

# Goodness Had Nothing to Do with It

Censoring Mae West

MARYBETH HAMILTON

Bystander: You're a fine gal, Lady Lou, a fine woman.

Mae West: One of the finest women that ever walked the streets.

*She Done Him Wrong*

**M**ae West is best remembered as Hollywood's most colorful victim of censorship. In 1933, with her first two starring pictures, *She Done Him Wrong* and *I'm No Angel*. West achieved a truly phenomenal popularity, becoming, in the words of the trade journal *Variety*, "the biggest conversation-provoker, free space grabber and all-around box office bet in the country. She's as hot an issue as Hitler."<sup>1</sup> But in 1934, after a nationwide campaign against film immorality with which West's name became virtually synonymous, she was subjected to the constraints of the Production Code Administration (PCA), the film industry's self-regulatory body, and her popularity began a steady decline. In 1938 Paramount dropped her from her studio contract, only six years and eight films after she began.

Other performers survived the Production Code Administration. Mae West did not. West herself gave a straightforward explanation of her troubles: she was a freewheeling sexual libertine victimized by a punitive censorship body

staffed by a group of Victorian prudes. West's biographers have echoed that analysis; so, more subtly, have many historians. For Robert Sklar, the pre-1934 West was raw, acerbic, even sexually revolutionary, precisely because she was uncensored. She was an exemplar of Hollywood's "Golden Age of Turbulence," exploding on screen with unfettered power before the censors killed her off.<sup>2</sup>

Yet the censorship files of the Motion Picture Producers and Distributors of America (MPPDA), more popularly known as the Hays Office, call that analysis into question. First, they make clear that Mae West was never "uncensored." Well before the founding of the PCA, West was subjected to Hays Office scrutiny. *She Done Him Wrong* and *I'm No Angel* underwent extensive revision by the PCA's precursor, the Studio Relations Committee (SRC), a systematic procedure applied to every Hollywood production well before the cameras began to roll.

At the same time, the files make clear that this censorship was a complex process and that the Hays Office was no simple body of prudes aiming to repress all sexual content. On the contrary, as Lea Jacobs has argued, Hollywood censors played a constructive role in shaping sexual expression and meaning.<sup>3</sup> West's experience was no exception. Before 1934, in fact, censorship helped create Mae West as we know her, shaping her persona far more effectively than West herself would ever admit.

In the final months of 1932 *She Done Him Wrong* went into production at Paramount and immediately fell under the scrutiny of the Hays Office. The studio received extensive advice from Dr. James Wingate, head of the SRC, the Hays Office's West Coast representative charged with administering the Production Code in detail. Wingate scrutinized every stage—each successive script draft, all the song lyrics, and the finishing touches for the release print. His suggestions, most of which Paramount implemented, dealt far more in pragmatics than morals. Through advice on dialogue, characterization, setting, and "atmosphere," he guided the studio in shaping controversial material so as to safeguard its investment and protect the film against costly deletions by state censor boards.

It was no easy endeavor. Mae West presented special problems, though not because, as West herself maintained, she "was the first [film star] to bring sex out into the open."<sup>4</sup> While the SRC was wary of sexual topics, it was also accustomed to dealing with them. The years 1931 and 1932 had seen the release by all major studios of a cycle of what the Hays Office dubbed "sex films": *Back Street*, *Possessed*, and *Blonde Venus*, among others, tales of the transgressions of beautiful and willfully modern young women. Though such films had caused the censors no end of headaches, they were a familiar commodity. The peculiar

troubles that West presented, in contrast, were rooted in her Broadway origins and her reputation for urban “realism,” for providing a glimpse of authentic underworld vice.

In 1932 Mae West’s national reputation rested on two events. The first was her arrest on obscenity charges in 1927 after producing two Broadway plays: *Sex*, a tale of prostitution, and *The Drag*, a “comedy-drama of homosexuality.” The second was her follow-up to the arrest, the 1928 hit play *Diamond Lil*, on which *She Done Him Wrong* was based. The tale of an 1890s Bowery madam who bewitches the preacher who sets out to reform her, the play capitalized on West’s notoriety, tantalizing audiences with a chance to “go slumming” with a convicted pornographer who would guide them down “the most wicked street in the world.”<sup>5</sup>

*Diamond Lil*’s claims to underworld authenticity ought to be taken with a large grain of salt. Set in a picturesque Gay Nineties tavern peopled with comical Bowery barflies, *Lil* was a sentimental slumming excursion, a fond look back at a caricatured past. It was a sharp contrast to West’s earlier plays, whose tone was leering and confrontational, whose style was rooted in underworld theater, and whose “urban vice” came across as uncomfortably real. *Lil* abandoned such blatant sensationalism to cultivate a chuckle of bemused nostalgia and highlight the bewitching persona newly developed by its star. Oozing through the play in her floor-length gowns, writhing and wriggling with every step, West made an amiably implausible period piece, a tabloid headliner in a whalebone corset. Every word, every gesture, exuded a good-humored irony. As one critic described it, “She seems to recoil with an almost gun-like precision after each of her more tawdry speeches, and makes her own comment . . . upon them, even while she continues to play them seriously.”<sup>6</sup>

What *Diamond Lil* offered was slumming made comfortable, the lure of the forbidden with the rough edges smoothed off, and as historians such as Lewis Erenberg have noted, in the twenties that style was the hallmark of successful Broadway nightlife. Like the Cotton Club, which trumpeted its presentation of genuine “black savagery” while closing its doors to black patrons, successful nightlife enterprises offered sanitized underworld fantasy lands that catered to the tastes of middle-class patrons, all of them loud in their rejection of “prudery” but often less adventurous than they liked to admit.<sup>7</sup>

So in truth, *Diamond Lil* was not nearly the shocker its Broadway publicists claimed. All the same, like the nightlife milieu it sprang from, West’s play made the Hays Office nervous. Since the 1920s Broadway had occupied a cultural niche from which the film industry was anxious to distance itself. It styled itself as a site of rebellion, of adventurous flouting of Victorian norms.

