"That's Just So-and-So Being So-and-So": On Some Possible Meanings, Functions, and Moral Implications of an Explanation

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ABSTRACT: When it comes to explaining someone's puzzling, objectionable, or otherwise problematic behavior, one type of explanation occasionally employed in the service of doing so is as follows: "That's just so-and-so being so-and-so." But what, exactly, do explanations of the type "That's just so-and-so being so-and-so" mean? More specifically, in what way, if any, is it meaningful or informative to say such things? And what is the precise function of such explanations of someone's behavior? Is it merely to present what one takes to be the underlying causes of the behavior, or something beyond that? In what follows, I lay out a few possibilities basic possibilities, to be precise, given philosophy's keen interest in fundamentals with respect to the various meanings, functions, and moral implications of explanations of the type "That's just so-and-so being so-and-so." While doing so, I apply these basic possibilities to three tokens of this kind of explanation: "That's just Manny being Manny" (in reference to Manny Ramirez, the former professional baseball player), "That's just Charlie being Charlie" (in reference to Charlie Rose, the former television host), and "That's just Trump being Trump" (in reference to Donald Trump, the current President of the United States).

Not long ago, the Red Sox's Manny Ramirez pulled off one of the most memorable plays in Major League Baseball's history. After chasing down and catching a fly ball hit deep to left field, Ramirez spun around and gunned the ball to the cutoff man, resulting in a double play at first. As remarkable as the catch and throw themselves were, what made the play so memorable was that, in between catching and throwing, Ramirez scaled the left-field wall and high-fived a spectator in the stands.

Reactions to the play ranged from adulation to irritation, but most agreed on its explanation: That's just Manny being Manny. You see, throughout his career, Ramirez's behavior—both on and off the field—regularly baffled people, fellow athletes and fans alike. And, time and time again, with no better explanation for it at their disposal, the bewildered simply shrugged and said, "That's just Manny being Manny." Indeed, so often was this explanation invoked that "That's just Manny being Manny"—frequently shortened to simply "Manny being Manny"—became a nearubiquitous catchphrase in sports media.¹

Explaining another's behavior in this way—"That's just so-and-so being soand-so"—is not unique to Ramirez, of course. And behavior thus explained is not always so innocuous. To wit, in the mid-2000's, a 21-year-old assistant to television's Charlie Rose, Kyle Godfrey-Ryan, told a longtime producer of Rose's about inappropriate phone calls the TV host had made to her. During the calls, Rose would describe his fantasies of Godfrey-Ryan swimming naked in his pool while he watched from his bedroom. The producer's reaction? "She would just shrug and just say, 'That's just Charlie being Charlie.'"²

Another example of not-so-innocuous behavior explained in this way involves the current president of the United States. As is well publicized, President Trump's behavior is often puzzling, objectionable, or otherwise problematic. From blatantly lying about matters great and small to singing dictators' praises, characterizing Mexican immigrants as rapists and criminals to bragging about grabbing women "by the pussy," President Trump's behavior has repeatedly elicited outcries and, with them, demands for explanation. And one of the most popular explanations of it, particularly (though not exclusively) among his supporters, is "That's just Trump being Trump."³ As one writer puts it, "Have you noticed how Trump's strongest supporters—I'm thinking Sean Hannity on Fox, for one—when confronted with something truly ugly that the president has done, have the same answer: 'Well, that's just Trump being Trump.' [sic]"⁴

But what does it mean to say "That's just Manny being Manny," "That's just Charlie being Charlie," "That's just Trump being Trump," or generally, "That's just so-and-so being so-and-so"? More specifically, in what way, if any, is it meaningful or informative to say such things? And what is the precise function of such explanations of someone's behavior? Is it merely to present what one takes to be the underlying causes of the behavior, or something beyond that? In what follows, I lay out a few possibilities—basic possibilities, to be precise, given philosophy's keen interest in fundamentals—with respect to the various meanings, functions, and moral implications of explanations of the type "That's just so-and-so being so-and-so." While doing so, I apply these basic possibilities to "That's just Manny being Manny," "That's just Charlie being Charlie," and "That's just Trump being Trump."

