

What's Wrong with Plagiarism?

by Gunnar Swanson

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What does "plagiarism" mean?

What's wrong with it?

What makes plagiarism bad? Please rate on a scale of one to ten, with one representing least importance and ten representing most importance:

LESS IMPORTANT	NEUTRAL						MORE IMPORTANT		
<i>Its effect on the original artist (i.e., person plagiarized):</i>									
1	2	3	4	5	6	7	8	9	10
<i>Harm to the original artist's client:</i>									
1	2	3	4	5	6	7	8	9	10
<i>Its effect on the plagiarizer:</i>									
1	2	3	4	5	6	7	8	9	10
<i>Its fraud against the plagiarizer's client:</i>									
1	2	3	4	5	6	7	8	9	10
<i>Its degradation of the design profession:</i>									
1	2	3	4	5	6	7	8	9	10
<i>Its insult to creative autonomy and the artistic spirit:</i>									
1	2	3	4	5	6	7	8	9	10
<i>Other (please specify)</i>									
1	2	3	4	5	6	7	8	9	10

What is the most significant nature of the damage or ill you marked as important above (e.g., if you marked 10 on "harm to the original artist's client," you might say "loss of actual monetary value of investment" or "reduction of faith in design," etc.)?

Please feel free to write on the margins or on additional sheets of paper.

THIS ARTICLE WILL NOT ANSWER MANY QUESTIONS ABOUT PLAGIARISM. IT WILL, I HOPE, START TO ASK THEM. BEFORE YOU READ THIS, FILL OUT THE QUESTIONNAIRE ABOVE. WE'LL WAIT FOR YOU.

Why Should Anyone Care? You're an honest, talented, and original designer who wouldn't think of doing anything that anyone would call plagiarism, so reading this would be a waste of time, right? The questionnaire starts with the simple questions "What does 'plagiarism' mean?" and "What's wrong with it?" They seem like stupid questions (and I was told as much by at least one person I sent it to,) but I hope an examination of a few explanations of what's bad about plagiarism can begin at least to clarify some of our rhetoric. I hope we learn a little about plagiarism and start to learn a lot about what we believe about design.

It seems evident to most of us that plagiarism is wrong. I believe that the nature of the wrong seems evident to most: it seems to be a particular form of theft. An examination of the nature of the property that is subject to theft was my reason for starting this line of inquiry. I believed that it might reveal something about the way we understand creative activities. The more I looked at the issues, the less either theft or the very notion of "intellectual property" made sense. But before I get to that, let's look at a few explanations of the crime of plagiarism.

The Word of God Argument:

Although the role of God is normally played by an associate professor or a favorite art teacher, this might be the most commonly accepted explanation. A few years ago when I started thinking about the subject I conducted a highly unscientific survey.¹ I sent out a few questionnaires to designers, educators, and friends. Only one reply directly invoked the Word of God argument. While others asked rhetorical questions like "What's wrong with stealing cars?" to indicate disdain for the line of questioning, Lou Danzinger left the scale of one to ten section blank, writing "All of this is irrelevant—it is dishonest, immoral and for anyone who has any sense of

¹ In 1990 I mailed the questionnaire that starts this article to designers, design educators, a law professor, and several others whom I suspected would have something interesting to say.

ethics it requires no further elaboration—it is simply wrong—period”

Although the statement that plagiarism is bad because it violates our ethics may seem tautological, it is in some ways the most satisfying argument. Defining ethics as a cultural construct that needs to be swallowed whole is not the same as claiming morality to be arbitrary. Plagiarism is an ethical question, and not necessarily a moral one.

I need to pause for a moment to define some terms. I cannot find commonly used terms for a distinction I need to make so I'll adapt two nearly synonymous words. The distinction I wish to make is between what I will call a moral question and an ethical one. Although there is significant overlap, I use “morality” to describe what can be considered at least to aspire to a universal scope, where by “ethics” I mean the conduct code of a specific group such as a profession. Even when similar principles apply, the ethical code varies greatly from group to group. Martin Luther King's plagiarism in his doctoral thesis was, in an academic setting, serious and cannot be explained away as naïveté or as a petty attack on a great man.² The same borrowing of phrases without attribution would probably not have been an ethical problem in a sermon, however. (If you think the difference is just oral versus written presentation, I suggest you ask Joe Biden about his speeches.)³

Whether divine command or collective intuition, much discussion of the “It is simply wrong” explanation would necessarily open up a Pandora's box of questions of theology and ethnocentrism. Ultimately the Word of God Theory suffers because we want to ask “Why does He say that?” To explain that plagiarism is wrong because it violates our ethics dodges the questions of why it is a violation of our ethics, how our ethics change or evolve and why? Even if ethical codes are historical, there must be a historical logic to them. The historical logic behind legal protection of creations of various sorts falls largely into the encouragement of such creativity and the protection of property rights. Most designers talking about plagiarism seem to concentrate on the latter.

