

“Ahead of the Lawmen”: Law and Morality in Disney Animated Films 1960–1998

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Abstract

This article examines the relationship between law and morality in a selection of animated Disney movies released between 1960 and 1998. The authors analyze all of the fully-animated, G-rated movies that grossed \$100 million or more (adjusted for inflation) which shaped the childhood of lawyers practicing today. We find that the predominant representation of the relationship between law and morality is that they are at odds. Law most often is portrayed as having no relationship to morality or, even worse, as an obstacle to justice. These findings have implications for theories of law and morality, justice, and ethics. These findings also raise provocative questions concerning the role of mass media and popular culture on children’s moral development and understanding of the role of law.

Keywords

Popular culture, media, law, social theory, film

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I. Introduction

One jump ahead of the headline
 One swing ahead of the sword
 I steal only what I can't afford,
 One jump ahead of the lawmen
 That's all, and that's no joke
 These guys don't appreciate I'm broke

“One Jump Ahead” (song), *Aladdin*, 1992¹

By the time American children are four-to-six years old, they have developed a moral code² and an awareness of a variety of legal concepts.³ Researchers suggest that children's moral orders vary,⁴ are relativistic⁵ and still are developing in this age range.⁶ By first grade, moral orders and children's understandings of rules shape their behavior. Among the many influences children have, parents, friends, and books play important roles in shaping these burgeoning moral and legal orders, as do media. Because childhood development experts have demonstrated that media play an important role in shaping moral and legal orders of young people, and because of law's important yet fraught connection to morality, we sought to examine some of the movies that shaped the childhoods of lawyers currently in practice. This article considers the relationship between law and morality in animated Disney movies initially released in theaters between 1960 and 1998. Our analysis demonstrates that Disney movies most often portray an antagonistic relationship between law and morals. This relationship raises questions about the effect of these movies on children's assessments of the utility of law for solving individual disputes and for regulating social and moral orders. Although this kind of conflict may be written off as a plot device (when law fails, violence or “action” becomes crucial for restoring the moral or just outcome),⁷ our findings reveal an ambiguous relationship between law and morality that calls for further analysis.

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1. Clements, R., & Musker, J. (Directors). (1992). *Aladdin* [Motion Picture].
 2. R. Shweder, E. Turiel, and N. Much, “The Moral Intuitions of the Child,” in John Flavell and Lee Ross, *Social Cognitive Development: Frontiers and Possible Futures* (New York: Cambridge University Press, 1981), pp. 288–305; Carol Gilligan, “In A Different Voice: Women's Conception of the Self and of Morality,” *Harvard Educational Review*, 47 (1977), 481–517.
 3. Jean Piaget, *The Child's Conception of Physical Causality* (London: Paul, Trench, Trubner & Co., 1930).
 4. Lawrence Kohlberg, “The Development of Children's Orientations Toward a Moral Order: I. Sequence in the Development of Moral Thought,” *Human Development*, 51 (2008), 8–20.
 5. Lawrence Kohlberg and Richard Hersh, “Moral Development: A Review of the Theory,” *Theory into Practice*, 16 (1977), 53–9.
 6. R. Shweder, E. Turiel, and N. Much, “The Moral Intuitions of the Child,” in John Flavell and Lee Ross, *Social Cognitive Development: Frontiers and Possible Futures* (New York: Cambridge University Press, 1981), pp. 288–305, cited on p. 288.
 7. Austin Sarat, “When Memory Speaks: Remembrance and Revenge in *Unforgiven*,” *Griffith Law Review*, 10 (2001), 139–59; Orit Kamir, “Honor and Dignity in the Film *Unforgiven*: Implications for Sociolegal Theory,” *Law & Society Review*, 40 (2006), 193–233; Austin Sarat, *Imagining Legality* (Tuscaloosa, AL: The University of Alabama Press, 2011).

II. Law, Morality, and Movies

Cultural objects such as movies, books, art, and television embody social understandings. This article begins with the premise, shared by the vast majority of scholars of culture and media, that media play a role in shaping individuals' perceptions of the world. At the same time, perceptions of the social world also influence cultural objects. As one scholar of culture asks, is the function of popular culture to propagandize to the masses or "is it about rebellion and opposition to the prevailing social order?"⁸ We argue that culture and cultural objects are mutually constitutive. In other words, cultural objects reflect, reinforce, challenge, and dismantle social orders.⁹ Culture is at once being reflected by and in cultural objects as culture is being shaped by those objects and how individuals interact with them.

This section of the article considers how scholars conceive of the relationship between law and morality generally and in film in particular. There are a variety of theories of popular culture and how movies might influence popular consciousness. Finally we explain why Disney movies are a suitable object of inquiry for our analysis.

I Law and Morality – in real life and in the movies

The relationship between law and morality has been widely debated among political theorists, jurists, and philosophers for centuries. It is far too simplistic to say that the purpose of law is to promote "morality" or even the social good. Legal Positivism most famously expressed by John Austin and later H.L.A. Hart,¹⁰ contends that there is no necessary relationship between law and morals. Although various jurisprudential schools take exception with this proposition, legal positivists point out that law is, at best, conceptually separate from moral and ethical values¹¹ or, at worst, nothing more than the rules of the sovereign backed by force.¹² At the other end of the law/morality spectrum are theorists of Natural Law who believe that just or moral laws emerge from natural circumstances. For advocates of Natural Law, laws emerge from a moral order that transcends individuals¹³ and can therefore be discovered or elaborated by people,

8. Dominic Strinati, *An Introduction to Theories of Popular Culture* (London: Routledge, 1995), pp. 3–4.

9. Wendy Griswold, *Cultures and Societies in a Changing World* (Thousand Oaks, CA: Pine Forge Press, 1994).

10. H.L.A. Hart, "Positivism and the Separation of Law and Morals," *Harvard Law Review*, 71 (1958), 593–629; John Austin, *The Province of Jurisprudence Determine* (London: Weidenfeld and Nicolson, 1832).

