December 2004

Plagiarism, Googling, and the Mouse: Is The Internet Killing Our Ability To Do Research?

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Recommended Citation

Hannay, William M. (2004) "Plagiarism, Googling, and the Mouse: Is The Internet Killing Our Ability To Do Research?," *Against the Grain*: Vol. 16: Iss. 6, Article 11.

DOI: <https://doi.org/10.7771/2380-176X.4438>

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Plagiarism, Googling, and the Mouse: Is The Internet Killing Our Ability To Do Research?

A Presentation to the 24th Annual Charleston Conference

by William M. Hannay¹ (Partner, Schiff Hardin LLP) <whannay@schiffhardin.com>

One morning, a couple of weeks ago, my wife called our local high school looking for our son, who is a Junior. He needed to see a doctor about a (fortunately, minor) health problem. It turned out that there was an opening in the doctor's schedule that morning, so she was trying to find him quickly. Well, to make a long story short, everybody was playing "Where's Waldo?" but nobody could find our son. It wouldn't have been like him to ditch school, but where was he? People got worried. Finally, he appeared of his own accord, and the answer proved to be that he had been in the school library. It was — and this is the take-off point for my remarks today — the last place anybody thought to look. The surprise came, not because young William is a bad student, but because "everybody" knows that "nobody" at Barrington High goes to the school library anymore.

Certainly the notion that "nobody" uses our high school library is an overstatement, but I don't think it's that much of an exaggeration. And I don't think that this phenomenon is unique to our local High School. My sense is that it is a phenomenon repeated at secondary schools throughout the United States, and increasingly at colleges and even graduate schools. When "they" say that nobody goes to the school library anymore, what "they" mean is that students are not using library books anymore to do research. Students are allowed by their teachers, even encouraged to substitute on-line "research" for the more traditional process of delving into, for example, hard-cover histories or biographies, books of literary criticism, or monographs on the social sciences. Indeed, I'll tell you frankly I don't know what my son was doing in the library because I seriously doubt that he has ever learned how to do research there. I suspect he was just looking for a quiet place to

get some homework done. Nothing wrong with that, of course, but there's a lot more that libraries offer to the intellectual process than just a lack of noise. And I worry that, as a society, we are developing a generation of students who don't know how to do "book" research.

This summer, I read about an online survey conducted by the **Electronic Publishing Initiative** at **Columbia University** in New York. The study concluded that electronic resources have become the main tool for university students gathering information.² Here's the principal findings of the survey:

- 99 percent of student respondents said that they were far more dependent on electronic resources than print resources for their schoolwork.
- The results show that undergraduate students, in particular, are heavily dependent on the Web.
- When going online to do work for a course, undergraduate students are more likely to use an Internet search engine (46.5 percent) than to go to a library-sponsored electronic resource (21.9 percent) by a factor of more than two-to-one. Graduate students are more likely to use library-sponsored electronic resources, however.
- Finally, while the physical library is still an important destination for students to retrieve articles and books, undergraduates are more likely to use the library as a study space, for the computing facilities, or for Internet access.

Commenting on the significance of the survey, **Kate Wittenberg**, director of **Columbia's Electronic Publishing Initiative** said: "students' research habits, and their preference for

using **Google** and

other search engines as their first stop rather than the library, is part of a more general cultural and social change and I am not sure that there is much that libraries, or anyone else, can do to change this pattern."³

I hope that this assessment is wrong, and that we can change the pattern of increasing dependence on **Google** and other search engines as the principal research tool for students. For it seems to me that there are at least three serious academic flaws that flow from this situation. First, reliance on Web browsing feeds an unwholesome tendency towards what one commentator has called "passive learning and grazing for information," rather than an active and questioning search for truth. Second, relying only on the Web denies students access to the vast majority of useful knowledge, for the simple fact is that the millions of pages of information on the Internet represent only a tiny percentage of the disciplined thought and writing available in books. Third, Web-based research provides students no guideposts or framework for analyzing the importance, acceptance, or even veracity of the information they electronically stumble across. (Is some unknown person's BLOG, for example, a valid and worthwhile authority to cite in a paper ... in the same league as peer-reviewed journals or well-recognized treatises?)

