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Abusive *Beats*?: Intimate Partner Violence in Music Lyrics

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Abstract

Prior research has examined intimate partner violence (IPV) in popular culture; however, little attention has been given to the presence of domestic violence myths in modern music. By utilizing a purposive sample taken from diverse music genres, this research employs content analysis to examine the prevalence of IPV and myths used to justify such portrayals through modern music. Findings indicate that IPV is reinforced through myths within modern music. The impacts of the acceptance and reinforcement of IPV myths are discussed.

Keywords: intimate partner violence, content analysis, modern music, IPV myths, lyrics

Introduction

Intimate Partner violence (IPV) is a serious public health issue with approximately one in three women (35.6%) and one in four men (28.5%) in the U.S. reporting experiences with rape, physical violence, and/or stalking by an intimate partner at some point in their lives (Black et al., 2011). Compared to men, women are notably more likely to experience physical violence by an intimate partner (Breiding, Chen, & Black, 2014; Menard, Andersen, & Godboldt, 2009). IPV[1], however, is not limited to physical violence. This form of interpersonal violence can also manifest as emotional, psychological, and/or sexual abuse by a current/former intimate partner (Coker et al., 2002; Coker, Smith, McKeown, & King, 2000). Intimate partner violence is associated with an array of physical, psychological, and emotional outcomes for victims (Black et al., 2011; Cronholm, Fogarty, Ambuel, & Harrison, 2011; Gehring & Vaske, 2017). For example, the consequences of IPV can emerge in the form of depression, low self-esteem, fear of intimacy, anxiety, reduced capability to trust others, post-traumatic stress disorder (PTSD) symptoms, emotional unavailability, sleep disturbances, flashbacks, and suicidal behavior (Branch, Richards, & Deutsch, 2013; Brewer & Thomas, 2019; CDC, 2019; Coker et al., 2002; Gehring & Vaske, 2017; Lagdon, Armour, & Stringer, 2014; Leino & Kisch, 2005; Lown & Vega, 2001; Tjaden & Thoennes, 2000; Wilbur et al., 2001).

Beyond identifying characteristics and consequences of IPV, prior research has indicated that the way individuals perceive IPV victims can influence societal responses to this form of violence, as well as affect individual reactions to IPV victims and offenders (e.g. Policastro & Payne, 2013). Importantly, studies have also suggested that public perceptions can affect the victim's reaction to their victimization experience (Garland et al., 2019). A growing body of research has begun to consider how domestic violence myths may influence individual and societal perceptions of IPV (Garland et al., 2019; Policastro & Payne, 2013; Westbrook, 2009). Westbrook (2009) defined domestic violence myths as misconceptions and false beliefs concerning IPV, abusers, and victims. A key gap in the existing literature is a systematic examination of the pervasiveness of domestic violence myths across a variety of cultural mediums during different time periods, such as modern music. Studies have often examined themes of gender-based violence and misogyny; however, limited research addresses non-sexualized violence especially regarding IPV. While the majority of studies on non-sexual violence have been addressed using music and music videos (Franiuk, Coleman, & Apa, 2017; Gourdine & Lemmons, 2011; Rhodes, Potoki, & Masterson, 2017; Rubin,West, & Mitchell, 2001; Thaller & Messing, 2013), few academic studies have considered the pervasiveness of domestic violence myths in modern song lyrics.

The advancement and hasty acceleration of digitally distributed media and the proliferation of on-demand online streaming services has transformed the U.S. music business. In 2013, streaming revenues contributed to 21% of the music industry's total $7 billion earnings (RIAA, 2013). In 2017, the revenues from recorded music in the United States increased 16.5% due to over 35 million paid subscriptions for online streaming services (RIAA, 2018). Because of the convenience of these streaming services, as well as the ubiquitous nature of technology, the flourishing population of online music consumers is chiefly responsible for the substantial growth of the U.S. music industry (RIAA, 2017). Currently, the widely popular digital music service, Spotify, provides music streaming to over 170 million active listeners worldwide (McIntyre, 2018). Considering the global popularity of on-demand streaming services, and of the music industry in general, it is

[1] We use the term intimate partner violence as it refers to more specific forms of victimization experienced at the hands of intimate partners. The broader concept of domestic violence can encompass other forms of violence that are not perpetrated by intimate partners. For instance, many domestic violence laws often provide protection based on who currently or formerly has lived in a household. This may include adult children, roommates, and siblings. With regard to domestic violence myths, we use this term as it is the way Westbrook (2009) conceptualized the phenomenon, although it is specific to intimate partner violence cases and does not refer to other forms of domestic violence (e.g. sibling abuse).

not difficult to recognize the widespread potential impact of the lyrics and themes of popular songs. Considering the reach that popular music has globally and the pervasiveness of IPV, it is important to consider how music may affect listeners' perceptions of IPV, especially if the lyrics may be perpetuating IPV myths. The purpose of the present study is to expand upon the existing literature by exploring instances of IPV in song lyrics. More specifically, the study examines the prevalence and nature of IPV myths found in this specific popular culture medium.

