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ARTICLE

Picture-Reading the Complexities of Transgender Experience

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Abstract
Depicting transgender persons in comics without falling into visual caricature and thereby perpetuating harmful stereotypes can be a delicate task. In this discussion, I draw upon the notion of picture-reading to argue that, despite this fact, comics as a medium is particularly well-suited—both formally and in terms of production-relevant factors—toward capturing and communicating the complexities of transgender experience.

Keywords: comics; gender expression; gender identity; narrative; queer; representation; transgender

1. Introduction

Depicting transgender persons in comics without falling into harmful forms of visual caricature and thereby perpetuating injurious stereotypes can be a delicate task. This issue is not unique to the depiction of transgender persons, of course: see, for example, Rebecca Wanzo's fantastic study *The Content of Our Caricature: African American Comic Art and Political Belonging* (2020) for an exploration of the harm of racialized visual caricature. The way that we represent, pictorially and also narratively, marginalized persons of any sort can and inevitably does play into their received social status and treatment insofar as beliefs, prejudices, and biases can be either reinforced or eroded through repeated exposure to images and stories.[1]

In this discussion, I draw further attention to particular problems facing even good-faith attempts at transgender representation in visual media and the particular harms such attempts incur upon transgender individuals and communities. From there, I look to both production-relevant and formal considerations—with respect to the latter, specifically the notion of *picture-reading*, introduced in Cowling and Cray's *Philosophy of Comics: An Introduction* (2022)—to argue that, despite these problems, comics as a medium is comparatively well-suited for capturing and communicating the complexities of transgender experience in a manner that affirms and encourages empathy and understanding rather than caricature, prejudice, or bias.

After exploring how picture-reading relates to comics' ability to synthesize interiority with exteriority, I discuss the distinction between gender identity and gender expression and argue for relevant parallels: between interiority and identity, on the one hand, and between exteriority and expression, on the other. With these parallels in place, the case can be made that comics can provide a comparatively nuanced exploration of relations and interplay between gender identity and expression.

[1]See also Mary Gregg's contribution to this special issue as well as, *inter alia*, Cowling, 2020, Kunka, 2017, Harris, 2003, Mag Uidhir, 2013. For discussion of complications of *de-racializing* departures of characters comics, see Flowers, 2020.

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2. Visual Media and the Struggle of Transgender Representation

Different mediums present characters differently: novels through linguistic description; painting through static pictorial representation; animation through dynamic pictorial representation; theater through embodiment via an actor; film through a combination of many, more, or all of these. Even setting aside for a moment the complexities and controversies of full-fledged theses of medium specificity, it should be clear that some mediums are, given their formal characteristics, limited in certain ways with respect to how they present characters.[2] Bracketing features such as cover art, a traditional novel cannot in itself provide us with a direct and genuinely visual representation of a character within.[3] A Renaissance painting cannot directly depict literal movement. And outside of theater and perhaps Smell-O-Vision, few if any mediums are equipped to present a character in a manner that leaves the audience with full olfactory access. Given these facts about these mediums, creators working within them have to make use of other resources and techniques to depict such things: the novel *describes* the visual aspects of the character, the painting *suggests* movement, and the film *implies* stench through the presence of flies buzzing around that unfortunately smelly character. Attempts at the representation of certain aspects of characters pose challenges for certain mediums, but these challenges can most often be met rather straightforwardly.

In her *Adorning Bodies: Meaning, Evolution, and Beauty in Humans and Animals* (2022), Marilynn Johnson considers and adapts Gricean notions of meaning as they apply to the presentation and interpretation of bodies. One species of such meaning is *natural meaning*, through which certain features of bodies (typically, biological or phenotypical features) are taken to mean something about the person: comparatively tall height indicates competence, a "babyface" suggests incompetence, and so on. Another species is *non-natural meaning*, through which other features of bodies (typically, features that result from adornment) are also taken to mean something about a person—the wearing of scrubs or judicial robes indicating a profession, the wearing of denim jackets with studs and patches pointing to musical inclinations, etc.—though in a manner that operates differently from that of natural meaning. With natural meaning, the feature *itself* means such-and-so whereas with non-natural meaning, the person instead *uses* the feature to mean such-and-so.

