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Moral Panic, Moral Breach: Bernhard Goetz, George Zimmerman, and Racialized News Reporting in Contested Cases of Self-Defense

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ABSTRACT

This article examines local news coverage of two landmark self-defense shooting cases—the 1984 Bernhard Goetz case and the 2012 George Zimmerman case—to interrogate the racialized construction of crime and, specifically, extend moral panic theory to the contemporary context of racial colorblindness. Analyzing 542 local news stories, I find the Goetz case was framed as a *moral panic,* while Zimmerman coverage exhibited a *moral breach.* The Zimmercan case: (1) is characterized by competing, rather than complementary, narratives; (2) reframes "folk devils" as victims and disrupts clear-cut allocations of blame; (3) emphasizes harm to *communities* rather than harm to *social order*; and (4) elicits calls for dialogue and acknowledgement rather than collective punishment and shaming. Unpacking what the different styles of narrative mean for racialized constructions of victims and criminals and the social construction of harm, threat, and social action, I argue that, despite the greater attention to race found in Zimmerman coverage, moral breaches tend to compartmentalize social problems and thus narrow their impact.

KEYWORDS: moral panic; politics of crime; racialization; self-defense; gun politics.

From March 2012 to July 2013, many Americans were captivated by the case of George Zimmerman, who shot Trayvon Martin in a gated community in Sanford, Florida on February 26, 2012. The case echoed another, in which Bernhard Goetz shot Barry Allen, Troy Canty, James Ramseur, and Darrell Cabey in a Manhattan subway in 1984. Both Zimmerman and Goetz claimed self-defense, both shot African American teenage boys who posed no immediate threat, and both were ultimately acquitted of all serious charges. Yet, local news coverage of the two cases was strikingly different, presenting the cases as profoundly different kinds of social problems. Infused with racial "code words," the Goetz case was treated as symptomatic of generalized social breakdown and widespread frustrations surrounding crime, whereas the Zimmerman case was treated as a flashpoint for race and racial relations against the

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backdrop of colorblindness (Harris 2012; Omi and Winant 2014). Unlike Goetz coverage, coverage of the Zimmerman case did not present a monolithic, racialized criminal; instead it drew attention to competing narratives that *contested* the production of "folk devils" and recast them as victims.

Scholarship suggests that crime news framing tends to follow the logic of a "moral panic": stylized folk devils, particularly young men of color, are presented as representative of an acute threat to the hegemonic values associated with social order. Although news outlets have become more fractured and, to some extent, more receptive to issues of representation and diversity since the 1980s (Garland 2008; Hier 2002, 2008; McRobbie and Thornton 1995; Parnaby 2003; Ungar 2001), studies of crime news framing tend to emphasize the reproduction, rather than destabilization, of hegemonic racial categories (Chiricos and Eschholz 2002; Dixon and Azocar 2006; Dixon and Linz 2000; Parham-Payne 2014). Set against this literature, news coverage of the Zimmerman case provides a negative case. How does *counterhegemonic* crime news framing allocate blameworthiness and harm? To what extent are racial stereotypes ruptured versus redrawn?

Using exceptional but theoretically generative cases (Burawoy 1998), I compare local coverage of the Goetz and Zimmerman cases. Given longstanding American practices of extralegal violence (Brown 1991; Cottrol and Diamond 1991) and entrenched stereotypes of criminals as racial minorities (Collins 2002; Stabile 2006), alleged self-defense cases provide an opportunity to disentangle the co-constitutive American news framing of race, crime, and threat. Sampling articles from the respective local newspapers (*The New York Times, Orlando Sentinel*), I used quantitative and ethnographic content analysis (Altheide and Schneider 2012) to code 542 news articles. Moral panic framing, characterized by individual folk devils presented as demonstrative of a larger racialized threat to social order, emerges in the Goetz coverage, while Zimmerman coverage illustrates a moral breach. That is, (1) it is characterized by competing, rather than complementary, narratives; (2) it reframes folk devils as victims and disrupts clear-cut allocations of blame; (3) it emphasizes harm to *communities* rather than harm to *social order*; and (4) it elicits calls for dialogue and acknowledgement rather than collective punishment and shaming.

This article primarily aims to gain analytical clarity on what I call a "moral breach" by drawing on existing theories of moral panic and moral regulation and situating these theories with the racial politics of colorblindness (Harris 2012; Omi and Winant 2014). It examines the discursive gains *and* costs of counterhegemonic framing for the racialized delegation of blame and harm. Attending to the constructions of victims and criminals and the discursive distribution of harm and threat, I argue that despite greater attention to race in Zimmerman coverage, such moral breaches tend to *compartmentalize* social problems and thus narrow their impact.

RACIALIZED CRIME NEWS FRAMING

As everyday schematic devices used "to allow its user to locate, perceive, identify and label a seemingly infinite number of concrete occurrences defined in its terms" (Goffman 1974:21), frames shape social movements (Benford and Snow 2000), social rituals and play (Lee 2009), community-police relations (Roussell and Gascón 2014), and crime news reporting. News outlets play a significant role in social problem construction by providing compelling frames that instruct publics not *what* to think but *how* to think about particular issues (Best 2010; Saguy and Gruys 2010). News reports of crime have a strong impact on perceptions of crime, distorting the extent and nature of criminal victimization (Garland 2004; Heath and Gilbert 1996).

Although U.S. stereotypes of men of color as criminal threats date back to antebellum fears of slave revolt that accelerated under Jim Crow after the 1890s (Muhammad 2010), since the 1960s, the media have played a growing role in maintaining and deepening the linkage between black and brown bodies and criminality. News stories deploy racialized imagery to frame criminality, violence, and victimhood in ways that reinforce a stark binary between white victims and racialized criminals (Stabile 2006). African Americans and Hispanics are more likely to be portrayed as criminal suspects than whites, controlling for rates of criminal offending, and they appear as criminal subjects in more "threatening contexts" (Chiricos

and Eschholz 2002; Dixon and Linz 2000). Whites are disproportionately portrayed as victims or law defenders (Dixon and Azocar 2006; Dixon and Linz 2000). Though African Americans experience higher rates of gun-related victimization, white victimization is overrepresented in gun crime coverage (Parham-Payne 2014).

News depictions of criminal suspects can play a role in creating a moral panic in which folk devils—such as young men of color—embody widespread anxieties about social disorder. As Stanley Cohen ([1972] 2011) outlines, in a moral panic:

> A condition, episode, person, or group of persons emerges to become defined as a threat to societal values and interests; its nature is presented in a stylized and stereotypical fashion by the mass media; the moral barricades are manned by editors, bishops, politicians, and other right-thinking people; socially accredited experts pronounce their diagnoses and solutions; ways of coping are evolved or (more often) resorted to; the condition then disappears, submerges, or deteriorates and becomes more visible (p. 1).

In the United States, politicians and the media used increasing violent crime rates in the 1970s and 1980s to deepen public fears of disorder and generate support for disproportionately austere criminal justice responses (Garland 2004). Scapegoating boys and young men of color (Bumiller 2009; Stabile 2006; Welch, Price and Yankey 2002; Western 2006;) as "superpredators" threatening the foundations of social order (Glassner 2010), politicians, pundits, and experts (i.e., "moral crusaders") mobilized moral panic to galvanize public fear and generate consensus for authoritarian responses to crime (Hall et al. [1978] 2013). As Katherine Beckett (1997) shows, the deployment of "tough on crime" frames by politicians, rather than actual crime rates, swayed public support toward punitive measures from the 1960s onwards.