Literature Review

IPV as a Theme in Music

From police officers entering record stores to destroy records deemed obscene to the Parents Music Resource Center (PMRC) lobbying for restrictions and labeling of music, efforts to restrict access to music has primarily focused on obscenity. While music has a long history of violence and aggression similar to the film and comic book industries, sexual themes rather than violence have ironically been the major focus of censorship efforts (Baleo, 2015; NCAC, 2019). For instance, folk and country music has a longstanding history of depicting violence against women often reflecting the legal and cultural values of the time. As spousal abuse was widely accepted and legal until 1920, and real legal remedy would not begin until the mid-1970s, much of American musical tradition perpetuates violence against an intimate partner (Baleo, 2015; Huston, 1996; Simon, 2003). Based on a real-life tragedy, songs such as *Delia's Gone*, made famous by Johnny Cash (1962, 1994), illustrate an acceptance of IPV especially when blame can be placed on the victim; Delia after all was "low down and trifling…and she was cold and mean."

While the acceptance of IPV may be rooted in the Southern and folk traditions of the "murder ballad," IPV, regardless of genre, remains an accepted form of storytelling within society (Baleo, 2015; Huston, 1996). From Bessie Smith's (1923) *Outside of That* to The Crystals (1962) *He Hit Me (And It Felt Like a Kiss),* lyrics have historically not only depicted the acceptance of IPV but generally have glorified such relationships. When women stepped outside of their traditional roles (e.g. Johnny Cash's (1962) Delia's Gone), would not accept their abuse, or the perpetrator, traditionally male, could not have or keep the object of his affection, he simply killed her (e.g. Joan Baez's (1959) *The Banks of the Ohio*; The Beatles' (1962) *Run for Your Life*).

Although female artists are often involved in the portrayal of these songs, they have typically been told from a male perspective reinforcing domestic violence myths and patriarchy (Baleo, 2015). However, with changing attitudes and changes in law, there has been a movement to address IPV from the perspective of the abused. Songs reimagining outcomes of IPV have emerged that focus on support for victims (Joni Mitchell's (1994) *Not to Blame*, Tracy Chapman's (1988) *Behind the Wall*, Tori Amos' (1992) *Silent All These Years*) (Greene, 2017). Many songs meant to educate about the dangers of domestic violence unintentionally continue to include victim-blaming sentiments. For instance, Ani DiFranco's (1992) *Fixing Her Hair* discusses the reasons why women stay, but in the end, when her friend will not leave the abusive relationship, DiFranco seemingly scoffs at her decision. More recently, the movement to take a stand against IPV has led to a number of "revenge songs," where victims murder their abusers (e.g. Dixie Chick's (2000) *Goodbye Earl*) while still encouraging the acceptance of violence and the promotion of the murder ballad (Baleo, 2015). Although images of victims retaking control of their lives have become more apparent, traditional depictions of IPV continue to be broadcasted across the airwaves and tend to reinforce common myths that surround this form of interpersonal violence.

The Power of Music to Influence Perceptions and Behavior

While it has been argued that violent music is only a reflection of societal norms (Baleo, 2015), the extant literature has noted the link between violent lyrics and aggressive thoughts including misogynistic lyrics and aggression towards women (Anderson, Carnagey, & Eubanks, 2003; Fischer & Greitemeyer; St. Lawrence & Joyner, 1991). As popular culture works to reflect, drive, and constrain the ways society constructs meaning and value (Kappeler & Potter, 2005; Katz, 2006), it has the power to influence our perceptions of everything from entertainment values to political issues, while also illustrating the important ways these different elements are intertwined. While serving as a reflection of reality, it would appear that the media has the power to reinforce both recognized and agreed-upon beliefs by using its platform to introduce and instill distinct social agendas. Through this process of social constructionism in which the presentation of beliefs and opinions are conflated with reality, exposure to popular media (e.g. music) can influence societal beliefs and the way in which consumers interact and construct meaning (Kappeler & Potter, 2005; Surette, 2015). Regardless of intentionality, popular culture mediums may not only reflect but perpetuate domestic violence myths.