These notions can apply to fictional representations of persons just as they can to nonfictional persons (as well as to nonfictional persons represented through fiction or creative nonfiction). To take an example from a film: consider Danny, a character portrayed by Morgan Davies in Lee Cronin's 2023 film, *Evil Dead Rise*. While Davies is a transgender man, there is no evidence in the film that determines that it is true in the fiction of *Evil Dead Rise* that Danny is a transgender man. Many viewers, reviewers, and commentators, however, have reached an apparent consensus that Danny is trans, perhaps on the ground that he is portrayed by a trans actor. It is not clear, however, that this inference is valid: just as cisgender actors have portrayed transgender characters in the past (consider Eddie Redmayne in 2015's *The Danish Girl*, Jared Leto in 2013's *Dallas Buyers Club*, and Felissa Rose in 1983's *Sleepaway Camp*, among many other examples), there is nothing stopping a transgender actor from portraying a cisgender character. (The question of whether cisgender actors *should* portray transgender characters is a further question, which, due to considerations of space and scope, I will not explore further here.)

Still, it might be argued that there *is* textual (or, in this case, filmic) evidence that Danny is trans: specifically, his physical characteristics. This claim is not appealing to the application of Gricean non-natural meaning to adornment: nothing about Danny's adornment throughout the film suggests that he is wearing something in order to convey that he is trans (as would be the case if he wore, say, a pink, white, and blue striped sweater—the colors of the transgender flag). Instead, this claim appeals to Johnson's application of Gricean natural meaning: Danny's stature, bone

[2]On medium specificity, see Carroll, 2019.

[3]I contrast *traditional* novels here with *illustrated* novels, which clearly can present characters in such a way though which arguably constitute a distinct medium.

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structure, vocal presentation, and other features all together *mean* that he is trans. We do not need the inference from actor identity to character identity, then, because we can instead rely on the natural meaning of biological or phenotypical presentation to establish facts about Danny's identity within the fictional world of the film.

The above reasoning, however, should be rejected on both epistemic and moral grounds. The epistemic objection goes like this: gender identity (transgender or otherwise) is an internal, subjective matter that does not strictly correlate with any physical features or collection of physical features. As such, we cannot reliably infer that someone is transgender just by examining such features. (The same applies in the opposite direction, as well: we cannot reliably infer that someone is cisgender just by examining such features, either.) If we cannot reliably draw such an inference, then, in the absence of some countervailing reason to do so, we ought (epistemically) not to do so.

Moving beyond the epistemic objection, the moral objection goes like this: by relying on physical features as indicators of transgender identity (either as a creator communicating to an audience or as an audience inferring facts about characters) we reinforce the false and dangerous—but nonetheless pervasive and persistent belief—that physical features (or collections of physical features) are reliable indicators of transgender identity. The fact that such reliance is conducive to harm toward transgender individuals gives us moral reason to reject it. If someone remains somehow unmoved by this reason, we might point out that such reliance is conducive to harm toward cisgender individuals as well, given that it increases the likelihood that they would be mistaken for transgender individuals and thereby treated as such, e.g. harassed in public restrooms, in sports contexts, and—speaking from experience—pretty much anywhere and everywhere else.

So far, we have primarily discussed an example from the film. Similar considerations apply to the comics medium, as well—and perhaps even more so. With comics, there is no actor embodying the character, which would leave audiences reliant entirely on aspects internal to the work when inferring facts about a character's gender identity (or relation to their gender identity). On top of that: being an illustrated medium historically related to and still highly influenced by cartooning, comics are more likely than film (aside from animated film) to rely on exaggerated features or other elements of caricature in order to visually communicate facts about a character's identity.[4] It would seem plausible to assert, then, that comics as a medium are more susceptible than live-action films as a medium to fall into the unfortunate habit of perpetuating false beliefs and harmful stereotypes about transgender persons. Comics creators would thereby inherit even stronger epistemic and moral reasons to not rely on the widespread but false and dangerous belief that transgender identity correlates with physical features in order to communicate facts about their characters to audiences.[5]

3. Transgender Representation in the Comics Medium

Shifting the focus more squarely onto comics now: just as creators in the medium might inherit even stronger (compared to creators in most other mediums) epistemic and moral reasons of the sort discussed above, they are also working within a medium that is especially well-suited toward capturing and communicating the complexities of transgender experience. We can see this through looking at both production-relevant and formal considerations of the medium. In this section, I will briefly discuss the former; in the next two sections, the latter.