11. H.L.A. Hart, "Positivism and the Separation of Law and Morals," *Harvard Law Review*, 71 (1958), 593–629.

12. John Austin, *The Province of Jurisprudence Determine* (London: Weidenfeld and Nicolson, 1832).

13. Thomas Hobbes, *De Cive* (London, 1651). <http://www.thomas-hobbes.com/works/liberty>; Albert Melone and Allan Karnes, *The American Legal System: Perspectives, Politics, Processes, and Policies* (Lanham, MD: Rowman & Littlefield Publishers, Inc., 2008); Philippe Nonet and Philip Selznick, *Law and Society in Transition: Toward Responsive Law* (New York: Harper & Row, 1978); Philip Selznick, Philippe Nonet, and Howard Vollmer, *Law, Society, and Industrial Justice* (New Brunswick, NJ: Transaction Books, 1980).

but not constructed by them. Our purpose here is not to argue that law is or is not coterminous with morality in the real world. Rather, we approach our project with an understanding that law and morals are not necessarily related because there can be “a contradiction between the needs of the community ... and the moral duties of and toward individuals.”¹⁴ And, even legal positivists recognize the desirability of a legal order that embodies morality for the legitimacy of the state.

Law and morals (or ethics) have relative definitions. Ethics are individual constructions of understanding harm or suffering while law requires evaluating actual social ills¹⁵ and minimizing social disorder. Because law and morality may have different and often contradictory aims, they may conflict. And yet, in the context of a children’s movie in which the moral, just, or correct outcome is unambiguous, it is easy to analyze the role of law and its relationship to the correct moral outcome. We ask, “did law, legal institutions and legal processes aid, thwart, or have no effect whatever on the proper outcome?” Even children are likely to notice the mechanisms that produce the proper outcome: individual bravery, the power of romantic love, and even magic play a role in achieving “happily ever after,” but we are particularly interested in law.

2 Theories of popular culture analysis and influence

“All audiences ... can be seduced” – Griswold¹⁶

It is difficult to know precisely how media influences affect the world-view of individuals and, more fundamentally, what popular culture represents. In other words, “[i]s popular culture there to indoctrinate the people, to get them to accept and adhere to ideas and values which ensure the continued dominance of those in more privileged positions who thus exercise power over them?”¹⁷ or is popular culture about resistance to the dominant order? Scholars associated with mass media theory embrace the notion that, as consumers of culture, people passively receive and incorporate ideas in the media they observe.¹⁸ Furthermore, postmodern scholars of mass media claim that mass media are so all-encompassing and intrinsically tied to culture that people cannot escape them. Ultimately – and inevitably – the media create our view of the world.¹⁹

14. Patrick Colm Hogan, “Tragic Lives: On the Incompatibility of Law and Ethics,” *College Literature*, 35 (2008), 3.

15. Patrick Colm Hogan, “Tragic Lives: On the Incompatibility of Law and Ethics,” *College Literature*, 35 (2008).

16. Wendy Griswold, *Cultures and Societies in a Changing World* (Thousand Oaks, CA: Pine Forge Press, 1994), p. 89.

17. Dominic Strinati, *An Introduction to Theories of Popular Culture* (London: Routledge, 1995), pp. 3–4.

18. Herbert Krugman and Eugene Hartley, “Passive Learning from Television,” *The Public Opinion Quarterly*, 34 (1970–71), 184–90.

19. Dominic Strinati, *An Introduction to Theories of Popular Culture* (London: Routledge, 1995).

We do not seek to demonstrate a direct link between how children understand law and morality; such a demonstration would require research with children. We do, however, begin with the supposition that there is some relationship between popular culture, moral development, and understandings of law. As Bandura, a social learning media theorist has shown, “children often do what they see others doing.”²⁰ Most studies that support such a conclusion relate to smoking tobacco or drinking alcohol.²¹ However, a similar effect may be seen in viewers’ perception of law. Bandura’s theory also suggests that people may learn passively,²² in that one does not have to be actively trying to learn from media to take lessons away from it: “The mere absence of resistance is all that may be required for learning to occur; the substance of entertainment television may be ‘caught’ rather than ‘taught.’”²³ Culture often is represented as a mirror to reality. Because of how pervasive media is in today’s society, “no horizon of expectations is robust enough to withstand the constant onslaught of violence and perversion.”²⁴ As a result, postmodernism asserts that “this mirror is now the only reality we have.”²⁵

We subscribe to a middle-ground approach that emphasizes the interrelationship between media and culture, but stopping short of the postmodernist claim that the cultural projections media reflect back at us is the only cultural reality we know. This approach is known in the literature as a dialogical theory which posits that popular culture has influence and constitutive power to help us understand the world around us, but that we also are not “cultural dopes.”²⁶ In other words, media has “‘framing’ power that limits the range of the decoding and discussion,”²⁷ but the theory recognizes that we can

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20. Erin Ryan and Keisha Hoerrner, “Let Your Conscience Be Your Guide: Smoking and Drinking in Disney’s Animated Classics,” *Mass Communication & Society*, 7 (2004), 264, citing Albert Bandura, *Aggression: A Social Learning Analysis* (Englewood Cliffs, NJ: Prentice Hall, 1973).
 21. Erin Ryan and Keisha Hoerrner, “Let Your Conscience Be Your Guide: Smoking and Drinking in Disney’s Animated Classics,” *Mass Communication & Society*, 7 (2004), 263; Elise Carol Kohn and Charles W. Henderson, “Movie Smoking Linked To Teens Trying First Cigarette,” *Health and Medicine Week*, (January 7, 2002), 7–9; Todd F. Heatherton and James D. Sargent, “Does Watching Smoking in Movies Promote Teenage Smoking,” *Current Directions in Psychological Science*, 18 (April 2009), 63–7.
 22. Albert Bandura, *Psychological Modeling: Conflicting Theories* (Chicago, IL: Aldine Atherton, 1971).
 23. Herbert Krugman and Eugene Hartley, “Passive Learning from Television,” *The Public Opinion Quarterly*, 34 (1970–71), 184–90; James Carlson, “Crime Show Viewing by Preadults: The Impact on Attitudes Toward Civil Liberties,” *Communication Research*, 10 (1983), 535.
 24. Wendy Griswold, *Cultures and Societies in a Changing World* (Thousand Oaks, CA: Pine Forge Press, 1994), p. 89.
 25. Dominic Strinati, *An Introduction to Theories of Popular Culture* (London: Routledge, 1995), p. 224.
 26. Dominic Strinati, *An Introduction to Theories of Popular Culture* (London: Routledge, 1995), p. 254.
 27. Chyng Feng Sun and Erica Scharrer, “Staying True to Disney: College Students’ Resistance to Criticism of *The Little Mermaid*,” *The Communication Review*, 7 (2004), 38.

interpret what we learn from media. John Fiske²⁸ used the analogy of mass culture being like a supermarket. “People may pick up mass-produced items from the cultural supermarket, but when they cook (make meanings) they mix these supermarket goods with whatever they have in the pantry at home, thereby individualizing and transforming the final product.”²⁹

In addition to traditional theories of the role of popular culture in shaping individuals’ understandings of society, the study of Disney film requires us to incorporate what we know from childhood development and how they interact with media. Children consume media differently, depending on their age. For example, several studies suggest that younger children are more passively receptive to cultural messages, especially ones with legal overtones, than are older children. Carlson states, “older children are more sensitive to the requirements of due process.”³⁰ This may mean that, in the case of Disney films, they would more commonly reject messages that promote shirking due process for the sake of raw morality.