On Possible Meanings

What, then, do explanations of the type "That's just so-and-so being so-andso" mean? One fundamental, though ironic, possibility is that they do not mean anything at all-that they are *meaningless* statements. This possibility is ambiguous, however, since a statement could be meaningless in at least two ways: emotionally and cognitively. Beginning with the former, by an emotionally meaningless statement, I mean a statement that fails to induce an emotion, either of a particular sort or of any sort whatsoever, in the person contemplating it. An example of an emotionally meaningless statement is, well, take your pick. For a statement's failure to induce an emotion is ultimately a matter of the person entertaining the statement rather than the statement itself. "The Eagles won the Super Bowl!" might induce an emotion in one person but not another, depending on each person's interests in, desires regarding, attitudes toward (and so forth) football, the National Football League, the Philadelphia Eagles, the Super Bowl, and more. In short, whether a statement is emotionally meaningless is fundamentally person relative—a function of the interests, desires, attitudes (etc.) of the person contemplating the statement.

By a cognitively meaningless statement, on the other hand, I mean a statement that lacks a truth value—more specifically (and classical logically, if you will), a statement that is neither true nor false. (This is not the only understanding of cognitive meaninglessness, of course. For others, see the following endnote.)⁵ An example of such a statement is "The color of F Minor is bliss." To see this, it helps to consider whether this statement is true or false. One does not want to say that it is true, obviously, since to do so would involve granting the statement's presuppositions (e.g., that F Minor can be colored, that bliss is a color), agree that F Minor's color is bliss, and so forth. But one does not want to say that it is false either, since—once again—to do so would involve granting the statement's presuppositions, albeit this time while denying that bliss is F Minor's color. Hence the judgment that "The color of F Minor is bliss" is neither true nor false—that it is cognitively meaningless.

Applying the preceding discussion to the statements "That's just Manny being Manny," "That's just Charlie being Charlie, and "That's just Trump being Trump," they might be, and arguably are in many cases, emotionally meaningless. After all, whether a statement is emotionally meaningless is person relative. And many people are not even aware that Manny, Charlie, and Trump exist, let alone have interests in, desires regarding, or attitudes toward them and their behavior so as to be emotionally swayed by the latter.

These statements might also be cognitively meaningless, at least in the sense that it is logically possible that they do not mean what they may appear to mean, and that their correct "meaning" is actually cognitively meaningless. Indeed, some people have publicly voiced the opinion that "That's just Trump being Trump" is meaningless, by which they mean *cognitively* meaningless, ostensibly.⁶ That said, as they are ordinarily used, "That's just Manny being Manny," "That's just Charlie being Charlie, and "That's just Trump being Trump" seem to be cognitively meaningful, possessing a truth value. Unlike "The color of F Minor is bliss," they appear to be statements that are true or false (even if we do not know which),

statements with which someone could agree or disagree, statements that are logically incompatible with competing statements such as "That's just Manny acting out of character," "That's just Charlie's martini kicking in," "That's just Trump's lack of education talking," and so on. Additionally, in Manny's and Trump's cases in particular, the frequency and seriousness with which "That's just Manny being Manny" and "That's just Trump being Trump" are said and contemplated, as well as the educational and cultural diversity of the people who say and contemplate them, points to their cognitive meaningfulness. Or, at the very least, it points to an apparent agreement among said individuals that they are cognitively meaningful. After all, the alternative—that said individuals are comfortable saying and contemplating in earnest things that are, by their own lights, cognitively meaningless—is hard to believe.

To be sure, statements of the type "That's just so-and-so being so-and-so" contain a bit of redundancy, specifically the "so-and-so being so-and-so" part. But this does not entail that such statements are cognitively meaningless. For statements can be cognitively meaningful even when they contain redundancy. Consider, for instance, classical logic's law of identity, commonly presented in terms of the statement "A thing is what it is" or, put symbolically, "A is A." As one can see, the law of identity contains redundancy. Even so, seemingly all logicians—classical and otherwise—agree that the law of identity is cognitively meaningful. (Whether they also agree on its truth value is a separate issue.) That statements of the type "That's just so-and-so being so-and-so" contain redundancy, then, does not render them cognitively meaningless.

But even if such statements are cognitively meaningful, they still might be empirically empty. What I mean by an empirically empty statement is a cognitively meaningful statement that does not make, either explicitly or implicitly, an empirical claim—a claim whose truth value must be established on the basis of sense experience, at least in part. Since an empirically empty statement does not make an empirical claim, no one ever needs to see, hear, taste, smell, or touch something in order to determine whether it is true or false. Logical statements, such as "A thing is what it is" and "Nothing can both have angles and have no angles whatsoever at the same time and in the same respect," are standard examples of empirically empty statements.