Given various human, economic, and material limitations, works situated within narrative mediums such as novels and films typically require a tremendous amount of time to create, produce, and distribute. Especially in the case of novels, engaging with them in an appropriately informed and sufficiently reflective manner also requires a significant investment of time and

[4]Cf. Gregg, forthcoming, Cowling, 2020, Wanzo, 2020, Kunka, 2017, Harris, 2003.

[5]Using the framework advanced in Mag Uidhir 2013, we might call comics that rely on such use of caricature *epistemically defective*.

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attention. Neither is particularly cheap to produce, especially if the production is intended to find or attract an attentive audience.

Comics, on the other hand, can be created comparatively quickly and on a minimal budget. Compared to novels and films, they are also relatively easy to distribute: one could upload a short comic to any social media platform, include some hashtags, and find an audience in just slightly more than an instant. In a discussion of LGBTQIA+ representation in comics that speaks directly to this point, artist and scholar Ajuan Mance (2017, p. 301) writes that.

> The rise of Internet-based free and low-cost comic distribution, as well as the proliferation of alternative book and zine tests in cities around the world, have enabled independent artists and writers to sidestep the need for publishing contrasts and distribution deals and instead, to access their readership directly. This development has had a disproportionate impact on queer and trans comics creators, many of whom have embraced webcomic platforms and alternative book and zine fests as a means to engage their readers directly.

Along similar lines, cartoonist and associated editor of *The Nib*, Mattie Lubchansky (2020, p. 1) writes that.

> Comics are accessible in a way that other forms of media could only dream of being. They are not only accessible to the reader, who is presented with a lot of information in an easily digestible way, but to the creator: One person can control the entire narrative in a medium they can publish easily online or cheaply in print. Thus, comics present amazing opportunities to be heard, to hear each other, and to tell the exact stories that we want and need to tell.

Comics scholar and creator Justin Hall (2013, A New Millennium section, para. 11) finds hope for the future of comics in these aspects of the medium's past:

> Whatever new venues open up, LGBTQ comics will survive, as they have for four decades, despite the odds. … It is precisely this scrappy attitude that guided the early lesbian comic books, the gay strips, and the queer zine anthologies. It will guide the LGBTQ graphic novels, comic books, and webcomics of the future. With so little real money in the comics medium, every creation is a personal labor of love, with all the splendid, messy diversity of artistry and business plans that that implies.

These commentaries all emphasize that in matters relevant to production, comics are an especially (or at least comparably) accessible medium for transgender and other marginalized creators who might often face greater social, economic, and other barriers toward creating and distributing their work when situated within the aforementioned mediums such as film or the novel.

4. Picture-Reading and the Synthesis of Interiority and Exteriority

Having argued that comics are particularly well-suited for the representation of transgender experience in a production-relevant sense, we'll now examine why the medium is similarly well-suited in a *formal* sense. In this section, I will lay the foundations for this claim through a discussion of *picture-reading*, a mode of engagement characteristic (perhaps even particular to) the comic medium. In the next, I will provide the full argument by drawing out connections between picture-reading and the communication of transgender experiences.

Cowling and Cray (2022) argue that the defining characteristic of the comic medium is that comics are created with the intention of being engaged through the act of *picture-reading*. Saving the

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full development of this particular mode of engagement for future work, Cowling and Cray (*ibid*, p. 57) write:

> "When picture-reading, we are open to incorporating one or more images into our unified attention. We are open to taking juxtaposed images as components in a narrative. We are open to finding closure among panels. We are open to taking text (or a solitary image) as determining what is true according to the narrative. Importantly, this *openness* is not the same thing as expectation. We can picture-read in the absence of text or even in the absence of juxtaposed images. We can even engage in a kind of frustrated picture-reading in the case of narrative abstract comics, where we seek to contract a narrative but are unable to do so. Importantly, the activity of picture- reading is not defined by what it attends to but by what it is *open to attending to*. … The work of picture-reading is, importantly, a learned mode of engagement that involves sensitivity to sequential panel layout, closure, and various means of quasi-compositional interplay between text and image."