Erich Goode and Nachman Ben-Yehuda (1994), however, remind us that moral panics are not simply instances of public mystification but can take a variety of forms—grassroots, elite engineered, or interest group oriented. In the context of crime, moral panics gain currency from broadly resonant stereotypes and biases, especially with regard to race (Welch et al. 2002:4). The portrayal of men of color as "criminals" in order to activate widespread, if taboo, racial biases is an example of what Michael Omi and Howard Winant (2014) refer to as "code words": rather than overt racism, coded racism emphasized the deserving ("hardworking Americans") versus the undeserving (the "welfare queen," the "gangbanger").

Moral panics can furthermore deepen stereotypes. Experimental psychologists show that African American criminal suspects, as compared to whites, are more memorable (Dixon and Maddox 2005) and treated with more suspicion (Peffley, Shields, and Williams 1996). African Americans are also more likely to be misidentified by readers as criminal suspects in violent crime stories (Oliver and Fonash 2002), and images of ambiguous objects are more likely to be identified as guns when associated with African Americans than with whites (Payne 2006). Scholars of racial threat (Blumer 1958) suggest that these associations may play a critical role in driving racial disparities in social control, such as arrests (Eitle and Monahan 2009; Muller 2012; Parker, Stults, and Rice 2005), police justifiable homicides (Smith 2004), and incarceration (Western 2006).

However, the rise of both identity politics, fueled by the civil rights movement, and new media have created new spaces for marginalized voices and underrepresented groups within both mainstream and alternative media channels to contest these racial misrepresentations. Taking stock of the increasing diversity of voices within the media and expanded channels for their dissemination, Angela McRobbie and Sarah L. Thornton (1995) complicate traditional moral panic theories by calling attention to interest groups who speak on behalf of so-called folk devils and "produce their own media as a counter to what they perceive as the biased media of the mainstream" (p. 568). If, as David Garland (2008:17) writes, "the targets of today's moral campaigns will sometimes have the capacity to resist deviant identities and assert the social value and normality of their conduct," there may be such a thing as "good moral panic" (David et al. 2011), such as one centered on bringing attention to racial profiling.

Relatedly, U.S. racial politics have shifted since the 1990s, likewise suggesting a rethinking of moral panic theory. The most recent rearticulation[1] of the civil rights agenda, colorblind racism, posits that "the goals of the civil rights movement have been substantially achieved, that overt forms of racial discrimination are a thing of the past, and that the United States is in the midst of a successful transition to a 'post-racial' society" (Omi and Winant 2014:257). Though not the only racial politics in the contemporary U.S. context (Wingfield and Feagin 2012), the emergence of colorblind racism on the twilight of the civil rights movement presents a paradox: as Fredrick Harris (2012) describes, the erasure of a black politics and its replacement by a universal "colorblind" approach that emphasizes racial unity at the very moment at which African Americans occupy unprecedented positions of power. How are racialized categories reproduced or resisted in contexts of pitched moral outcry, given the backdrop of colorblind racism? To explore, I introduce the concept of moral breach.

MORAL PANICS, MORAL BREACHES

Scholars have advanced early moral panic theory by extending it to topics ranging from rave culture to climate change to corporate crime. Moving beyond moral panics as exceptional, episodic, irrational, and injurious events (Waddington 1986), scholars now ask how moral panics relate to quotidian social processes of moral regulation and how moral panics might not just reproduce hegemonic order but also contest it. "Hegemony" refers to the adoption of a dominant group's values, perspectives, and interests as the "common sense" of a society. Hegemonic orders are unstable and open to contestation; counterhegemonic struggles trouble hegemonic "common sense" and expose the power relations that sustain hegemony by exploiting slippages and contradictions within hegemonic orders.[2]

Expanding moral panic theory, scholars posit that moral panic is best understood as embedded in broader, everyday processes of moral regulation aimed at sustaining hegemonic relations (Critcher 2009; Hier 2002, 2008; Rohloff and Wright 2010). Bridging insights from scholarship on risk, late liberalism, and neoliberalism (Beck 1992; Giddens 1991; Rohloff and Wright 2010; Rose, 1990), Sean Hier (2011) defines moral regulation as "a long-term process of encouraging others to internalize codes of moral conduct and act on their own behavior to affirm a sense of phenomenal security in a world of perceived or potential insecurity" (p. 528). The distinction between moral regulation and moral panic lies not in the latter's irrationality (Waddington 1986), but in how threats are constructed, how harm is understood to be impactful, and what kinds of solutions are proposed. While moral panic formulates threats as individualized folk devils that harm the basis of society and thus call for *collective* solutions, moral regulation emphasizes *collective*, amorphous risks that are seen to harm *individuals* rather than undermine the social fabric per se and thus call for *individual* (or neoliberal) strategies of risk management. Thus, moral panic can be seen as a momentary outburst (Lundström 2011) or an extreme version of moral regulation (Critcher 2009).

Considering moral panic and moral regulation as *discursive logics* (Siltaoja 2013) provides an opening to raise the issue of the "good" moral panic (Cohen 2011) amid increasing critiques of the normative biases of traditional moral panic theories (Cohen 2011; Rohloff and Wright 2010). Reviewing key tensions in contemporary moral panic research, Matthew David and colleagues (2011:216) suggest that rather than reinforce the "hegemonic order," moral panics may also threaten it by calling attention to unrecognized social problems (see also Cohen 2011:241). The possibility of a "good"

1. Omi and Winant (2014) use the term "racial rearticulations" to examine race relations in the United States in the post-civil rights era, noting that racial domination (think: Jim Crow) has been largely replaced by racial hegemony (think: colorblind racism) whereby dominant interests incorporate elements of opposing social and political groups.
2. Counterhegemonic struggles may become—and indeed, aspire to be—hegemonic; this is how Gramsci, following Marx, understood the progression of class struggle. However, other kinds of counterhegemonic struggles are geared more at troubling normative orders than replacing one normative order with the other. As Brown (2008) describes, for example, feminist critique revolves around the disruptive interrogation of prevailing gender orders. Even as aspects of feminist ideology become incorporated into the hegemonic order (Johnston and Taylor 2014), feminism remains counterhegemonic to the extent that it maintains commitment to disruption.

moral panic raises at its core the question of how threat, harm, and response are constructed in the context of counterhegemonic, as opposed to hegemonic, moral processes.[3] As one example, Amanda Rohloff (2011) analyzes Al Gore's climate change campaign as a "civilizing offensive" operating as "a part of a wider moral panic that seeks to improve upon the behaviours, manners and morals of all of 'us' who contribute to the perceived social crisis of anthropogenic climate change" (p. 637). While a civilizing offensive fans panic by boosting a problem's urgency (Rohloff 2011:641-42), it differs from a moral panic in that the target is self-regulation rather than folk devils. Further, it draws attention to risks, threats, and forms of regulation, but to upset hegemonic order rather than sustain this order.