An empirically empty statement is to be contrasted with an empirically full statement, by which I mean a cognitively meaningful statement that makes an empirical claim, either explicitly or implicitly. Accordingly, with an empirically full statement, someone ultimately needs to see, hear, taste, smell, or touch something in order to determine whether the statement is true or false. Empirical statements, such as "The Eiffel Tower is in Paris, France" and "The universe is expanding," are (naturally) standard examples of empirically full statements.

Before applying each of these types of statement to "That's just Manny being Manny," "That's just Charlie being Charlie," and "That's just Trump being Trump," it is important to note that, since empirically empty statements do not make any empirical claims, they are often inadequate as explanations for empirical matters, as is the issue of why someone behaved the way that he or she did. (I write "often" since some empirically empty statements, such as "Nothing can both have angles and have no angles whatsoever at the same time and in the same respect," can adequately explain some empirical matters, like why square circles do not exist.) This is not the case with the latter, however. Empirically full statements are often adequate as explanations for empirical matters (Humean skeptical considerations aside, of course) and they are so, in large part, in virtue of the empirical claims they make. (For powerful evidence of this, one need look no further than to the natural sciences.)

Applying each of these types of statement to "That's just Manny being Manny," "That's just Charlie being Charlie," and "That's just Trump being Trump," they could be empirically empty. To wit, those who say these things might be issuing a logical statement, perhaps one with a meaning mirroring that of the law of identity, namely, "Manny (or Charlie, or Trump) is who he is." But there are at least two reasons for thinking that this is not what they mean, frequently at any rate. First, as such, these statements would not make empirical claims and, in turn, would be the kinds of statement that are often inadequate as explanations for empirical matters, as are the matters of why Manny, Charlie, and Trump behaved the way that they did. Perhaps these *particular* empirically empty statements are, in fact, adequate explanations for these *particular* empirical matters. But this seems rather unlikely at first blush—indeed, verging on ad hoc—and, in any case, a compelling reason to think that they are would be needed before one could agree.

The second reason for thinking that those who say "That's just Manny being Manny," "That's just Charlie being Charlie," and "That's just Trump being Trump" are not submitting an empirically empty statement pertains to what appears to be their typical purpose for doing so. Since that is not covered until the next section, however, a discussion of the second reason will have to be postponed until then.

To sum up, when someone issues an explanation of the type "That's just soand-so being so-and-so," the possibilities with respect to meaning are many, even at the most basic of levels. The statement might be emotionally meaningless or meaningful, cognitively meaningless or meaningful, empirically empty or full, and more. That said, at least as they have been and frequently are invoked, "That's just Manny being Manny," "That's just Charlie being Charlie," and "That's just Trump being Trump" appear to be both cognitively meaningful and empirically full. Other possible meanings are available, of course, particularly when one considers meanings above those of the most basic levels. But these will suffice for now.

On Possible Functions

This brings us to the function of explanations of the type "That's just soand-so being so-and-so." When someone explains another's behavior by invoking a "That's just so-and-so being so-and-so" kind of statement, what is the function of the latter? In other words, what purpose does her statement serve? At bottom, and most obviously, it serves to explain the other's behavior. But there at least two ways in which someone's behavior could be explained: descriptively and evaluatively. By explaining someone's behavior descriptively—or, as it might be better put, *strictly* descriptively—I mean presenting what one takes to be the underlying cause(s) of his or her behavior. Examples of strictly descriptive explanations include, though are not limited to, appeals to psychological and physical causes, as in "Danielle gave Julian some money because she believed she ought to" (an appeal to a psychological cause) and "Adam is trying to regain his balance because Lisa shoved him" (an appeal to a physical cause). By explaining someone's behavior evaluatively, on the other hand, I mean attaching an evaluation—positive or negative, implicit or explicit—to what otherwise would be a strictly descriptive explanation. Examples of evaluative explanations include "Paul shouts profanities because he has Tourette syndrome" (the implicit evaluation being that, given the underlying cause of Paul's behavior, it is less problematic than it otherwise might be) and "Kate is helping Amanda only because she has been hypnotized to do so" (the implicit evaluation being that, given the underlying cause of Kate's behavior, it is less commendable than it otherwise might be).