Moreover — and I come now to the main issue I want to discuss with you — it is undeniable that the Internet has become the single greatest tool for academic dishonesty ever made available to high school and college students. With a well-chosen **Google** search and a few clicks of that devilish little Mouse, a student can find and download portions of articles or even whole term papers and pass them off as his own. Plagiarism is not new, but it used to be a physically harder crime to commit when you had to write it all out by hand if you wanted to copy. The increasing tendency of students to resort to the electronic form of cheating has been monitored in the past few years by several academics. One of the better known scholars in this area is **Rutgers** professor **Donald McCabe**, the founder of the **Center for Academic Integrity** at **Duke University**.

Prof. McCabe reports, for example, that, in a survey of 14,000 college students at 23 schools, more than one in five students admitted to cheating on a test in the past year.⁴ Moreover, according to **McCabe**, the fastest growing form of cheating is taking information from the Internet and passing it off as the student's own work. See *Chicago Sun-Times*, July 25, 2004, p. 16. While ten percent of college students admitted to Internet plagiarism in 1999, that number rose to around forty percent in 2003,

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Books and The Internet: from page 32

This is not to say that there is no downside to online purchasing. There are certainly the problems noted above, changes to individual jobs which may not be well received, shifting and sometimes increasing workload, as well as a host of issues worthy of consideration by librarians and others in the bookselling business.

Not the least of such issues is the effect of all of this on traditional library book vendors. They were not represented on this panel, but it is undeniable in my opinion that every one of them has felt the effects of online bookselling by non-traditional book sellers. They have been given a new cast of characters with which to compete and somewhat different criteria to re-

spond to. Speed and availability have risen much higher on the list of library "must haves" than they once were. Traditional vendors have had to provide their own online inventory and ordering systems and have sometimes found that they were roundly criticized for the clumsiness of their first efforts. Library loyalty has slipped as libraries have found, once a credit card was in hand, much greater inventory, lower prices and sometimes free shipping online. Booksellers like these as well as the libraries they serve have lacked the nimbleness that characterize Internet-based businesses, but both are learning. It seems inevitable that the nimblest, most inventive, most savvy Internet-based bookselling and buying and the most in touch with the "now" will be the most successful — whether library or bookseller.

McCabe stated in a telephone interview with the *New York Times* this summer. See *New York Times*, Aug. 22, 2004. "Students are more liberal in their interpretation of what's permissible and what's not," he said. (Quoted in the *Sun-Times* article supra.) Many students simply crib what **Google** dredges up free, but **McCabe** estimates that two percent of students purchase papers online. *New York Times*, supra.⁵

And it is not only in academic studies and surveys that evidence of the problem can be found. **ABC's "Primetime Thursday"** aired an hour-long report on cheating in school on April 29 of this year. **Primetime's** investigation found cheating on campuses everywhere — from top public high schools and colleges to Ivy League universities. Students described the powerful temptation to cheat, telling **ABC** they are under intense pressure to get good grades — and keep up with peers who cheat on exams and papers. "It's unfair on your part, if you're studying ... so many hours for an exam and everybody else in the class gets an 'A' cheating," said **Sharon**, a college student. "So you want to get in the game and cheat, too."

Comments from several of the students **ABC** interviewed indicate that the cheating trend may reflect a deep-seated cynicism among students that getting an education is more about learning to "work" the system than learning math and history.⁶ Cheating in school, they argue, is good preparation for a career in the business world, where some do whatever's necessary to get ahead. (The **Primetime** report struck a nerve among parents and teachers. Hundreds wrote in after the show, concurring with the existence and enormity of the problem. See http://www.charactercounts.org/pdf/Primetime_post-show_comments.pdf.)

