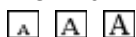


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October 2011 | 'zone'

Probably the most (in)famous Australian teenager of recent times, now-17-year-old Kim Duthie—better known as the “St Kilda Schoolgirl”—first came to public attention when she posted naked pictures of two prominent St Kilda Australian Football League (AFL) players on Facebook. She claimed to be seeking revenge on the players’ teammate for getting her pregnant. This turned out to be a lie. Duthie also claimed that 47-year-old football manager Ricky Nixon gave her drugs and had sex with her. She then said this was a lie, then that she lied about lying. That she lied at least twice is clear, and in doing so, she arguably reinforced the pervasive myth that women are prone to lie about rape and sexual abuse.

Precisely what occurred, and why Duthie posted the naked photographs will probably never be known. However, it seems clear that Duthie felt herself wronged. Can she therefore be held entirely to blame for the way she went about seeking redress from a group of men with infinitely more power than she—socially, financially and (in terms of the priority given to elite football in Australian society) culturally? The many judgements passed on Duthie’s behaviour in the media highlight the crucial, seldom-discussed issue of how problematic behaviour on the part of women might reinforce patriarchal norms. This is a particularly sensitive issue in the context of a spate of alleged sexual assaults committed by elite Australian footballers over the past decade.

Given that representations of alleged rape cases in the media and elsewhere so often position women as blameworthy for their own mistreatment and abuse, the question of whether or not women can and should be held accountable in certain situations is particularly fraught. By exploring media representations of one of

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these complex scenarios, we consider how the issue of "complicity" might be understood in a rape culture. In doing so, we employ Auschwitz survivor Primo Levi's highly influential concept of the "grey zone," which signifies a complex and ambiguous realm that challenges both judgement and representation.

Primo Levi's "Grey Zone," Patriarchy and the Problem of Judgement

In his essay titled "The Grey Zone" (published in 1986), Levi is chiefly concerned with Jewish prisoners in the Nazi-controlled camps and ghettos who obtained "privileged" positions in order to prolong their survival. Reflecting on the inherently complex power relations in such extreme settings, Levi positions the "grey zone" as a metaphor for moral ambiguity: a realm with "ill-defined outlines which both separate and join the two camps of masters and servants. [The 'grey zone'] possesses an incredibly complicated internal structure, and contains within itself enough to confuse our need to judge" (27). According to Levi, an examination of the scenarios and experiences that gave rise to the "grey zone" requires a rejection of the black-and-white binary opposition(s) of "friend" and "enemy," "good" and "evil."

While Levi unequivocally holds the perpetrators of the Holocaust responsible for their actions, he warns that one should suspend judgement of victims who were entrapped in situations of moral ambiguity and "compromise." However, recent scholarship on the representation of "privileged" Jews in Levi's writings and elsewhere has identified a "paradox of judgement": namely, that even if moral judgements of victims in extreme situations should be suspended, such judgements are inherent in the act of representation, and are therefore inevitable (see Brown). While the historical specificity of Levi's reflections must be kept in mind, the corruptive influences of power at the core of the "grey zone"—along with the associated problems of judgement and representation—are clearly far more prevalent in human nature and experience than the Holocaust alone.

Levi's "grey zone" has been appropriated by scholars in the fields of Holocaust studies (Petropoulos and Roth xv-xviii), philosophy (Todorov 262), law (Luban 161–76), history (Cole 248–49), theology (Roth 53–54), and popular culture (Cheyette 226–38). Significantly, Claudia Card (*The Atrocity Paradigm*, "Groping through Gray Zones" 3–26) has recently applied Levi's concept to the field of feminist philosophy. Indeed, Levi's questioning of whether or not one can—or should—pass judgement on the behaviour of Holocaust victims has considerable relevance to the divisive issue of how

women's involvement in/with patriarchy is represented in the media.

Expanding or intentionally departing from Levi's ideas, many recent interpretations of the "grey zone" often misunderstand the historical specificity of Levi's reflections. For instance, while applying Levi's concept to the effects of patriarchy and domestic violence on women, Lynne Arnault makes the problematic statement that "in order to establish the cruelty and seriousness of male violence against women as women, feminists must demonstrate that the experiences of victims of incest, rape, and battering are comparable to those of war veterans, prisoners of war, political prisoners, and concentration camp inmates" (183, n.9). It is important to stress here that it is not our intention to make direct parallels between the Holocaust and patriarchy, or between "privileged" Jews and women (potentially) implicated in a rape culture, but to explore the complexity of power relations in society, what behaviour eventuates from these, and—most crucial to our discussion here—how such behaviour is handled in the mass media.