3 Why Disney?

Disney movies receive much attention and analysis from scholars in a variety of disciplinary and interdisciplinary fields. Disney movies have been critiqued by critical race scholars for employing racist stereotypes,³¹ by feminist scholars for their use of outmoded gender roles,³² by scholars of sexuality studies for promoting and even naturalizing heterosexist norms,³³ and by many scholars and public thought leaders for being culturally insensitive and stereotypical.³⁴ These critiques might be predictable because

28. John Fiske, *Reading Popular Culture* (London: Routledge, 1989).

29. Wendy Griswold, *Cultures and Societies in a Changing World* (Thousand Oaks, CA: Pine Forge Press, 1994), p. 90.

30. James Carlson, “Crime Show Viewing by Preadults: The Impact on Attitudes Toward Civil Liberties,” *Communication Research*, 10 (1983), 538.

31. Mia Towbin, Shelley Haddock, Toni Zimmerman, Lori Lund, and Litsa Tanner, “Images of Gender, Race, Age, and Sexual Orientation in Disney Feature-Length Animated Films,” *Journal of Feminist Family Therapy*, 15 (2004), 19–44.

32. Doris Bazzini, Lisa Curtin, Serena Joslin, Shilpa Regan, and Denise Martz, “Do Animated Disney Characters Portray and Promote the Beauty-Goodness Stereotype?,” *Journal of Applied Social Psychology*, 40 (2010), 2687–709; Richard Breaux, “After 75 Years of Magic: Disney Answers Its Critics, Rewrites African American History, and Cashes In on Its Racist Past,” *Journal of African American Studies*, 14 (2010), 398–416.

33. Lauren Dundes, “Disney’s Modern Heroine Pocahontas: Revealing Age-old Gender Stereotypes and Role Discontinuity under a Facade of Liberation,” *The Social Science Journal*, 38 (2001), 353–6; Dawn England, Lara Descartes, and Melissa Collier-Meek, “Gender Role Portrayal and the Disney Princesses,” *Sex Roles*, 64 (2011), 555–67.

34. Richard Breaux, “After 75 Years of Magic: Disney Answers Its Critics, Rewrites African American History, and Cashes In on Its Racist Past,” *Journal of African American Studies*, 14 (2010), 398–416; Mia Towbin, Shelley Haddock, Toni Zimmerman, Lori Lund, and Litsa Tanner, “Images of Gender, Race, Age, and Sexual Orientation in Disney Feature-Length Animated Films,” *Journal of Feminist Family Therapy*, 15 (2004), 19–44.

the moral absolutism that makes Disney movie consumers so comfortable and which give the movies such mass appeal necessarily over employ standard cultural norms, making Disney films a rich source for analyzing the relationship between law and morality. Because Disney movies follow relatively predictable moral tales, the law nearly always plays a formal or informal role in ensuring or resisting the unambiguously correct moral outcome. Further, Disney movies enjoy a tremendous market share, and have lasting impact on loyal audience members.³⁵

Disney movies, which are made for children, follow clear thematic and narrative patterns. The films are formulaic enough to be familiar and yet innovative enough to be interesting. Once a “magic box office formula” has been discovered, “films recycle themselves in a number of sequels.”³⁶ Disney films are not always strict sequels, but they follow remarkably similar character development lines, as well as analogous portrayals of morality and law. Indeed, the prosaic and perhaps comforting moral themes, such as the triumph of good over evil and right over wrong, likely provide impetus for parents to buy Disney films for their children.

Like their parents, children also have reason to identify with moral absolutism over relativism because it is less philosophically complex, leading children to unquestioningly view a protagonist’s rejection of the law, for the sake of “morality,” as acceptable. Disney is a cultural staple because many people have seen the animated movies that Disney produces. In a previous study, 96 of the 103 students in the class had previously seen *The Little Mermaid*, a film that, “generated \$84.4 million in the United States in 1989” when it first opened in theaters.³⁷ Children in Disney’s target demographic often view movies repeatedly in the theater and at home on video, DVD, or now, streaming online, as opposed to older audiences who only rarely view a movie more than once or twice.³⁸ The frequent viewing patterns of youths would suggest that they might absorb such films more deeply than older audiences would of other movies. In fact, Disney has become such a shared cultural force that one study asserted, “These films to [sic] inspire at least as much cultural authority and legitimacy for teaching specific roles, values and ideals than more traditional sites of learning such as public schools, religious institutions, and the family.”³⁹ That Disney’s influence has been placed on par with that of the family clearly demonstrates its immense cultural power.

35. Dawn England, Lara Descartes, and Melissa Collier-Meek, “Gender Role Portrayal and the Disney Princesses,” *Sex Roles*, 64 (2011), 555–67.

36. Dominic Strinati, *An Introduction to Theories of Popular Culture* (London: Routledge, 1995), p. 230.

37. Chyng Feng Sun and Erica Scharrer, “Staying True to Disney: College Students’ Resistance to Criticism of *The Little Mermaid*,” *The Communication Review*, 7 (2004), 42.

38. Richard Potts, Angela Belden, and Celinda Reese, “Young Adults’ Retrospective Reports of Childhood Television Viewing,” *Communication Research*, 35 (2008), 39–60; Lauren Dundes, “Disney’s Modern Heroine Pocahontas: Revealing Age-old Gender Stereotypes and Role Discontinuity under a Facade of Liberation,” *The Social Science Journal*, 38 (2001), 360.