Why is this happening? Why don't all students recognize that, for example, cutting and pasting text from the Web without attribution is plagiarism. One scholar attributes some of the difficulties in teaching ethics to students to "the values of a generation that has no problem downloading songs off the Internet."⁷ If copyright laws are perceived as irrelevant when it comes to music on the Internet, the ethical leap from failing to pay for music to failing to credit sources may not be far.⁸ One, possibly apocryphal but wonderfully amusing anecdote illustrates the moral tone-deafness of many students:

A professor had a student come to his office to argue for an A on a paper instead of the C he received. When the professor asked the student to explain why he should get an A, the student appeared flustered, then replied, "Because the student I bought it from got an A."⁹

Another scholar finds a more global explanation, suggesting that students are dishonest "because their role models (parents, instructors, doctors, lawyers, clerics, police, and society in general) offer little to stimulate principled action" and that "[c]onsequentialist ethical theories that care more about results than principles take precedence over traditional moral thinking."¹⁰ As a result, he argues, "unethical activ-

ity becomes acceptable when it is convenient or whenever one can get away with it."

And plagiarizable information is exceptionally "convenient" to find. Not only is it easy to find articles or Websites from which students can cut-and-paste a sentence or a paragraph, but from a variety of so-called "term paper mills," students can find entire papers, probably on the very topic the teacher has assigned. To test this convenience, I did a little experiment. Yesterday (November 4th), I ran a search on **AOL** for "free term papers" — I got 55,115 hits.¹¹ These included three sponsored sites which were not exactly "free" but they would undoubtedly have sounded appealing to a desperate student:

www.monsterpapers.com, offering access to "1 Million Term Papers and Essays" for only \$9.95.

www.serve.com, offering "Term Paper and Research Paper Service" — it was at pains to note that "We are NOT a free service but our prices are low"

www.papersonline.us — obviously a highly ethical and patriotic operation — it offers "Non-plagiarized term paper writing services from USA" at "Only \$8 per page" for 4 days delivery with a "Money-back guarantee."

There were also innumerable non-"sponsored sites" that were indeed "free," including:

Term Paper Sites.com with "Only the highest quality sites on the net" with "Thousands of free and searchable Term papers!"

And a site billing itself as the "Home of teens for free term papers [and] homework" where you can also "Chat and Hangout." It's name? True gentle ladies and gentle men, I ask you to please close your ears. It's **www.schoolsucks.com**.

Just to see what kind of papers were available for "free," I plugged in a **Google** search for "free term papers and *The Scarlet Letter*." (**William**, my son, is reading it for his English class, and I was curious what temptations might lay in the path of him and his classmates.) I got 29,900 hits. So I looked at a couple of them. They looked like pretty realistic high school papers: turgid, bewildered, tuneless ... but probably worth a "B" in most high school English classes.

So it is convenient — terrifyingly convenient — to find tons of material to plagiarize in whole or in part. And, at least until the past couple of years, it has been woefully easy to "get away with it." As the dean of one college journalism school comments, "Many of the students think that their professors are too lazy, too busy, or too dumb to catch them. Some of those students and others have gotten away with it before, certainly in junior high school and high school, sometimes in other college courses."¹² It would be difficult for the typical teacher to catch such Internet plagiarism, but enlightened entrepreneurship seems to be coming to the rescue. An increasing number of computer-based detection tools are now available to academic institutions to catch the cheaters.¹³

One of the most successful is **Turnitin.com**, a California-based company formed in 1996 by

a group of researchers at **University of California** at Berkeley who created a series of computer programs to monitor the recycling of research papers in their large undergraduate classes. It is reported that over 3,500 institutions license **Turnitin's** plagiarism prevention system, including hundreds of high schools, submitting as many as 20,000 papers daily.¹⁴ The software compares a student's essay to all text publicly available on the Internet, to various books and academic journals, and to millions of essays already turned in to the service, and within five minutes, can issue a report that highlights each passage that matches another source.¹⁵ "Approximately 30 percent of the 20,000 papers we check a day are less than original," the CEO of **Turnitin's** parent, **iParadigms LLC**, is quoted as saying. "Our system doesn't detect plagiarism, it detects verbatim copy. It is up to the instructor to determine if plagiarism has occurred."¹⁶