Though that rebellion was obviously tempered in practice, on the surface Broadway endorsed it wholeheartedly, spotlighting jazz, racial exotics, and the thrills of the underworld, all the while enticing consumers with the chance to let loose.<sup>8</sup>

As a potential source of actors, writers, and screenplays, that entertainment culture posed no end of problems for the Hays Office, always attentive to the fears of the provinces and their middle-class cultural guardians, who had long viewed the movies as an encroachment, and who had grown even more hostile as sound technology threatened to bring Broadway's much-publicized "realism" directly to Main Street. In Hays's view the film industry, like it or not, had to take this hostility seriously. While Broadway could afford to revel in its reputation for serving up metropolitan wickedness, filmmakers could not: they had to sell their product in small towns as well as big cities, under the scrutiny of state and municipal censor boards. In response Hays developed a public relations strategy of selling movies as a quintessentially mainstream amusement, detached from the world of urban nightlife and in line with the values of the American heartland. As part of the industry's "special endeavor to prevent the prevalent type of play from becoming the prevalent type of picture," Hays heralded Hollywood's production of "pure entertainment," which left spectators as morally untainted on leaving the theater as when they went in.<sup>9</sup>

If that "special endeavor" were to retain credibility, *Diamond Lil* and Mae West would have to be censored. Most obviously, the film would have to sever all direct links to the play. To that end, acting on Hays Office suggestions, Paramount changed the title to *She Done Him Wrong*. West's character became "Lady Lou," and publicity stressed West's most famous (if misquoted) catchphrase, "Come up and see me sometime," instead of the play's best-known line, "You can be had."<sup>10</sup> Beyond that, however, the task grew more complicated: eradicating all traces of the Broadway style that James Wingate described as "sordid realism," a style that seemed to promise spectators a glimpse of authentic underworld vice.<sup>11</sup>

To blot out that style, the Hays Office looked to the conventions it had developed to regulate "sex movies," the tales of ambitious women who used love affairs to move up the social and material ladder. In vetting such stories, the censors had a clear aim: to get them onscreen in a form that could turn a profit without causing trouble for the film industry. That did not mean deleting sexual material entirely. Instead, the censors sought to walk a fine line between offending the traditional and boring the adventurous. This goal demanded strategies of screen representation in which sexual content was suggested, not overt, "from which conclusions might be drawn by the sophisticated mind,

but which would mean nothing to the unsophisticated and inexperienced," as James Wingate's precursor Jason Joy put it.<sup>12</sup>

In practice, this meant infusing sex films with a high degree of ambiguity. The SRC urged that wherever possible, the heroine's sexual encounters be shown indirectly, through vague verbal or visual allusions, leaving it an open question when (or whether) they took place. Just as important, the SRC insisted, the film should not seem to endorse her conduct. If only for the purpose of disarming critics, it had to condemn her, whether through scenes in which she is denounced by others, repents of her own sins, or (as the SRC urged in 1932 in the case of MGM's *Red-Headed Woman*) is made so farcical that it would be impossible to take her conduct seriously.<sup>13</sup>

From the beginning the SRC staff approached *Diamond Lil* with an eye to the latter strategy, aiming to mute all echoes of its Broadway reputation by veiling the story in nostalgia and comedy. As Wingate put it, the film would caricature "the manners and customs of the period" and "develop the comedy elements, so that the treatment will invest the picture with such exaggerated qualities as automatically to take care of possible offensiveness."<sup>14</sup> The Hays Office, in other words, would out-West Mae West by employing precisely the devices that made *Diamond Lil* such a departure from her other Broadway forays.

They started with the Bowery setting, conspicuously thickening its air of nostalgia. The transition to film facilitated this. The movie employed period music as background accompaniment, which echoed behind the opening credits and heralded the appearances of Lady Lou. Those jangling melodies and barbershop harmonies helped to lend both the Bowery and Lou's exploits an even quainter sentimentality than West had managed to inject into the stage version. The atmosphere was established in a lighthearted montage that followed the opening credits. Introducing the Bowery setting through an organ grinder and monkey, two elegant women on bicycles, and an aggravated street sweeper cleaning up after a horse, it stressed the sexual innocence of the picturesque Gay Nineties, a time, as an explanatory caption put it, "when there were handlebars on lip and wheel—and legs were confidential!"

The Hays Office's main worry, however, was Lady Lou herself. Wingate bemoaned her "low-toned" characteristics, her seeming rootedness in the underworld, and sought to downplay her realism and make her a creature of fantasy. At Wingate's request, Paramount made several script changes that muted Lou's past transgressions, "soft-peddling the many references to the number of Lady Lou's previous affairs" and leaving the nature of the relationships "open to debate."<sup>15</sup> In practice, this meant channeling most mentions of Lou's history through comic repartee with her black maid, a wholly new character, who (in

the words of the first script draft, titled *Ruby Red*) “knows everything about Lou,” and whose sly familiarity with her mistress allowed viewers to infer what the film could not directly state.<sup>16</sup> It also meant replacing blunt references to the heroine’s predatory passions with allusive one-liners. Gone, for instance, was Lil’s recital of her encounters with “burnin’ lovers”; in its place was Lou’s memorable description of herself as “the finest woman who ever walked the streets.”<sup>17</sup>

In the end, Wingate’s attempt to tame *Diamond Lil* resulted in a substantial number of changes, but on screen, hardly anyone noticed them. They fit with uncanny neatness into the trajectory of the original script. More fully than the SRC ever realized, its strategy of investing the narrative with ambiguity and replacing sexual aggression with comedy and nostalgia had been part of the original play. Ironically, then, the more Paramount worked to implement SRC suggestions, the more like the play the film became. Successive drafts of the script make clear that West was able to use the Hays Office’s insistence on comedy to her advantage in her battle to overturn script revisions ordered by Paramount screenwriter John Bright. Bright, who had made a name for himself with the violent gang tale *The Public Enemy*, initially sought to recast the script into a darker, more solemn underworld drama, dropping wisecracks and inserting moments in which Lou sees the error of her ways. By the time the cameras rolled, West had cut the new emphasis on melodramatic repentance, which disrupted the desired tone of humor and fantasy, and reinstated many of her one-liners.<sup>18</sup>

As a consequence, the film Paramount released in early 1933 struck *Variety* and most other observers as a carbon copy of *Diamond Lil*. By all appearances it seemed to have a nearly identical impact on audiences. The film came across, like the play, as a trip to a genial urban underworld; and despite the Hays Office’s eagerness to avoid Broadway “realism,” reviewers brought up that word again and again. To Wingate’s certain chagrin, nearly all noted the screenplay’s stage origins—and how little it had changed in transition. Still exuding “that lusty quality which made the play indigenous to both its star and to Broadway,” the film altered little except the names and the title, “to deceive Will Hays, who seems easy to deceive.”<sup>19</sup> The script and the backgrounds may have been toned down, but juxtaposed against them were sensational elements that succeeded in evoking West’s Broadway origins, making the completed film much less safely fantastical than its regulators had hoped.