39. Henry Giroux, “Animating Youth: the Disnification of Children’s Culture,” *European Medi@ Culture-Online*, pp. 1–24. Retrieved August 8, 2012 at <http://www.european-mediaculture.org>, p. 2.

a Relativism in Morality and Law. Disney taps into the developing moral systems of children in order to appeal to a young audience despite the complexity of relationship between law and morals in the specific situations. The clash of morality and law emerges in Disney films as children take a side in a particular conflict. In the Kohlberg “model of moral development,”⁴⁰ Kohlberg describes a “progression from children acting morally out of desire to avoid punishment from authority figures to a contractual, reciprocal sense of interpersonal morality to eventually a sense of fairness in relation to societal norms and rules codified for the good of the larger social group.”⁴¹ Most young viewers of Disney likely fall into one of the first two categories of moral development. For viewers in the first category, seeing someone do something immoral and not be punished for it would give these people the idea that such an action was, in fact, moral. For example, seeing Aladdin steal fruit and bread from the market is portrayed as completely moral, even though it is blatantly illegal and morally ambiguous.⁴²

This scene demonstrates how these movies present morality as interpersonally constructed: because Aladdin shares with starving children, his actions are clearly presented as moral but illegal. He escapes punishment not by appealing to the authorities’ good will, but by outrunning them in an exciting chase scene. The film uses the audience’s still-developing moral compasses to portray the protagonist as unambiguously moral, even if his actions tell a different, more complicated story. The perspective in Disney films is a form of extreme moral relativism and yet the viewer knows precisely whom they should be cheering for. In Disney, law is a standard that can be followed strictly or loosely as it benefits the protagonist. As soon as an illegal path better suits the protagonist and as long as it advances a “moral” outcome, it becomes acceptable indeed required that the protagonist disregard the law, especially if the law presents an obstacle to the “moral” outcome. According to Piaget, children have a “developmental sequence” in which they come to an “understanding that a person has to take responsibility for one’s behavior and that rules for social conduct are contingent, conventional and negotiable rather than intrinsically correct and fixed across contexts.”⁴³ Disney taps into this developmental sequence playing on situations in which the law does not align neatly with moral outcomes. The law is secondary to the proper outcome and is just as relative as morality itself.

Other, less linear theories of children’s moral development contend that, “moral practices [are] linked to particular social contexts.”⁴⁴ Symbolic interactionists, for example, contend that norms are established by social experiences, and how people imagine others

40. Elinor Ochs and Tamar Kremer-Sadlik, “Introduction: Morality as Family Practice,” *Discourse & Society*, 18 (2007), 6, citing Lawrence Kohlberg, *The Psychology of Moral Development* (San Francisco, CA: Harper and Row, 1984).

41. Elinor Ochs and Tamar Kremer-Sadlik, “Introduction: Morality as Family Practice,” *Discourse & Society*, 18 (2007), 6, citing Lawrence Kohlberg, *The Psychology of Moral Development* (San Francisco, CA: Harper and Row, 1984).

42. Peter Singer, “Famine, Affluence, and Morality,” *Philosophy & Public Affairs*, 1 (1972), 229–43; Stuart Green, “Looting, Law, and Lawlessness,” *Bepress Legal Series*, 1511 (2006).

43. Elinor Ochs and Tamar Kremer-Sadlik, “Introduction: Morality as Family Practice,” *Discourse & Society*, 18 (2007), 6.

44. Elinor Ochs and Tamar Kremer-Sadlik, “Introduction: Morality as Family Practice,” *Discourse & Society*, 18 (2007), 7.

reacting to our actions.⁴⁵ Disney movies relieve children of the burden of imagining such outcomes. Rather, children can see the results of such actions in animated form. If the result is positive and endorsed by the protagonist (even if the original action was illegal), then children may view the action as moral.

III. Methodology

Our interests lie in how law constitutes morality and how morality constitutes law in these films; law can be presented as promoting or thwarting morality. And, we are interested in the connection between law and morality among lawyers practicing today. Of course, animated Disney movies would be only one small part of an adult's moral compass, but it is worth exploring because of the clear moral tales and the ambiguity of law's role in promoting the right outcomes. We do not subscribe to the idea that there ever was a "golden age" of professionalism during which lawyers were more ethical than they are today.⁴⁶ Neither do we mean to suggest that conceptions of morality are formed solely (or even primarily) by osmosis through Disney movies. However, there is a sense that lawyers today are culpable in (or at least implicated in) what are considered serious moral wrongdoing in civil and criminal law and particularly within corporations.⁴⁷

To explore the relationship between law and morality in the films that shaped the youth of lawyers practicing today, we look to the most viewed animated Disney films released between 1960 and 1998. Disney released 46 animated films in the period. We limit our analysis to full-length, fully-animated, G-rated feature films which grossed \$100 million or more in 2009 dollars. These parameters ensure that we are analyzing the most widely-viewed and influential children's movies in the period: *101 Dalmatians* (1961); *Jungle Book* (1967); *Robin Hood* (1973); *The Rescuers* (1977); *The Little Mermaid* (1989); *Beauty and the Beast* (1991); *Aladdin* (1992); *Lion King* (1994); *Pocahontas* (1995); *Toy Story* (1995); *The Hunchback of Notre Dame* (1996); *Hercules* (1997); *Mulan* (1998); and *Bug's Life* (1998).⁴⁸

45. Wendy Griswold, *Cultures and Societies in a Changing World* (Thousand Oaks, CA: Pine Forge Press, 1994), p. 53.

46. Patrick Schiltz, "Legal Ethics in Decline: The Elite Law Firm, the Elite Law School, and the Moral Formation of the Novice Attorney," *Minnesota Law Review*, 82 (1998).

47. Christina Salem, "The New Mandate of the Corporate Lawyer After the Fall of Enron and the Enactment of the Sarbanes-Oxley Act," *Fordham Journal of Corporate and Financial Law*, 8 (2003), 765–87.

48. Geronimi, C., & Luske, H. (Directors). (1961). *101 Dalmatians* [Motion Picture]; Reitherman, W. (Director). (1967). *Jungle Book* [Motion Picture]; Reitherman, W. (Director). (1973). *Robin Hood* [Motion Picture]; Lounsbery, J. R. (Director). (1977). *The Rescuers* [Motion Picture]; Clements, R. M. (Director). (1989). *The Little Mermaid* [Motion Picture]; Trousdale, G., & Wise, K. (Directors). (1991). *Beauty and the Beast* [Motion Picture]; Clements, R., & Musker, J. (Directors). (1992). *Aladdin* [Motion Picture]; Allers, R., & Minkoff, R. (Directors). (1994). *Lion King* [Motion Picture]; Gabriel, M., & Goldberg, E. (Directors). (1995). *Pocahontas* [Motion Picture]; Lasseter, J. (Director). (1995). *Toy Story* [Motion Picture]; Trousdale, G., & Wie, K. (Directors). (1996). *The Hunchback of Notre Dame* [Motion Picture]; Clements, R., & Musker, J. (Directors). (1997). *Hercules* [Motion Picture]; Bancroft, T., & Cook, B. (Directors). (1998). *Mulan* [Motion Picture]; Lasseter, J., & Stanton, A. (Directors). (1998). *Bug's Life* [Motion Picture].

