

10 | The Beat of the Gavel

Rap, 'Race', and Criminal Injustice

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Rap music is routinely policed as a symbol of trouble and a source of danger, through legal penal¹ tactics that accuse rappers of glamourising, glorifying, inciting and even causing violent crime.² Stripping it of its artistic nature and ignoring its performative genre norms, police, prosecutors and judges target rap as literal, autobiographical testimony – to adduce lyrics, videos and still images as 'evidence' of criminal wrongdoing; thereby putting an entire music genre 'on trial'.³ So popular has this criminalising trend become, that a New York Senate State Bill was (nick)named: the 'Rap on Trial' Bill⁴ – speaking volumes for how institutionalised the war against rap has become. Despite such fair-minded legislation, which emerged as an antidote to the unjust penalisation of rap, the crusading zeal with which rap music continues to be apprehended as a 'crime', shows no signs of abating.

Written against the backdrop of such punitive fervour, this chapter offers a flickering snapshot of how rap music is summoned to the defendant's seat – by unearthing the legalistic arsenal that criminalises rap(pers), while also exposing the discriminatory logic that makes the racialised, state-sanctioned criminalisation of Black⁵ music genres possible in the first place. Nowhere is such 'condemnation of Blackness'⁶ more audible than in the discriminatory suppression of UK drill music – by anti-Black policies and politics of law and order that police human difference ('race') through the political category of 'crime'.⁷ Following a broad-brush description of UK drill music, the remainder of this chapter will focus on legal penal processes through which this latest rap subgenre is cast (out) as criminogenic.⁸ Arguing that the selective, racialised criminalisation of UK drill music offers a unique register through which to understand the racialisation of 'crime' and the criminalisation of 'race',⁹ this chapter ends with a concluding bar that . . . spits truth to power¹⁰ – as an oppositional coda that denounces racist legal penal processes that police the beats and make crimes out of rhymes rather than protect 'the public' against danger.¹¹

What's That Sound? Introducing UK Drill Music

UK drill music, a British offshoot of Chicago drill, broke into the mainstream in 2018 – through lurid headlines that described it as the ‘demonic’¹² and ‘nihilistic’¹³ ‘knife crime rap’¹⁴ that ostensibly provided ‘the soundtrack to London’s murders’,¹⁵ while also ‘spreading a message of hatred and violent revenge’.¹⁶ (Mis)interpreting this new rap subgenre’s dark, gritty, deep-bass, punchy 808-generated beats¹⁷ as menacing – and mistaking its provocative bars (lyrics) for real threats of violence – UK drill continues to haunt the penal imagination as a criminal enterprise (which it is *not*), rather than an art form (which it actually *is*). Lacking appropriate knowledge of or literacy in rap *lore*, cops, prosecutors and judges have therefore reduced drill to little more than the object and subject of criminal *law*.¹⁸ As such, drill was indelibly linked to and marked by associations with violence at the outset – although that very same genre is also celebrated as a commercially successful asset to the popular music industry; through chart-topping hits, sold-out gigs, headlining festival line-ups and endless playlists on YouTube and Spotify. This is not to deny, justify, downplay or condone any of the violence (or misogyny) in some but by no means all drill music. Rather, it is to stress that drill is *selectively* singled out for lyrical content that is otherwise overlooked, tolerated or excused in other music genres¹⁹ and different art forms too.²⁰ First-person narratives that may be partly or purely performative, fictional, hyperbolic or fabricated even – as is the case with many other music lyrics or literary works – make drill vulnerable to accusations of violence, ‘gangsterism’ and ‘criminality’, even though rappers consciously exploit such ‘outlaw narratives’²¹ as a sought-after commodity to be consumed online by followers whose clicks, views, likes and shares can and *do* bring fame and material rewards too.²² In short, this is a story of a new rap subgenre emerging – only to find itself mired in and threatened by old stereotypes that refuse to see, let alone listen to, Black music outside a legal penal context.

Sounds Bad: Prosecuting Rap Music Beat by Beat

Having introduced and situated the emergence of UK drill in the legal penal context that made a public enemy out of it, this section offers an overview of the various ways rap enters the courtroom as a source of criminal evidence. To do so, the main legal arguments that are made to

prosecute UK drill are outlined to reveal the normalised, legalised and institutionalised racist ideology that undergirds, justifies and (re)produces such legalistic sophistry and criminal injustice. While the preceding parts of this chapter have already sketched the broad contours of the legal(ised) criminalisation of rap subgenres like drill, what follows is a head-on confrontation with the specific tools and tactics that legal penal functionaries marshal to charge rappers with the offence of making music they (pre) judge as distasteful and harmful.