² King received his doctorate from Boston University in the 1950s. In the early 1990s researchers discovered apparent plagiarism in his thesis. BU provost Jon Westling appointed a committee of three professors in the BU School of Theology and one from American University. They recommended that a letter be attached to King's dissertation in the university library, noting that numerous passages lacked appropriate quotations and citations of sources. The committee said that “no thought should be given to the revocation of Dr. King's doctoral degree from Boston University” and the assertion that despite its flaws, the dissertation “makes an intelligent contribution to scholarship.” “Panel confirms plagiarism by King at BU” Charles A. Radin, Boston Globe October 11, 1991.

³ Biden's presidential aspirations were derailed when an opponent's aides delivered a videotape to journalists that suggested that Biden had plagiarized some of his comments from British Labor Party leader Neil Kinnock “Plagiarism Suggestion Angers Biden's Aides; British Politician Given Credit, Senator Says” Eleanor Randolph, Washington Post September 13, 1987.

Property Rights/Plagiarism as Thievery:

It would be a mistake to assume that all discussions of morality and/or ethics should concentrate on a search for the victim, but the victim certainly must be a major issue when discussing property rights and theft. The majority of people I polled (and, I believe, the majority of designers, writers, photographers, and artists) tended to state the problem of plagiarism as one of property and theft.

One could argue that the greatest harm caused by shoplifting or burglary is not the loss of the property stolen, but the damage to the self development, karma or soul of the thief, or to the unwitting receiver of the stolen goods who has been duped into participation in crime, or to society as a whole. Crime also forces us to spend resources on burglar alarms and security guards and robs us of the chance to lead life free of fear. Somehow, though, the stance that the harm to the owner of property stolen is not central to the nature of theft seems a bit perverse. Certainly we can state that stealing from a billionaire “who wouldn’t miss it” is as much stealing as is stealing from someone poor, but does anyone believe that taking a couple of pencils home from your work at a large corporation is the exact equivalent of taking pencils from a blind man selling them on the street?

As a society we get around this contradiction by taking a wider view—if anyone is to be really secure, we say, then we all must be. Thus “wouldn’t miss it” is beside the point. But it is still the collective possibility of individual harm that is at issue. Petty theft is punished less severely than grand theft, for instance; it is not just the act of thievery we abhor, but the loss of property. We do, as a society, factor in the extent of the harm.

So how do we view harm and the victim when we treat plagiarism as theft? Unless dead people’s work is in an estate or public trust, do they become “fair game?” Do people automatically own their imagery whether they want to or not? Are we violating the property rights of people who don’t believe in such property rights if we use a motif of another culture, or does the “property” only exist if those rights are asserted?

The notion of theft is based on the idea of ownership and property rights. People from many non-western cultures would find this entire discussion quite curious, since in much of the world the idea of collective accretion of ideas and form is dominant, and the construct of individual creativity that dominates in the US and Europe is not emphasized. The idea of ownership of form even begins to fade as we leave the world of art, design, and related commerce here in the US. The thought that someone was first to create an “I♥someplace-or-something” bumper sticker has probably never occurred to most owners of “I♥someplace-or-something” bumper stickers. Even if the original and its originator were pointed

out, the idea that their “I♥someplace-or-something else” bumper sticker steals something from Milton Glaser⁴ would probably seem quite foreign. The right to profit from an invention by means of ownership of rights to the invention is widespread in our culture; I’m not sure the same idea applied to aesthetic or communicative configuration is.

Another pause for definition: The term “rights” has a range of meaning including the freedoms we reserve for all people—human rights, those we reserve for all people in a given society—civil rights, and those that are less permanent and more case specific—other legal rights. It is proper to say that the vehicle code gives one the right to drive at a given speed but that “right” is revocable in a way that we do not consider the right to free speech to be. Referring to these lesser and more specific rights as “rights” can confuse an argument. This is my reason for making a distinction between “rights”—i.e., moral rights—and “interests”—i.e., purely legal rights.