Most sensational of all was Mae West herself. Neither Wingate nor Hays nor anyone else had anticipated the nature of her performance, how completely it would prove resistant to external control. One look at the completed film con-

vinced Wingate that West's acting style had subverted all his efforts to veil Lou and her surroundings in comedy. He wrote to Will Hays with obvious dismay, "Miss West gives a performance of strong realism."<sup>20</sup>

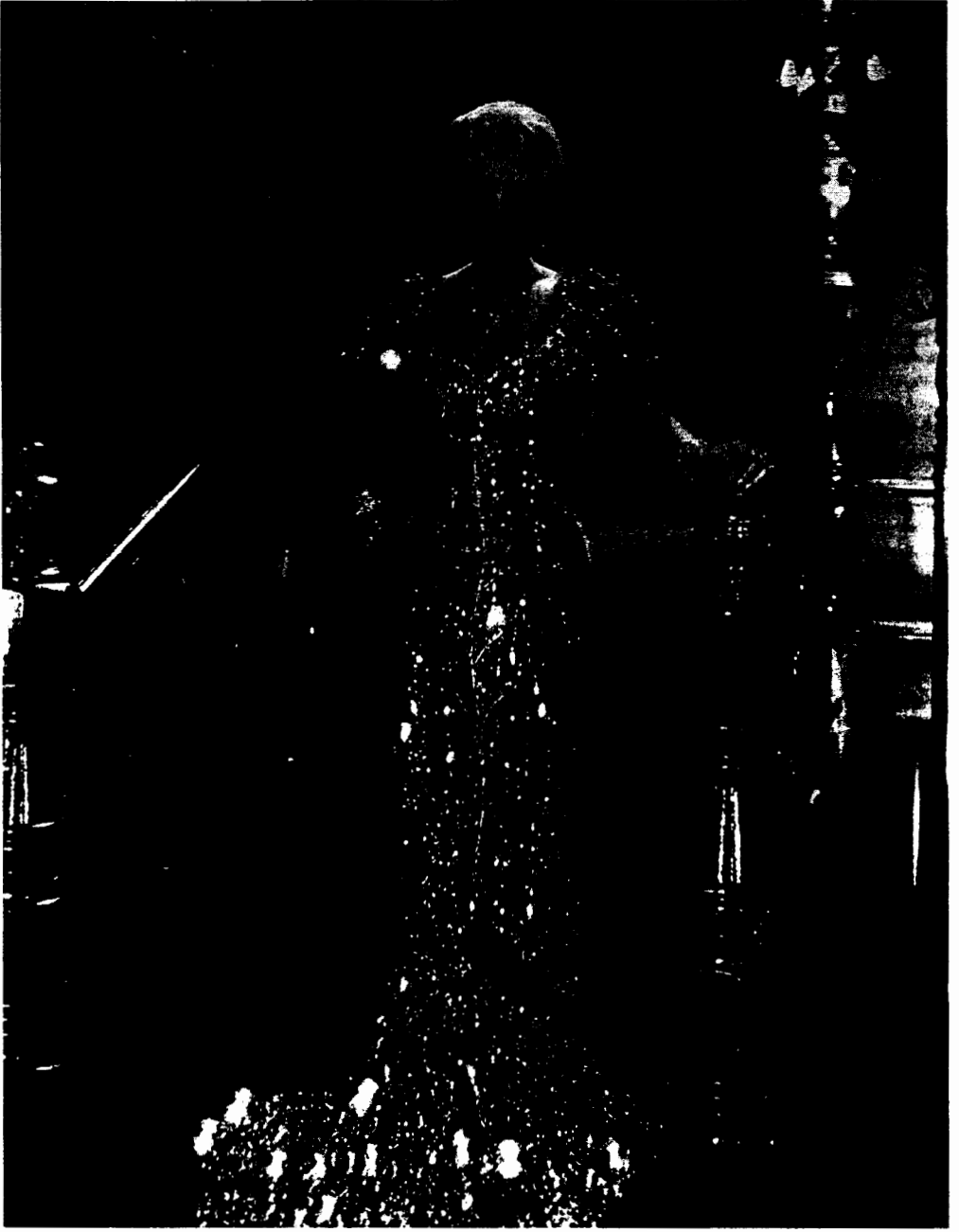
What Wingate saw as "realism" was West's highly conventionalized performance style, the oozing walk, the hard-boiled speech that lent an unexpected saltiness to seemingly innocent lines. It was a familiar phenomenon on Broadway, but on film it shone forth as altogether novel, not least because the camera served it up as spectacle, West's body an eroticized feast for the eye. While a stage audience might have chosen to focus on West alone, the screen audience was given no choice. As *Variety* noted, supporting characters are "never permitted to be anything more than just background. Miss West gets all the lens gravy and full figure most of the time."<sup>21</sup>

In reading her sexual style as "realism," Wingate was most likely joined by much of the film's audience. Studio publicity for *She Done Him Wrong*, like stage publicity for *Diamond Lil*, touted its authenticity and sexual frankness, attributing them to West's real-life links to the urban underworld. Newspaper stories and fan-magazine interviews generated by Paramount lavished attention on her Broadway arrests ("Welfare Island Fails to Tame the Wild West!"); her friendship with Broadway racketeer Owney Madden, "the Killer of Tenth Avenue"; and even the fact that she "freely admits she has been the patron big sister of the afflicted of what Broadway calls Fairyland."<sup>22</sup> This was no ordinary actress, and certainly no purveyor of fantasy, but a convicted sex offender who used the screen to display her true self. "Mae West actually courts gossip," the studio emphasized, "and your worst innuendoes are music to her ears."<sup>23</sup>

Such blatant appeals to sensationalism appalled the Hays Office—not least because they proved so effective. By early March it was apparent that Paramount had produced a sensation. Released in February around the time of Roosevelt's Bank Holiday, *She Done Him Wrong* defied the trend of declining attendance, raking in huge box office receipts even in areas where West had been previously unknown. Evidently, good-natured slumming excursions appealed nationwide, in Mississippi no less than Manhattan. In Birmingham, Alabama, her film became the biggest draw in town, and in Lincoln, Nebraska, it played three week-long engagements, attracting larger and more boisterous audiences each time.<sup>24</sup>

Clearly, the Hays Office's tactics had backfired. Despite all the efforts to sever its ties, *She Done Him Wrong* continued to evoke Broadway, and, as Wingate realized, the jibes about West's triumph over the ineffectual Will Hays only added fuel to the reformist fire, lending new justification to the contention that the industry was unfit to control its own products. Wingate was

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Mae West appears in all her glory in *She Done Him Wrong* (Paramount, 1933). Photo courtesy Margaret Herrick Library, Academy of Motion Picture Arts and Sciences.



not alone in his worries. Sidney Kent, the head of Fox Film Company, saw *She Done Him Wrong* shortly after its release and wrote an aggrieved letter to Will Hays in New York.

In my opinion it is the worst picture I have seen. It was the real story of Diamond Lil and they got away with it. They promised that that story would not be made. I believe it is worse than *Red-Headed Woman* from the standpoint of the industry—it is far more suggestive in word and what is not said is suggested in action.