Aware of the problem of making controversial (and unnecessary) comparisons, Card ("Women, Evil, and Gray Zones" 515) rightly stresses that her aim is "not to compare suffering or even degrees of evil but to note patterns in the moral complexity of choices and judgments of responsibility." Card uses the notion of the "Stockholm Syndrome," citing numerous examples of women identifying with their torturers after having been abused or held hostage over a prolonged period of time—most (in)famously, Patricia Hearst. While the medical establishment has responded to cases of women "suffering" from "Stockholm Syndrome" by absolving them from any moral responsibility, Card writes that "we may have a morally gray area in some cases, where there is real danger of becoming complicit in evildoing and where the captive's responsibility is better described as problematic than as nonexistent" ("Women, Evil, and Gray Zones" 511).

Like Levi, Card emphasises that issues of individual agency and moral responsibility are far from clear-cut. At the same time, a full awareness of the oppressive environment—in the context that this paper is concerned with, a patriarchal social system—must be accounted for. Importantly, the examples Card uses differ significantly from the issue of whether or not some women can be considered "complicit" in a rape culture; nevertheless, similar obstacles to understanding problematic situations exist here, too. In the context of a rape culture, can women become, to use Card's phrase, "instruments of oppression"? And if so, how is their controversial

behaviour to be understood and represented? Crucially, Levi's reflections on the "grey zone" were primarily motivated by his concern that most historical and filmic representations "trivialised" the complexity of victim experiences by passing simplistic judgements. Likewise, the representation of sexual assault cases in the Australian mass media has often left much to be desired.

Representing Sexual Assault: Australian Football and the Media

A growing literature has critiqued the sexual culture of elite football in Australia—one in which women are reportedly treated with disdain, positioned as objects to be used and discarded. At least 20 distinct cases, involving more than 55 players and staff, have been reported in the media, with the majority of these incidents involving multiple players. Reports indicate that such group sexual encounters are commonplace for footballers, and the women who participate in sexual practices are commonly judged, even in the sports scholarship, as "groupies" and "sluts" who are therefore responsible for anything that happens to them, including rape (Waterhouse-Watson, "Playing Defence" 114–15; "(Un)reasonable Doubt").

When the issue of footballers and sexual assault was first debated in the Australian media in 2004, football insiders from both Australian rules and rugby league told the media of a culture of group sex and sexual behaviour that is degrading to women, even when consensual (Barry; Khadem and Nancarrow 4; Smith 1; Weidler 4). The sexual "culture" is marked by a discourse of abuse and objectification, in which women are cast as "meat" or a "bun." Group sex is also increasingly referred to as "chop up," which codes the practice itself as an act of violence. It has been argued elsewhere that footballers treating women as sexual objects is effectively condoned through the mass media (Waterhouse-Watson, "All Women Are Sluts" *passim*).

The "Code of Silence" episode of ABC television program *Four Corners*, which reignited the debate in 2009, was even more explicit in portraying footballers' sexual practices as abusive, presenting rape testimony from three women, including "Clare," who remains traumatised following a "group sex" incident with rugby league players in 2002. Clare testifies that she went to a hotel room with prominent National Rugby League (NRL) players Matthew Johns and Brett Firman. She says that she had sex with Johns and Firman, although the experience was unpleasant and they treated her "like a piece of meat." Subsequently, a dozen players and staff members from the team then entered the room, uninvited, some through the bathroom window,

expecting sex with Clare. Neither Johns nor Firman has denied that this was the case.

Clare went to the police five days later, saying that professional rugby players had raped her, although no charges were ever laid. The program further includes psychiatrists' reports, and statements from the police officer in charge of the case, detailing the severe trauma that Clare suffered as a result of what the footballers called "sex." If, as "Code of Silence" suggests, footballers' practices of group sex *are* abusive, whether the woman consents or not, then it follows that such a "gang-bang culture" may in turn foster a rape culture, in which rape is more likely than in other contexts. And yet, many women insist that they enjoy group sex with footballers (Barry; Drill 86), complicating issues of consent and the degradation of women.