Whether or not we follow along with taking creation with the intention to be picture-read as *the* defining characteristic of comics (and, hence, unique to comics), most would agree that it is at least a standard feature of the medium.[6]

In the passage cited above, picture-reading is described in terms of readerly *openness* to engage with a work in particular ways. The picture-reader, *qua* picture-reader, remains open to attending to text—as it appears in word balloons, narration boxes, and other forms. They also remain open to attending to images, both individual and juxtaposed. And, crucially, picture readers remain open to attending to the complex, "quasi-compositional interplay" between text and image. This interplay goes beyond that which might be found in, say, subtitled films: in such cases, the text is there to clarify the meaning of the spoken word, provide access to sonic cues, and so forth. Similarly, it goes beyond the interplay we see in illustrated novels (in which the image is there to supplement to the text) and children's books (in which, typically, the image and text autonomously provide information and content). Instead, with genuine picture-reading—as opposed to the activity of reading along with pictures—the text and the image each contribute to the generation of new content. While some content is dependent entirely on the text and some is dependent entirely on the image, some depends on the particular interaction between the two and as a result would not be reducible to either in isolation. The text is not there merely to clarify the image, and the image is not there nearly to supplement the text—instead, the two work in unison to nonredundantly generate and communicate information.[7]

This centrality of picture-reading to comics means that the comics medium is (perhaps uniquely) apt for certain tasks. Text tends to be particularly well-suited for communicating *interiority*: the internal, private thoughts and experiences of characters within the story. It does not have a monopoly on interiority, of course, as we can see by attending to, say, the convention within manga of indicating emotions through particular pictorial representations.[8] We can make similar observations about image and *exteriority*: image tends to be particularly well-suited for communicating the external, public actions, events, states-of-being, and states of affairs within the world of the story. Text can do this—as anyone who has ever read even a minimally competent novel can attest to—but image is reliably able to do so in an arguably more direct manner. Even if the text can succeed in, as they say, "showing" rather than mere *telling*, the image is well-suited to *showing* in an even more robust and literal sense.

In being attuned to the complex interplay between text and image, the attentive picture-reader thereby remains attuned to the complex interplay between interiority and exteriority. Some

[6]*Standard* in the sense discussed in Walton, 1970.
[7]See also, *inter alia*, Wartenberg, 2012.
[8]See, for example, Abbott & Forceville, 2011.

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Figure 1. Panels from Boy Loves Girl #28 (1952)

information gathered through picture-reading—that which depends entirely on text—might be solely interior information, while other information—that which depends entirely on image—might be solely exterior information. But, when intertwining text and image in a manner that communicates above and beyond what text and image convey in isolation, we see a complex blend of interiority and exteriority that gives rise to information that is, in a sense, a little of each yet also above or beyond both.

As an example, we can look at the following panels from *Boy Loves Girl* #28 (1952), with pencils and inks by Ruth Atkinson and script, colors, and letters uncredited (Figure 1). Looking at just the images (and word balloons, representing externalized speech), we see a man (Terry) and woman (Brenda) in a passionate embrace segueing into some hesitation and foreshadowing of either revelation or conflict. Looking at just the contents of the thought balloons, we see the intensity of Brenda's affection for Terry coupled with a potentially lingering or recently overcome sense of self-doubt. Reading the two together—*picture-reading* them—we get a glimpse into the depths of Brenda's emotional state and struggle that goes beyond what either presents in isolation.

5. Identity and Interiority, Expression and Exteriority

To see how interiority and exteriority relate to gender identity and expression, respectively, we'll first take some time to more carefully discuss those latter notions. In contemporary, colloquial discourse about transgender experience, *gender identity* can be taken to refer to one's internal, deeply felt, existential sense of how they relate to themselves and the world around them (including

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other persons) in terms of gender.[9] *Gender expression*, on the other hand, is the external, publicly observable communication—through mannerism, adornment, and perhaps bodily features—of gender identity (or relation to gender identity).

In response to charges that notions of gender identity like that mentioned above are insufficiently informative, Katharine Jenkins (2018) has more rigorously developed a *norm-relevancy* account of gender identity. On this view, our "gender identities" are really complex "maps" encoding how we relate to various actions and their apparent relations to gendered norms: for some of us, the act of shaving our legs will feel *norm-compliant*, whereas for others the same act will feel *norm transgressive* and for others still it will feel *norm neutral.* These "maps"—each encoding relations to countless acts and associated gendered norms—influence how we experience ourselves and the world around us (including other persons) in terms of gender. Since such "maps" are often prohibitively complicated to fully describe, we instead refer to them with short-hand, idealized gender language (that is terms such as *man*, *woman*, *nonbinary*, *genderfluid*, etc.).