I cannot understand how your people on the Coast could let this get by. There is very little that any of us can do now.<sup>25</sup>

Kent's letter was a sign of forces brewing that would compel Mae West to change, despite her box office success. *She Done Him Wrong* infuriated reform groups already distressed by the onslaught of sex films and now horrified to discover that a convicted pornographer was parading on screen for all the world to see. As their protests intensified in the spring of 1933, Will Hays became increasingly nervous. With Hollywood receiving so much bad press, and with government intervention in business an apparent trend, Washington might well decide to subject the film industry to heavy-handed federal controls. The only way to quash the threat was to tighten the self-regulatory process. By April Hays was in Hollywood haranguing filmmakers in person. More ribald productions, he warned, more Broadway sensationalism, and they could be certain of punitive government action, for they would have provided their critics with precisely the ammunition they needed.<sup>26</sup>

By late spring, as West prepared to begin filming a follow-up, she found her employers at Paramount under new pressure to proceed with care. In truth, they might well have acted more prudently even without the Hays Office. *She Done Him Wrong* may have made a mint, but it also caused the studio more than a few headaches: much bad feeling within the industry, a profusion of deletions by the state censors, and an expensive last-minute cut demanded by a panicky Hays Office. One week before the premiere, and after all the prints had been sent to exhibitors, MPPDA official Vincent Hart saw the film and was shocked by West's performance, particularly her rendition of "A Guy What Takes His Time" (or "Slow Motion Man"), on paper a mild love lyric, but in West's hands a graphic celebration of languorous sex. At the insistence of Hart and Hays, Paramount recalled the prints and deleted all but the song's first and last verses. Compounding the studio's embarrassment, James Wingate wrote to the heads of all the major film companies to inform them of the Hays Office's action.<sup>27</sup>

This time around Paramount was determined to avoid any such wrangles and keep West's creative influence within bounds. Though she received a full screenwriting credit for the feature that took shape over the summer and probably did contribute a skeletal narrative,<sup>28</sup> the final product was almost certainly fleshed out by Paramount scriptwriter Harlan Thompson. "Harlan *wrote* the script," his widow insisted, and it seems indisputable that hands other than West's were involved.<sup>29</sup> At least on the surface, the new vehicle, *I'm No Angel*, was more circumspect than anything she had ever created alone.

The most obvious change was in the film's setting. The tale of a circus dancer turned lion tamer who wins the heart of a society man, *I'm No Angel* extricated West from the New York City underworld on which she had built her Broadway career. Gone was even a romanticized trace of the Bowery milieu, whose unsavory associations had so dismayed the Hays Office. Instead, the new film was rooted more securely in fantasy, following Tira, the "dancing, singing marvel," from a carnival sideshow to a penthouse apartment and the unreal luxury of the movieland rich.

Tira, too, represented a bow to caution. No queen of the underworld, she is a wisecracking gold digger, shrewd and ambitious, less explicitly out for sex than for money. "Somewhere there's a guy with a million waitin' for a dame like me," Tira says, and her eagerness to find him impels the narrative, leading her from a circus tent to the lap of luxury and the seductions of orchids, diamonds, and furs.<sup>30</sup> At the same time, there is a conspicuous if formulaic display of atonement. Unlike Lady Lou, seemingly an unashamed carouser to the final credits, Tira is reformed by love. "I never knew I could go for anyone like I have for him," she announces of her wealthy suitor, Jack Clayton, and the film goes out of its way to show that she means it. When Clayton believes her unfaithful and breaks their engagement, she is genuinely shattered. "I ain't never seen nobody so broken-hearted as you was when you and Mr. Clayton done bust up," testifies her maid, Beulah. "He's made me feel like a different dame," Tira agrees. "I ain't just a Sister Honky Tonk no more."

Clearly, Will Hays's admonitions had had some effect. Even Paramount's publicists got into the act, as *Variety* reported shortly before *I'm No Angel's* release.

To offset any possible backfire from women's club groups and hinterland censors, Paramount executives have given orders to the studio publicity department to change its policy on the type of publicity going out on Mae West, . . . with a soft peddling on any attempt to present her as the spectacular and bizarre character she is on the screen.<sup>31</sup>

The results put an end to fan-magazine profiles of West as an authentic sexual outlaw. "The difference between her and her characterizations amazed me," one

colleague asserted in a press release. "Despite the lurid publicity her sensational stage plays and jousts with the law have earned for her, she has never had her name blemished by any personal scandal."<sup>32</sup> Quiet, generous, deeply religious, this was a woman who cared for her craft and served her jail sentence as a "sacrifice to her principle that honest views of love, life, and sex were less harmful than dishonest and glossed-over implication."<sup>33</sup> Certainly, the prison officials were never misled.

How seriously the authorities regarded the sentence may be gathered from the fact that she spent none of that time in a detention cell with the real offenders against public decency.

The warden saw in her a superior woman of charm and intelligence. For that ten days she was the guest in his house. His children loved the beautiful lady who taught them songs and dances. He is still one of her staunchest admirers.

And many of the less fortunate inmates are grateful to Mae West for acts of kindness and charity.<sup>34</sup>

But it would be wrong to give the impression that *I'm No Angel* set out to purify West entirely. After all, her ribald performance in *She Done Him Wrong* had made her Paramount's hottest commodity. The challenge was to repackage West more acceptably within a contentious mass medium, not by deleting all sexual references, but by burying them more subtly beneath the film's surface. This *I'm No Angel* accomplished, to the Hays Office's evident relief. "While many of the gags border on questionable dialogue . . . most of the suggestions are left to the imagination," Vincent Hart noted approvingly.<sup>35</sup>

The chief food for the imagination was Mae West's persona. On paper Tira was an ambitious dancer with a craving for money. On the screen she exuded earthier desires. West's swiveling hips, knowing laugh, and appraising gaze injected a bawdiness that the script had carefully eschewed. Her one-liners were vague but allusive, and her delivery conveyed a full-fledged sexual history that the film did not otherwise avow.

**Fortune-teller:** You are very wise.

**Tira:** Oh, I profit by my experiences. (chuckles) Now, listen, honey—uh—you just tell me about my future. You see, I know all about my past.

As Joseph Furnas of the *New York Herald-Tribune* observed, while the plot

seems to be trying to lace Miss West's pungency into the stiffly-boned confines of the screen formula for heroines, however reckless, . . . Miss West bursts gloriously forth from these restraining influences, much the same overblown,

gaudy and zestful lady as before. The scenarist may insist that she is the customary hard-boiled heroine with the heart of gold, but through means best handled by herself, she keeps the audience profitably reminded that her hard confidence and carnal humor are something new on the screen.<sup>36</sup>

With its circus narrative so patently absurd, *I'm No Angel's* true subject matter was West's performance. To that extent the film made a lasting change in what she herself would come to call the Mae West character. On Broadway and in *She Done Him Wrong* she had plugged herself into the lore of the urban underworld, offering herself up as a genial scandal. This Mae West was different. Stripped of her New York associations, she became more iconic, a universal figure larger than life. The only lore at work was Mae West's—her style, her wisecracks, her famous spectacle. As one critic put it, "The show, this time, is entirely the Mae West personality."<sup>37</sup> West became an enigmatic plot in herself.