Similarly, Hier and colleagues (2011) consider media coverage of a ban on hoodies (hooded sweatshirts) in a U.K. shopping center. Although the media treated hoodies as emblematic of youth crime, these representations were met by multiple contested frames, which "managed to partially shift the onus of problematization from youth transgression to governmental regulation" (Hier et al. 2011:272). Bridging moral panic and moral regulation frameworks, the authors describe "a unique political dynamic of 'double problematization'":

> Moral panics also involve problematization of existing regulatory measures. Claims, counter-claims, and resistance represent struggles over the ascription of blame, but also simultaneous struggles over the proper regulatory responses to matters of crime and law-and-order (Hier et al. 2011:272).

These analyses serve as a starting point for distinguishing *counterhegemonic* versus *hegemonic* moral processes. I use the term moral breach to situate counterhegemonic moves as moral processes with distinct logics. Like moral panics, but unlike moral regulation, moral breaches are "pitched" and include "a moment of problematization" (or blame attribution) and a "moment of solution" (Hier 2002:330). Yet, while moral panics tend to defend widespread social values (hence "good moral panics," though rallied on behalf of marginalized groups, are framed in terms of defense of general social values), a counterhegemonic moral breach is a theoretical device for analyzing moments of pitched moral concern in which conflicting value systems, which are not necessarily presented in universal terms (see "harm to communities below"), clash—for example, in the case of Zimmerman, embrace of racial inclusion versus resistance to institutional racism. Moral panics can also be ambiguous, contentious, and contradictory, but they are more oriented to recentering normative orders, whereas moral breaches tend to "pivot the center" (Collins 2002) through disruptive, multifaceted, moral outcries that disrupt, rather than displace, hegemonic categories. My choice of the term "breach" highlights how gaps, slippages, and contradictions in normative orders come to be exploited rather than obscured. If a moral panic facilitates a retrenchment of hegemonic order, a moral breach opens up the opportunity for an interruption of this order, or, put differently, a panic about moral panic.

In the context of crime news framing, I argue that counterhegemonic moral breaches differ from hegemonic moral panics on four key indicators: competing narratives; contested blameworthiness; harm to communities; and dialogue and acknowledgement.

Competing Narratives

Though moral panics are inherently unstable and not always successful in consolidating hegemonic orders, moral panics distinctively revolve around asserting "shared anxieties" (Hier 2002:321) to effect "phenomenal security" (p. 312). Moral breaches, in contrast, challenge hegemonic orders not by asserting an alternative "moral economy" of harm and blame but by destabilizing this moral economy. This is reflected in the relationship between different narratives within a moral panic versus moral breaches: rupturing rather than replacing hegemonic orders, moral breaches contain competing,

3. This view is not without its critics, and even proponents are concerned with losing analytical specificity by extending moral panics to "approved crusades" (Cohen 2011:241).

mutually exclusive frames (Garland 2008; Hier et al. 2011), whereas moral panics are more likely to contain complementary, mutually reinforcing narratives.

Contested Blameworthiness

Under a moral breach, these competing narratives intersect to produce contestation over the form of social harm and the distribution of blame. In a moral breach, the blameworthiness of specific individuals is hotly contested, whereas moral panics "designate as unproblematically problematic the agency of the folk devil" (Hier 2002:330). Rather than "unproblematically problematic," the blameworthiness of individuals (such as Zimmerman) becomes contested through competing narratives of depersonalized threat. While moral panic framing emphasizes "individualized" threats (i.e., embodied by individual folk devils), moral breaches draw on more depersonalized threats (e.g., institutional practices associated with colorblind racism).

Harm to Communities

Moral breaches emphasize problems related to *communities within* society. Under moral panic framing, victims are representative, even universalistic, members of a "society under siege," as their victimhood is seen in terms of threats to shared values that sustain social order. Instead of threat *by* folk devils, moral breaches emphasize threat *to* them (Hier et al. 2011). Yet, unlike moral panic framing, these harms are framed not in terms of broad-based social values but instead as more narrow harms specific to communities.[4] As such, a moral breach takes the form of an "anti-denial" movement in which "acknowledgement becomes the slogan [and] previously denied realities must now be brought to public attention, their dangers exposed, their immorality denounced," thereby recasting folk devils as victims (Cohen 2011:241).

Dialogue and Acknowledgement

Yet, this acknowledgement comes at a cost. Moral breaches emphasize dialogue and acknowledgement meant to "improve manners and morals" (Rohloff 2011:639) at the level of communities and institutions, rather than micro-level self-regulation or macro-level punitive reforms. Thus, where moral panics *deepen* the othering of folk devils through collective punishment and shaming, moral breaches *compartmentalize* problems as concerns of victimized communities rather than society-wide concerns. This simultaneous acknowledgment *and* compartmentalizing of racial harm is in line with the contradictory impulse of colorblind racism to condemn racism, especially past racial injustice, while simultaneously downplaying to its present-day forms.

Two strategically chosen cases—the 1984 Goetz shooting and the 2012 Zimmerman shooting—are illustrative. Noting that crime news framing tends to align with traditional moral panic theory, I chose the Zimmerman shooting as an *exceptional* case. For comparative purposes, I choose a "typical" case of moral panic—local coverage of the Goetz shooting. Acknowledging that these two cases occurred in strikingly different social contexts and historical moments, my goal is map out the form that counterhegemonic crime news framing takes and its impact on racial categories by comparing the distinct logics of a *hegemonic moral panic* (Goetz) and *counterhegemonic moral breach* (Zimmerman) (see Table 1).

METHODOLOGY

The Cases

The 1984 Goetz and 2012 Zimmerman cases are alleged self-defense (or "justifiable") shootings. Sufficiently ambiguous to be open to alternative discursive framings regarding who was the victim and the criminal (that is, they could have been framed differently), these cases provide a generative, if

4. Here, communities are social groups of people aware of and mobilized around—whether discursively, politically, or otherwise—shared interests (i.e., these are communities of victims who reflexively "talk back"; see McRobbie and Thornton 1995).

Table 1. Moral Panics versus Moral Breaches

	Goetz *Moral Panic*	*Zimmerman* *Moral Breach*
Explanatory narratives	Complementary	Competing
Form of threat	Individualized folk devils	Contested blameworthiness
Target of harm	Society represented by a virtuous victim	Communities of folk devils-cum-victims
Calls for action	Collective punishment, shaming of folk devils	Dialogue and acknowledgement, compartmentalization of social problems

exceptional (Burawoy 1998; see also Rohloff 2011:647) opportunity to unpack ruptures in social categories regarding crime, criminality, and victimhood (Althiede and Schneider 2012). Note that the ambiguity is not due to *who* committed the act of violence but whether the act *constituted a crime* (Black 1983). Other similarities between the cases include: the use of guns to shoot black victims; significant evidence to contradict claims of self-defense; major legal road blocks as each case made its way to court; and not guilty verdicts for the shooters.

