MARKETING PROFESSIONAL WRESTLING TO CHILDREN: AN ETHICAL EXAMINATION

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INTRODUCTION
As noted by Laczniak, Burton, and Murphy (1999), there has been a notable lack of attention given to marketing ethics in the sport literature, and the attention which has been given has focused on an important yet relatively limited set of topics, much of it addressing the issue of ambush marketing (e.g., Meenaghan, 1996; O'Sullivan & Murphy, 1998). The practice and study of marketing ethics is as important for the sport and entertainment industry as it is for any other. Kotler’s (1997) “societal marketing concept” suggests that organizations should build social and ethical considerations into their marketing practices, acting in the best long-term interests of society. The Code of Ethics of the American Marketing Association (AMA) also promotes the importance of marketing ethics, stating that marketers should not do harm knowingly, and should offer products and services that are safe and fit for their intended uses.

Reasons can be posited as to why such a lack of attention to marketing ethics exists within the sports literature. For instance, one might charge that within academic research as a whole, dismissal of research considered to be colored by a normative or overly polemical tone is commonplace (perhaps rightfully so). Further, one might harbor the notion that the consumption of sport in its various forms has relatively little potential for harm. In other words, challenging the marketing of other consumer products within an ethical framework, such as marketing tobacco to teens and credit cards to the young and to the mentally disabled, seems a valuable pursuit given the potential harm these products can do to consumers. However, one might see the viewing of sport, even sport that raises ethical eyebrows, far down the potential for harm scale when compared to the potential harm that comes from teen smoking and teens and the mentally disabled using credit cards. However, the explosion in popularity of one form of sport, or more accurately “sports entertainment”, begs ethical examination, due to its targeting of children and its potential to cause harm.

THE POPULARITY OF PROFESSIONAL WRESTLING AS “SPORTS ENTERTAINMENT”
Professional wrestling is a very popular form of entertainment. World Wrestling Entertainment (WWE), the professional wrestling industry leader in virtually every statistic (e.g., television ratings, live event attendance, licensing revenue) broadcasts over 7,500 hours of television programming to over 130 countries in 23 different languages throughout Europe, the Middle East, Africa, Asia, Australia, New Zealand, and Latin America. Each week, WWE television is viewed by an average of 16 million people in the U.S. alone, and revenues for the NYSE traded company approach a half-billion dollars annually ($485.7 million in 2007). Further, attendance for WWE events has grown from 1.1 million fans in 1997 to 2.1 million in 2007, with a current average ticket price of almost $50 ( “Live and Televised Entertainment,” 2008). WWE’s flagship show, Monday Night RAW on USA Network is consistently the number one rated regularly scheduled cable television program, while the company’s other core show, Friday Night Smackdown on CW, which was the most watched program on that network among all male demographics and is often the top-rated program of the night in all of television among males aged 18-34 (note: Smackdown programming is now aired on My Network TV). Combined, RAW and Smackdown drew average weekly Nielsen ratings of 6.25 in 2007, while yet another WWE television program, ECW: Extreme Championship Wrestling, drew an average Nielsen rating of 1.47 in 2007. In addition, ECW: Extreme Championship Wrestling, is the Sci Fi Channel’s most popular show in terms of households and total viewers (Guthrie, 2007). The 7.72 combined Nielsen rating for RAW, Smackdown, and ECW clearly highlight wrestling’s popularity (Guthrie,
2007). Indeed, in recent years, pro wrestling has drawn ratings that would make many sports envious. In addition to strong television ratings, the WWE stages approximately 350 live events per year, including more than 60 international events, and wwe.com averages 17.5 million unique visitors a month (Guthrie, 2007). This popularity and ubiquity has resulted in the WWE becoming a publicly held global enterprise with a $1.2 billion market cap (Guthrie, 2007).