At the heart of the enigma lay the issue of the "real" Mae West. Who was she? Why did she specialize in sexual roles? What did she *intend* by her enactments? *I'm No Angel* heightened the debate. At the same time that Paramount's publicity department, in an abrupt about-face, was claiming that the off-screen West bore no relation to her film persona, the script subtly but persistently hinted the opposite, encouraging viewers to conflate actress and character through suggestively autobiographical details. Tira's birth date, August 17, is the same as West's; her cootch dancing in the circus recalls West's shimmy dancing in vaudeville; her appearance in court near the end of the film, rebutting Jack Clayton's slurs on her character, evokes West's notorious courtroom battles on Broadway.<sup>38</sup>

Throughout the film, viewers are encouraged to watch and wonder at West's flamboyant style. Often they can do little else as the action comes to a halt, or rather, hangs suspended, while the camera focuses on West simply strutting her stuff. To musical accompaniment, she banter with her maids and her admirers, parrying their compliments with ironic comebacks to a chorus of appreciative laughter. At times her encounters with suitors seem almost surreal in their scrupulous avoidance of physical contact. The one kiss in *I'm No Angel*, between Tira and Jack Clayton (Cary Grant), is filmed from behind, with Clayton's head filling the screen, completely obscuring our view. Clearly, West's much-vaunted sexual frankness, as presented by Paramount, had little to do with fleshly passion. Instead the film offered her style as a treat in itself, the arched eyebrows and pelvic gyrations accentuating wisecrack after quotable wisecrack, many bandied about in press releases even before the premiere.

Clayton: Ah, you were wonderful tonight!

Tira: Ummm. I'm always wonderful at night. (laughs)

Clayton: (laughs) Yes, but tonight you were especially good.

Tira: Well, when I'm good I'm very good, but when I'm bad, I'm better.

(laughs)

Clayton: (laughs) . . . Of course, if I could only trust you.

Tira: Oh, you can. Hundreds have. (laughs)

Clayton: (laughs) Don't you know I'm mad about you?

Tira: I could tell you'd be the first time I saw you. (laughs)

Clayton: (laughs) Say, I must be transparent.

Tira: Honey, you're just wrapped in cellophane. (laughs)

It is difficult to exaggerate the sheer peculiarity of such exchanges. Almost ostentatious in their physical reticence, they amuse, but they also bewilder. They push West's artifice and secret bemusement to the foreground while leaving their meaning entirely unclear. Consciously or not, West had achieved a similar effect with *Diamond Lil*, her irony suggesting some private joke that she seemed to be savoring but never revealed. Now, thanks to the censors, audiences had even more cause to wonder exactly what she was laughing at. On that score the film remained stubbornly open-ended, leaving the task of interpretation up to the viewer.

And one need only examine the critical raves showered on West from the most unlikely quarters to see how varied the interpretations could be. In the wake of *I'm No Angel*, she was praised by a diverse collection of writers who united in adoring her performance style while holding flatly contradictory opinions about what it actually meant. To the French novelist Colette, West's manipulation of her heavysset body (the "powerful" breast, the "well-fleshed thighs," "the short neck, the round cheek of a young blonde butcher") signaled her defiant and explicitly feminist rejection of the demure, compliant Hollywood heroine.<sup>39</sup> To acerbic critic George Jean Nathan she was the embodiment of old-fashioned womanliness, in stark contrast to the "endless succession of imported lesbians and flat-chested flappers" foisted upon filmgoers before.<sup>40</sup> Gilbert Seldes saw West's air of good-humored mockery as a joyous affirmation of healthy heterosexuality and a populist rejection of the "infertile . . . and moribund" inversion of high-culture artists like Marcel Proust,<sup>41</sup> while George Davis and Parker Tyler read her irony as a homosexual style directly inspired by the theatricality of the gay male subculture.<sup>42</sup>

That Mae West could sustain all these interpretations and more was the secret of her Hollywood success. *I'm No Angel* was West's biggest hit, with good reason: male traditionalists could delight in a full-figured sex bomb, feminists

in an unabashedly autonomous heroine, homosexual men in seemingly intentional camp, and the Hays Office in seemingly intentional restraint. "On the whole much better than we expected," wrote a relieved James Wingate. "In fact, the film contained nothing which we considered basically questionable or liable to cause trouble, and though it contained the expected number of wise-cracks and Mae Westisms, we believe it will meet with no real difficulty."<sup>43</sup> Even some of West's harshest critics within the Hays Office found the picture delightful—not least the official who had been most outraged by *She Done Him Wrong*. Paramount, declared Vincent Hart, "is to be congratulated. This picture will be box office to the nth degree. . . . It is a knockout all the way through, and . . . I'm for it, irrespective!"<sup>44</sup>

That *I'm No Angel* succeeded so brilliantly was due not just to Mae West, but to the Hays Office. On this occasion, conventional wisdom to the contrary, censorship actually enhanced her appeal. Not only West, but also her censors, sought to mediate sex so as to appeal to the widest range of viewers. And it is hard not to argue that, though West had done it well on Broadway, in Hollywood the Hays Office did it even better.

If the story of Mae West and the Hays Office is not as simple as it is often made out, it is also true that over time West's relation to the censors would change. The key year in that process was 1934, when after months of moralist protest the Hays Office was reconstituted in a blaze of publicity and the SRC replaced by the Production Code Administration, marking the moment, as legend has it, when the Production Code was at last fitted with teeth.

In truth, what the new arrangement marked was a change in the Hays Office's procedures for regulating sex films. The PCA put an end to strategies of "leaving [sexual suggestions] to the imagination," at least as far as Mae West was concerned. Those strategies provoked an uproar in the wake of *I'm No Angel*, the very film that James Wingate had predicted would meet with "no real difficulty." He could not have been more mistaken. The film stirred up a storm, and not just because of West herself, but because of who came to see her.

*I'm No Angel* made abundantly clear that West's most ardent fans were young women. That fact flew in the face of all predictions. Given her burlesquian curves and ribald reputation, most had assumed she would prove a limited stag draw. On the contrary, *I'm No Angel* drew such a large female audience that an Omaha theater owner held women-only screenings, complete with complimentary coffee and rolls, so that women could savor West amongst themselves.<sup>45</sup>

Since the turn of the century, perceptions of young women's vulnerability

motion of West's "PERSONALITY—swinging hips—bedroom eyes—and the throaty growl of an amorous cat."<sup>49</sup> To educators and clerics the success of West's film provided solid evidence of Forman's contentions. To them it seemed undeniable that young women were taking West as a role model. "There must be tens of thousands of high school girls all over the United States reading, hearing and seeing all they can of this particular star and her wanton heroines, imitating them so far as they can," lamented Presbyterian educator Harmon Stephens in a 1934 pamphlet entitled *Moral Welfare*. "On a 'character day' in one high school, nine girls came in imitation of her. 'She,' according to the billboard, 'is the kind of girl who can lose her reputation and never miss it.' Virtue lies prostrate."<sup>50</sup>

To reformers, as Stephens's words indicate, imitating Mae West was no laughing matter. She embodied the threat of the whole cycle of sex films with their glamorous and all-too-enticing gold diggers. In a decade short on material luxuries, she showed girls that wealth was theirs for the taking if they only made use of their bodies to follow her character's lead.<sup>51</sup>

Yet West was more than a run-of-the-mill gold digger, more than an ordinary sexual object. To that extent, the upheaval she provoked was unique. While both women and men objected to West, male detractors found her peculiarly unsettling, an unease provoked less by her immorality than by her unabashed pleasure in calling the shots. That was what fueled the outrage of industry critic Martin Quigley, who damned *I'm No Angel* by thundering, "There is no more pretense here of romance than there is on a stud farm."<sup>52</sup> West was a singularly disturbing sex symbol because her agency was too apparent. She too obviously relished her sexual power and her independence from male control.

