearing on book bans, Representative Nancy Mace asked if anything prevented a student who couldn’t find a book in their school library from accessing it elsewhere, through a public library, bookstore, or Amazon? Such arguments fail to consider, as Knox notes, “those who might be harmed by making such materials inaccessible to them” (749; emphasis added). As librarian Samantha Hull responded to Mace, a child’s access to transportation, their “financial means,” and their home environment (it is “not always” safe for children to read at home, Hull notes) all determine whether a child can acquire a book that is not in their school library. Claiming that a text’s continued existence in the marketplace disproves the fact of its censorship deliberately overlooks the weakening of the library’s status as a space of free inquiry and the impact of censorship on young readers. The child who can only access *ABAB* through their school library has been affected by censorship even if a child from a wealthier family can purchase *ABAB*.

### **AUTHOR'S BIONOTE**

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