To achieve this popularity surge, pro wrestling has significantly transformed and repackaged their product. Where it once was promoted as “real sport,” it now unashamedly admits that it is testosterone-laced theater. Where it once tried to hide the predetermined nature of the results, it now proudly promotes itself as entertaining camp. As WWE states on its website, “Our formula is straightforward. We develop compelling storylines anchored by our Superstars” (“Business overview,” 2008). It is now recognized as full-fledged soap opera, with the actors (wrestlers) free to act, not restrained by the pretense that they are engaged in a legitimate sport contest. This has led to viewers tuning in to see what will happen next, to see the creative, unencumbered direction in which the writers will take the stories. As alluded to earlier, the WWE now labels this product not sport, but “sports entertainment”, and the wrestlers are now not only called wrestlers, but “Superstars” (note: the company is has recently has been moving more toward reference their “Superstars” as “Entertainers” rather than “Sports Entertainers”), engaging in activities typical of mainstream entertainment stars (e.g., starring in major motion pictures, television programs, and appearing as guests on popular talk shows). Indeed, the WWE has capitalized on this by starting WWE Films, which has produced such films as 2007’s The Condemned, starring Stone Cold Steve Austin, and 2006’s The Marine, starring John Cena.

Wrestling has emancipated itself from the restraints of sport legitimacy, and this has allowed many people who have avoided it in the past to embrace it for what it is (entertainment) and not what it is not, much like they would embrace any other fictional television show. Wrestling fans now come, unashamedly, from many different occupations, income levels, and educational levels (Ashley, Dollar, Wigley, Gillentine, & Daughtrey, 2000). A manifestation of this can be seen in the variety of advertisers on wrestling programming, which include or have included, among others, cosmetic firms, banks, hotels, pharmaceuticals, and long-distance carriers.

While repackaged as “sports entertainment”, wrestling has also exploded in popularity due to its successful targeting of the male 18-34 year old demographic. Wrestling, in particular the WWE, has attracted this group through ratcheting up the sexual and violent content in its events and programming, content that many young men value in their entertainment. For example, a sampling of WWE programming (RAW and Smackdown) reveals the following:

- Mark Henry, a WWE wrestler (and former U.S. Olympian) also known as Sexual Chocolate, leans back in his dressing room chair as a woman begins seductively rubbing and kissing her way down his bare chest and stomach. The woman, a “gift” from Henry’s two WWE female valets, then lowers her head beyond the view of the television camera (the picture stops at his waist) as Henry proceeds to arch his head back, close his eyes and moan in ecstasy. The activity being performed onscreen is not ambiguous to the viewer, though it is not directly seen. The woman finishes her task and Henry graciously thanks her as he caresses her body. When he reaches a certain part of “her” anatomy, he shockingly discovers that his lover is not actually a she, but a he. Henry had been duped by his valets who had grown tired of his brand of macho chauvinism. His two valets then formed their own partnership called PMS (Pretty Mean Sisters) and set out to humiliate other male wrestlers.

- Triple H, one of the WWE’s top superstars, dresses as his masked rival Kane, and stages a scene in a funeral home where he, inside of an open casket, engages in necrophilia with Kane’s deceased girlfriend Katie Vick. The act was taken to completion, upon which Triple
H, still hovering over the body in the casket exclaims upon wiping a substance off of Ms. Vick’s head, “I guess I really did screw your brains out.”

Upset at what he sees as insubordination by his “bastard son” Hornswoggle (a “leprechaun” wrestling character), WWE Chairman and on-screen personality Vince McMahon brings another wrestler, JBL, into the ring for a confrontation with Hornswoggle. John “Bradshaw” Layfield (better known as “JBL”) handcuffs Hornswoggle’s protector, Finlay, to the steel cage that surrounds the ring. McMahon proceeds to profusely whip Hornswoggle with his belt. JBL then drops elbows on the prone Hornswoggle, beats him, and then throws him like a rag doll into the side of the steel cage.

Whether it is with content such as this, or the antics provided by characters such as Val Venis (a former WWE superstar who portrayed the role of an ex-porn star impressed by his past career and remaining prowess) Vince McMahon seems to have captured the pulse of the baser instincts of this 18-34 year old male demographic, a demographic strongly coveted by advertisers.