In an era when men's status as breadwinners was so precarious, male control was a sensitive issue. One has only to look at oral histories of the Great Depression to see how often families were broken by sexual tension and men's flagging sense of authority.<sup>53</sup> In that context, West's popularity with women endangered the industry by making it vulnerable to male resentment, even among men who enjoyed West themselves, as the Hays Office's Ray Norr cautioned Will Hays. "The very man who will guffaw at Mae West's performance as a reminder of the ribald days of his past will resent her effect upon the young, when his daughter imitates the Mae West wiggle before her boyfriends and mouths 'Come up and see me sometime.'"<sup>54</sup>

As historian Nancy Woloch reminds us, the depression was not a feminist era. However ambiguously, popular amusements of the twenties had celebrated female sexual expressiveness, which in the thirties may well have stirred growing unease. The evidence from social history is largely speculative, but it does

seem probable, as some historians have suggested, that depression-inspired fears of family instability were accompanied by a reaction against sexual liberalism, even by a sense that past moral profligacy was to blame for the present crisis.<sup>55</sup> It made sense that those tensions would center on girls. The moral transformations of the 1920s had been most visibly embodied by aggressive young women, by the revealing fashions and risqué tastes of the flapper. Insofar as she reached precisely that audience and seemed likely to inspire emulation, Mae West could indeed be seen as a threat.

In carefully shaping *I'm No Angel*, the Hays Office had tried to avert that prospect, but not only did the effort fail. In some ways, ironically, it made matters worse. Though no longer billed as an outright sensationalist, West became a larger-than-life sexual puzzle, an endlessly debatable erotic enigma who was more intriguing to viewers than ever before. One hostile critic argued that while in *She Done Him Wrong* she had been "amusing in a flamboyant way and different," *I'm No Angel* turned her into a "goddess, . . . an example and a model for the girlhood of the world."<sup>56</sup> By encouraging speculation about her intentions and leaving conclusions "to the imagination," the film provided too much ammunition for imaginations that could not be trusted and, as one outraged reformer put it, "compelled [the audience] to do its own dirty thinking on inferences that it cannot escape."<sup>57</sup>

To a large extent, then, the 1934 crisis was provoked by the Hays Office's own censorship strategies. Not surprisingly, in the years that followed precisely those strategies would change. Under PCA scrutiny, West was subjected to a new brand of censorship that altered her style nearly out of recognition—although not as completely out of recognition as the PCA would have liked. Gone was the open-endedness of *I'm No Angel*, where suggestions were "left to the imagination." The aim of this censorship, in contrast, was to prevent the imagination from playing too much.

The new regulatory strategy, and West's problems with it, can be seen in the trouble-fraught production of her 1936 release *Klondike Annie*, which starred West as the Frisco Doll, a rough-edged San Francisco dance hall singer who is implicated in a murder and flees to Alaska. En route she meets an idealistic young woman who is traveling to the Klondike to save souls for the Salvation Army. When the woman dies, the Doll adopts her uniform as a disguise but finds herself drawn by the woman's calling and reformed by her example.

In its heavy-handed insistence on pointing a moral, on showing the West character learning a lesson, *Klondike Annie* illuminates how radically the PCA attempted to alter West's style. As PCA head Joseph Breen put it, the film "depend[ed] for entertainment less on her wisecracks and more on a legitimate





Mae West comforts the sick in *Klondike Annie* (Paramount, 1935). Photo courtesy Margaret Herrick Library, Academy of Motion Picture Arts and Sciences.

story and sincere characterizations.”<sup>8</sup> In other words, it downplayed what *I’m No Angel* had spotlighted, the enigmatic Mae West spectacle, and where the earlier film had solicited audience interpretation, *Klondike Annie* sought to suppress it. It stressed an unambiguous story marked by what Breen called “compensating moral values,” narrative signposts that took viewers by the hand to prevent them from reading West’s performance in a sensational way.

After 1934 that formula guided all of West’s films, but it never worked as well as the PCA hoped. Even *Klondike Annie* caused problems, though it seemed unimpeachable on the surface. As Paramount’s John Hammell stressed to Will Hays, it depicted an unmistakable conversion experience, the Frisco Doll’s moral regeneration through her friendship with the settlement worker.

In their close contact on board ship, we have the contrast and clash of the two characters—the earnest devout mission worker and the flippant product of a hard, cruel upbringing—West.

During the voyage, we see the gradual impression the mission worker makes on West. She tells stories of her work among the unfortunates in the slum district of San Francisco and the good work she hopes to do in her new field. She tells the story of her life of service and sacrifice. West becomes, little by little, deeply impressed with it all. . . . We have many scenes connected with this work in which West is shown as helping the unfortunates, lifting the fallen, etc.<sup>59</sup>

That was the idea, anyway. But even with this narrative, the PCA had objections: just how sincere that conversion appeared to be had everything to do with how Mae West played it. With her performance style so imbued with irony and ambiguity, even the most heartfelt conversion experience could remain open to question. In this regard, Hammell anticipated Will Hays's worries and attempted to quell them in advance.

At no time in our picture will West play the religious character with her tongue in her cheek. At no time will religious services be held by West which will have any indication of levity or burlesque. We are endeavoring to cast her in a role in which we will take full advantage of those qualities which have endeared Mae West to millions of theatergoers, but the laughs that come from our picture will never be at the expense of religion, religious people, or earnest workers in the missionary field.

The ending of our story will be a romance between West and one of the characters in our picture, and it will indicate for the future a normal life and nothing that will bring condemnation from the most scrupulous.<sup>60</sup>

The PCA, however, was not convinced. Breen and his colleagues poured over the script in pursuit of troublesome double meanings, moments when West might seem to be giving the audience "a suggestion that has a flavor of sex."<sup>61</sup> What, they asked indignantly (and no doubt with some reason), would West's audience make of a statement like the following, when the supposedly reformed Frisco Doll preaches her philosophy of salvation: "You can't save a man's soul if you don't get close to him. It's the personal touch that counts. That's my experience."<sup>62</sup>

The PCA did its best to expunge such moments, cutting out double entendres wherever they found them and bombarding Paramount with suggestions for additional episodes that might make the Doll's conversion even more convincing. How about, Breen suggested, a scene of West doing "settlement-type activities" with the rough, debauched miners—cutting out paper dolls, or playing charades? How about turning the Frisco Doll into a Carrie Nation-style crusader and showing her clearing out the saloons? Or, even

better, how about endowing the Doll with a large sum of money that she's determined never to give up, and at the end of the picture showing her spending it on some good cause—"an airplane to pick up serum for a dying child, or steamship fare home for some poor devil anxious to start life anew"? Breen's enthusiasm for these changes fairly carried him away. He wrote to Hammell exuberantly:

It seems to me that you might be able to get a lot of fun out of this kind of an incident. I can imagine how Mae would put on a thing like this.