‘Criminally-Minded’

The repudiation of UK drill as an inherently and quintessentially violent music genre that encourages, celebrates and even enables acts of serious (youth) violence is vividly illustrated by the use of lyrics, music videos and still images obtained from music videos: as direct evidence of wrongdoing, as confessions to an offence, or as expressions of intent to commit an offence. The use of such material, however, is also used indirectly. A case in point is the imposition of Criminal Behaviour Orders (CBOs). Such ‘ancillary orders’²³ require drill artists to inform the police twenty-four hours in advance of their intention to publish any videos online while also demanding that they give a forty-eight-hour warning of the date and locations of any planned live performance. But they can also prevent suspects from associating with certain people, entering designated areas, wearing hoods, or using social media and unregistered mobile phones. The police also request the removal of drill music videos from YouTube²⁴ and monitor the playing of UK drill music on air by requesting radio stations to pluck drill tracks out of their playlists – as the Met Deputy Commissioner, Sir Stephen House disclosed at a Police and Crime Committee meeting of the London Assembly.²⁵ The Metropolitan Police has even formed a Drill Music Translation Cadre, consisting of police officers who act as rap expert witnesses, decoding lyrics and translating them into evidence for the prosecution.²⁶ Such heavy-handed measures could be justified, if substantive, reliable, tangible and concrete evidence existed to support them.²⁷ In the absence of such evidence, however, the dictates of the legal penal system stand in for evidential facts – in ways that have alarmed law reform and human rights organisations,²⁸ leading legal professionals,²⁹ defence counsels, the expert witnesses they instruct, as well as social scientists, rap experts and legal scholars.³⁰

'Gang-Affiliated'

UK drill is also blamed for and targeted as little more than a front for gang membership and collective offending despite a thin evidence base and a number of troubling implications. Such a prosecutorial strategy is enabled by so-called gang injunctions which, under Section 34(5) of the Policing and Crime Act 2009, allow legal penal agencies to define acts as gang-related – provided that the targeted group (a) 'consists of at least 3 people', (b) 'uses a name, emblem or colour or has any other characteristic that enables its members to be identified by others as a group', and (c) 'is associated with a particular area'. In the context of drill music, this means that anyone who raps on camera with at least two other people, wearing T-shirts with the drill collective's name or logo in their neighbourhood, can be identified as a gang member and prosecuted as such. Inferring gang association through appearances in drill videos that circulate on social media is hardly evidence and complicated further by the fact that the pose, imagery and performance of 'gang lifestyles' have been a staple in various rap subgenres (drill included) since the emergence of gangsta rap in the 1990s. Worse still, gang association *cannot* be inferred through appearances in videos with known gang members, when there can be many innocent reasons for associating with gang members, including musical collaborations, or kinship and friendship ties.³¹

'Bad Characters'

When all else fails, drill music material is relied on as evidence of the defendants' 'bad character', or to denote involvement in 'joint enterprise'.³² Section 98 of the Criminal Justice Act, 2003 defines bad character evidence as 'evidence of, or of a *disposition towards*, misconduct' rather than evidence which 'has to do with the alleged *facts* of the offence with which the defendant is charged' (emphasis added). As for joint enterprise, it is a legal doctrine that allows the court to show a link or association between defendants. Given the broad scope of such legislation, it is possible to convict individuals of crimes *without* committing the criminal act they are charged with, or even being at the scene of the crime. To introduce such 'evidence' in court, prosecutors present such material in conjunction with witness statements that are produced by relevant 'experts' (usually police officers, 'gangs experts' and forensic linguists), who may also be instructed to give evidence in court. The arguments that such cases are usually based on, involve a matter-of-fact presentation of drill-related material – without

adequately interrogating the artistic, literary or fictional nature of the ‘evidence’ that is brought before judges and jurors.³³