Goetz

On December 22, 1984, Bernhard Goetz, a white man in his late thirties, opened fire on Barry Allen, Troy Canty, James Ramseur, and Darrell Cabey, four African American teenagers in a Manhattan subway. Goetz shot each once. Then, saying, "You don't look so bad, here's another one," he shot Cabey a second time, paralyzing him from the waist down. The teens had asked Goetz for money; he said he could see by the "shine of their eyes" that they wanted to mug and attack him. They were carrying screwdrivers and all had arrest records, but Goetz knew none of that. Meanwhile, Goetz was carrying his gun illegally. Gun permits were difficult to obtain in New York City (and still are); he had applied for one after a violent mugging some years prior, but was denied by the police. After the subway shooting, it took a while for charges to be filed. First a grand jury refused to indict him for attempted murder, then a second grand jury did. When the case went to trial, Goetz was found not guilty of any serious charge except gun possession. This became the most infamous case of self-defense of the 1970s, 1980s, and 1990s—a period when "tough on crime" politics were ascendant and covert racism operated via "code words" (Beckett 1997; Omi and Winant 2014).

Zimmerman

On February 26, 2012, George Zimmerman, a white Hispanic man in his late twenties, shot and killed 17-year-old Trayvon Martin in a gated community in Sanford, Florida. Zimmerman was driving around his neighborhood, legally armed with a handgun, when he saw Martin, an unarmed African American with no criminal record, walking in the rain and wearing a hoodie. Martin had gone to the store to purchase snacks and was walking back to his father's house. Zimmerman dialed 9-1-1 to alert police of someone "suspicious," complaining "these assholes always get away." The dispatcher told Zimmerman to stay in his car and that police were on their way, but Zimmerman pursued Martin. After some kind of physical altercation, Zimmerman lethally shot Martin in the chest (in contrast to the Goetz case, in which victims were injured and one was severely paralyzed, but none died). As with Goetz, it took a while for Zimmerman to be tried: police maintained they did not have sufficient evidence, but eventually a special prosecutor charged Zimmerman with second-degree murder. When the case went to trial, the jury found that, like Goetz, Zimmerman committed self-defense, not murder.

Despite their similarities, these cases took place in strikingly different contexts. The Goetz case occurred in 1980s New York City, in a context of heightened concerns about both crime and criminal justice inefficacy (Beckett 1997). Guns were effectively outlawed. The Zimmerman case unfolded in a context of

dropping crime rates (even if some kinds of crime in Zimmerman's neighborhood may have been on the rise) and wide access to guns. Finally, while the Goetz case occurred in the context of racial "code words," the Zimmerman case exploded against the backdrop of colorblind racism (Beckett 1997; Harris 2012; Omi and Winant 2014). Their divergent contexts drove my choice of these two cases: the dropping crime rates and greater public sensitivity to racial issues at the time of Martin's death suggest the possibility of changing frames surrounding racialized crime news. Thus, these cases present an opportunity for extending theory (Burawoy 1998). Given that context informs my theoretical sampling approach, this article does not attempt to draw a causal argument regarding context so much as to develop a theoretical framework for understanding different kinds of racialized crime news framing. I refer to the context of these cases in my analysis to clarify distinctions in coverage.

Methods

Newspapers function as a site for the construction of social problems that, as established news outlets, allow for long-range longitudinal comparison. Newspaper coverage is strongly influenced by whether an issue is local versus national in scope, with local public spheres fostering deliberative engagement and national public spheres encouraging polarized conflict (Perrin and Vaisey 2008).[5] Accordingly, I use *The New York Times* as the most prominent *local* paper covering the Goetz shooting (rather than the nation's paper of record). Likewise, I use the *Orlando Sentinel* as the local paper for the Zimmerman shooting. While *The New York Times* is a national paper popularly regarded as biased toward leftist, progressive, or liberal politics, the *Orlando Sentinel*, a regional paper, is comparatively to the right. This difference does not detract from my analysis but may, instead, bolster it, given that I found *The New York Times* was more favorable toward Goetz, while *Orlando Sentinel* coverage was more critical of Zimmerman.

I sampled these local papers over the lifespan of these cases. I included the first 40 reported articles on each case and the subsequent 60 articles on each case after a verdict was rendered; otherwise, I sampled every third article in the local papers. This resulted in coverage periods of December 23, 1984 through November 8, 1987 (Goertz) and March 9, 2012 through July 20, 2013 (Zimmerman). I included all article types mentioning the cases, ranging from short, "30-word rants" (*Orlando Sentinel*) to editorials, court proceeding reports, and other coverage. I removed articles that were not substantively related to the cases, as well as duplicate articles. This resulted in a total sample of 542 (201, *New York Times*; 341, *Orlando Sentinel*). Using Atlas.ti software to code, I employed both quantitative content analysis (QCA) and ethnographic content analysis (ECA) (Atheide and Schneider 2012).

Quantitative Content Analysis (QCA)

I inductively coded the first 40 stories on the Goetz shooting and the first 40 on the Zimmerman shooting and then relied on existing analyses of U.S. crime and broader scholarship on media narratives of social problems to develop a set of codes for QCA. Thereafter, I deductively coded all subsequent articles for (1) the narratives used to frame the shooting (self-defense; race/racial tensions; prevalence of crime; inefficacy of the criminal justice system; police incompetence; gun laws and policies); (2) whether the article expressed sympathy and/or approval of the shooter's actions; and (3) whether the article expressed sympathy and/or approval of the shooting victims. Each article could include several narratives; all were coded separately. The author performed all the coding, and significance levels were calculated using student's *t*-tests. To check for intercoder reliability, a research assistant coded a random sample of 80 articles for (1) narratives and (2) sympathy toward shooter and shooting victims. Training took approximately two hours. All codes showed agreement of at least 90 percent between the author and research assistant.

5. Note that coverage in different outlets may thus vary; a preliminary analysis of *LA Times* coverage of the Goetz shooting, for example, revealed coverage more focused on race and racialization, which may indicate a "good" moral panic or moral breach. For comparative purposes, this article thus focuses on *local* coverage.

ECA

In addition to QCA, I analyzed stories with inductive codes to examine *how* frames were mobilized. Core themes across the two cases included the demarcation between victims and criminals; the mobilization of evidence, such as crime statistics or histories of racism; and presentations of persons involved in the cases as relatable or unfamiliar. These themes emerged in different ways and with different consequences across the two cases.

EXPLANATORY NARRATIVES

Local newspaper coverage was equally likely to frame the Goetz and Zimmerman cases in terms of "self-defense"; there is no statistically significant difference between the incidence of this frame. However, Goetz coverage was more monolithic in presenting Goetz as the "good guy" and the victims as the "bad guys." In contrast, Zimmerman coverage was more divided with respect to who deserved sympathy ($p < .01$; see Table 2).

In Goetz coverage, self-defense, crime, and race/racial tension served as *complementary* narratives, each mutually reinforcing one another to produce an integrated, overarching interpretation of the case. Goetz coverage was organized under the master frame "crime," which appeared in 30 percent of stories. Master frames tend to be non-specific, elastic, and inclusive so that they can be applied to a number of more localized issues and provide an overarching organization to the construction of social problems (Benford 2013). Though not the most frequent frame ("self-defense" appeared in 41 percent of all Goetz stories), "crime" provided an organizing language to understand the shootings, with crime rates and fear of crime often referenced as the backdrop to the shootings. One article spent two pages unpacking public opinion of the case, opening by noting:

> Half of New York City's residents believe that crime is the worst thing about living in the city . . . A majority expressed support for Bernhard Hugo Goetz, who touched off a nationwide debate on vigilantism and public safety by shooting four youths who had accosted him on a subway train and had sought money. Two in five said muggings and holdups had become so bad that New Yorkers "have a right to take matters into their own hands" (*NYT* 1/14/1985).