While a majority of pro wrestling’s audience is indeed the young male adult, it has been and remains a very popular form of entertainment among children under 18 years old. Rosellini (1999) cited Nielsen figures showing RAW drawing more teenage male viewers than Monday Night Football, and showing a full 15% of televised wrestling viewers being under 11 years old. More recently, Nielsen Media Research shows that WWE Smackdown was watched by the second most number of children aged 2-11 (492,000) during the week of July 28 through August 3, 2008 (“Nielsens ratings for July 28 Aug. 3”, 2008). Children are a significant portion of the audience for live wrestling events, televised wrestling (both regular and pay-per-view programming), and both industry (e.g. wwe.com) and fan-operated wrestling Internet sites (e.g., www.wrestlingnewsworld.com, www.prowrestlingscoops.com). The industry recognizes and actively capitalizes on this fact. The WWE, in fact, promotes its appeal to children to potential investors and corporate partners, offering news releases trumpeting its television ratings among children. For example, a 2007 release promotes the New Year’s Day RAW program as being the number one primetime cable program among households, total viewers, men 18-34, and male teens 12-17. This same release promotes RAW as posting season high ratings among males 6-11, persons 6-11, adults 18-49 and adults 25-54 (“WWE ratings see,” 2007). Similarly, the WWE corporate website promotes the fact that Friday Night Smackdown is the top rated program on Friday nights among total teens, male teens, and males 12-34 (“Business overview,” 2008).

The WWE’s intentional targeting of children is also evidenced by past weekend morning programming for children that highlighted the events of the more popular (and more violent and risqué) weeknight programs and encouraged children to tune in to these programs. The value of children to the wrestling industry is also evidenced by their licensing revenue stemming from the sale of consumer products, many of which are targeted to children and teens. Licensed products marketed to and purchased by children include action figures and other toys, apparel, video games, DVDs, and more. The WWE is currently marketing children’s Easter Egg Baskets on its website. One of the offerings is a D-Generation X Easter Basket, named after the wrestlers who form a group called D-Generation X (their signature salute is a crotch chop while their signature saying is “Let’s Get Ready to Suck It”). The WWE maintains licenses with approximately 120 licensees, with products sold through Wal-Mart, Target, Toys-R Us, and other retailers. WWE video games alone have generated over $1 billion in revenues since 1999 (“Consumer products,” 2008), and the company’s licensing operations represent 23% of their revenues (“WWE overview,” 2008). The WWE also indirectly benefits from advertising sold to firms which target children on WWE programming, including toy, video game, and food product firms. Indeed, IHF, the marketer of Chef-Boy-R-Dee, saw its sales
increase 6% in 1999, an increase attributed primarily to its advertising on WWE television using wrestlers as endorsers of the product (Thompson, 1999).

In becoming increasingly attractive to the young male adult, has pro wrestling put a potentially harmful (both physically and developmentally) product in the path of children? Is the pro wrestling industry, knowingly or unknowingly, engaging in unethical marketing practice? The first question has received attention in the mainstream press, particularly during the several years following an incident involving the death of a six-year-old girl at the hands of a playmate who killed her by imitating moves he had seen on professional wrestling (e.g., Macintyre, 2001). In addition, organizations such as the Parent’s Television Council (PTC) have taken a vocal stance against pro wrestling, even to the point of activism such as encouraging consumer boycotts against firms which advertise on WWE programming. However, to fully examine both questions posed above, it is beneficial to do so based on research on aggression and televised violence and appropriate marketing ethics theory.

MARKETING ETHICS, TELEVISED VIOLENCE, AND PROFESSIONAL WRESTLING
Pro wrestling’s targeting of children is best examined under teleological and social contract theory perspectives. The study of ethics is essentially comprised of two sets of theories. The first is teleological ethics (utilitarianism or ethical egoism), which is defined as theories of ethics according to which the rightness of an act is determined by its end. Teleological ethics focuses on the consequences of actions and behaviors in determining their worth (Ferrell & Gresham, 1985). The second set of theories is deontological ethics, which state that certain actions are right or wrong, regardless of their consequences. While ethical evaluations are most often made using a combination of teleological and deontological principles, most prior attention to ethical issues in target marketing has taken a teleological perspective (e.g., Pollay, 1993). Under a teleological framework, an ethical evaluation of pro wrestling’s targeting of children must be examined in light of its potential negative consequences on the development of the attitudes and behaviors of children who consume it.

Another important consideration in ethical evaluations of targeting strategies is social contract theory, which states that corporations exist only through the cooperation and commitment of society. In essence, this means that there is a social contract for business that provides corporate legitimacy on the basis of the consent of those affected by the business (Dunfee, Smith, & Ross, 1999). To a degree, a business (in this case the professional wrestling industry) and society hold each other responsible for the condition of their mutual existence. Like teleology, this perspective also calls for the examination of pro wrestling’s targeting of children in terms of its effect on the attitudes and behaviors of children who consume it, as this clearly represents a component of the societal condition.