Yours for bigger and better films!

Cordially yours,

Joseph Breen<sup>63</sup>

Scrutinizing West's scripts with meticulous care, the PCA attempted to tame her performances and in the process to eliminate "irresponsible" interpretation by her female audience. As they soon realized, it was a futile endeavor. West's viewers could never be made entirely passive as long as they remained equipped with a memory—as long as they brought their own knowledge of West and her past into the movie theater and could bring it to bear on what they saw on screen. With West at the helm, even the most scrupulously sanitized story could be subverted by a well-placed wink. That was the lesson a frustrated Joseph Breen took from *Klondike Annie*, which, despite all his precautions, proved impossible to render thoroughly innocent. He noted in a private memo:

Just so long as we have Mae West on our hands with the particular kind of a story which she goes in for, we are going to have trouble.

Difficulty is inherent with a Mae West picture. Lines and pieces of business, which in the script seem to be thoroughly innocuous, turn out when shown on the screen to be questionable at best, when they are not definitely offensive.<sup>64</sup>

For that reason, the PCA was fighting a losing battle in attempting to create a remodeled Mae West. Her style could not be made to fit into what was becoming the new Hollywood mold. Her fate after 1934 expresses in miniature the PCA's effect on the motion picture industry. West would be gradually weeded out of Hollywood, and, in just that manner, the interpretive variety her films had allowed would be gradually weeded out too.

In some ways, it may be true that West's experience of censorship was atypical. She would often complain that her films were regulated more severely than anyone else's, and she was probably right. As the lightning rod for the

dirty-film crisis, West's films necessitated particular caution if the industry were to persuade its critics that Hollywood had learned its lesson and renounced immoral pictures at last.

At the same time, it is also true that the PCA introduced strategies for dealing with sex films that affected not just Mae West but the whole genre. Those new forms of censorship, as Lea Jacobs observes, transformed the viewer's experience by eliminating "the double meanings, the calculated ambiguities, and the narrative disjunctures which gave the films of the early thirties their zest."<sup>65</sup> They eliminated, in short, precisely those features that catered to a range of viewpoints on questions of sex by presenting viewers with a deliberately enigmatic spectacle and leaving them to read it however they pleased. But by the late thirties those "calculated ambiguities" were gone, replaced by far more straightforward narratives that stressed conservative sexual values—female passivity, premarital chastity—packaged as apolitical "harmless amusement."

In January 1938 Paramount released a new Mae West film, *Every Day's a Holiday*. It was not a happy occasion. The film received withering reviews: "Sex ain't what it used to be, or maybe Miss West isn't."<sup>66</sup> In addition, it inspired little enthusiasm among fans. Even a prerelease scandal—West's banning from NBC radio after trading ribald jokes with Charlie McCarthy—stirred up only minimal audience interest. Most theaters gave the film a single week's engagement, in sharp contrast to the month-long runs accorded *She Done Him Wrong*. By the end of its release, the film had lost money, West's first out-and-out box office failure. For Paramount, its fate confirmed that West, for too long a source of Hays Office difficulties, had now become an embarrassment and a liability. *Every Day's a Holiday* ended West's association with Paramount once and for all.

The film itself provides sad testimony to the effect of the constraints under which West operated. Though she attempted to recapture her early success by returning to 1890s New York City, the plot lacked the rowdy good humor and the sly double meanings she had been able to employ in the past. West played Peaches O'Day, a New York con woman, whose adventures are kept carefully within high society and whose criminality consists of nothing more inflammatory than convincing a small-town yokel to buy the Brooklyn Bridge.

Late in January the film had its world premiere at the Paramount Theater in New York. As it turned out, it was a thrilling evening. The police department turned out in force, and uniformed officers swarmed through the theater. They were not there, however, to control Mae West. In an effort to draw in additional patrons, the Paramount Theater had arranged for an intermission per-

formance by a new local sensation: Benny Goodman. The *New York Times* reported:

It was like old times yesterday, with a new Mae West show opening and a squad of patrolmen marching down the aisles. The joker is that the police weren't after Miss West, but had been called in to restore order when a personal appearance by Benny Goodman and his band threatened to turn the Paramount into a playground for the intellectually suspect (we hesitate to call them mentally retarded). What with the adolescent exhibitionists dancing in the aisles, clawing their way upon the stage or swaying animalistically in their seats, Miss West's *Every Day's a Holiday* just couldn't escape being the second feature on the bill. And if there had been a Popeye or a Betty Boop on the program, she would have run third.<sup>67</sup>

By the end of the 1930s, the "adolescent exhibitionists" had abandoned not just Mae West but movies as a whole. Young women's desire to be rebellious, to use leisure to forge a sexual identity, would be sought out, not in the theater, but in music—in swing, jazz, and eventually rock and roll. Such areas were no less stigmatized than movies as a "playground for the intellectually suspect." But, for the moment at least, they were free from the heavy hand of "protective" control.

## NOTES

1. *Variety*, October 17, 1933, 19.

2. Robert Sklar, *Movie-Made America: A Social History of American Movies* (New York, 1975), 175, 184–87. The most comprehensive biography of West is George Eells and Stanley Musgrove, *Mae West: A Biography* (New York, 1984).

3. Lea Jacobs, *The Wages of Sin: Censorship and the Fallen Woman Film, 1928–1942* (Madison, Wis., 1991), 23.

4. Quoted in Ellis Nassour, "Mae West," *Club* (undated interview in Mae West clipping file, Billy Rose Theatre Collection of the Performing Arts Research Center, New York Public Library).

5. Advertisement for *Diamond Lil* at the Flatbush Theater, Brooklyn, September 1929, in *Diamond Lil* clipping file, Billy Rose Theatre Collection.

6. Quoted in Montrose J. Moses and John Mason Brown, *The American Theatre as Seen by Its Critics* (New York, 1934), 305–7. For a full discussion of West's Broadway plays, see my forthcoming book, *"When I'm Bad, I'm Better": Mae West, Sex, and American Entertainment* (New York, 1995).

7. Lewis Erenberg, *Steppin' Out: New York Nightlife and the Transformation of American Culture, 1890–1930* (Westport, Conn., 1981).