We need to reconsider authorship and the way we regard the author. If we correctly speak of property rights (as opposed to, say, property interests) we must assign to those rights inherent nature. We believe rights exist even if not asserted or even known by the holder of the rights. When a designer appropriates a form or a visual idea from the work of another designer we deem it plagiarism. When designers appropriate forms from “fine artists,” the reaction is mixed. When designers appropriate forms from non-designer/non-artists it is called “recognition of the vernacular.” If our property rights to our work are, indeed, rights, they must exist inherently. By making the “vernacular” fair game, we are stating that there are rights that we accrue by the fact of our being professional designers. Signs painted in the windows of grocery stores do not just appear; they are created by people every bit as much as fancy paper promotions are. Their authors are real, but because graphic designers do not know the authors we pretend they do not exist.

Designers seem to think of themselves as part of a privileged elite. We think that we should be able to borrow freely from the work of non-designers, yet should be able to defend our own work from such use by others. This is either pure hypocrisy or we must assume there is something in the origin or intent of work that makes it plagerizable or not.

If we consider that plagiarism is a special case of theft—the stealing of something that can only be possessed by a special category of people—then we must either be specific about what makes that category of people special or risk being assumed to be another “special interest group” like mining or oil companies claiming their “right” to the minerals below public lands or agribusiness corporations claiming

⁴ Glaser’s “I♥NY” campaign’s translation into bumper stickers ranging from “Yo♥Oaxaca” to “I♥My [Dog Head]” is thought to have inspired the design/illustrator’s many talks on inspiration and plagiarism.

their “right” to crop subsidies.

Even if designers’ self-appointed position as the owners of form is valid, plagiarism-as-theft runs counter to the rhetoric and the interests of designers. Most designers will claim that design is not a commodity and should not be treated as such. We are hurt and mystified that bureaucrats are so stupid and unfeeling that they wish us to collect sales tax on our work, as if our work were a product. Our work, we insist, is not a product but rather it is a process. (If that is true, wouldn’t real plagiarism be the copying of someone’s working method rather than the copying of someone’s work?)⁵

The legal basis for the protection of “intellectual property” under US law is not that someone has the right to the “sweat of his brow,” but that it is to society’s benefit to have people invent things. Giving profit from an invention to the inventor encourages more invention. When we extend legal privilege and label it “moral rights,” we must be careful to avoid mistaking a privilege we covet for a “right” denied us.

Copyright law does not protect ideas, it protects specific use of ideas. This is because the law is designed to encourage invention. The owning of ideas is contrary to that end, whereas receiving benefit from specific use of ideas works toward that end.

The plagiarism-as-theft argument that doesn’t smack of self-interest is the idea that the owner of design is the culture, and that the theft is of the unique cultural significance of the original object. Does valid improvement on the original (thus not a plagiarism) diminish the original’s unique cultural significance in much the same way, and doesn’t this really come down to a problem of a muddling of the historical record—not theft but dishonesty?

Plagiarism as an Assault on the Collective Good/Lies and Fraud:

One objection to theft is that it deprives a rightful owner of the use or the sale of the thing stolen. That fails to address theft of intangibles, such as software piracy. The assumption of typeface designers is that if unauthorized copies of fonts weren’t made, authorized copies would be paid for (and type design would become a more viable business.) That dubious proposition is beside the point for those who see theft as a basic wrong, but for many the question of who is harmed will always be central. Although one might assume that the entity that would lose the most by plagiarism is a client who paid good money for original work, only to have it hijacked by an unscrupulous competitor, “Harm to the original artist’s client” ranked very low in my poll results. It seems clear to most that the thing being stolen belongs to the originator and isn’t transferred with the payment of an invoice. And it’s not strictly

⁵ I thank Ed McDonald for this insight from the margin of his questionnaire.

the diminishment of the value of the originator's craft that's at stake. If the client never knows the work was copied, that doesn't seem to diminish the damage. I have managed to find few who would argue that unnoticed plagiarism is even relatively benign. It seems that knowledge of the act (by other than the plagiarizer) is not the primary problem and the obvious direct injuries might seem to require knowledge.