In line with both teleology and social contracts, a significant amount of literature on ethical targeting has focused on the role of product harm and consumer vulnerability (e.g., Rittenburg & Parathasarathy, 1997; Smith & Cooper-Martin, 1997; Wolburg, 2005). Vulnerable consumers are defined as those who are more susceptible to economic, physical, or (as is potentially the case with wrestling and children), psychological harm because of characteristics that limit their ability to maximize their utility and well-being. Essentially, the perception of a targeting strategy as unethical increases as product harm and the target market’s vulnerability increases. Under this ethical umbrella, then, it is necessary to examine the extent to which pro wrestling has the potential to cause psychological and/or physical harm, and the extent to which children are particularly vulnerable to this harm.

PROFESSIONAL WRESTLING’S POTENTIAL FOR HARM
Aggression has been defined as “behavior that inflicts harm, either physically or psychologically, including explicit or implicit threats and nonverbal behavior” and “any action
that serves to diminish something in a physical, psychological, social, or emotional manner” (National Television Violence Study, 1997, p. 37). Research examining the effect of viewing televised violence on aggression has generally established a small to moderate relationship between the two. For example, in a meta-analysis of 556 studies (survey and experimental) on media violence and aggression, Paik and Comstock (1994) arrive at a small to medium effect size in field studies, and a large effect size in lab studies. Other studies have concluded that viewing televised violence is causally related to increased aggression and that this relationship persists over time (e.g., Huesmann, Eron, Lefkowitz, & Walder, 1984; Huesmann, 1986; Singer, Singer, & Rapaczynski, 1984). Further, many studies have specifically examined the effect of the viewing of televised violence by children and its effect on their subsequent aggression and found a causal relationship (e.g., Christakis & Zimmerman, 2007; Ellis & Sekyra, 1972; Liebert & Baron, 1971; Murray, 2008). While no study has proven a direct causal relationship specifically between watching wrestling and an increase in aggression, a widely publicized correlational study by DuRant et. al (2008) found that after adjusting for ethnicity, gender, median family income, age, region of the country, other fighting behaviors, and family composition of 16-20 year olds, the frequency of watching wrestling was associated with violent behaviors such as having tried to hurt someone with a weapon and threatening to hurt someone with a weapon.

Three major findings regarding the effect of televised violence on aggression have been consistent in this literature over the past three decades, two of which are relevant to pro wrestling (the third, increased fearfulness about becoming a victim of violence, will not be discussed). The first stems from social learning theory (Bandura, 1973), and it is that viewing televised violence increases aggression toward others through learning and imitation. For example, Bandura has shown that children will show an increase in aggressive behavior as a result of exposure to aggressive models. This effect occurs whether or not the model is a live person, a person dressed as a cartoon character in a film, or a filmed human model (each of which applies to pro wrestling). In the case of wrestling, this would equate to children viewing pro wrestlers as attitudinal and behavioral models, and imitating their language, gestures, and behaviors in their own settings. In a survey of school teachers, Bernthal (2003) found that teachers reported prolific student imitation of the aggressive language and behavior that the students had watched on televised professional wrestling.

The second major finding regarding the effect of televised violence on aggression is that viewing televised violence tends to have a desensitizing effect on viewers (National Television Violence Study, 1997). Material that once was seen as offensive or degrading to victims may be evaluated as less so with continued exposure. Indeed, many wrestling fans who defend criticisms of wrestling program content often do so by claiming that the programming content is not particularly aggressive (physically, sexually, or otherwise). These fans, including children, state that pro wrestling does not contain any more aggression (attitudes, language, and behavior) than does afternoon soap operas or prime-time comedies and dramas. Interestingly, this one of the main defenses WWE owner Vince McMahon has given against criticism of his product.