To emphasize: on Jenkins's norm-relevancy account, our gender identities do not determine our behavior or expression, but instead influence *how we feel about it.* Some expressions will feel compliant, others will feel transgressive, and still others will feel neither. Insofar as these feelings are internal, gender identity remains a wholly internal matter. (I would submit, too, that any other plausible account of gender identity will yield the same result.)

Of course, the relations between gender identity and gender expression—henceforth, just *identity* and *expression*—are complex, and reasonable debate can be had about which is more fundamental. Judith Butler (1990), for example, has famously argued that gender identity is wholly constructed through the performance of (what we are calling here) gender expression. (Given that the gendered norms discussed in the context of Jenkins's account are socially constructed, the norm-relevancy account can easily account for this claim.) For present purposes, it suffices to note that it is meaningful to speak of identity as meaningfully different from expression.

The relevant differences are simply these: identity—again, being an internal sense—is an aspect of interiority, whereas expression—being an external communication—is an aspect of exteriority. This motivates a general view about the representational facilities of comics: within them, text is particularly well-suited at communicating information about identity whereas image is particularly well-suited at communicating information about expression. And, given that picture-reading involves openness to the interplay of text and image in a manner that synthesizes interiority and exteriority, picture-read mediums will therefore be adept at communicating the complex interplay between identity and expression.[10]

Consider a comic featuring a transgender character who, in the world of the story, is not public about their identity and hence engages in expression conventionally suggestive of their gender assigned at birth to the degree that they are consistently read as cisgender. (In other words—and to use less-than-ideal language—they are "closeted.") In such a case, text might communicate the character's interior identity while image might communicate their external expression. The interplay between the two would then be able to highlight the character's experienced tension between identity and expression in a manner irreducible to either text or image in isolation. Furthermore, the glimpse into the character's inner world will inform our reading of their external world, and *vice versa*, highlighting the complex interplay between identity and expression experienced by many transgender persons.

Alternatively, consider a comic featuring a transgender character who, in the world of the story, is *also* not public about their identity but this time in a different way: they engage in expression

[9]Much has been written about the concept of gender identity, both inside and outside of the field of philosophy. For just some of the relevant philosophical discussion, see Barnes, 2022, Dembroff, 2021, 2020, 2018; Bettcher, 2020, 2009; Jenkins, 2018, 2016; Butler, 1990.

[10]See the essays in Baldanzi, 2023 for recent, in-depth discussion of the representation of (in the author's terms) female and nonbinary characters in graphic fiction.

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conventionally suggestive of their gender identity to the degree that they are consistently read as cisgender. (In other words—and again, to use less-then-ideal language—they are "stealth.") In this case, we see much the same as before: the interplay between text and image can highlight the (arguably no less complex) experience of congruence between identity and expression in a manner also irreducible to either text or image in isolation. Suppose, for example, that a part of the character's experience is the struggle to remain externally calm and nonreactive during encounters in which their identity might be nonconsensually made public—that is, in which they are "outed." This would be difficult to convey in film without reliance on voice-over narration, and difficult to convey in a novel due to the lack of visible element. In neither medium, of course, would it be *impossible*—but in comics, this sort of experience would be remarkably easy to portray.

As a third narrative possibility, consider a comic featuring a transgender character who, in the world of the story, *is* public about their identity yet, due to not expressing in a manner that conventionally aligns with gendered norms, is consistently misread and misgendered. Suppose further that this character is in a context in which visible reaction to such misreading and misgendering would likely lead to social sanction—perhaps even in the form of violence. In encouraging picture-reading in a manner sensitive to the complex interplay between interiority and exteriority, such a comic would be particularly well-suited—in comparison to an analogous novel or film—at communicating the nuances of this character's struggle.

In all three of the above cases, a competent comic creator could generate and communicate the intended complexities without relying at all on visual markers that the character in question is transgender. The common tropes of square jawlines or broad shoulders and narrow hips to suggest trans feminine identity and delicate features or mastectomy scars to suggest trans masculine identity can fall to the side as the creator instead establishes the character's experience of identity through information conveyed through text.[11] This is in line with claims made earlier, regarding the autonomy of identity and expression: identity is not reliably inferable from any collection of physical features, nor is the presence of any physical features a reliable indicator of identity. In being able to tell the above stories, with all of their complexity, in a manner that respects this autonomy, the competent comics creator is able to avoid both the epistemic and moral objections raised previously, in Section 2.