The authors viewed all of the movies coding all references to law including illegal activity, punishment, criminality, contracts, litigation, and lawyering as well as broader legal/philosophical constructs such as justice, liberty, rule of law, fairness, and the like. We began with questions about representations of law's efficacy or inefficacy in Disney movies, quickly concluding that law is very present in the films, almost never portrayed efficaciously, and yet the unambiguously moral outcome universally is achieved by the end of the movie.

IV. Analysis

Our analysis of Disney movies demonstrates that the relationship between law and morality in Disney movies is ambiguous at best. Law plays a variety of roles in producing moral outcomes that serve as the climax of all Disney films: law occasionally aids the moral outcome, often is a useless afterthought, but most often is an impediment to achieving the proper moral outcome.

I When Law Is at Odds with Morality

Law and morality are most often and most emphatically presented as at odds one with the other in the Disney films that make up our sample. *The Little Mermaid* contains perhaps Disney's most troubling representation of the discontinuity of law and morals. In *The Little Mermaid*, the protagonist, Ariel, a young mermaid, falls in love with a human, Prince Eric and wants to marry him. In a fit of teenage angst involving resisting her father, King Triton (the King of the Sea), Ariel seeks the counsel of Ursula, the Sea Witch who collects shriveled shells of mer-people that she enslaves body and soul. Ursula offers to help Ariel telling her that in order to get Eric, Ariel will have to "become human herself." Ursula is willing to use her magic to transform Ariel's fins into legs but only in exchange for Ariel's voice and a contractual "bet" that if Ariel is unable to obtain Eric's kiss of "true love" in three days, Ursula will ultimately own Ariel, body and soul.

This arrangement is sealed with 16-year-old Ariel's signature on a contract drawn up by Ursula. Ariel is unsuccessful in receiving the kiss due, in no small part, to Ursula's interference (including using Ariel's acquired voice to trick Eric). When the three days are over, Ursula exclaims, "She's mine!" snatches Ariel (whose legs have magically become fins again), and scurries off to her sea cave followed by Flotsam and Jetsam, Ursula's loyal henchmen in the form of electric eels. King Triton is waiting at the Sea Witch's cave to get his daughter back. As Ariel begins to shrivel, King Triton points his powerful trident at Ursula commanding, "Ursula, Stop!" The Sea Witch stops only to produce the golden contract with Ariel's signature. King Triton attempts to destroy the contract using a powerful force of nature visibly represented as lightning bolts from his trident whose powers have been demonstrated earlier in the movie. The lightning force ricochets off the contract with such power that it pushes Ursula back violently, though the contract remains intact. Ursula recovers and chides King Triton, exclaiming, "See! The contract is legal, binding, and enforceable. No one can [invalidate the contract] ... not even you, Triton."

Law is represented in two ways in this scene. There is a powerful rule of law message in this scene because what is presented as binding “law” cannot be overturned by the will (or force) of the King. In this way, an important principle of law is reinforced – no one, not even the most powerful leader, is above the law. Unfortunately, this Rule of Law principle is completely at odds with the correct moral outcome. At the same time, “law” (in this case contract law) is presented completely formalistically. If the contract is executed, it is binding, regardless of whether the contract is morally bankrupt.

Assuming the legal code of the Disney audience, Ariel signs – and is bound by – an illegal and immoral contract. Under US law, the contract is illegal both because Ariel is 16 years old (not old enough to enter into a legally binding contract) and also because the contract is one in which she is selling body parts (in the United States, there are strict prohibitions on selling body parts).⁴⁹ It may be that, in the presumably imaginary mer-world, sixteen is the age of majority and that no ban on the sale of body parts exists, but the contract is also illegal because it is unconscionable, which resonates clearly with the audience due to the extreme conditions of the contract. Even first-year law students understand the doctrine of unconscionability, the common law standard for invalidating contracts because they violate some shared sense of moral standards.⁵⁰ Exchanges made when the conditions of power are such that one person has no real choice, a contract is unconscionable. A contract is also unconscionable if a person is enslaved or conscripted into indentured servitude. Even if slavery is formally “legal” in the mer-world, the audience is not given a sign that this is accepted practice among the “good guys” of the sea, and is morally questionable, particularly given the (assumed) audience aversion to slavery. Thus, even if undersea law is not identical to the legal code a Disney audience is bound by, the dramatic moral implications of the contract were undoubtedly drawn explicitly to resonate with the audience as morally reprehensible.

While there is a so-subtle-as-almost-not-to-be-noticed message about law in *The Little Mermaid* in which law and morality are in sync (the rule of law, not of men is observed), the abject immorality of the contract is not questioned. Indeed, the contract is blindly enforced with no mediating party to assess the morality of the contract. Meanwhile, the primary symbol of authority and morality, King Triton, is powerless in the face of the binding nature of the contract. When King Triton’s intervention which clearly is on the side of justice fails to produce a just outcome, the mer-world is reduced to violence. The reader unfamiliar with the movie will not be surprised to find out that the good guys prevail, Prince Eric manages to destroy Ursula, the evil Sea Witch, a reflective Triton decides to allow Ariel to be human, Ariel and Prince Eric enjoy a lavish Disney princess wedding complete with an enormous white gown (with tiara), rainbows, singing dolphins, and the promise of living happily ever after.

Another example of law being at odds with morality can be seen in the film *Aladdin*. Princess Jasmine is bound by traditional law found in many cultures of having to marry

49. Michele Goodwin, *Black Markets: The Supply and Demand of Body Parts* (New York: Cambridge University Press, 2006).

50. Seana Valentine Shiffrin, “Paternalism, Unconscionability Doctrine, and Accommodation,” *Philosophy & Public Affairs*, 29 (2000), 205–50.

royalty. This tradition is justified by the desire among elites to make the ruling class more powerful and by the social desirability of marriages that result in financial security. Prince William's choice of Kate Middleton exemplifies the class-based characteristic of "normal" mate selection in modern society. Even in contemporary American society such customs persist. For instance, current President Barack Obama's choice to marry Michelle Obama – a Harvard Law School educated attorney – exemplifies the social desirability of marriages resulting in financial security. It is difficult to imagine that someone who marries a low-wage worker would be seen as a desirable President of the United States. Despite Americans' love of "ordinary folk," we expect our leaders to be married to other educated, upper-class people. These dominant cultural norms of "like-marrying-like" reflect the pervasiveness of norms, whether they be informal customs or formal laws.

