

As Jeremy Geltzer notes in the introduction to *Filthy Pictures and Dirty Words: Film and the First Amendment*, his study documents the ways in which motion pictures, through a series of definitive court cases that spanned the twentieth century, expanded “fundamental freedoms,” particularly those related to free-speech protections (1). In the first key decision, handed down in 1915, the Supreme Court refused to grant constitutional protections to film, instead finding it to be “a business, pure and simple” (46). This decision allowed film censorship to continue to flourish for nearly four more decades.

The Supreme Court did not extend any First Amendment protections to films until its 1952 decision concerning the film *The Miracle of Our Lady at Fatima* (dir. John Brahm, 1952). Even then, Geltzer notes that this decision was “not a bombshell that eviscerated censorship,” but in many ways it did signal the beginning of the end for most film censorship (139). After this decision, legal battlegrounds over film shifted to content, namely obscenity, and procedure. As the title of Geltzer’s study notes, obscenity could take two forms: “dirty words and filthy pictures” (201). The Court had difficulty not only in regulating obscenity but also even in defining it. As an example, Geltzer references Justice Stewart Potter’s famous “I know it when I see it” definition of obscenity (217). The Court ultimately found that banned works must be “utterly, completely, entirely without social importance” and expectations based on “an average person applying contemporary community standards” (219). However, in the 1973 *Miller* ruling, the Court redefined obscenity to refocus on local community standards as defined by state law, shifting the power to determine obscenity back to the state (252). Soon after that ruling, technology would forever change the regulatory power of both the courts and the state.

If Geltzer overplays his argument at any point, it is in his estimation of film censorship’s popularity in the 1910s and 1920s. Ultimately, only six states enacted motion-picture censorship boards to regulate all films that entered their states, which meant that dozens did not. While less sweeping codes were enacted in cities and states throughout the nation, they often lacked effective enforcement mechanisms, much less the money needed for such regulation, to make much of a mark. For example, in Virginia, the state censorship board ultimately came to rely upon the services of retired women who could be paid a minimal fee for their work; the board didn’t even have the money to update their equipment in order to view sound movies during the first few years of their existence. While it’s important to point out the tide of regulation that befell the movies during the 1910s and 1920s, it’s equally important to emphasize that many of those regulatory prospects fell far short of would-be censors’ desires to tame the fare on screen. And these statutes were hotly contested. Again, in Virginia, many supported film censorship but seemingly just as many argued against granting the state this type of regulatory power. Film censorship was central to the broader cultural wars of the time, and Geltzer’s account could more fully probe its opposition as well as its supporters.
Geltzer brings this study into the present by noting the ways in which the home-based consumer market forever changed censorship. He notes, “home video and sexually explicit materials were seemingly made for each other” (264). Child pornography is illegal, but other legal conundrums, ranging from hate speech to animal cruelty, remain. But while his focus on technology and what he calls the “politics of profanity” is appreciated, it seems that the rise of the Internet and personal computing devices has ultimately ended any battle between free speech and censorship in favor of the former (303).

In conclusion, Geltzer’s account offers an expansive, detailed, and definitive history of film censorship in the US. His conclusion that films pushed boundaries that ultimately instituted far-reaching changes related to morality, cultural norms, and protections related to freedom of speech and expression is well developed and clearly substantiated. Unlike many academic legal histories, it is bogged down neither by legal-ese nor by details about one complicated court case after another. Instead, Geltzer crafts a highly readable, page-turning narrative of censorship at the movies. This study represents a must-have on the bookshelves of not only scholars of film and legal history but also the average person who likes a good read and would like to know more about the history of censorship and film.

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