Here, crime provides the means for making sense of Goetz's action not as aggression but as self-defense; he is not a violent criminal, but a victim exercising his "rights." "Self-defense" and "crime" act as complementary and mutually reinforcing frames.

The frame of race/racial tension likewise complemented this heightened concern regarding crime. Goetz coverage generalized the sense of social breakdown by explicitly highlighting that the problem crossed the lines of race:

> Politicians and civic leaders—black and white—have contributed through negligence, inefficiency, or cowardice, to the decay of New York, so that now, as not a generation ago, unemployed youths on the street soon after felony convictions can threaten black and white residents and travelers, regularly and with impunity (*NYT* 6/26/1987).

Table 2. Sympathy in Goetz and Zimmerman Coverage

	Goetz Coverage	*Zimmerman Coverage*
Percent sympathetic toward shooter**	27	16
Percent sympathetic toward victim**	8	28

*$p > .5$ **$p > .01$ (two-tailed tests)

Table 3. Frames in Goetz and Zimmerman Coverage

	Goetz Coverage (percent)	*Zimmerman Coverage (percent)*
Self-defense*	41	40
Crime**	30	3
Race/racial tension**	21	46

* $p > .5$ ** $p > .01$ (two-tailed tests)

Race/racial tensions strengthens the master frame of crime by emphasizing its generalizability across different populations.[6] Some articles took pains to point out that black New Yorkers were not just more likely to be involved in crime, but were also more likely to be victims of crime, suggesting, for example, that "blacks and Hispanics, unfortunately, suffer more than others from these abuses, because . . . they are the mass of subway riders" (*NYT* 1/19/1985).

In contrast, Zimmerman coverage presented the frames of self-defense, crime, and race/racial tension as *competing* narratives that elicited mutually divergent interpretations of the case (see Table 3). Rather than subsumed under the master narrative of crime, race/racial tension was mobilized as a *competing* narrative with regard to self-defense. The race/racial tension frame appeared in 46 percent of Zimmerman stories—more than twice as often as in Goetz coverage ($p < .01$). Crime barely appears in Zimmerman coverage ($p < .01$); there were no references to the proportion of crimes committed by African Americans or acknowledgement that African Americans, too, are afraid of crime. Furthermore, multiple narratives are more likely to occur in the same news story in Zimmerman coverage than in Goetz coverage.

Race/racial tension provided an irreconcilably different explanation than self-defense, emphasizing Zimmerman as a threat not to society at large, but to the black community. Self-defense, in contrast, situated Zimmerman as a "well-intentioned victim." One article called these frames "competing narratives;" another drew on the inkblot metaphor to reflexively describe this ambiguity in coverage:

> One has Trayvon an innocent victim of a racist murderer. The other has George Zimmerman as a well-intentioned victim. Rarely are shades of gray or complexities allowed in. It's part of the culture of picking sides we have in this country . . . facts be damned (*OS* 4/8/2012).

> Many people see only what they want. The only lessons learned are the ones they're convinced they already know . . . it all depends on how you look at the inkblot . . . If you were already convinced the world is full of young black thugs, well, there's a good chance that's what you saw in this case, too. If you were convinced that minorities are unfairly profiled and unable to get equal justice, well, that's the story you see playing out again . . . Even through my lens, Zimmerman may not be guilty—because he isn't on trial for how well he listened to the dispatcher (*OS* 7/7/2013).

Here, the reader was presented with multiple viewpoints, but instead of a coherent, unified narrative, the story reproduced the adversarial logic of the U.S. court system, presenting these frames as mutually exclusive.

Thus far, coverage seems to operate under distinct narrative structures: Goetz coverage featured a coherent, if multifaceted, discourse suggestive of a moral panic. Zimmerman coverage featured a divisive, polarized discourse suggestive of a moral breach. Building on this difference, I turn to the construction of harm and the allocation of blameworthiness across the two cases.

6. Note that only after the verdict in the Goetz case was rendered did race/racial tensions emerge as a competing narrative to the narrative of self-defense.

FORMS OF THREAT

Moral panics scapegoat racialized folk devils as representative of a broad threat to hegemonic values within a given society. As with much crime coverage in the United States, Goetz coverage illustrated moral panic framing, buttressing racial stereotypes of young men and boys of color as criminal superpredators (Bumiller 2009; Collins 2002; Glassner 2010; Stabile 2006; Welch et al. 2002).

The teens Goetz shot are often unnamed and treated as a threatening gang,[7] though one testified that the four had not met until that day. Portrayed as predators, coverage emphasized their criminal histories and violent tendencies: "The police said that the four teenagers all had arrest records and that three of them were carrying long screwdrivers in their jackets. They lived near each other in the Bronx and apparently were friends" (*NYT* 1/1/1985). While this particular story identified Goetz's race, the boys' racial identities were not mentioned. This was not uncommon. Instead, stories featured racial code words that implicitly construct them as threatening: they were "from the Bronx," they "all had arrest records," and three "were carrying long screwdrivers." Even though their screwdrivers could have been used for a variety of purposes that did not involve harming Goetz—for example, to break into vending machines—coverage generally treated them as evidence that the boys were poised to violently victimize Goetz.

Accordingly, the boys became representative of a broader criminal element—teenagers of color who left the tough streets of the Bronx to victimize unsuspecting Manhattanites:

> In recent months, several youths who live in the projects in the South Bronx have been in the news. Four had been in trouble with the law and, on a subway car in December, met with a series of bullets from the gun of Bernhard Goetz (*NYT* 4/6/1985).

This story—published long before Goetz went to trial—already characterized the boys he shot as criminals. Indeed, it uses the boys as a trope to begin an article on an entirely different topic—basketball star Ed Pickney, also from the Bronx. Here, the boys stand in for a faceless, nameless, racialized threat. Meanwhile crime statistics (both general rates of crime as well as statistics on the race of those who commit crimes) were used to corroborate Goetz's fears as "reasonable":

> Scholars such as Dr. Kenneth B. Clark, professor emeritus of psychology at the City University of New York, have expressed doubt that Mr. Goetz would have shot four white youths asking him for money . . . however, Marvin E. Wolfgang, a criminologist at the University of Pennsylvania, said that perceptions about who is more likely to commit a crime have some statistical basis. The rates of crime for four violent offenses—homicide, rape, robbery, and aggravated assault—are at least ten times as high for blacks as they are for whites, he said (*NYT* 6/18/1987).

Criminologists, self-appointed media experts, lawyers, and even President Ronald Reagan appeared in coverage as moral crusaders, emphasizing the threat of crime as a widespread, legitimate concern. The 1984 Goetz shooting thus demonstrates that coverage of self-defense cases can reproduce the familiar tropes of racialized folk devils and thus resemble crime news coverage more generally.