Plagiarism can be seen as a violation of a general prohibition against freeloading. It is wrong, under this theory, for anyone to act in a manner that would threaten society if we all acted that way.⁶ Applying this to design is a problem, however. The idea that everybody should do original work because otherwise there wouldn't be anything left to plagiarize is interesting but strikes me as a dead end.

Plagiarism as a lie is probably the definition with the fewest problems: lying can have victims and specific harm, but most of us believe that lying is wrong even if no victim other than the liar is identifiable. And, after all, no matter how you feel about issues of property, ownership, cultural value, there is no doubt that presenting someone else's work and claiming it as your own is lying. When a lie is told for the purpose of gain it becomes fraud; we can assume that most design presented by professional designers is for the purpose of gain, so the term generally applies to designers' plagiarism.

Designers discussing plagiarism usually distinguish it from homage, appropriation, quotation, or eclecticism. There are no clear boundaries between these modes of use and plagiarism. Judgments are often made not on the basis of the work, but on the basis of the respect one has for the author of the "copy." Once in a class I took, a fellow student was looking for graphic illustrations of the word "appropriation" and I suggested he look at some of Picasso's compositions that I described as "ripped from Goya." The instructor was angered by the use of the term "ripped" because, he said, "Picasso was a great artist." My use of the word "ripped" in that instance was deliberately obtuse and provocative, but I don't believe I'm being either by asking now whether Picasso's status as an artist had anything to do with it. Bad work by a lousy artist approached with the same intent as Picasso might not have been as important a tribute to Goya, but would it have been any closer to being plagiarism? If so, aren't we back to a privileged elite who are not subject to the constraints of the common folk?

In addition to the homage, appropriation, et al, problem, the very nature of design makes attribution a stickier problem than it is with painting or sculpture. Design is generally a collaborative process. Many people work on it and contributions and improvements upon those contributions are made freely.

⁶ My thanks to Dr. David "Doc" Mayo of the philosophy department at University of Minnesota Duluth for this insight and his many comments on a draft an earlier article on this subject.

When a designer speaks before an art directors' club or AIGA meeting and shows work, there is the implicit statement that what we are seeing is that designer's work. I can count on one hand (with fingers left over) the number of times I've heard a designer say "this piece was designed by my assistant so-and-so" or "this page was put together by freelancer what's-her-name." The argument in the favor of our hypothetical speaker is that our hypothetical audience knows how design goes together and thus suffers no illusion that anyone does all of the work that comes out of a design firm. Following this argument one might expect a designer showing a piece involving photography to point out that it was stock photography. After all, our audience knows how design goes together and would falsely assume the designer's participation in art direction of the photos.

The assumption of a level of knowledge and the intent to confuse the truth are, of course, central to the question of implicit lying and this definition of plagiarism. If we generally assume the best of people, we will minimize our assumption that there was an actual attempt to defraud, but is plagiarism (or lying, for that matter) necessarily a willful act? We do not call misinformed people who make statements believing them to be true "liars." We do speak of unconscious plagiarizers, however. This makes it clear that the act of plagiarizing and the lie of presenting the work as "original" are not exactly one and the same. (This may be a linguistic problem, where there is an intersection of the definitions of "plagiarism" and "lie," but each is inadequate to describe the other. It is also possible, though I think unlikely, that it is merely one of those language quirks like pants being plural while shirt is singular.)

It is equally clear that the physical act of copying is not the plagiarism. If copies are made for analysis, practice, or legitimate use involving no fraud, we do not consider them to be plagiarized. (Please note that violation of copyright and plagiarism are not synonymous. Copying this article on a photocopy machine without permission may be a violation of copyright but it is not likely to be plagiarism.)

It is some combination of the copy and the lie that add up to plagiarism. But what if the potential plagiarizer doesn't know that a falsehood is being understood? Is a joke told when there is someone in the room without a sense of humor a lie? Is a parody plagiarism if someone isn't familiar with the work being parodied?

There was quite a bit of complaint about Paula Scher's Swatch ads, based on Herbert Matter's 1930s Swiss tourism posters, as examples of plagiarism. The claim was that confusion was created over authorship. My assumption has always been that Scher assumed that either people would recognize Matter in the ads, know that that work was from before Scher's time, and know that Matter had died before the ads were produced, or they were outside the world that cared to make judgments about authorship and thus it wasn't important. While some considered the Matter

+ Scher attribution deception, I saw it as an homage combined with a joke. (The fact that Sher had permission from Mercedes Matter, Herbert Matter's widow, and paid a royalty for the use of the form removes any "property rights" arguments from this discussion.)