Northwestern University has announced that it has begun using a similar Internet service this fall. The one selected by NU is called "SafeAssignment" and allegedly not only searches for exact phrase matches but also looks for similar wording in cases where a student was savvy enough to change a few words in the lifted material. The university's associate provost for undergraduate education is quoted as saying that the service is necessary to combat a "significant" 10 percent to 20 percent rise in academic dishonesty.¹⁷

But one Website concerned with the plagiarism plague warns that plagiarism detection services are not a complete answer.

These services don't catch "custom essays," and they don't catch plagiarism when the original work isn't already in the digital domain. If you rely on detection, you are doing a disservice to your students. ... The fact is, detection services help to catch the cheaters who fall into the "not so bright" category. Smart cheaters can skate circles around these services.¹⁸

Moreover, the use of detection services carries with it a risk of being wrong. Consider, for example, the report of a **University at Canterbury** student in England who admitted downloading material from the Internet for his degree after the school began to run a pilot program of plagiarism-detection software to analyze students' work. He was advised, just before his final exams, that he would get no credits for his course work and is now suing the university for negligence. The student, 21-year old **Michael Gunn**, claims that **Canterbury** officials should have warned him that his actions were against school regulations.¹⁹

So what is the answer to plagiarism and the too easy use of **Google** and the mouse? **Prof. Lawrence Hinman**, director of the **Values Institute** at the **University of San Diego**, identifies three steps that institutions can take: "Our first and most important line of defense against academic dishonesty is simply good teaching. Cheating and plagiarism often arise in a vacuum created by routine, lack of interest and overwork. ... The second remedy is to encourage the development of integrity in our students. A sense of responsibility about one's intellectual de-

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velopment would preclude cheating and plagiarizing as inconsistent with one's identity. ... Third, we must encourage our students to perceive the dishonesty of their classmates as something that causes harm to the many students who play by the rules."²⁰

Certainly the positivist approach suggested by **Professor Hinman** is vital in the long run. But in the meantime, it is just as important to use the available legal and academic sanctions against student plagiarists when they get caught. Honor codes and school policies against plagiarism must be emphasized and enforced by both secondary and post-secondary institutions, and the discipline meted out should be publicly disclosed so that an example can be made of those who have violated the codes or policies.²¹ Where the academic institution has taken such disciplinary action, the accused plagiarist all too often turns to the courts of law in an attempt to avoid the loss of degree or, in the case of teachers, loss of job. Invariably, judges reject the plaintiff's effort to have the court second-guess the academic institution's procedures.²²

The publicity given to the numerous instances of famous or near-famous "adults" that have been found guilty of plagiarism is highly salutary, both because it shows that people do get caught and also because it shows what a devastating effect committing plagiarism can have on one's life and career. Here's a quick list:

- In late September of this year, **Lawrence**

Tribe, a distinguished **Harvard** law professor, admitted that he had copied without proper attribution portions of a 1974 book by **Henry Abraham** entitled *Jus-tices and Presidents*.

- Notorious journalism scandals have recently come to the surface, such as the ones involving **Jayson Blair** (*New York Times*), **Jack Kelley** (*USA Today*), and **Richard Judd** (*Hartford Courant*).
- Historians **Stephen Ambrose** and **Doris Kearns Goodwin** used entire passages from other publications in their books without indicating from whence the material came.
- **Huang Zongying**, an associate professor of English at **Peking University**, was fired after a Chinese graduate student brought the misconduct to light.
- **Roger Sheperd**, an Arts Professor at **New School U.**, resigned after admitting plagiarism. Portions of **Meredith L. Clausen's** book, *Pietro Belluschi: Modern American Architect*, appeared in **Sheperd's** book, *Structures of Our Time: Thirty-one Buildings That Changed Modern Life* without attribution.
- In September 2004, **Mostafa Imam**, a Saudi Arabia-based researcher, was accused of plagiarizing photographs of various organisms previously published in micropaleontology articles by other authors. Shortly thereafter, **Imam** died of a fatal heart attack.
- Tony-nominated playwright **Bryon Lavery** has been accused of plagiarizing passages from a 1997 *New Yorker* article by **Malcolm Gladwell** about **Dr. Dorothy**

Otnow Lewis and her book *Guilty by Reason of Insanity*. **Lewis** and **Gladwell** say that a number of passages in **Lavery's** play "Frozen" are taken directly from their own work.