While a link has been established between television violence and aggression, contextual factors have been identified which strengthen this relationship, and many of these contextual factors are indeed present in professional wrestling. First, children and adults are more likely to attend to and learn from models who are perceived as attractive, and it has been shown that children as young as four can distinguish “good guys” from “bad guys” (Huesmann & Eron, 1986; National Television Violence Study, 1997). Certainly, the pro wrestling portrays its athletes, particularly the “babyfaces” (the industry term for “good guys”) as attractive characters to be emulated.
Second, when violence is perceived as justified, learning of aggression is increased (e.g., Maiuro & Eberle, 1989; Rule & Ferguson, 1996). Indeed, in a content analysis of professional wrestling television programming, Tamborini et. al (2005) found that wrestling portrays violence as justified moreso than do other prime-time television genres. Related to this, a significant portion of each wrestling event is comprised of, in both wrestling action itself and in dialogue between wrestlers, aggressive response to shame. Wrestlers on each and every broadcast react to injustices against them perpetrated by other wrestlers. In the context of babyfaces reacting to injustices by “heels” (the industry term for “bad guys”) with aggressive language and behavior, this aggression might be particularly attractive. Along these lines, research has shown that children who report more involvement with professional wrestling (on a 22-item wrestling involvement scale) tended to respond more aggressively to shame as measured by an 8-item scale (Bernthal & Medway, 2005).

Third, the presence of weapons has been shown to increase the learning of aggression (National Television Violence Study, 1997). The use of weapons in pro wrestling has become increasingly commonplace. Wrestlers are hit with steel chairs, kendo sticks, trash cans, stop signs, and other objects (including even the proverbial kitchen sink), thrown on beds of tacks, and hit with mock baseball bats and sledgehammers. Indeed, the WWE previously had an established “Hardcore Division” where matches consisted solely of the use of these weapons.

Fourth, humor in the context of violence has been shown to increase the learning of aggression. For example, Baron (1978) found that exposure to hostile humor increased subjects’ aggression toward people, while nonhostile humor reduced it. One of the main reasons for this effect is that humor fosters an emotional desensitization to violence, leading the audience to perceive the violence/aggression as significantly less serious, and indeed, relatively less violent than if the humor were not present (Gunter & Furnharm, 1984; Jablonski & Zillmann, 1995). Like weapons, humor has become increasingly prevalent in pro wrestling and is a regular on WWE programming. From the Sexual Chocolate incident described earlier, to a large former wrestler named Rikishi that used to regularly grind his posterior into the faces of horrified opponents, to simple “humorous” insults given by one wrestler to another(e.g. The Rock, Chris Jericho, etc.), the violence portrayed in pro wrestling takes place with humor (however boorish) as a regular companion.

Fifth, rewards for violence increases the learning of aggression (National Television Violence Study, 1997) and is particularly applicable to pro wrestling. Heels and babyfaces alike are rewarded for violence with wins, audience approval, and championship belts. Indeed, the WWE has “non-traditional” matches on a regular basis in which the winner is determined by rules such as whomever makes the opponent bleed first (a “First Blood” match) and whomever makes the opponent quit first (an “I Quit” match).

Given agreement with the premise that a relationship between television violence and the learning of aggression has been established, and subsequently examining pro wrestling in light of a number of contextual programmatic factors shown to strengthen this relationship, viewership of professional wrestling by children could potentially lead to their learning of aggression. Given further agreement with the premise that the learning of aggression is attitudinally and potentially physically harmful, it can be concluded that viewing professional wrestling in its current format as sports entertainment indeed has strong potential to cause children harm.

CHILDREN’S VULNERABILITY TO PROFESSIONAL WRESTLING’S POTENTIAL FOR HARM

While pro wrestling appears to provide an environment in which aggression has the potential to be learned, and thus harm has the potential to be caused, it also meets the second criteria for unethical targeting as well, in that when the industry targets children, it targets a segment that
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is vulnerable to learning the attitudes and behavior demonstrated on its programming and at its live events. In short, research has shown that children’s developing cognitive abilities and limited world experience leaves them particularly vulnerable to learning from the messages of television (e.g., Dorr, 1986; Eron & Huesmann, 1987; Singer & Singer, 1988). Television can and does teach children cognitive scripts which influence their social behavior. These scripts, formed by direct experience or observation, are learned early and serve as a guideline for future behavior (Huesmann, 1986). Simple exposure to the scripts offered by the wrestling industry is not as potentially dangerous as is the fact that these scripts are perceived as “cool.” With youth’s perception of this content as in-vogue comes the frenzied applause, cheers, and imitation that it generates (Bernthal, 2003). What scripts does pro wrestling teach? Aggressive response to shame, bending and breaking rules to succeed (few matches in today’s wrestling are won “cleanly,” but rather by some form of scripted cheating behavior), and viewing women first and foremost as sexual objects, to name a few.