However, the 2012 Zimmerman case demonstrates that this is not the only possible form that coverage may take. Perhaps reflecting dropping crime rates, less pervasive concerns about crime, and the supplanting of racial code words by racial colorblindness,[8] Zimmerman coverage did not generally

7. This is also perhaps a result of there being four boys instead of just one (as in the case of Trayvon Martin).
8. Interest in crime as the United States' "most important problem" has dropped precipitously in the last 20 years; in June 2013, only 3 percent of Americans said crime was the nation's "most important problem" (Newport 2013), in contrast to 49 percent in 1994 (Caroll 2005). Since 1989, Gallup have asked a representative group of Americans, "Is there more crime in the United States than there was a year ago, or less?" In 1989, 84 percent of Americans said "more"; only 5 percent said "less." By 2011 and 2013, the percentage of Americans who said "more" dropped to 68 percent and 64 percent, respectively, and the respective portion of those who said "less" increased to 17 percent and 19 percent (see Gallup 2015). Unfortunately, only since 2000 has

stylize Martin as a representation of an ever-present threat of crime, and coverage was more sympathetic toward Martin than Zimmerman.

Nor was Zimmerman stylized as a folk devil. His blameworthiness was hotly contested, with his portrayal as a criminal entailing ambiguity on multiple dimensions. Across coverage, his demographic, biographical, and character attributes were fluid and contradictory: Sometimes white, sometimes Latino; sometimes a wannabe cop, sometimes an engaged neighbor; sometimes an overt racist, sometimes just the product of a racist society; sometimes a murderer, sometimes the victim of a "tragedy." Zimmerman was generally portrayed in a negative light, but, defying categorization, he was afforded far more narrative room than the "bad guys" in Goetz's case, his criminal intent often treated as an open question rather than a closed case. Even his racialization as a "white Latino" opened ambiguity about his racial motivations, with some stories highlighting his Hispanic heritage to dissociate him from accusations of racism.

Zimmerman was repeatedly given narrative room to be innocent *and* guilty, even as he never denied killing Martin. Some coverage painted Zimmerman as a racist murder, reproducing the court narrative that Zimmerman's culpability turned on whether he was motivated by "anger or malice" (*OS* 7/18/2013). Other stories attempted to determine whether Zimmerman was "truly" a racist by interviewing friends and neighbors. Reflecting the divisive and multifaceted logic of moral breaches rather than the more coherent outrage of moral panics, these stories sat alongside others that cast the case as "a tragedy, truly" (defense attorney Mark O'Mara, *OS* 7/13/2013) or "a sad case [with] no monsters" (defense attorney Don West, *OS* 6/30/2013).

Zimmerman's ambiguous blameworthiness suggests institutional racism (i.e., colorblind "racism without racists"; Bonilla-Silva 2006). Institutional racism relies on quotidian colorblind practices that are race neutral on the surface but result in racial disparities in outcomes and reproduce racial stereotypes. For example, public law enforcement overtly relies on criminal markers when choosing whom to stop, yet because of the slippage between criminal stereotypes and racial stereotypes, these actions result in disproportionate stops of men of color (Epp, Maynard-Moody, and Haider-Markel 2014), regardless of any racial animus on behalf of the officer (Payne 2006). Likewise, racial profiling unsettled Zimmerman's criminality; he could be innocent *and* guilty because he represented a form of racism that could function *without* individual animus. Thus, at times, the race/racial tension frame neutralized Zimmerman's *personal* criminal liability by emphasizing his actions as embedded in a broader context of institutional racism that drove police officers, store clerks, and armed men like Zimmerman to profile young men of color who "looked like" criminals. Broader racism seemed to subsume or explain individual accusations of racism.

TARGETS OF HARM

Though on opposite sides of the barrel of the gun, Goetz and Martin both figured as the predominant victim in their respective coverage. Their portrayals shared some similarities: both were presented as exercising their right to occupy public space, and their clean criminal records were emphasized. Nevertheless, as *victims* evocative of broader *social harms*, Goetz and Martin were constructed differently. Goetz was presented as a broadly relatable victim worthy of sympathy, and Martin became representative of a community of wronged victims.

Goetz was a stand-in for a general social condition. Within a broader context of rampant crime and social insecurity, a variety of personal attributes helped portray him as a blameless victim. He was largely depicted as a white, mousy, perhaps eccentric electrical engineer; one story described him as "a thin, blond, clean-shaven white man about 6 feet tall and weighing about 155 pounds . . . neatly dressed in a light blue jacket and gray sweater, and . . . wearing clear, gold-rimmed spectacles" (*NYT*

Gallup started asking "Overall, how would you describe the problem of crime in the United States—extremely serious, very serious, somewhat serious, not too serious or not serious at all?" Answers to this question have ranged from 13 percent to 22 percent (extremely serious); 29 percent to 39 percent (very serious), 35 percent to 52 percent (somewhat serious), and 2 percent to 5 percent (not too serious).

12/23/1984). A few stories buttressed this imagery by reporting that the teenage boys thought Goetz was "easy bait" (*NYT* 4/26/1987) and "looked soft" (*NYT* 6/3/1987). As stories regularly mentioned the boys' arrest records, they occasionally pointed out that Goetz "has never been arrested" (*NYT* 1/4/1985). Goetz may have been armed, but his race, employment status, and lack of criminal history helped distinguish him from the "thugs" (*NYT* 6/18/1987), as did his experiences of victimization and community engagement:

> Mr. [Goetz], who had worked with a group seeking to rid his neighborhood of drug dealers and had organized petition drives for increased police protection, was attacked in a subway station four years ago . . . The son of the manager of Mr. Goetz's apartment building described him as a "very quiet and a very smart guy." "He's not the violent type," the man said, "but he's also not the type to let people abuse him" (*NYT* 1/6/1985).

Because Goetz was an involved community member who was "not the violent type," he became the "true" victim, despite being illegally armed and having shot four men who did not physically attack him. Goetz's actions thus were treated *not* as evidence of his culpability but as heroic responses to the undeniable threat of crime. Further, as a victim who "stood up" to rampant crime, Goetz vindicated widespread fears:

> Many people—from Chicago to Hawaii to Canada—have responded passionately and vehemently to an event that seems to have embodied their fears and frustrations about crime in their own cities . . . citizens have responded with overwhelming appreciation for the anger that apparently motivated Mr. Goetz to shoot the youths (*NYT* 1/7/1985).

Here, the case gains purchase from a widespread sense of being "sick and tired of being abused" (*NYT* 1/19/1985). Instead of an aggressor, Goetz becomes a blameless, even heroic victim, responding to anger and frustration felt by "everyone":

> He acted out everyone's fantasy, the psychologists say—this cool, calm man with his chrome-plated gun. If I get hassled on the subway or the street, our day dreams go, I'll teach those punks a lesson . . . a lot of people in this city—especially those who ride the subway—have a perception that the social contract has broken down and that not very much is being done about it (*NYT* 12/29/1984).

Just short of endorsing Goetz's actions, the article celebrates Goetz because he acted out a commonplace fantasy, implying consensus surrounding Goetz's actions (Goode and Ben-Yehuda 1994).

In contrast to Goetz coverage, Zimmerman coverage called attention to the harm enacted *on* communities of folk devils—now recast as victims. Coverage portrayed Trayvon Martin as a victim emblematic of pains suffered by particular *communities* rather than society as a whole. Explicitly identifying Martin as black, coverage of the Zimmerman case emphasized a racialized nightmare, not a universal fantasy:

> His [Trayvon's] death is the ultimate nightmare scenario feared by many black parents, who stress the importance of first impression to their children during "the talk": Be aware of negative stereotypes that the majority could hold about you, and do your best to avoid them (*OS* 10/28/2012).