Spitting Truth to Power

Reflecting on the regular use of such prosecutorial strategies against rap(pers), the racist ideology that informs and sanctions such practices remains invisible, without subjecting such legalistic trickery to the critique it deserves. This involves (a) challenging the evidential weight of such ‘evidence’, (b) questioning the expertise of those who are instructed as such by the prosecution, and (c) highlighting the problems with interpreting drill lyrics and videos in a courtroom setting and in a strictly law enforcement context. What is presented as evidence-led attempts to prosecute those who are suspected of wrongdoing based on the music they produce, therefore, sounds a warning against the dangers of drawing on drill-related material – without scrutinising the admissibility and relevance of such material, which reproduce racist stereotypes about Black music genres and ‘criminality’ instead of upholding high standards of evidence. Even the relevant Criminal Procedure Rules, Criminal Practice Directions and Crown Prosecution Service guidelines could, in theory, challenge such racialised criminalising practices, were they used to do that. Without challenging criminal injustice on those grounds, however, drillers remain vulnerable to processes of gathering and presenting ‘evidence’ that has insufficient weight to withstand scrutiny, given that it is richer in prejudicial impact than evidential/probative value.³⁴ This is made worse by the fact that the success and impact of such evidence depend on making an emotive case to the jury by portraying defendants in a negative light or whether the drill-related material used is even connected to the charges brought against the defendant.³⁵

None of this would be possible were it not for anti-Black policies and politics of law and order that perceive and pursue Black Britons as ‘permanent suspects’,³⁶ whose forms of creative expression are perceived and policed as ‘aesthetically “out of tune”, culturally “out of place” and politically “out of order”’.³⁷ Drill music is just the latest example in a long history of criminalising Black music(s) from the era of colonial slavery to the present day.³⁸ Just as earlier Black music genres were policed as audible signs of rebellion, insurrection and disorder, it would not be an exaggeration to suggest – as Murray Lee does³⁹ – that drill is prosecuted in the way that it is, precisely because it ‘challenges, transgresses,

confronts, goads, and subverts mainstream society and culture, police and agents of social control, and even the aesthetic sensibilities of mainstream music and the music industry'.⁴⁰ Calling, as Lee commendably does, for a 'musicriminology' that is attuned to questions of culture and power, rap scholars should draw on the music to spit truths to power against rap-illiterate colleagues and legal penal practitioners – who only see danger in rappers' rhymes. Rather than 'hear the singer, they analyse the lyrics; rather than hear the drum, they study the song title'⁴¹ – ignoring rap as a cultural practice that speaks of, as well as to rappers' inventiveness, creativity, and artistic imagination; just as it opposes the dominant socio-cultural and political order that polices it as 'noise to be eliminated rather than as music to be appreciated'.⁴²

Notes

1. The neologism 'legal penal system' – not unlike the abolitionist catchphrase 'criminal legal system' – is coined here to problematise, refute and refuse the term 'criminal justice system', insisting that the latter is a system of laws that (literally) *creates* 'crime' – both as a concept and a reality – through turning certain activities into punishable offences. This is not to deny that violence and harm exist, or that there are people who commit violent acts that cause harm. Rather, it is to stress that 'crime' is a political category that condemns, stigmatises, marginalises and racialises violence as the inherent trait, individual anomaly, cultural pathology and personal responsibility of 'deviant' individuals and groups. Notions like 'law' and 'justice', therefore, are not understood here as interchangeable or synonymous. As Ben Quigley (2007: 15) argues, '[w]e must never confuse law and justice. What is legal is often not just. And what is just is often not at all legal'. Legal practitioners, therefore, do not (necessarily) observe principles and ideas of 'justice', but enforce 'the law'; the technical and legal(istic) restrictions on the behaviour, actions and activities of 'the public'. While 'justice' denotes and embodies notions and ethical standards of fairness, 'the law' is 'the technical embodiment of attempts to order society' (Williams, 1993: 139). What we refer to or think of as 'the law', therefore, simply refers to 'written law, codes, [and] systems of obedience' (Williams, 1993: 138), *not* that higher, 'just' ethical plane that we think that the law signifies or stands for. For that reason, the term 'legal penal system' is used throughout this chapter to stress that the state's juridical infrastructure delivers punishments, not justice – using 'the law' as an instrument of political (mis)rule. See Quigley, B. (2007) 'Letter to a Law Student Interested in Social Justice'. *DePaul Journal for Social Sciences* (1)1: 7–28 and Williams, P. J. (1993) *The Alchemy of Race and Rights*. London: Virago.