Applying each of these types of explanation to "That's just Manny being Manny," "That's just Charlie being Charlie," and "That's just Trump being Trump," they could be strictly descriptive. For example, it could be an appeal to a psychological cause otherwise expressed as "Manny (Charlie, Trump) has long believed that he should behave that way." The explanation could also be evaluative. For instance, it might be said as a way of expressing "Manny (Charlie, Trump) has been conditioned to behave that way," the implicit evaluation being that, given the underlying cause of Manny's (Charlie's, Trump's) behavior, it is less problematicor commendable, as the case may be-than it otherwise might be. And, of the two, "That's just Manny being Manny," "That's just Charlie being Charlie," and "That's just Trump being Trump" are frequently evaluative. That they are so is due to the explanations' usual context, which is that of confusion over or objection to Manny's, Charlie's, and Trump's behavior (such as the aforementioned high-fiving, sexually harassing, and dictator praising). This is reflected in one of the quotations above regarding Trump, specifically this part of it: "Have you noticed how Trump's strongest supporters ... when confronted with something truly ugly that the president has done, have the same answer: 'Well, that's just Trump being Trump.' [sic]") In this context, these tokens of "That's just so-and-so being so-and-so" explanations are used in an attempt to provide an evaluative-specifically, a mitigating-explanation, one which contains the implicit evaluation that, given the underlying cause of Manny's, Charlie's, and Trump's behavior, it is less problematic than it otherwise might be. Whether others agree with the implicit evaluation is, of course, another issue altogether. That explanations of the type "That's just so-and-so being so-andso"-or any other explanation, for that matter-are deemed mitigating by some does not entail that others will agree or even that they should. But, importantly, those who explain another's behavior thus not only embrace the implicit evaluation but often attempt to convince others to do so as well.

There are, however, two types of mitigating explanations that require mentioning: those that cite an underlying cause which indicates that the behavior is consistent with the character of the one engaging in it, and those that cite an underlying cause which indicates that the behavior is inconsistent with the character of the one engaging in it. "Joe's behavior isn't surprising—he is, after all, a jerk" is an example of the former, whereas "Pat's feeling ill and isn't herself today" is an example of the latter. And in the case of "That's just Manny being Manny," "That's just Charlie being Charlie," and "That's just Trump being Trump," the kind of mitigating explanation at work seems to be the former, something along the lines of "Manny's (Charlie's, Trump's) behavior isn't surprising—he is, after all, a goofball (playboy, narcissist, etc.)." In reference to Trump's alleged affair with former Playboy Bunny Karen McDougal, for example, John Nolte writes, "[I]t is not like Trump has ever portrayed himself as some holier-than-thou figure ... Trump being Trump is baked in the proverbial cake."⁷ And in Manny's and Charlie's cases, the combination of the explanations themselves and the manner in which they have been proffered—with a shrug, smile, or some other gesture indicating a lack of surprise—suggests that those who employ these explanations believe Manny's and Charlie's behavior to be consistent with their characters.

Exactly *how* the (alleged) fact that the other's behavior is consistent with his character renders his behavior less problematic than it otherwise might be is an important question. But it is also one that we need not answer here. For present purposes, it suffices to know that, for those who explain Manny's, Charlie's, and Trump's confusing, objectionable, or otherwise problematic behavior in these terms, somehow it does. (It is worth reiterating that the fact that an explanation is deemed mitigating by some does not entail that others will or should agree.) All this to say, explanations of the type "That's just so-and-so being so-and-so" are often invoked in an attempt to provide a mitigating explanation, one which contains the implicit evaluation that, given the underlying cause of the other's behavior, one which indicates that the other's behavior is consistent with his character, his behavior is less problematic than it otherwise might be.

What's more—and this brings us to the second reason for thinking that "That's just Manny being Manny," "That's just Charlie being Charlie," and "That's just Trump being Trump" are not usually empirically empty statements—since such mitigating explanations include an empirical claim, one regarding the underlying cause that is allegedly consistent with their respective characters and thereby (somehow) mitigating, these statements are also empirically full.

Summing up, when someone invokes an explanation of the type "That's just so-and-so being so-and-so," two of the most basic possible functions include to provide a strictly descriptive explanation of someone's behavior and to provide an evaluative explanation of someone's behavior. And, at least as they have been and often are invoked, "That's just Manny being Manny," "That's just Charlie being Charlie," and "That's just Trump being Trump" appear to be evaluative specifically, mitigating—containing the implicit evaluation that the other's behavior is less problematic than it otherwise might be. There are others functions of this kind of explanation, to be sure, but this will do for present purposes.