Design is also usually about clear communication and thus it dwells primarily in the realm of the cultural norm. Every metaphor, cliché, and standard phrase had an original author. At some point each becomes "part of the language" and the original author need not be acknowledged. How do you sort out what is quotation and what is just plain talking?

Does the great Swatch plagiarism case hinge on whether the "audience" knew Herbert Matter's work? If so, can one become a plagiarizer by overestimating people? Is work shown in one venue proper quotation and in another plagiarized? Does the fact that Herbert Matter is both a great and important designer and dead make him a part of the culture and thus part of the language or does the fact that Herbert Matter is both a great and important designer and dead make him a part of the culture and thus precious and to be protected against commercial encroachment? Again, is the harm caused by plagiarism's lie a collective harm?

Another form of dishonesty closely related to fraud is cheating. It differs from theft in that it does not require the existence of property or ownership. Although cheating can harm a "real" or would-be winner directly, everyone is harmed by cheating. By unjustly rewarding a dishonest individual, cheating shakes the faith of everyone in the fairness of the system, making everyone less able to compete. Does the metaphor or reality of competition apply to design and is that the way we wish to judge ourselves and our work? Even if competition is not our major focus on design, we can decry an atmosphere of unfair competition. Cheating, like the other forms of dishonesty I've discussed, can do great damage to the cheater, creating the illusion that a simple trick can make life or our work easy. It can do similar damage to the rest of us by leaving the impression that the cheater may be right about that.

A Need for Further Examination: I don't offer any of this as a general rule of plagiarism. It may be that we might more properly talk of plagiarisms—related acts that are not quite defined the same way. The differences in attitudes about authorship and individuality make it hard to consider borrowing a phrase in a blues or folk song the same way we might consider borrowing a phrase in a doctoral thesis or a poem. Perhaps it's not just the context or the localized rules of plagiarisms that are different but the natures of the act. Most of my arguments apply, I believe, in most instances of plagiarism but I cannot say for sure.

It is the other side of the theft argument that I think needs real examination—

the notion of “intellectual property.” Perhaps the phrase started out as a metaphor but it is usually taken literally. The difference in legal origin (the Fifth Amendment protection of a “natural right” against usurpation by tyrants vs. a utilitarian move to “promote the Progress of science and useful Arts”) was once important but now too often the right to such supposed property is regarded as every bit as real and natural as any other ownership.

The Sonny Bono Copyright Extension Act⁷ puts a strain on the Constitutional justification—“to encourage the practical arts.” One could hardly believe that Mickey Mouse entering the public domain after so many years would have discouraged future cartoonists. Copyright is, for society, a balancing act between rewarding authorship and thus encouraging more such production, and restricting use, thus discouraging authorship based on past work. By most descriptions our culture is accelerating and its artifacts becoming more quickly disposable. There is some dissonance in the fact that copyright has been extended even as its utility for encouragement would seem to have been compressed.

I believe that many of the problems with the notion of plagiarism as theft come from the acceptance of non-corporeal manifestations of creativity as “stuff” that is indistinguishable from, say, a home or farm. The very real (and very sticky) problem we face is the issue of ownership of increasingly unreal “stuff” in our lives.

Plagiarism and Computer Technology: Advances in technology have brought old questions to a new light. There is a grand tradition in the arts of the appropriation of previous material. In the plastic arts this has taken the form of formal elements having been digested by artists and re-presented. Thus the “copying” was made, by reforming by hand, the work of the copying artist.

In collage, found elements were reused in their original form but with new context. This practice escapes the claim of fraud in that the source is evident. A casual viewer would not tend to assume that a collage artist had created the elements, cut them out, and glued them together (although this has occasionally been the case.) A collage seems to be a collection of borrowed elements.

In music the announcement of assemblage is not as clear. The crafts of composition and performance tend to integrate material, leaving the impression of an original whole. When symphonies quoted folk songs the humble, public domain nature of the quoted material may have been a legal saving grace; the ethical questions are slightly murkier. Jazz riffing off of popular tunes often made a show of the original and its transformation. To the extent that this was not the fact, the original tune was beside the point of the major creative activities. If craft and

⁷ See “Legal Affairs—Tad Crawford and Laura Mankin review The Sonny Bono Copyright Term Extension Act” *Communication Arts* V. 41, Number 2, 1999.

performance elements are prime concern, the performance can stand on its own even when somehow derived from previous performance. (For a Charlie Parker fan, Bird's debt to the authors of "Back Home Again in Indiana" or "Cherokee" were negligible or, at least, beside the point. "Donna Lee" and "Ko Ko" were the genius and Parker was no dwarf, whether on the shoulders of giants or not.)