2. For an overview of such accusations, see Fatsis, Lambros 'Decriminalising Rap Beat by Beat: Two Questions in Search of Answers', in Peters, Eleanor (ed.) *Music in Crime, Resistance, and Identity* (London: Routledge, 2023a) pp. 63–77.
3. Kubrin, Charis and Nielson, Erik 'Rap on Trial', *Race and Justice* 4/3 (2014): 185–211; Erik Nielson and Andrea Dennis *Rap on Trial: Race, Lyrics, and Guilt in America* (New York: New Press, 2019); J. I. Lerner and Charis Kubrin 'Rap on Trial: A Legal Guide for Attorneys', *UC Irvine School of Law Research Paper* 35 (2021). For a digital compendium to scholarly research related to 'rap on trial', see Charis Kubrin's valuable website: <https://endrapontrial.org/research/>.
4. Dillon, Nancy 'New York Lawmakers Introducing Bill to Limit Rap Lyrics as Evidence in Criminal Trials', *Rolling Stone* (2021). www.rollingstone.com/music/music-news/ny-state-senators-bill-legislation-rap-lyrics-evidence-criminal-trials-1258767/ [Accessed 29 March 2022].
5. The term 'Black' is used here to refer to cultural practices that are rooted in, evolve from and establish a dialogue with cultural traditions of the African diaspora. This is not meant to deny the term its coalitional meaning or potential in global anti-racist movements, but to apply it more narrowly to Afro-diasporic culture(s).
6. Khalil Gibran Muhammad *The Condemnation of Blackness: Race, Crime, and the Making of Modern Urban America* (Cambridge, MA: Harvard University Press, 2010).
7. Lambros Fatsis 'Policing the Union's Black: The Racial Politics of Law and Order in Contemporary Britain', in Gordon, Faith and Newman, Daniel (eds.) *Leading Works in Law and Social Justice* (London: Routledge, 2021a) pp. 137–150.
8. Lambros Fatsis 'Policing the Beats: The Criminalisation of UK Drill and Grime Music by the London Metropolitan Police' *The Sociological Review* 67/6 (2019a): 1300–1316; Lambros Fatsis 'Sounds Dangerous: Black Music Subcultures as Victims of State Regulation and Social Control' in Peršak, Nina and Di Ronco, Anna (eds.) *Harm and Disorder in the Urban Space: Social Control, Sense and Sensibility* (London: Routledge, 2021b): 30–51.
9. Angela Davis 'From the Prison of Slavery to the Slavery of Prison: Frederick Douglass and the Convict Lease System', in James, J. (ed.) *The Angela Davis Reader* (London: Blackwell, 1998): 74–95. See also Fatsis, Lambros 'Grime: Criminal Subculture or Public Counterculture? A Critical Investigation into the Criminalization of Black Musical Subcultures in the UK'. *Crime Media Culture*, 15/3 (2019b): 447–461.
10. 'Spitting' in the rap lexicon refers to rhyming, but the word is also used here to give a rap-focused spin on the idea and practice of speaking truth to power – as the mode through which public intellectuals raise their voice against social injustice. For a reformulation of this classic trope against the dominant Euromodern literature on public intellectuals and in the context of rap culture, see Fatsis 2019b: 452–456.