On Possible Moral Implications

As they are frequently employed, then, explanations of the type "That's just so-and-so being so-and-so" appear to be cognitively meaningful, empirically full, and evaluative—in particular, mitigating. This brings us to our final discussion, one regarding some possible moral implications of such employment of such explanations. I begin by discussing possible moral implications of when these explanations succeed in rendering the other's behavior less problematic than it otherwise might be—without, it should be noted, assuming that they ever do succeed. I then discuss possible moral implications of when these explanations fail to render the other's behavior less problematic than it otherwise might be (without assuming that they ever do fail). As the reader might have already surmised, the former discussion is much more straightforward than the latter discussion.

When explanations of the type "That's just so-and-so being so-and-so" succeed in rendering the other's behavior less problematic than it otherwise might be—that is, when the other's behavior is less problematic given the proffered mitigating explanation "That's just so-and-so being so-and-so"—then such explanations can defeat certain erroneous charges leveled against the other, namely, those that accuse the other's behavior of being more problematic than it is actually is. This, presumably, is one of the explanation's intended effects for those who invoke it. So far, so good.

But when explanations of the type "That's just so-and-so being so-and-so" fail to render the other's behavior any less problematic than it otherwise might be in other words, when the other's behavior is not less problematic, even with the proffered mitigating explanation "That's just so-and-so being so-and-so"—a number of additional, interrelated problems can arise. To begin with, such explanations can function as giving the other's problematic behavior a pass. This is due to the fact that, as *failed* mitigating explanations, the behavior they characterize as not problematic (or, at least, not *so* problematic) is actually (so) problematic. And to do this is to allow the behavior to go unchecked—that is, it is to give it a pass, at least in practice. When Charlie's long-time producer shrugged and replied, "That's just Charlie being Charlie," for instance, she allowed his objectionable behavior to go unchecked.

Second, when a pass is given to problematic behavior, the behavior can thereby be enabled. After all, and as covered above, to give a pass to problematic behavior is to allow the behavior to go unchecked. And the end result of not checking behavior can be enabling said behavior. Hence John Stuart Mill's line: "Bad men need nothing more to compass their ends, than that good men should look on and do nothing."⁸

Third, giving a pass to and enabling problematic behavior can be morally objectionable under certain conditions, depending on the precise nature of the problematic behavior, the conditions under which the behavior arises, and so on. Giving a pass to and enabling, say, sexual harassment is a case in point.

Fourth, when the explanation gives a pass to and enables the other's problematic behavior, it can, in turn, normalize said behavior, meaning that the problematic nature of the behavior can be downplayed if not altogether ignored.⁹ That problematic behavior which has been allowed to go unchecked and enabled can result in said behavior's normalization should come as no surprise since, as unchecked and enabled, the behavior has not been opposed, at least in practice. And, similar to before, normalizing problematic behavior can be morally objectionable under certain conditions, depending, again, on the precise nature of the problematic behavior, the

conditions under which the behavior arises, and so forth. (Like above, normalizing sexual harassment is a case in point.)

Fifth, when the normalized problematic behavior is that of a person with an unusual amount of power, prestige, and reach—as Manny, Charlie, and Trump have been to varying degrees and, at least in Trump's case, continue to be—the normalization of said behavior can spread broadly and quickly. For example, according to a recent report by the Anti-Defamation League, white supremacist propaganda on college campuses tripled during Trump's first year in office.¹⁰ And scholars such as Kevin Boyle, an American history professor at Northwestern University who specializes in the history of racial violence and civil rights, believe that Trump's repeated attacks on people of color is at least partly to blame. Referring to the white supremacists who rallied—violently, in some cases—in the University of Virginia's hometown of Charlottesville last year, Boyle maintains that "Donald Trump gave them permission to come out into the real world."¹¹

Finally, when the explanation gives a pass to, enables, and normalizes the other's problematic behavior, those who invoke it serve (to one degree or other) as the behavior's enablers and normalizers and, thus, can be complicit in the latter to the degree to which they do so. And just as enabling and normalizing problematic behavior can be morally objectionable under certain conditions, so too can being complicit in enabling and normalizing problematic behavior. (Being complicit in enabling and normalizing, say, hate crimes is a case in point.)

To be sure, at the level of the individual, such complicity might be small enough as to warrant little moral concern. But at the level of society, such complicity can be widespread enough to warrant considerable moral alarm indeed. After all, if a critical mass of individuals employ an explanation of another's problematic behavior that enables and normalizes it, then the latter is unlikely to change and, in turn, people—both those who enable and normalize said behavior and those who do not—are more likely to suffer from it, whether individually, societally, or both. Just how much moral concern would be warranted at either level would depend in part on the precise nature of the problematic behavior, the conditions under which the behavior arises, and so on. However—and this is the point I would like to emphasize—it would also depend on how widespread the complicity is.