- In March of this year, the president of **Central Connecticut State University**, **Richard Judd**, was accused of plagiarizing materials for an op-ed piece that appeared in the *Hartford Current* the previous month. A few days later, he announced that he would retire at the end of the school year.

Importantly, there are various legal weapons available to academic institutions to fight plagiarism committed by the student or academician as well as the aiding and abetting of such misconduct by online term paper mills. With respect to the latter, for example, 14 states have enacted laws that prohibit and, in most cases, criminalize the sale of term papers, thesis, dissertation, or other written material where the writer knows or should reasonably have known that such written material is to be submitted by another person for academic credit at any institution of higher learning in the state.²³ Unfortunately, neither academic institutions nor prosecutors have proven interested in pressing such cases.

With respect to the plagiarists themselves, academic institutions seldom press for legal sanctions against the perpetrators other than internal disciplinary measures. Nevertheless, sanctions under various legal theories are in fact available.²⁴

In the end, teachers are the first line of defense in both detecting and deterring pla-

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WEBWORTHY

Column Editor: **Pamela M. Rose, M.L.S.** (Web Services & Library Promotion Coordinator, Health Sciences Library, University at Buffalo; Phone: 716-829-3900 x129; Fax: 716-829-2211) <pmrose@buffalo.edu> wings.buffalo.edu/~pmrose

Webworthy has reviewed 330 Websites to date! Are you reading this intro? If so, we'd like to know if you find this column useful! Email the editor at <pmrose@buffalo.edu> with your comments and any suggestions for improvement!

*Websites are chosen for uniqueness, depth of information, functionality and ease of access. Sites are organized by broad subject area and are visited just prior to publication. Please let the editor know of any broken links. Comments and suggestions welcome to **Pamela M. Rose**, Health Sciences Library, University at Buffalo, 3435 Main St., Buffalo, NY 14214-3002; 716-829-3900 x129; <pmrose@buffalo.edu>. Unless otherwise noted, Internet sites were also reviewed in *Science's NetWatch* column. — PR*

Computers

Are you helping in the search for ET? If you're not already using your desktop

computer's downtime to search for signs of alien life, **IBM** is recruiting volunteers to help crunch research problems which will aid society. The **World Community Grid** will begin with the **Human Proteome Folding Project**, and will move on to five or six projects a year. — <http://www.worldcommunitygrid.org>

Exhibits

Learning about 87 eminent physicists who excelled in the field from 1900-1976 might seem like just another biographical excursion. Except these 87 persons are not named **Albert**, **Robert**, or **Hans**. Contributions of 20th Century Women to Physics profiles an international roster of scientists, including **Dorothy Crowfoot Hodgkin** who won the 1964 Nobel Prize in chemistry, and **S. Jocelyn Bell Burnell** who identified the first pulsars. Although the intro

page still states 83, the subdiscipline categories include a total of 87 names. There were other women contributors to the field prior to and after 1976; however this group had the most documentation available and have been thoroughly researched. Also included are a photo gallery, historical documents from 1891-2000, and a section titled "In her Own Words" with notable quotes from the subjects.