11. To avoid misleading generalisations about ‘the public’, it is important to stress the obvious point that there are publics that are *protected and not policed* (white, affluent, middle-class people) and there are publics that are *overpoliced and unprotected* (primarily Black people and other(wise) minoritised groups). For a book-length discussion on this, in the context of Covid-19, see Fatsis, Lambros and Lamb, Melayna *Policing the Pandemic: How Public Health Becomes Public Order* (Bristol: Policy Press, 2022).
12. Mararike, Shingi, Harper, Tom, & Gilligan, Andrew (2018) ‘Drill, the “Demoniac” Music Linked to Rise in Youth Murders’. *The Times*. Available from www.thetimes.co.uk/article/drill-the-demoniac-music-linked-to-rise-in-youth-murders-0bkbh3csk [Accessed 29 March 2022].
13. John Simpson “‘Drill’ Music: A Nihilistic Genre Filled with Boasts of Death and Violence’ *The Times* (2018) Available from: www.thetimes.co.uk/article/drill-music-a-nihilistic-genre-filled-with-boasts-of-death-and-violence-g7p736tcj [Accessed 29 March 2022].
14. The Sunday Times Magazine. ‘The Knife Crime Rap: Everything You Should Know about Drill Music’. *The Sunday Times Magazine* (5 May 2019) p. 1.
15. Sam Knight ‘The Soundtrack to London’s Murders’, *The New Yorker* (2018) www.newyorker.com/news/letter-from-the-uk/the-soundtrack-to-londons-murders [Accessed 29 March 2022].
16. Sian Boyle ‘Soundtrack to Murder’ *Daily Mail* (2021) www.dailymail.co.uk/news/article-9585461/Soundtrack-murder-time-gangland-drill-track-Number-One.html [Accessed 20 July 2021].
17. ‘808s’ refers to the loud bass drum beats created by and composed with the 808 or TR-808 Rhythm Composer, an analogue drum machine that has been a staple ingredient in the making of ‘phat’/fat/heavy hip-hop beats/rhythms. For a brilliant, original, imaginative and promising ‘take’ on ‘808s’ as tools for knowledge production, see Katherine McKittrick and Alexander Weheliye ‘808s and Heartbreak’, *Propter* 2/1 (2017): 13–42. For an overall defence of Black music(s) as ‘Black method’, or as epistemology in sound, see Katherine McKittrick *Dear Science and Other Stories* (Durham: Duke University Press, 2021). See also Fatsis 2021b and Lambros Fatsis ‘Arresting Sounds: What UK Soundsystem Culture Teaches Us about Police Racism and Public Life’ in Charles, Monique with Gani, Mary (Eds.), *Black Music in Britain in the 21st Century* (Liverpool: Liverpool University Press, 2023d).
18. Fatsis 2021b: p. 33; emphasis added; and Ilan, Jonathan ‘Digital Street Culture Decoded: Why Criminalizing Drill Music Is Street Illiterate and Counterproductive’, *British Journal of Criminology* 60 (2020): 994–1013.
19. See Amy Binder ‘Constructing Racial Rhetoric: Media Depictions of Harm in Heavy Metal and Rap Music’, *American Sociological Review* 58/6 (1993): 753–767; Carrie Fried ‘Who’s Afraid of Rap: Differential Reactions to Music Lyrics’, *Journal of Applied Social Psychology* 29/4 (1999): 705–721; Carrie Fried ‘Stereotypes of Music Fans: Are Rap and Heavy Metal Fans a Danger to

- Themselves or Others?' *Journal of Media Psychology* 8 (2003): 2–27;
- Adam Dunbar, Charis Kubrin and Nicholas Scurich 'The Threatening Nature of "Rap" Music', *Psychology, Public Policy and Law* 22 (2016): 280–292;
- Adam Dunbar and Charis Kubrin 'Imagining Violent Criminals: An Experimental Investigation of Music Stereotypes and Character Judgments', *Journal of Experimental Criminology* 14/4 (2018): 507–528.
20. bell hooks *Outlaw Culture: Resisting Representations* (London: Routledge, 2006) pp. 134–144; Fatsis, 2023a.
 21. Nielson and Dennis *Rap on Trial*, p. 114.
 22. Forrest Stuart *Ballad of the Bullet: Gangs, Drill Music and the Power of Online Infamy* (Princeton: Princeton University Press, 2020); Jabari Evans "'We [Mostly] Carry Guns for the Internet": Visibility, Labour, Social Hacking and Chasing Digital Clout by Black Male Youth in Chicago's Drill Rap Scene', *Global Hip Hop Studies* 1/2 (2020): 227–247.
 23. Ancillary orders, CBOs included, are imposed on offenders by the court in addition to an actual sentence. See CPS (2019) for more details.
 24. See Fatsis 2019a: 1303–1305 and Tilman Schwarze and Lambros Fatsis 'Copping the Blame: the Role of YouTube Videos in the Criminalisation of UK Drill Music', *Popular Music* 41/4 (2022): 463–480.
 25. London Assembly *Police and Crime Committee Meeting* (17 November 2021 at 10 am) Available from <https://webcasts.london.gov.uk/Assembly/Event/Index/f546d1a1-66c0-452a-961e-d0d1b00ddebe?in=2021-11-17T11%3A58%3A13.788Z> [Accessed 29 March 2022], timestamp: 02:15:18 – 02:19–40.
 26. Quinn, E. 'Lost in Translation? Rap Music and Racial Bias in the Courtroom', Policy@Manchester Blogs. (2018) <http://blog.policy.manchester.ac.uk/posts/2018/10/lost-in-translation-rap-music-and-racial-bias-in-the-courtroom/> [Accessed 29 March 2022]; Eithne Quinn, Joy White and John Street 'Introduction to Special Issue: Prosecuting and Policing Rap', *Popular Music* 41/4 (2022): 419–426. DOI: <https://doi.org/10.1017/S0261143022000642>;
 - Fatsis, Lambros 'The Road, in Court: How UK Drill Music Became a Criminal Offence' in Jade Levell, Tara Young and Rod Earle (Eds.), *Exploring Urban Youth Culture Outside of the Gang Paradigm: Critical Questions of Youth, Gender and Race On-Road* (Bristol, UK: Policy Press, 2023b): 100–114.
 27. Fatsis, 2019a; Ilan, 2020; Adam Lynes, Craig Kelly and Emma Kelly 'Thug Life: Drill Music as Periscope into Urban Violence in the Consumer Age', *British Journal of Criminology* 60/5 (2020): 1201–1219.
 28. Sandra Paul *Tackling Racial Injustice: Children and the Youth Justice System: A Report by JUSTICE* (London: Justice, 2021).
 29. Garden Court Chambers 'Drill music, gangs and prosecutions – challenging racist stereotypes in the criminal justice system' Webinar Series (2020). Available from www.gardencourtchambers.co.uk/events/drill-music-gangs-and-prosecutions-challenging-racist-stereotypes-in-the-criminal-justice-system [Accessed 22 March 2022].