It would do us well, of course, to look beyond mere narrative *possibilities* and into actual comics. A prime example of the sort of communication under discussion here can be seen in Lennon Sweets's three-panel webcomic "Baby's First Binder" (2020), through which the trans identity of the person depicted can be inferred only when the images are read together along with the title of the comic.[12] Similarly, Delta Vasquez's "Seeing Other People" (2021) employs a synthesis of image and the contents of thought bubbles to offer a brief but powerful meditation on trans embodiment, gender dysphoria, euphoria, beauty, and envy.[13] With both of these comics, the internal aspects are communicated through text, the embodied aspects are presented through image, and the full richness and complexities of the tensions at the heart of the respective narratives are available only through the (pictured-read) synthesis of the two.

Further trans-specific examples of this interplay between interiority and exteriority, synthesized through picture-reading, are not difficult to find. Corey Maison's 2020 *Identity: A Story of Transitioning* (Zuiker Press) utilizes text boxes to offer glimpses into the primary (trans) character's internal narrative, while using only indicators of non-natural meaning—haircuts, clothing, etc.—to suggest external perception of her gender identity. Julia Kaye's *Super Late Bloomer* (2018) and *My Life in Transition* (2021) and Sophie Labelle's *Assigned Male* webcomic (ongoing since 2014)

[11]This is not to say, of course, that such features should be *avoided* in any strict sense, as systematically leaving them out would lead to a very narrow presentation of how bodies can be: some people have mastectomy scars, square jawlines, and so forth Instead, what can "fall aside" is the *reliance* on such features to communicate facts about characters.

[12]"Baby's First Binder" is available to view at https://twitter.com/Lennonsweets/status/1219444264272310273.

[13]"Seeing Other People" is available to view at https://thenib.com/seeing-other-people/.

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similarly avoid indicators of natural meaning to suggest gender identity, relying instead on monologue and dialogue in synthesis with depictions of situations characters find themselves in as well as indicators of non-natural meaning in the form of chosen elements of gender expression. Maia Kobabe's *Gender Queer: A Memoir* (2019) explores genderqueer identity through the author's depictions of emself coupled with both nondiagetic text and conversations with others, without putting the reader in a place where they would be able to infer what descriptions would accompany the depictions, and *vice versa*, were the two engaged with in isolation. Rhea Ewing's *Fine: A Comic About Gender* (2022) serves as an important narrative and visual reminder of the diversity of bodily features across all genders, representing gender and bodily diversity in such a rich way that readers would likely feel intrusive, silly, or both were they to try to infer facts about gender identity and gender assigned at birth simply by scanning through the images of the various characters depicted within.

6. Concluding Remarks

Throughout this discussion, I have motivated and advanced a rather humble claim: that comics as a medium is particularly well-suited—both formally and in terms of production-relevant factors—toward communicating the complexities of transgender experience. This is true despite comics creators facing what might be especially strong versions of the epistemic and moral complications of transgender representation: the aptness of the medium makes the conscious avoidance of such epistemic and moral error a comparatively easier affair.

The central points motivating the claim specifically about the formal aspects of the comics medium come from the association of identity with interiority and expression with exteriority, along with observations about the complex interplay of identity and expression and the particular aptness of picture-read mediums in particular of capturing analogous interplay between interiority and exteriority. Combining this with the claim about the mediums' sociohistorical aptness goes some way toward explaining why comics are such a frequently chosen medium for trans-centered narrative: as Hillary Chute (2017, p. 349) has pointed out, "[t]he fastest-growing area in comics right now may be, broadly speaking, queer comics—comics that feature in some way the lives, whether real or imagined, of LGBTQ … characters."

Chute's claim, of course, extends beyond just trans narratives in comics. As a final, more speculative point, then: I suspect too that the conclusions drawn from the discussion throughout this paper would generalize to establish that comics as a medium is particularly well-suited also toward capturing the complexities of experiences of queerness aside from transgender experience, as well as of much neurodivergence. A full defense of that claim, however, would require another discussion.

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