My favorite, made by **Hertha Marks Ayrton** (1912)

whose work on the electric arc was precursor to the field of plasma physics: "An error that ascribes to a man what was actually the work of a woman has more lives than a cat." — <http://cwp.library.ucla.edu/>

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gism, and there is much good advice available on the Web about how to do just that. For example, an excellent set of guidelines on "Anti-Plagiarism Strategies for Research Papers," prepared by **Mr. Robert Harris** in 2002 is available at <http://www.virtualsalt.com/antiplag.htm>. The guidelines provide helpful and workable details on how to apply the general goal of "mak[ing] the assignment and requirements enough that an off-the-shelf paper or a paper written for another class or a friend's paper will not fulfill the requirements" so that only a newly written paper will suffice.²⁵

I do not know the extent to which your own academic institutions formally attempt to inculcate in their students, teachers, and researchers a deeper respect for book research versus online research as well as unfailing sense of academic honesty and integrity, nor do I know the extent to which your institutions consciously and intentionally include library professionals in either the broader challenge of teaching intellectual rigor or the process of detecting and deterring plagiarism. But if the institutions do not redouble their efforts to inspire academic honesty and if they do not include library professionals in these efforts, those institutions are leaving themselves on a collision course with the present trends towards lazy and dishonest scholarship. Addressing these issues is not a "luxury" that can be postponed until a better time, notes **Professor Lawrence Hinman**. "It is a short step from dishonesty in schools and colleges to dishonesty in business."²⁶

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Geology

Cold. Snow. Ice. Glaciers. Icebergs. Welcome to the cryosphere! If you live in Buffalo or Minnesota and want to know more about the world of cold, visit the **National Snow and Ice Data Center** out of Boulder, CO. View the curious formations sculpted by snow and ice, such as sastrugi (formed by wind) or ogroves (alternating bands of light and dark ice). Experts can dig into more than 400 data sets of snow depths or satellite images then follow the gradual crumbling of the **Larsen Ice Shelf** in Antarctica. — <http://nsidc.org/>

Paleontology

When your 10 year old begins to hunger for more information about T. Rex, turn to the **Paleobiology Database**, maintained by paleontologist **John Alroy** of the **U. of California Santa Barbara**. With more than 43,000 fossil collections' detailed data, the site offers a wealth of collective information which allows users to map collection sites, look at detailed profiles including lists of other remains, and ask "big-picture" questions like tallying the diversity of ferns since the demise of the dinosaurs. — <http://paleodb.org>