Feminist rape scholarship documents the repetitive way in which complainants are deemed to have "invited" or "caused" the rape through their behaviour towards the accused or the way they were dressed: defence lawyers, judges (Larcombe 100; Lees 85; Young 442–65) and even talk show hosts, ostensibly aiming to expose the problem of rape (Alcoff and Gray 261–64), employ these tactics to undermine a victim's credibility and excuse the accused perpetrator. Nevertheless, although no woman can be in any way held responsible for any man committing sexual assault, or other abuse, it must be acknowledged that women who become in some way implicated in a rape culture also assist in maintaining that culture, highlighting a "grey zone" of moral ambiguity. How, then, should these women, who in some cases even actively promote behaviour that is intrinsic to this culture, be perceived and represented?

Charmyne Palavi, who appeared on "Code of Silence," is a prime example of such a "grey zone" figure. While she stated that she was raped by a prominent footballer, Palavi also described her continuing practice of setting up footballers and women for casual sex through her Facebook page, and pursuing such encounters herself. This raises several problems of judgement and representation, and the issue of women's sexual freedom. On the one hand, Palavi (and all other women) should be entitled to engage in any consensual (legal) sexual behaviour that they choose. But on the other, when footballers' frequent casual sex is part of a culture of sexual abuse, there is a danger of them becoming complicit in, to use Card's term, "evildoing."

Further, when telling her story on "Code of Silence," Palavi hints that there is an element of increased *risk* in these situations. When describing her sexual encounters with footballers, which she states are "on her terms," she begins, "*It's consensual for a start. I'm not drunk or on*

drugs and it's in, [it] has an element of class to it. Do you know what I mean?" (emphasis added). If it is necessary to define sex "on her terms" as consensual, this implies that sometimes casual "sex" with footballers is *not* consensual, or that there is an increased likelihood of rape. She also claims to have heard about several incidents in which footballers she knows sexually abused and denigrated, if not actually raped, other women. Such an awareness of what may happen clearly does not make Palavi a perpetrator of abuse, but neither can her actions (such as "setting up" women with footballers using Facebook) be considered entirely separate.

While one may argue, following Levi's reflections, that judgement of a "grey zone" figure such as Palavi should be suspended, it is significant that *Four Corners's* representation of Palavi makes implicit and simplistic moral judgements. The introduction to Palavi follows the story of "Caroline," who states that first-grade rugby player Dane Tilse broke into her university dormitory room and sexually assaulted her while she slept. Caroline indicates that Tilse left when he "picked up that [she] was really stressed." Following this story, the program's reporter and narrator Sarah Ferguson introduces Palavi with, "If some young footballers mistakenly think all women want to have sex with them, Charmyne Palavi is one who doesn't necessarily discourage the idea." As has been argued elsewhere (Waterhouse-Watson, "Framing the Victim"), this implies that Palavi is partly responsible for players holding this mistaken view. By implication, she therefore encouraged Tilse to assume that Caroline would want to have sex with him.

Footage is then shown of Palavi and her friends "applying the finishing touches"—bronzing their legs—before going to meet footballers at a local hotel. The lighting is dim and the hand-held camerawork rough. These techniques portray the women as artificial and "cheap," techniques that are also employed in a remarkably similar fashion in the documentary *Footy Chicks* (Barry), which follows three women who seek out sex with footballers. In response to Ferguson's question, "What's the appeal of those boys though?" Palavi repeats several times that she likes footballers mainly because of their bodies. This, along with the program's focus on the women as instigators of sex, positions Palavi as something of a predator (she was widely referred to as a "cougar" following the program). In judging her "promiscuity" as immoral, the program implies she is partly responsible for her own rape, as well as acts of what can be termed, at the very least, sexual abuse of other women.