In contrast to formal laws and social customs, an ethical view of *Aladdin* compels us to look at the narrative for Aladdin and Jasmine as individuals. Aladdin and Jasmine's feelings for each other make the moral case for marriage (based in love, not dynasty) the correct moral outcome; children know that Aladdin and Jasmine should be married. And, in *Aladdin*'s conclusion, morality (or the importance of a Princess wedding) trumps law. More broadly, in our analyses of Disney films, Disney consistently takes this side, in which the ethics applied to a personal circumstance trump both formal legal and social rules established in these fictional societies (be they under the sea or in faraway Middle Eastern lands).⁵¹

Aladdin contains other morals-over-law narratives in addition to the main Jasmine–Aladdin romance storyline. For instance, Aladdin's decision featured at the beginning of this article to steal food from the market is made moral because of individual personal necessity and the morality of sharing – he and others are able to eat – over the social good of maintaining the necessary standard of having to pay for goods. As a result, *Aladdin* portrays stealing food as moral, even when the stealing is in direct contradiction with the law.

In *Beauty and the Beast*, the illegal detention of Belle's father in an insane asylum is another instance where law and morals are at odds. The villain Gaston and his conspirator, Monsieur D'arque, devise a plan to detain Belle's father, Maurice, in an asylum. After Maurice claims to have seen the 10-foot tall beast, Gaston decides to use Maurice's story to argue that Maurice is insane and needs to be institutionalized. Gaston and Monsieur D'arque go to Maurice's house and ask Maurice to recount his story of the beast in front of skeptical villagers. The villagers heckle Maurice, and two of Gaston's thugs grab Maurice. As he tries to struggle away from his captors, Maurice is taken away to the asylum. Gaston then tells Belle that the only way to save her father is for Belle to marry Gaston.

This situation presents yet another instance in which law is at odds with morality. Under the law, a declaration of insanity is one of the only legal ways to indefinitely

51. We do not argue that this ethics-over-law narrative in Disney films is a "right" or "wrong" choice by the filmmakers. Rather, we make salient the fact that Disney films do not necessarily focus on the social good that may arise from custom or law.

detain a person against his or her will.⁵² The rule of law, therefore, is understood as the basis of Maurice's imprisonment in the asylum. Gaston and Monsieur D'arque act as executives with the power to apprehend Maurice. Because the rule of law seems to be behind the villains, the villagers do not challenge the villains' abduction of Maurice. Indeed, the law of insanity is blindly enforced.

"Law" (in this case, law's execution) is presented as a normal mechanism for exercising power; if a person is insane, s/he belongs in an asylum, even if the basis for the determination of insanity is deceptive and immoral. This scene portrays the message that law cannot be overturned by the will of an individual (Maurice). In this way, the rule of law is reinforced: no one is above the law, and the law validates forceful incarceration if decision-makers conclude it is necessary. Furthermore, Gaston's efforts to woo Belle into marriage are accepted in Western culture as part of a man's attempt to court a woman. Historically, legal marriage began with a proposal, and the proposal was – and often still is – expected to come from the man.

Here, the Rule of Law is at odds with the desirable moral outcome. Gaston's ultimatum invalidates the law of contract because Belle's decision to marry Gaston is made under duress and a marriage under such conditions legally is invalid. Furthermore, Gaston's misrepresentation of Maurice's mental state makes Maurice's forced incarceration illegal. Before being indefinitely detained, Maurice could expect a judge or third-party to independently determine his sanity or insanity. And yet, in the fantastical time and place of *Beauty and the Beast*, the heckling villagers constitute the trier of fact, and their "jury decision" solidifies Maurice's fate in the asylum. No one (except protagonist Belle) challenges Maurice's institutionalization. As a result, Belle is left on her own to be the sole champion of morality struggling against the rule of law, and moral resolution is not reached until the film plunges into violent conflict.

Disney protagonists often break the law at the end of films to vanquish the villain (as was the case with Prince Eric exploding Ursula in *The Little Mermaid*). In these instances, the protagonist's evaluation of the situation leads toward punishment of the villain that necessarily goes well beyond reparation. These two circumstances differ with respect to who engages in judgment, how the agent and his or her acts are understood (in terms of the assignment of responsibility), and the target of enforcement or punishment. In each of these cases, "the differences are not merely a matter of focus or stress. They involve fundamental incompatibilities."⁵³ Hogan describes the contrast in punishment, based on the nature of the harm, saying:

Legal evaluation and action involve principles that push toward reducing our empathic responses to agents (thus, at the extreme, dehumanizing them and substituting a general calculus

52. *Jones v. United States*, 463 U.S. 354 (1983), pp. 361–70; Peter McCandless, "Liberty and Lunacy: The Victorians and Wrongful Confinement," *Journal of Social History*, 11 (1978), 366–86; Henry Yellowlees and G.W.B. James, "Discussion on Certification in Mental Disorders from the Medical and Social Aspects," *The British Medical Journal*, 2 (1924), 707–14.

53. Patrick Colm Hogan, "Tragic Lives: On the Incompatibility of Law and Ethics," *College Literature*, 35 (2008), 10.

for the individual focus of humanizing empathy), toward increasing punishments beyond basic reparations (since basic reparations would not provide a disincentive for future crime), toward foregoing forgiveness. Ethical evaluation and action, in contrast, involve principles that push toward enhancing our empathic response to agents (thus humanizing them, and substituting this empathically individualized humanization for broad calculative concerns), toward reducing punishments to basic reparations (except in the case of the ethical self-evaluation by the agent), and toward genuine forgiveness.⁵⁴

He goes on to place this contradiction in the context of Aristotle's works:

Aristotle wrote that we have tragedy when the hero falls due to some action of his or her own, but not due to an evil character. If the hero's character is evil, then we may simply view his or her fall as deserved, thus not tragic. If the hero falls through no fault of his or her own, that "shocks our feelings". We do not experience tragic fear and pity, but anger. We feel the fall to be tragic only when the hero is guilty, yet not so guilty that we desire the punishment. Punishment goes beyond any given act – for an act, as such, cannot be punished – to the character, which, in this case, is not fundamentally bad. In that way, such punishment goes beyond what is morally necessary. Indeed, from a moral point of view, punishment – at least punishment beyond reparation (which is a sort of undoing of the harmful act) – is always excessive.⁵⁵

This "fundamental incompatibility" exists in many Disney-imagined conflicts, especially those which involve vigilante justice. Often, the Disney-protagonist in some way punishes the villain for his/her actions, in a way that exceeds what most Americans would consider the "moral" response. However, when it suits the protagonist to do something that is immoral, no legal response is issued. In both cases, the protagonist is portrayed as being in the right and the outcome, therefore, is suitable and just.