The extant literature supports that music may influence the attitudes, behaviors, and perceptions of listeners (Anderson et al., 2003; Fischer & Greitemeyer, 2006; Greitemeyer, 2011; Rubin et al., 2001; Thaller & Messing, 2013). While the portrayal of women has increasingly shown “greater diversity, more complexity, and dramatically mixed messages about the individual female persona and women’s roles in society” (Cooper, 1999, p. 355), negative gender stereotypes where women are presented as inferior and marginalized remain pervasive in popular music (Weitzer & Kubrin, 2009). Despite this variation in portrayals, it remains uncommon for women to be presented as independent, intelligent, enterprising, or superior to men (Rubin et al., 2011).

Some researchers have suggested that the lyrical content within certain music genres contains ideas that advocate for specific kinds of behavior (Bushong, 2002; Greitemeyer, 2011; Fischer & Greitemeyer, 2006; Rubin et al., 2001). Lull (1985) indicated that lyrics and musical characteristics can amplify the experience of music listening, which has the ability to affect listeners’ attitudes and perceptions. Additionally, lyrical messages combined with the fashion and style of artists are often woven into the collective consciousness of an artist’s fan base (Lull, 1985). The examination of the impact of music on aggression and violence-related behaviors has led to a growing body of literature in the field (Anderson, et al., 2003; Barongan & Hall, 1995; Fischer & Greitemeyer, 2006; Krahé & Bieneck, 2012; Mast & McAndrew, 2011).

The research on music and violence against women is fairly consistent in portraying greater negative attitudes, thoughts, and behaviors toward women after exposure to sexually violent or misogynous music (Anderson et al., 2003; Atkin & Abelman, 2009). A content analysis conducted by Rubin and colleagues (2001) found a link between a listener’s preference for particular genres of music and their attitudes towards women. More specifically, heavy metal listeners, compared to other musical genres, were more likely to report traditional sex role attitudes that relegate women to subservient roles in society (Ruben et al., 2001). Sexually explicit and derogatory lyrics are especially apparent in rap music, which has been repeatedly criticized for lyrics that objectify, exploit, or victimize females (Weitzer & Kubrin, 2009). In contrast, country and rock music have a long history of embracing violence and murder (Baleo, 2015; Simon, 2003). It is important to note that attitudes may draw a listener to a particular type of music rather than the music influencing the attitudes of the listener. Scholars, however, acknowledge that it is important to continue to disentangle this relationship to determine whether exposure to particular themes reinforce negative attitudes toward women and sex-role stereotypes (Rubin et al., 2001; Weitzer & Kubrin, 2009).

Domestic Violence Myths and Realities

While much of the current academic literature is primarily concerned with established rape myths (Garland, Branch, & Grimes, 2016; Lee, Hust, Zhang, & Zhang, 2011), scholars have recently begun to examine myths regarding domestic violence and IPV (Garland et al., 2019; Policastro & Payne, 2013; Westbrook, 2009). These myths have regularly been conceptualized as misconceptions and false beliefs about IPV, abusers, and victims (Westbrook, 2009). Studies have suggested that those who accept domestic violence myths are more likely to assign responsibility to victims for their victimization, excuse the perpetrator, and minimize the seriousness of the abuse (Peters, 2008; Policastro & Payne, 2013; Westbrook, 2009). A few examples of myths concerning IPV include but are not limited to the following: *it is not abuse or violence if the behavior expressed does not result in physical injury*; *victims and abusers are emotionally and mentally unstable*; and *survivors are to be blamed for their own abuse* (Westbrook, 2009). Some of these myths even imply that a battered woman can, if she truly wants, steadfastly and successfully end a violent relationship simply by leaving her abuser (Yamawaki et al., 2012). Unfortunately, these myths are not only perpetuated in small, conversational settings, but they are often broadcasted to the public via popular culture mediums and the media, including music.