8. Lewis Erenberg, "Impresarios of Broadway Nightlife," in William R. Taylor,

ed., *Inventing Times Square: Commerce and Culture at the Crossroads of the World* (New York, 1991), 158–77.

9. MPPDA Resolution of June 19, 1924, reprinted in Garth Jowett, *Film, the Democratic Art: A Social History of American Film* (Boston, 1976), 466.

10. Memo from Maurice McKenzie, November 29, 1932, *She Done Him Wrong* file, Production Code Administration Collection, Margaret Herrick Library, Academy of Motion Picture Arts and Sciences (AMPAS), Beverly Hills, California (hereafter cited as PCA).

11. Wingate to Will Hays, December 2, 1932, *She Done Him Wrong* file, PCA.

12. Joy to Wingate, February 5, 1931, *Little Caesar* file, PCA, quoted in Richard Maltby, "The Production Code and the Hays Office," in Tino Balio, ed., *Grand Design: Hollywood as a Modern Business Enterprise* (New York, 1993), 40.

13. For an incisive analysis of these representational strategies, see Jacobs, *Wages*, 27–105.

14. Wingate to Harold Hurley, November 29, 1932; Wingate to Hays, December 2, 1932, *She Done Him Wrong* file, PCA.

15. Wingate to Hurley, November 29, 1932, *She Done Him Wrong* file, PCA.

16. For this draft, dated November 8, 1932, see *She Done Him Wrong* file, Paramount Pictures Collection, AMPAS.

17. See release dialogue script, January 17, 1933, R2, 1, *She Done Him Wrong* file, Paramount Pictures Collection, AMPAS. The script for the 1928 production of *Diamond Lil* is held in the Shubert Archives, New York.

18. Contrast, in particular, Bright's initial draft of November 8, 1932, with the release dialogue script, both in the Schubert Archives.

19. *New York Daily News*, February 11, 1933, 20.

20. Wingate to Hays, January 13, 1933, *She Done Him Wrong* file, PCA.

21. *Variety*, February 14, 1933, 12, 21.

22. *New York Daily News*, February 24, 1933.

23. Ben Maddox, "Don't Call Her Lady!" (clipping in possession of author from an unknown 1933 movie magazine).

24. *Variety*, February 28, 1933, 8.

25. Undated letter from Sidney Kent to Will Hays, *She Done Him Wrong* file, PCA.

26. Maltby, "Production Code," 57.

27. Telegram from Vincent Hart to Wingate, February 3, 1933; Hays to Wingate, February 27, 1933; Wingate to Harry Cohn, March 2, 1933 (all in *She Done Him Wrong* file, PCA).

28. The origins of *I'm No Angel* remain less than clear, as with all West's films after *She Done Him Wrong*. Its basic premise—a circus dancer turned lion tamer who invades and conquers high society—developed out of a short story or treatment called "The Lady and the Lions" written by writer-publisher Lowell Brentano. From there the process of revision becomes murkier. My speculation that West contributed a skeletal plot is based on the fact that the film's narrative, particularly its early sequences, bears strong similarities to West's first play, *Sex*. In both, West plays a notorious woman who is eager to escape her sleazy surroundings and has a series of comic encounters—with her male protector (who accuses her of "getting high hat"), with an ingenue (whom she urges to find a rich lover), and with a suitor (who tries to embrace

her and before whom she dances). In both, she is implicated in a jewel theft and flees into a job as an entertainer, succeeding in enchanting a rich man until her past returns to haunt her.

29. Eells and Musgrove, *Mae West*, 121.

30. All quoted dialogue was transcribed from *I'm No Angel* (MCA Universal Home Video).

31. *Variety*, October 3, 1933, 3.

32. "Making Love to Mae West," *Picturegoer* 3 (December 30, 1933): 13.

33. "Why Mae West Went to Prison," *Picturegoer* 3 (December 23, 1933): 13.

34. *Ibid.*

35. Memo from Vincent Hart, October 4, 1933, *I'm No Angel* file, PCA, AMPAS.

36. *New York Herald-Tribune*, October 22, 1933, 3.

37. *New York Evening Journal*, October 14, 1933, 8.

38. Carol Ward, *Mae West: A Bio-Bibliography* (Westport, Conn., 1989), 84–86.

39. Colette, *Colette at the Movies: Criticism and Screenplays* (New York, 1980), 62–64.

40. George Jean Nathan, *Passing Judgements* (New York, 1935), 266–68.

41. Gilbert Seldes, *Mainland* (New York, 1936), 119.

42. George Davis, "The Decline of the West," *Vanity Fair* (May 1934): 46, 82; Parker Tyler, *The Hollywood Hallucination* (New York, 1944), 95–99.

43. Wingate to Hart, September 16, 1933; Wingate to Hays, September 20, 1933 (both in *I'm No Angel* file, PCA).

44. Memo from Hart, October 4, 1933, *I'm No Angel* file, PCA.

45. *Variety*, October 24, 1933, 23.

46. Kathy Peiss, *Cheap Amusements: Working Women and Leisure in Turn-of-the-Century New York* (Philadelphia, 1986); Daniel Czitrom, "The Politics of Performance: Theater Licensing and the Origins of Movie Censorship in New York," in this anthology.

47. Henry James Forman, *Our Movie-Made Children* (New York, 1935), 147.

48. *Ibid.*, 222–23.

49. *I'm No Angel* ad quoted in *Christian Century* 50 (October 25, 1933): 1327.

50. "Churches War against Obscenity," *Literary Digest* 117 (March 3, 1934): 21.

51. Jacobs, *Wages*, 16–17.

52. Martin Quigley, *Decency in Motion Pictures* (New York, 1937), 35–36.

53. See, for example, Studs Terkel, *Hard Times: An Oral History of the Great Depression* (New York, 1970).

54. Quoted in Richard Maltby, "Baby Face, or How Joe Breen Made Barbara Stanwyck Atone for Causing the Wall Street Crash," *Screen* 27 (March–April 1986): 44.

55. Nancy Woloch, *Women and the American Experience* (New York, 1984), 458.

56. Malcolm D. Phillips, "What Price Hollywood Now?" *Picturegoer* 3 (November 4, 1933): 12–13.

57. Alice Ames Winter to Will Hays, November 21, 1933, Hays Collection, Indiana State Library, quoted in Jacobs, *Wages*, 108.

58. Breen to Hays, December 31, 1935, *Klondike Annie* file, PCA.

59. John Hammell to Will Hays, June 29, 1935, *Klondike Annie* file, PCA.

60. *Ibid.*

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61. Breen to Hammell, October 22, 1935, *Klondike Annie* file, PCA.
62. Noted in Breen to Hammell, September 4, 1935, *Klondike Annie* file, PCA.
63. Breen to Hammell, September 5, 1935, *Klondike Annie* file, PCA; see also *ibid.*
64. Memo of February 10, 1936, *Klondike Annie* file, PCA.
65. Jacobs, *Wages*, 153.
66. *New York Times*, January 27, 1938.
67. *Ibid.*