30. Fried, 1999; Kubrin and Nielson, 2014; Nielson and Dennis, 2019; Fatsis, 2019a: esp. 1303; Erin Lutes, James Purdon and Henry Fradella 'When Music Takes the Stand: A Content Analysis of How Courts Use and Misuse Rap Lyrics in Criminal Cases', *American Journal of Criminal Law* 46/1 (2019): 77–132; Abenna Owusu-Bempah 'The Irrelevance of Rap', *Criminal Law Review* 2 (2022). ISSN 0011-135X.
31. For a comprehensive discussion on the (ab)use of 'gang discourses' as a criminalising tool in the UK, see Hannah Smithson, Rob Ralphs and Patrick Williams 'Used and Abused: The Problematic Usage of Gang Terminology in the United Kingdom and Its Implications for Ethnic Minority Youth', *The British Journal of Criminology* 53/1 (2013):113–128.
32. For a good critical discussion of joint enterprise law, see Becky Clarke and Patrick Williams '(Re)producing Guilt in Suspect Communities: The Centrality of Racialisation in Joint Enterprise Prosecutions', *International Journal for Crime, Justice and Social Democracy* 9 (2020): 116–129; Susie Hulley and Tara Young 'Silence, Joint Enterprise and the Legal Trap' *Criminology & Criminal Justice* 22/5 (2022):714–732, DOI: <https://doi.org/10.1177/1748895821991622>.
33. Fried, 1999; Dunbar and Kubrin, 2018; Nielson and Dennis, 2019; Nicholas Stoia, Kyle Adams and Kevin Drakulich 'Rap Lyrics as Evidence: What Can Music Theory Tell Us?' *Race and Justice* 8/4 (2018): 330–365.
34. Nielson and Dennis, 2019.
35. Owusu-Bempah, 2022.
36. Robert Ralphs, Juanjo Medina and Judith Aldridge 'Who Needs Enemies with Friends Like These? The Importance of Place for Young People Living in Known Gang Areas', *Journal of Youth Studies* 12/5 (2009): 483–500; Fatsis, 2021c.
37. Fatsis, 2021b: 38.
38. Fatsis, 2021b; Fatsis, 2023d; Lambros Fatsis 'From Overseer to Officer: A Brief History of British Policing through Afro-Diasporic Music Culture' in Cavalcanti, Roxana, Squires, Peter & Waseem, Zoha (Eds.), *Southern and Postcolonial Perspectives on Policing, Security and Social Order* (Bristol, UK: Policy Press, 2023c) pp. 45–61.
39. Murray Lee 'This Is Not a Drill: Towards a Sonic and Sensorial Musicriminology', *Crime Media Culture* 18/3 (2021): 446–465.
40. Ibid., 460.
41. Robin Kelley *Yo' Mama's Disfunktional: Fighting the Culture Wars in Urban America* (Boston: Beacon Press, 2008) p. 41.
42. Fatsis, 2021b: 37.