With the preceding in mind, one naturally wonders when, if ever, explanations of the type "That's just so-and-so being so-and-so"—when cognitively meaningful, empirically full, and mitigating—succeed in rendering the other's behavior less problematic than it otherwise might be. I am inclined to think that they almost never, if ever, do. To wit, that Manny is just being Manny when he high-fives a fan mid-play, Charlie is just being Charlie when he sexually harasses an intern, and Trump is just being Trump when he blatantly lies about matters great and small does nothing to mitigate the problematic nature of these behaviors, or so it seems to me. This is not to say that I deem high-fiving a fan mid-play, sexually harassing an intern, and blatantly lying to be equally problematic. Indeed, I find the first of these to be hardly problematic (if problematic at all) and the second and third to be seriously problematic. But it is to say that, however problematic the behavior might be, it is not mitigated *simply* by the fact that that one who engages in the problematic behavior

is just being who he is. Granted, it might mitigate the problematic nature, or claims thereof, of his character. If, for instance, "That's just Charlie being Charlie" is used to express something along the lines of "Charlie just behaves that way because of a hereditary mental disorder," then it might be that his problematic behavior does not or, at least, should not—reflect poorly on his character.¹² But mitigating the problematic nature of his character is not one and the same as mitigating the problematic nature of the latter. To be sure, these are mere declarations, and merely declaring something is far from arguing for it. But arguing for these things is an article-length endeavor unto itself.¹³ For now, then, it will have to suffice to say that, what might appear on its face to be a rather innocuous explanation of another's behavior—"That's just so-and-so being so-and-so"—might not be so innocuous after all.

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⁵ For an overview of cognitive meaningfulness (and, with it, theories of meaning) see William P. Alston, *Philosophy of Language* (Englewood Cliffs, NJ: Prentice-Hall, Inc., 1964). For some particular understandings of cognitive meaningfulness, see A. J. Ayer, *Language, Truth, and Logic* (New York: Dover Publications, 1952); Antony Flew, "Theology and Falsification." in *Philosophy Now*, edited by Steven M. Cahn (New York: Oxford University Press, 1964), 28-9; Carl G. Hempel, "Problems and Changes in the Empiricist Criterion of Meaning," *Revue Internationale de Philosophie* Vol. 4, No. 11 (1950): 41-63; Karl Popper, "Science: Conjectures and Refutations," in *First Philosophy: Fundamental Problems and Readings in Philosophy*, 2nd edition, edited by Andrew Bailey, (Peterborough, Ontario: Broadview Press, 2011), 338-42.

⁶ Stevenson.

⁷ Nolte.

⁸ John Stuart Mill, *Inaugural Address Delivered to the University of St. Andrews* (London: Longmans, Green, Reader, and Dyer, 1867), 36.

⁹ For more on Trump and normalization, see James Harbeck, "What Does Normalize Even Mean?," *The Week* (November 22, 2016), accessed April 2018, available at http://theweek.com/articles/662376/what-does-normalize-even-mean; and Mark Peters, "What Does It Mean to 'Normalize,' Exactly?," *The Boston Globe* (November 17, 2016), accessed April 2018, available at

https://www.bostonglobe.com/ideas/2016/11/17/what-does-mean-normalize-exactly/nsvIiXsSwh5aDDW3lsBnTO/story.html.

¹⁰ The Anti-Defamation League, "White Supremacist Propaganda Surges on Campus," *ADL.org* (January 29, 2018), accessed February 2018, available at https://www.adl.org/education/resources/reports/white-supremacist-propaganda-surges-on-campus.

¹¹ Claire Galofaro, "Trump Rise Put Spark to Long-Simmering Racism, Experts Say," *Portland Press Herald* (August 13, 2017), accessed February 2018, available at https://www.pressherald.com/2017/08/13/trump-rise-put-spark-to-long-simmering-racism-experts-say-white-supremacy-has-always-lurked-in-the-shadows-of-america-but-now-its-actively-trying-to-move-into-the-mainstream/.

¹² Whether this would be a case of citing an underlying cause which indicates that the behavior is consistent or inconsistent with the character of the one engaging in it is unclear.

¹³ In progress.