Regarding the objectification of women, most pro wrestling organizations, including the dominant WWE, routinely promote their female wrestlers as sexual objects. The WWE has featured matches with their “Divas” (the WWE term for their female wrestlers) such as the “Bra and Panties Match” (where the winner is the first to strip her opponent down to her bra and panties), “Pudding Matches” (where the bikini-clad combatants wrestle in a pit of chocolate pudding), and “Paddle on a Pole” matches, with the winner the first to climb a pole, obtain a paddle, and spank her incapacitated opponent. Indeed, a WWE program attempted to gather ratings for a Monday night program through in-program promotion of “HLA” (Hot Lesbian Action, which was to take place in the ring that night). This included promotion of such activity during the prime-time hour, hours when children are likely to be and are indeed viewing. Further, lingerie posters, Divas “Undressed” DVDs, and other sexually provocative items have been among the top sellers on WWE.com. It has also become commonplace for the WWE to leverage their Divas by having them appear in full undress in Playboy magazine (e.g., Sable, Torrie Wilson, Candice Michelle, Maria). A cursory examination of wrestling related web sites, including industry operated and privately operated sites, reveals the strong connection between the objectification of women and the professional wrestling industry, with the vast majority of sites offering image sections devoted to bikini and lingerie clad women, and not a small percentage of privately operated sites offering partial or full nudity. Though he is no longer a WWE Superstar, one of the WWE’s more popular wrestler’s in recent years was The Godfather, who played a pimp character. When he wrestled, he paraded to the ring a bevy of women he referred to as his “hos”, while he was referred to himself as “Pimp Daddy.” One can only hope that such cognitive scripts aren’t among those learned by young boys watching professional wrestling, but research noted earlier (e.g., Huesmann, 1986) suggests otherwise.

CONCLUSION

Does professional wrestling, by increasing product attractiveness to and actively targeting the male 18-34 year old demographic, put a potentially harmful product in the path of children? The answer is yes. The wrestling industry asks society to give children credit. It posits that since children recognize wrestling as staged aggression (i.e., “fake”), they will not use it to form cognitive and behavioral scripts. If similar logic were applied to advertising, it could be concluded that since consumers recognize advertising as just that, advertising, it should also have little to no effect on consumer behavior. Yet the television industry claims just the opposite, as does the wrestling industry in regard to advertising on its programming. Somewhat ironically, while the television industry earns large sums of money through the sale of advertising by (accurately) claiming that televised advertisements do indeed influence viewer’s behavior, and while it also claims that television is a valuable medium by which positive behaviors can be learned, it oddly claims that televised aggression has little influence on behavior (Singer & Singer, 1988). The wrestling industry has offered the same arguments in defense of its product when critics decry its exposure to children. While the logic behind why
both industries make these claims is obvious from a business perspective, it is nonetheless troubling.

Though it has been argued here that the professional wrestling industry has some culpability for the potential negative effects that can arise from children watching its product, it should be acknowledged that parents or other guardians of children are certainly not without responsibility. Further, it has not been the intent of this article to suggest that every aspect of professional wrestling is potentially harmful to children. Indeed, some positive values such as perseverance, overcoming adversity, playing by the rules, etc. are modeled in wrestling programming, and it would be inconsistent to claim that wrestling is capable of fostering negative outcomes in children while incapable of fostering some positive ones. Future research might even examine potential moderating effects of positive adult supervision on the outcomes of children’s wrestling viewership. However, when one considers prior research establishing that children can learn aggression from televised violence, wrestling programming that includes violence portrayed in contexts that strengthen the learning of aggression, programming that fosters objectification of women and other negative scripts, it can be reasonably posited that the bad outweighs any potential good.

Laczniak and Murphy (1993) and Laczniak, Burton, and Murphy (1999) suggest a series of tests to use in evaluating the ethics of marketing practices, including practices of firms in the sport and entertainment industry. While some tests are deontologically based, two apply to the issue currently under examination. The “consequences test” seeks to determine if there will likely be any major damages to people or organizations resulting from an action (in this case marketing professional wrestling to children). The “justice test” seeks to determine if an action leaves a person or group who is a member of a relatively underprivileged class less well off. If the term underprivileged class is expanded to include a class or market segment that is “vulnerable,” which is in the spirit and intent of the justice test, it could be argued that professional wrestling industry, in actively and intentionally targeting children, performs poorly on both tests.

REFERENCES