The problematic representation of Palavi raises the complex question of how her "grey zone" behaviour

should be depicted without passing trivialising judgements. This issue is particularly fraught when *Four Corners* follows the representation of Palavi's "nightlife" with her accounts of footballers' acts of sexual assault and abuse, including testimony that a well-known player raped Palavi herself. While Ferguson does not explicitly question the veracity of Palavi's claim of rape, her portrayal is nevertheless largely unsympathetic, and the way the segment is edited appears to imply that she is blameworthy. Ferguson recounts that Palavi "says she was able to put [being raped] out of her mind, and it certainly didn't stop her pursuing other football players." This might be interpreted a positive statement about Palavi's ability to move on from a rape; however, the tone of Ferguson's authoritative voiceover is disapproving, which instead implies negative judgement. As the program makes clear, Palavi continues to organise sexual encounters between women and players, despite her knowledge of the "dangers," both to herself and other women.

Palavi's awareness of the prevalence of incidents of sexual assault or abuse makes her position a problematic one. Yet her controversial role within the sexual culture of elite Australian football is complicated even further by the fact that she herself is disempowered (and her own allegation of being raped delegitimised) by the simplistic ideas about "assault" and "consent" that dominate social discourse. Despite this ambiguity, *Four Corners* constructs Palavi as more of a *perpetrator* of abuse than a victim—not even a victim who is "morally compromised." Although we argue that careful consideration must be given to the issue of whether moral judgements should be applied to "grey zone" figures like Palavi, the "solution" is far from simple. No language (or image) is neutral or value-free, and judgements are inevitable in any act of representation.

In his essay on the "grey zone," Levi raises the crucial point that the many (mis)understandings of figures of moral ambiguity and "compromise" partly arise from the fact that the testimony and perspectives of these figures themselves is often the last to be heard—if at all (50). Nevertheless, an article Palavi published in Sydney tabloid *The Daily Telegraph* (19) demonstrates that such testimony can also be problematic and only complicate matters further. Palavi's account begins:

If you believed *Four Corners*, I'm supposed to be the NRL's biggest groupie, a wannabe WAG who dresses up, heads out to clubs and hunts down players to have sex with... what annoys me about these tags and the way I was portrayed on that show is the idea I prey on them like *some of the starstruck women I've seen out there*. (emphasis added)

Palavi clearly rejects the way *Four Corners* constructed her as a predator; however, rather than rejecting this stereotype outright, she reinscribes it, projecting it onto other "starstruck" women.

Throughout her article, Palavi reiterates (other) women's allegedly predatory behaviour, continually portraying the footballers as passive and the women as active. For example, she claims that players "like being contacted by girls," whereas "the girls use the information the players put on their [social media profiles] to *track them down*." Palavi's narrative confirms this construction of men as victims of women's predatory actions, lamenting the sacking of Johns following "Code of Silence" as "disgusting."

In the context of alleged sexual assault, the "predatory woman" stereotype is used in place of the raped woman in order to imply that sexual assault did not occur; hence Palavi's problematic discourse arguably reinforces sexist attitudes. But can Palavi be considered complicit in validating this damaging stereotype? Can she be blamed for working within patriarchal systems of representation, of which she has also been a victim? The preceding analysis shows judgement to be inherent in the act of representation. The paucity of language is particularly acute when dealing with such extreme situations. Indeed, the language used to explore this issue in the present article cannot escape terminology that is loaded with meaning(s), which quotation marks can perhaps only qualify so far.

Conclusion

This paper does not claim to provide definitive answers to such complex dilemmas, but rather to highlight problems in addressing the sensitive issues of ambiguity and "complicity" in women's interactions with patriarchal systems, and how these are represented in the mass media. Like the controversial behaviour of teenager Kim Duthie described earlier, Palavi's position throws the problems of judgement and representation into disarray. There is no simple solution to these problems, though we do propose that these "grey zone" figures be represented in a self-reflexive, nuanced manner by explicitly *articulating* questions of responsibility rather

than making simplistic judgements that implicitly lessen perpetrators' culpability.

Levi's concept of the "grey zone" helps elucidate the fraught issue of women's potential complicity in a rape culture, a subject that challenges both understanding and representation. Despite participating in a culture that promotes the abuse, denigration, and humiliation of women, the roles of women like Palavi cannot in any way be conflated with the roles of the perpetrators of sexual assault. These and other "grey zones" need to be constantly rethought and renegotiated in order to develop a fuller understanding of human behaviour.

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