One interpretation is that Disney takes a legal view of punishment, but an ethical view of transgressions. The punishment in this generation of Disney films is almost always death, which goes far beyond the villains' transgression. The only clear exceptions to villain death come in the two earliest films in our sample. In *101 Dalmatians* (1961), Cruella de Vil crashes her car when she swerves off the road and into a small ravine with her two goon-sidekicks as passengers. The final scene shows Cruella standing amongst the wreckage yelling, blaming her sidekicks for the crash she caused, and crying that the Dalmatians escaped. In the second earliest film, Disney's 1967 *The Jungle Book*, viewers last see the villain Shere Khan being burned in a fire and running away for his own survival. That the non-fatal punishments come in the earlier films may demonstrate a general move by Disney that simply comports with social changes about representations of violence in film and toward more serious and exorbitant punishments. In the later films such as *Beauty and the Beast*, the villain Gaston falls to his death during the final

54. Patrick Colm Hogan, "Tragic Lives: On the Incompatibility of Law and Ethics," *College Literature*, 35 (2008), 14.

55. Patrick Colm Hogan, "Tragic Lives: On the Incompatibility of Law and Ethics," *College Literature*, 35 (2008), 15 (citation omitted).

fight with the protagonist Beast. In *The Little Mermaid*, Ursula explodes at the hands of Prince Eric. In *The Lion King*, Scar is handed over to the hyenas (to be severely maimed or killed, the consequence of which is of no further concern to the protagonist). In *Hercules*, after acting as a lawyer making contracts to acquire people's souls, Hades is pushed into the pit of condemned souls.

In each instance, Disney's narrative presents the protagonist's actions (his crimes and the punishments he metes out) from his view only. This individualized view creates a situation in which the excessive punishment to the villain is seen as acceptable. Thus, Disney engages in a fundamental distortion of both categories (morality and legality). Instead of following the definitions and implications of each, Disney picks and chooses the elements that are most convenient for its protagonists (and their storylines). When the protagonist makes the ethical choice, legal punishment is invalidated; however, when the protagonist makes unethical choices (that often permit harm to another, usually the villain), legal punishment – even in excess – is validated.

2 When Law and Morality Are Unrelated

Law's tenuous relationship to morality in Disney films perhaps is most palpable when the law is unrelated to protagonist's moral decision-making. In our sample of Disney films, the protagonist uses the power of law when convenient; when not convenient, the protagonist eschews the law. The violent outcomes in Disney films demonstrate the weakness of law as a social control mechanism. For instance, in *The Lion King*, after a physical battle with protagonist Simba, villain Scar is cornered and presumably eaten by famished hyenas. In another instance, Jaffar, villain of *Aladdin*, is indefinitely trapped in a Genie bottle and later explodes at the hands of the protagonists.⁵⁶

Consequently, often law fundamentally has nothing to do with dictating the final resolution of the films.⁵⁷ In the most significant final scenes, protagonists ignore the role of law in dictating the villains' proper punishments. The acts of the protagonists – by definition of their goodness – are justified, even if the protagonists intend to do harm to the villains. In the case of Ursula's death in *The Little Mermaid*, where Prince Eric impales Ursula, the protagonist intentionally causes suffering – and death – to the villain. Yet, this direct harm seamlessly is part of, indeed crucial for the moral resolution of the film.

Two conclusions emerge from these portrayals of law. First, law-abiding behavior is unrelated to the identity of protagonists and villains (whose identities are determined by who Disney presents as the ethical protagonist and immoral villain). Second, law is irrelevant in determining a just punishment for the villain; instead, the punishment is determined solely by the moral choice of the protagonist, even if that choice is to kill or assault the villain. In both situations, law is not in direct opposition to ethics (as is the

56. In a subsequent film, *The Return of Jaffar – Kingdom Hearts II* (1994), during a physical battle with protagonists Aladdin, Jasmine, Genie, and Iago, Iago kicks Jaffar's lamp into lava, causing Jaffar to explode.

57. The moral maxim determining the fate of the villain can be stated as "bad things can happen to bad people even if the protagonist acts badly."

case with Aladdin stealing food as policemen chase him); rather, law is irrelevant and unnecessary. Morality alone determines the outcome, and that moral determination rests solely with the protagonist.

V. Conclusion

Our analysis of Disney films reveals an ambiguous relationship between law and morality. At times, law is coterminous with morality, but overwhelmingly, law is at odds with morality. In all of the films, the just conclusion is achieved only because law is unrelated to morality. Although we make no normative claim about Disney's choices, the films reinforce a notion that our heroes are always justified – even to cause others' harm, suffering, or death.

Our results raise several questions about childhood moral development and the possible consequences of Disney's portrayal of law and morality. First, the ubiquity of Disney films raises the question of the magnitude of this genre's influence on child moral development. Second, and coupled with the ubiquity of Disney, Disney's tapping into children's "developmental sequence" mean that the films contribute to children's perceptions of rules, obligations, morality, and law. Though we have no direct causal "proof," repeated media messages that ignoring rules is acceptable to reach desired results may impact the tendency to engage in delinquent behavior. Previous socio-legal research has revealed how children's literature shapes legal consciousness⁵⁸ and legal scholarship has explored whether portrayals of television lawyers influence the ethical relativism pervading lawyers' attitudes about justice and law practice.⁵⁹ Similarly, the widespread culture of academic misconduct among secondary and post-secondary students raises the question of whether ambiguous media messages about the need to accept rules contribute to cheating.⁶⁰

To be sure, some will say that children's movies are nothing more than entertainment and that this kind of analysis treats too seriously what is little more than mindless distraction for children while their parents steal a few moments to prepare dinner. It may be that television and films do not actually affect how children see the world at all or at least that the effect is more minimal than we would expect. And yet, "the size of television's effects ... may be less important in the long run than its persistence and pervasiveness."⁶¹ Another

58. William P. MacNeil, "'Kidlit' as 'Law-and-Lit': Harry Potter and the Scales of Justice," *Law & Literature*, 14 (2002), 545–64; Desmond Manderson, "From Hunger to Love: Myths of the Source, Interpretation, and Constitution of Law in Children's Literature," *Law & Literature*, 15 (2003), 87–152.

59. William Simon, "Moral Pluck: Legal Ethics in Popular Culture," *Columbia Law Review*, 101 (2001), 421–47.

60. Lene Arnett Jensen, Jeffrey Jensen Arnett, S. Shirley Feldman, and Elizabeth Cauffman. "It's Wrong, But Everybody Does It: Academic Dishonesty among High School and College Students," *Contemporary Educational Psychology*, 27 (2002), 209–28; Karla R. Hamlen, "Academic Dishonesty and Video Game Play: Is New Media Use Changing Conceptions of Cheating?" *Computers & Education*, 59 (2012), 1145–52.