Here, Martin is the victim of Zimmerman's overzealous desire to stamp out crime *and* of racialized stereotypes about black boys and men as criminals. The "ultimate nightmare" is not to be randomly singled out and mugged because you "looked soft" (as in Goetz coverage) but to be targeted and

hunted because of the "first impression" made by one's race. Martin's death represents a nightmare faced not by all Americans, but by those at risk of being racially profiled as criminals:

> "That could have been me," said Barry Sapp . . . who grew up in an upper-middle-class family in Tallahassee but said he was once harassed by police when he was 18 for being a black man in a mostly white neighborhood at night (*OS* 3/28/2012).

Unlike Goetz coverage, which emphasized the broad relatability of the case, Zimmerman coverage emphasized racial identity (e.g., "I am Trayvon") and parental ties (e.g., President Obama's comment that, "If I had a son, he would look like Trayvon," in his March 23, 2012 statement on the case) to demarcate the relatability of the case. For example, one article mimicked a letter to a son from his father, who wanted to have "the talk":

> Not about birds and bees. About surviving a world that often sees darkness if black is the skin you're in . . . What to do? Well, there are, for example, rules that we've learned for surviving driving while black. Show your hands and don't raise your voice. Avoid provocation . . . . A father's duty is to protect his kids. But the tragic truth is that safety tips are no guarantee (*OS* 3/23/2012).

Here, a father grapples with communicating a basic unfairness to a young son. Apologetic for a society in which his son must change his behavior to survive, he emphasizes humility over bravado. Still, even the best safety tips are "no guarantee." Here Martin becomes a flashpoint victim, representing familial and community struggle to protect black lives.

Racial identity also historicized the case. Coverage linked a range of racialized victims, from an African American hazing victim who died a few months prior to Martin (*OS* 4/14/2012) to the murder of Emmett Till (*OS* 3/17/2012). Some stories highlighted the actions of the NAACP and civil rights activists Al Sharpton and Reverend Jesse Jackson. Others used the language of civil rights to make sense of the Zimmerman case and the public outcry. One story referenced

> lynch mobs that killed with impunity and mass tragedies such as a 1920 riot in Ocoee and the 1923 burning by a white mob of Rosewood, an all-black Levy County town, for which no arrests were made. And more recently, with the notorious 1992 acquittal by an all-white jury of four white Los Angeles cops involved in the brutal beating of Rodney King. The message: black lives have little worth (*OS* 3/17/2012).

Juxtaposing Martin's death with other, politically charged losses of black life, coverage acknowledged (Cohen 2011) acute racial injustices through a history of discrimination and inequality.

In this way, Zimmerman coverage introduced a critical stance—it made it possible, for example, to articulate Zimmerman as a "racist murderer." Yet, these social critiques of Zimmerman's action also narrowed the impact of the Zimmerman story by suggesting that those most heavily impacted by the story were but a sliver of the public: the black public. The Zimmerman case exposed a nightmare, but not one faced by everyone (in contrast to Goetz). Except for limited discussion about possible race riots in the aftermath of the Zimmerman verdict (which never materialized), there was little reference to generalized social breakdown. Indeed, coverage of the Zimmerman case presupposed, and produced, a divided public, with the "majority" implicitly or explicitly (*OS* 10/28/2012) counterposed to the fears of "many black parents" and their children. This suggests that not all victims are created equal: some rally general concerns of social breakdowns; others elicit more narrow concerns of certain communities and certain populations.

CALLS FOR ACTION

The allocation of blame and harm shape which solutions are seen as viable and appropriate. Goetz coverage emphasized solutions that attacked broad and deep-seated social problems. Suggestive of a punitive sentiment that "something must be done" (Hier 2011:527; see also Welch et al. 2002), these solutions took the form of "tough on crime" measures geared at addressing the "roots" of criminal behavior (a lax criminal justice system). This construction opened a space (albeit very small) to promote an alternative remedy: structural solutions aimed at addressing issues of education, housing, and employment inequalities. Alternatively, Zimmerman coverage emphasized "national dialogue" as an end in itself—a goal that at least one Goetz story explicitly dismissed—while simultaneously calling for criminal justice reform with regard to racial inequalities. This increased sensitivity to inequity came at a cost: structural solutions were virtually absent from Zimmerman coverage, and the case was framed around addressing the distinct concerns of the black community.

Reflecting a punitive response to the shooting, 15 percent of Goetz stories referenced the ineffectiveness and laxity of the criminal justice system. One story noted that "these emotions should be directed toward strengthening a law-enforcement system that we all agree is not working very well" (*NYT* 1/05/1985). Presenting the case as "about a failure of government" (*NYT* 6/20/1987), stories emphasized statistics suggesting a lack of enforcement. One story lamented:

> After a mugger's first brush with the law, he has experienced the indifference of the authorities to his act. So the criminal justice system does more to contribute to a continuance of criminal activity than many people dare say. Most street criminals have records of dozens of arrests with little time in jail . . . the judiciary . . . has the power to impose adequate sentences but is not using that power (*NYT* 1/27/1985).

Advocating more cops, more enforcement, and more sentencing, stories emphasized *collective punitive* responses reflective of a moral panic.

Other proposals, however, emphasized *structural* rather than *punitive* solutions: "build more affordable housing, create new jobs, make our criminal justice system responsive to all citizens and build an educational system that gives all children a chance to learn" (*NYT* 6/20/1987). Four percent of stories referenced a socioeconomic cause to New York's crime problem, at times juxtaposing punitive solutions with structural remedies. Consider this letter to the editor:

> One positive step is to make criminals, once caught, wish they had not been criminals. Reinstate stocks and use corporeal punishment. Another step would be to provide jobs for unemployed youths . . . That is society's obligation, and we should get on with it before it is too late (*NYT* 1/2/1985).

Although initially punitive, the tone shifts to concerns about "society's obligation" to ensure that "unemployed youth" are targeted with jobs programs. In the wake of Goetz's non-guilty verdict, a leader of a group called 100 Black Men demanded redress of structural precarity: "I submit that the best challenge we can take is to find jobs for these young men" (*NYT* 6/18/1987). These sentiments appear sparingly in coverage; nevertheless, the framing of the Goetz case as a problem of general social breakdown appeared to create a small opening to discuss solutions that addressed broader problems of inequality and lack of access to resources.

Limited in Goetz coverage, structural solutions were absent in Zimmerman coverage, even though socioeconomic inequality had grown in the intervening years and upward mobility has stagnated (Putnam 2015). Instead, the overwhelming emphasis was on "national dialogue" (*OS* 4/2/2012) to acknowledge the harms and pains faced by black parents and children. Refusal to remain silent became a form of political action, as described by one pastor:

> We have met together and experienced the grief of Trayvon being killed . . . this has given us an opportunity to get more involved in our communities . . . and . . . have a grieving so we can talk and learn where the problems are (*OS* 7/15/2013).