This is also a factor in the visual collage. When a collage artist cuts out a bit of a photograph to reuse in an illustration, it may or may not be a copyright law violation but it can hardly be condemned as plagiarism. In "Little Photoshop of Horrors," a panel discussion in *Print* magazine, photo collage artist Stephen Kroniger made the apt comparison of his use of a baseball cap cut out of someone else's photograph to the photographer's presentation of the logo on the cap. The photographer cannot be expected to have originated all of the form in the photo. Logo design is beside the point of where we see the originality of the photograph; cap photography is beside the point of collage making.⁸

This argument extended is the defense for sampling and reworking of existing material, two staples of hip hop culture. The sampling ethos has been absorbed by the visual culture, at least that portion that is below the legal radar. Rave flyers and much of the web are classic examples.

Technological advances allow a relatively unskilled web designer to combine code from one website and images from others and end up with something that does not scream "borrowed elements recombined" like a collage of magazine clippings. Digital collage techniques allow the combination of elements in a seamless fashion also removes the natural disclaimer of cut edges. Music sampling can create "new" works derivative of previous performance that are not re-performed. The derivative work makes collages of sound, seemingly claiming pre-existing form as somehow original—falsely so by previous standards of originality.

Conclusions/Confusion: In an earlier draft of this article I tried to explain why I would recommend against engaging in plagiarism. The best answer I came up with is "It's no damned fun."

Like many ethical problems, my main objection to plagiarism may not be my moral outrage but my disgust at stupidity. British graphic designer James Souttar put it well: "I'd always thought that graphic design was like cooking in this respect. A plagiarist is someone who buys a meal from a smart restaurant, takes it home and serves it up to his guests. He could do it every night—even put a sign outside the door, advertising the food—but it would be a sorry way to make a living (especially since it's likely to be cold and congealed by the time he serves it up). Especially

⁸ "Little Photoshop of Horrors: The Ethics of Manipulating Journalistic Imagery" Janet Abrams *Print* v. 49 Number 6, 1995.

when the same amount of effort could be put into convincing the chef to show him how it's done."⁹

My strongest objection to plagiarism isn't my being served congealed food. It's the thought the poor wretch in that metaphoric kitchen. Most things plagiarizable might be likened to a random drug test.¹⁰ Whether a final exam, a work of art, a piece of design, a speech, or an article, the object says "This is a fair sample of who I am" as much as a drug free urine sample might say "This is representative of my drug free life." There is significant disagreement over the validity, importance, fairness, and legality of random drug testing. The message of buying a tube of certified drug free urine might be protest against invasion of privacy or a statement that drug use is not an important describer of our characters. The message of buying a term paper or copying a poster design must be less viable as objection to tyranny.

Design is a voluntary act so plagiarism as protest seems unlikely. Whether theft, lie, fraud, freeloading, deafness to the voice of God, cultural vandalism, or whatever combination, plagiarism is a falsification of self.

I'm not one who defines design as primarily self expression but clearly there is something of the designer in the design. That's why most designers choose to design. For many of us, the important part is the part that is a small sample of our souls. My naïveté may be showing but I don't understand the desire to falsify an affirmation of self. It seems like a losing game. Not only is the act of plagiarism a negative reflection of character, but plagiarized work robs the designer/copyist of one more precious chance to reach out with the very thing we design for—to connect directly with other human beings. It makes a spiritual act mechanical.¹¹

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⁹ Message to GRAPHICS email list.

¹⁰ My thanks to Dr. David Cole of the philosophy department at the University of Minnesota Duluth for this delightfully bizarre metaphor.

¹¹ I would like to thank Dr. Robert Evans of the philosophy department at the University of Minnesota Duluth for his comments on plagiarism and character as well as the whole UMD philosophy department and everyone else who attended my colloquium on this subject at UMD in April 1996. Finally I wish to thank Katie Salen and Rosemary Swanson for their work in editing the first version of this article. That version appeared in *Zed3*.