Endnotes

1. **Bill** is a partner in the Chicago-based law firm, **Schiff Hardin LLP**, and has been a frequent speaker over the years at the **Charleston Conference**. He is an Adjunct Professor at **Chicago-Kent College of Law** and the author of numerous books and articles on legal topics.
2. See **Carol Power**, "US students let Google do their homework," *The Irish Times*, July 23, 2004, at 53.
3. Id.
4. A case in point is reported in the *Boston Globe* for March 3, 2000, at B1 (sixty-three students in introductory computer science class at **Dartmouth** were charged with plagiarism on homework assignment).
5. "These days, stressed-out perfectionists and lazy no-goods alike can Google their way to an astounding array of plagiarism Web sites." **Suzy Hansen**, "Dear Plagiarists: You Get What You Pay For," *New York Times*, August 22, 2004, Sec. 7, Col. 1, at 11 (reviewing samples of essays from online paper mills).
6. The report featured the results of an ABC News poll about the attitudes of kids toward cheating in school. http://abcnews.go.com/sections/primetime/US/cheating_poll_040429.html
7. **University of Georgia** associate professor **Barry Hollander**, quoted in *V. Whitehouse & J. Nicholls*, "Inside these hallowed halls: how journalism schools are confronting student plagiarism," *The Quill*, August 1, 2004, No. 6, Vol. 92; Pg. 14.
8. Id.
9. Related in **Theresa Winslow**, "The Cheat Is On," *The Maryland Gazette*, June 5, 2004, at C1.
10. **Robert Hauptman**, "Dishonesty in the Academy," *Academe*, <http://www.aaup.org/publications/Academe/2002/02nd/02ndhau.htm>.
11. The same search for "free term papers" on **Google** came up with 5,090,000 hits. By contrast, a search for "plagiarism detection" came up with only 36,000 hits on **Google** and a mere 7,107 hits on **AOL**.
12. **Dane S. Claussen**, director of the journalism and mass communication graduate program at **Point Park University** in Pittsburgh, quoted in *V. Whitehouse & J. Nicholls*, "Inside these hallowed halls: how journalism schools are confronting student plagiarism," *The Quill*, August 1, 2004, No. 6, Vol. 92; Pg. 14.
13. One article makes the disturbing suggestion that some term paper mills "have ties to plagiarism detection software companies." For example, detection software companies, **PlagiServe** (<http://www.plagiserve.com>) and **EduTie** (<http://www.edutie.com>) have connections to term paper sites like **MightyStudents.com** (<http://www.mightystudents.com>), **Essaymill.com** (<http://www.essaymill.com>), **EssaysOnFile.com** (<http://www.essaysonfile.com>) and **TopEssays.com** (<http://www.topessays.com>).
14. See *The Irish Times*, July 23, 2004, at 53.
15. Id.
16. **Jordan Muhlestein**, "New technology harbors new era of cheating," *The Daily Universe*, Brigham Young University, May 11, 2004.
17. Quoted in *Chicago Sun-Times*, July 25, 2004 at 16.
18. See <http://www.plagiarized.com/index.shtml>.
19. See *The Irish Times*, July 23, 2004, at 53.
20. **Lawrence M. Hinman**, "How to Fight College Cheating," Editorial, *Washington Post*, September 3, 2004, at A19.
21. It would be surprising if any educational institution did not have such a code or policy. A quick Web search turned up numerous examples on line. It also turned up the curious anomaly of one state university library Website that included both the school's honor code as well as an extensive list of hyperlinks to fee-based and "free" term paper mills. One wonders about the wisdom of providing such information. As one legal commentator observed when encountering a similar situation on another university library's Website, "[w]hile such information is not difficult to find, I consider it unethical to provide links to businesses that are explicitly violating the law." **Ronald B. Standler**, "Plagiarism in Colleges in USA" (2000), available at <http://www.rbs2.com/plag.htm>.
22. See *Chandamuri v. Georgetown Univ.*, 274 F. Supp. 2d 71 (D.D.C. 2003), where an American student of Indian descent sued Georgetown, alleging unlawful discrimination on the basis of national origin and retaliation after the university sanctioned him for plagiarism. The court dismissed the complaint, concluding that plaintiff offered no evidence that the disciplinary hearing was not conducted in accordance with the procedures published in the university's honor code. Moreover, the honor code clearly set forth the definition of plagiarism, and the hearing board's decision not to exercise its discretionary power to adjust the sanction was not a violation of the sanctioning guidelines.
23. See California Education Code §§ 66400 – 66405; Accord, Colorado § 23-4-101-106; Connecticut § 53-392a-e; Florida § 877.17; Illinois ch. 110, § 5/0.01 – 5/1; Maine 17-A § 705; Massachusetts ch. 271, § 50; Nevada 207.320; New Jersey 18A:2-3; New York Education Law § 213-b; North Carolina § 14-118.2; Pennsylvania title 18, § 7324; Virginia § 18.2-505; Washington 28B.10.580 – 584.
24. See **Stuart P. Green**, "Plagiarism, norms, and the limits of theft law: Some observations on the use of criminal sanctions in enforcing intellectual property rights," 54 *Hastings L.J.* 167 (2002); **Ronald B. Standler**, "Plagiarism in Colleges in USA" (2000), available at <http://www.rbs2.com/plag.htm>.
25. One section of **Mr. Harris'** guidelines gives practical details on how to detect plagiarism. Rule number one is to "[l]ook for the clues." As you read the papers, he advises, look for internal evidence that may indicate plagiarism, such as mixed citation styles, lack of references or quotations, unusual formatting, off topic discussion, signs of datedness, anachronisms, anomalies of diction, anomalies of style, and smoking gun blunders.
26. "How to Fight College Cheating," Editorial, *Washington Post*, September 3, 2004, at A19.