Pushing for the arrest of Zimmerman thus became a mechanism to force collective acknowledgement. Given African Americans' exclusion from the formal means of justice, Martin's parents pressured the justice system to recognize black victimization, "vow[ing] they won't give up until Zimmerman is charged with the 17-year-old's slaying late last month" (*OS* 3/18/2012). Institutional reforms were presented less as a solution to a broad problem than a way to acknowledge experiences of exclusion and grief unique to the black community. One reverend viewed his demand for Zimmerman's arrest as a demand for recognition of black men's treatment by police: "We call for an immediate arrest. We want him behind bars . . . because you have arrested a lot of black men without probable cause" (*OS* 3/15/2012).

Demands for better communication, more respect, and greater sensitivity likewise characterized calls for police reform. Roughly 18 percent of stories referenced police incompetence. One story noted "What we really need right now is a police chief who not only has the confidence of the police officers but one who has excellent rapport with the community" (*OS* 1/30/2013), while another emphasized police abuse in Sanford: "In the weeks that followed, the NAACP and local black residents accused the Police Department of a long-standing pattern of ignoring crimes committed against blacks and of harassing and abusing blacks" (*OS* 3/20/2013). "Rebuild[ing] trust lost after the shooting of Trayvon Martin" (*OS* 4/2/2014) described one of the core objectives of Sanford's incoming police chief, while the President of the NAACP emphasized "ensur[ing] that our sons and daughters wake up and feel safe in Sanford" (*OS* 2/21/2012). Note that this is distinct from the *collective* reforms embraced in Goetz coverage: while Martin's death could have been framed as undermining justice in the United States (i.e., injustice for one American is injustice for all), reforms tended to emphasize harms to the black community. (This was also generally the case in discussions of Stand Your Ground laws, which appeared in 21 percent of stories.)

This emphasis on black community and black identity, however, created openings to undercut the critiques and reforms raised with the Zimmerman case. First, recognition of racial stereotypes was mobilized to implicate Martin directly: had Martin not chosen to wear a hoodie that night, he might still be alive. The recognition of racial markers, thus, was mobilized to *individualize risk* and assign responsibility to individuals who failed to navigate pervasive stereotypes.

Additionally, the valuation of black lives was mobilized as a means of refocusing blame back onto African Americans. Consider this excerpt from a letter to the editor:

> Over the course of a few days, there have been dozens of shootings in Chicago, including a police officer. At least 10 of those were homicides. A majority of those shootings was black-on-black crime . . . I have heard it said in the Trayvon Martin tragedy by media pundits that young black lives have no value. Sharpton and others prove their point when almost 50 victims of gun violence here in Chicago can't get Sharpton's attention (*OS* 3/25/2012).

Acknowledgement here is a means to deepen, rather than disrupt, blameworthiness. African Americans are blamed for most black deaths, and black community leaders are portrayed as partial and opportunistic.

Other commentators bemoaned "race-baiters" as creating, rather than merely exposing, miscarriages of justice:

> It seems that well-intended lawyers—as well as some zealots who have nothing to do with the prosecution of Zimmerman—thought it might be a good idea to appear in churches and in

> front of national and local television cameras and microphones . . . It appears the self-serving hype so inundated the black community with nonobjective advocacy that it likely caused such a bias within certain communities that not one African American in Zimmerman's pool of prospective jurors could withstand the test of impartiality (*OS* 6/27/2013).

Here, harm is inverted such that misinformed African Americans, rather than racism, threaten fairness and equality.

These distinctions in "calls for action"—Goetz coverage emphasizing collective responses amid general social breakdown, Zimmerman coverage presenting narrower reforms that address community-specific inequalities—reveal openings *and* limitations that emerge within different kinds of framing. The outrage in Goetz coverage unleashed support for racially tinged punitive measures, but it also created space to call attention to structural inequalities. Such reforms were absent from Zimmerman coverage; instead, the range of possible solutions was narrow, and at times, black identity was even reified to redelegate blame to African Americans.

The predominant calls for action—punitive outcry in *The New York Times* and acknowledgement and dialogue in the *Orlando Sentinel*—are perhaps surprising given that *The New York Times* tends to lean politically left while smaller papers tend to be more conservative. That said, the secondary calls for action—on structural solutions in Goetz coverage and on reallocating blame to African Americans in Zimmerman coverage—may reflect biases in newspapers rather than differences in coverage. Thus, this finding should be treated with caution.

Nevertheless, this analysis suggests that the black criminal trope is not the only vehicle through which crime becomes a means of social control (as in Goetz), though it has attracted the most scholarly interest. Categories of victimhood, my analysis of Zimmerman coverage suggests, can also be constructed to minimize the social impact of the loss of black life. Specifically, it reduces what could otherwise be a moral panic of broad social concern to a cautionary tale for only *some* Americans.

CONCLUSION

This article examines two distinct framing logics, moral panic and moral breach. Coverage of the Goetz case illustrates a moral panic. Goetz coverage centered on a clearly identifiable folk devil (black criminals), symptomatic of a broader social breakdown. Support for Goetz was portrayed as relatively unified, as he was celebrated as acting out the "fantasies" of those who, presumably, could imagine themselves as victims. Public outcry centered on enhancing punitive sanctions for wrongdoers. Coverage of the Zimmerman case illustrates a moral breach, with multiple, competing narratives that painted Zimmerman as a racist, a good Samaritan, or an overeager, wannabe cop. Media accounts centered on multiple, divisive tropes rather than a singular folk devil. And where the case was seen as symptomatic, it was symptomatic *not* of generalized social breakdown but of racism within the United States affecting particular communities. Zimmerman was depicted as acting out a *nightmare,* but one that impacted only some Americans. Instead of punitive sanctions, reforms centered on encouraging dialogue, sensitivity, and awareness.

These two cases emerge in distinct periods, which drove my analytical decision to focus on them. The Goetz case occurred in the 1980s, a period during which racial "code words" galvanized Americans' fears of black criminals and concerns about the inefficacy of the criminal justice system, while the Zimmerman case took place in a context of dropping crime rates and increasing racial colorblindness. These are theoretically rich, but exceptional cases: the vast majority of self-defense cases reported in news outlets do not ignite this level of interest. Many go unreported. Because African Americans disproportionately commit justifiable homicide (Barnes 2012), future research should longitudinally sample less noted instances of claimed self-defense to more broadly examine framings over time and in different contexts, especially as guns become culturally accepted tools of self-protection (Carlson 2015).

While this article contributes most directly to scholarship on the racialized construction of crime, the concept of moral breach opens new questions about the study of social reactions and their subsequent framing (Garland 2008). This article emphasizes race as a fault line in American society; it leaves unaddressed questions of how moral panics and moral breaches emerge with respect to citizenship, gender, sexuality, class, and other lines of difference. What conditions facilitate moral panics as opposed to moral breaches, within and beyond the context of racialized news reporting? Are there contexts in which moral breaches and moral panics are mutually reinforcing? Are certain groups—racialized criminals versus undocumented immigrants; pedophiles versus date rapists; meth addicts versus white-collar criminals—more likely to elicit one response as opposed to the other? For example, in light of "post-feminism" (McRobbie 2004), extending the concept of a moral breach to the framing of rape and sexual assault may be especially fruitful. Thus, my goal in introducing the concept of moral breach is to open the theoretical door to more nuanced understandings of hegemonic and counterhegemonic processes.

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