61. James Carlson, "Crime Show Viewing by Preadults: The Impact on Attitudes Toward Civil Liberties," *Communication Research*, 10 (1983), 549.

drawback of this kind of analysis is that there is scholarly disagreement about when and how children develop their senses of morality.⁶² In the absence of a definitive answer to these questions, we base our analysis on the information that does exist, which, overall, suggests a non-linear, cumulative, and contextual development of morality.

Despite the salient themes of law and morality in our analysis, the effect of Disney films on children's moral consciousness may be small when compared to the effect of the overall daily consumption of children's television. While some children may view Disney films daily, others may watch Disney films only once a year, but view other cartoons and children's television programs daily, while still others may not be permitted to watch television and movies at all.⁶³ Although television consumption is greater than consumption of Disney films, television and film tackle common subjects such as violence and vigilantism, and therefore, the moral messages of Disney films are part of a broader phenomenon present in both types of media. Because vigilantism is common and strongly resonates with audiences in popular adult films such as *Dirty Harry* and children's television such as *Pokemon*, its presence both in Disney films and generally in children's entertainment demands further analysis. Along with many other children's movies and television programs, Disney films are among the first sources of vigilantism to which children are exposed. Therefore, Disney movies are an appropriate location for studying broad cultural patterns found in movies and television, especially in terms of their ability to expose children to complex social matters.

These first exposures to the complexity of the moral bases of conflict resolution are significant. Though Disney protagonists' vigilantism may be justified as self-defense, adult film heroes' vigilantism such as *Dirty Harry* cannot. Whatever the differences in justifications, Disney protagonists share with adult film heroes a lack of accountability to the formal legal system. This lack of accountability is illustrated palpably by Disney's portrayal of self-defense determinations. In the films we analyzed, the determinations of self-defense were not in the hands of a trier of fact such as a judge or jury. Rather, the protagonists made implicit self-defense arguments as their own moral prerogative and the trier of fact is the viewer.

For example, *Beauty and the Beast* culminates with no investigation into Gaston's death. Instead, the film ends in a room of town admirers witnessing the wedding of Belle and the Beast, with the question of Gaston's whereabouts totally absent from the film's ending and the town's consciousness. *Aladdin* ends not with his accepting responsibility

62. Elinor Ochs and Tamar Kremer-Sadlik, "Introduction: Morality as Family Practice," *Discourse & Society*, 18 (2007), 7–9.

63. Victor C. Strasburger, "Children, Adolescents, and the Media," *Current Problems in Pediatric and Adolescent Health Care*, 34 (2004), 54–113; Steven J. Kirsh, "Cartoon Violence and Aggression in Youth," *Aggression and Violent Behavior*, 11 (2006), 547–57. A. G. Sudha, "Factors Influencing The Change In Behaviour Of Children On Viewing Cartoon Programs – A Study," *Namex International Journal of Management Research*, 1 (2011), 32–43. Given children's massive consumption of television, we encourage future analyses that connect the study of Disney films to children's television consumption in order to strengthen the connection between entertainment and children's moral development.

for stealing bread in the market by confessing to the police but with Aladdin and Princess Jasmine's wedding, during which the townspeople act as gleeful marriage witnesses rather than witnesses to a crime helping investigators administer proper legal procedure. *The Little Mermaid* does not end with Prince Eric's arrest, an investigation, or his awaiting trial for the murder of Ursula. Neither are Ariel and King Triton investigated or arrested for conspiracy or accessory to murder. No prosecutor decides whether or not to press charges as the protagonists are held in jail. Instead, Disney films routinely and predictably end with a public wedding celebration after protagonists take the law into their own hands by killing the villain. In Disney's world, the protagonists do not have to answer to authorities; the protagonists *are* the authorities. Because the validity of the self-defense theory rests entirely with the protagonist's own moral judgment, our heroes are the law and the rule of law is notably absent. And yet, like their portrayal in adult vigilante films, the audience sympathizes with the hero.

It is not just legal authority that is questioned in Disney films, parental authority also is questioned. In *Aladdin* and *The Little Mermaid*, Princess Jasmine and Ariel choose to pursue suitors that their parents clearly reject. The dominant message in both films is to resist parental authority when the child views the parent's exercise of that authority as an abuse. Under most systems of law, children are expected to obey orders from parents, and in many societies, it is customary for male suitors to ask parents for their daughter's hand in marriage and for children to obey the parents' wishes. In contrast, Disney films send the powerful message that it is acceptable and desirable to undermine authority figures, and this moral imperative to resist authority may be powerful enough to be internalized by children.⁶⁴

Of course, as adults, we view Disney films inherently differently than do children. We hope we have not fallen into what Buckingham characterizes as "pretentiousness," in our analysis. We recognize that the "fear of 'taking it too seriously' can ... actively inhibit analysis"⁶⁵ and yet, we must not assume that, "what we perceive to be significant will necessarily be perceived as significant – or indeed, be perceived at all – by the audience."⁶⁶ Our analysis is bound to be affected by many more years of life experiences (not to mention our education and status as university professors), whereas children (the primary audience) may not take away any messages of skewed law and morality systems from Disney movies. However, as long as we take into account the creation of children's moral compasses, and the way in which people view Disney movies, studied empirically, we may avoid most of the potential for error raised by Buckingham.

Future analyses should examine more causally whether exposure to messages of the disjuncture of law and morality make illegal behavior more morally justifiable.⁶⁷ And

64. Justin F. Martin, "Children's Attitudes Toward Superheroes as a Potential Indicator of their Moral Understanding," *Journal of Moral Education*, 36 (2007), 239–50.

65. David Buckingham, "Dissin' Disney: Critical Perspectives on Children's Media Culture," *Media Culture Society*, 19 (1997), 290.

66. David Buckingham, "Dissin' Disney: Critical Perspectives on Children's Media Culture," *Media Culture Society*, 19 (1997), 290.

67. Theories of procedural justice show that this is true for adults but we know of no such studies of children.

we raise the question of how mass media can foster non-violent legal resolution. The dehumanization and violent fate of the villains in these films raises the question of whether the moral message of law's irrelevancy makes violent outcomes justified or even desirable. Such questions and issues must be reserved for future analyses, but Disney's portrayal of law as unrelated or at odds with morality already is revealed.

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