Other myths often presented in popular culture mediums and the news media focus on the notion that only certain types of people are victimized (Garland et al., 2018; Westbrook, 2009). More specifically, myths often suggest that *only men are perpetrators of IPV, while women are the victims*. A current debate exists in the literature regarding gender symmetry in IPV with some research suggesting that women are the predominant victims (Breiding et al., 2014; Hamberger, 2005; Menard et al., 2009; Tjaden & Thoennes, 2000) while other studies identify that men and women are equally likely to be victims of IPV (Houry et al., 2008; Robertson & Murachver, 2007). The inconsistency across studies has been attributed to methodology in terms of sampling and measurement strategies. Johnson (2006) argues that researchers are tapping into two different phenomena and advocates for a more nuanced view of IPV that acknowledges the complexity of violence in relationships. More specifically, Johnson (2006) suggests that studies that identify women as the primary victims are uncovering intimate terrorism. This form of IPV involves a control dynamic whereas situational couple violence is another form of IPV where a control motive is absent (Johnson, 2006). According to Johnson's (2006) conceptualization, situational couple violence is characterized by gender symmetry in offending and victimization as it is often the result of a conflict that has escalated to violence rather than an attempt for one partner to control another with emotional and/or physical violence.

An emerging belief often recognized within the literature is that *IPV only consists of physical violence*, and that the only way for this behavior to be identified is when a physical injury occurs (Garland et al., 2019; Westbrook, 2009). While this myth is often reinforced throughout the media, an abundance of research draws attention to the multifaceted nature of IPV and demonstrates that victims experience a range of abusive behaviors including psychological/emotional abuse, as well as sexual violence by partners (Coker et al., 2002; Follingstad, Coyne, & Gambone; Schumacher & Leonard, 2005). For instance, a study by Coker and colleagues (2002) determined that 29% of women and 23% of men experienced psychological abuse in their lifetime. Other studies have even shown that victims often report that the nonphysical abuse and resulting psychological wounds were as harmful, if not worse than the physical abuse they suffered (Seff, Beaulaurier, & Newman, 2008). Moreover, psychological abuse has been highlighted as a key component in setting up and maintaining the overall abusive dynamic in a violent relationship (Dutton & Painter, 1981). Psychological abuse can be contextualized as psychological danger, disempowerment, loss of control in a relationship, and psychologically aggressive behaviors (e.g., name calling, humiliation, threats) (Coker et al., 2000; Gehring & Vaske, 2017). Stark's (2007; 2009) work on coercive control further demonstrates that IPV victims who encounter the system (e.g. police and battered women's shelters) have generally experienced a pattern of control where emotional

violence was interwoven with physical abuse in order for the abuser to gain complete control over the victim. The belief that IPV is only physical can serve to negate instances where an individual may have been a victim to multiple forms of IPV, including emotional abuse and sexual coercion by their partner (Stark, 2007).

The idea that *IPV victims can just leave an abusive relationship or fight back whenever they want* is yet another harmful myth that may be perpetuated by popular culture (Garland et al., 2018; Yamawaki et al., 2012). Worden and Carlson (2005) found that approximately 23% of respondents indicated that women secretly wanted to be abused, and 63% of respondents felt that women had the capability to leave an abusive relationship if they truly wished. This myth is in conflict with literature that documents leaving as a "process" with statistics indicating that victims leave an average of seven times before permanently terminating an abusive relationship (Buel, 2020). Moreover, it disregards research findings that identify leaving the abuser as an especially dangerous time for an abuse victim (English, Marshall, & Stewart, 2003) with research suggesting that victims are at an increased risk of intimate partner homicide during the time immediately following separation (Spencer & Stith, 2018) .

Critics have often misused data when discussing IPV and homicide rates across perpetrator and victim sex as statistics fail to account for self-defense. As noted by Follingstad and colleagues (2015), no jurisdiction has ever allowed battered woman syndrome to be used as a justification for intimate partner homicide. State statutes have consistently upheld the standard of "imminent danger." Currently, national statistics on how many women are imprisoned for killing their abusers do not exist. A 2005 study by the New York Department of Corrections and Community Supervision determined that 67% percent of imprisoned women serving terms in New York for killing someone close to them (excluding children) had been abused by their victim (Snyder, 2019). Data indicates that women are more likely to be seriously injured or killed than their male counterparts, which places female victims of IPV in a Catch-22 situation where they are unable to leave (Breiding et al., 2014; Menard et al., 2009).

Myths About IPV Perpetrators

Myths surrounding IPV are often associated with IPV victims, but myths also exist about perpetrators. These myths most often excuse the acts of the perpetrator by placing blame elsewhere, such as *alcohol, drug use, past victimization, stress, and mental illness* (Ganley, 1998; Garland et al., 2018; Peters, 2003). Many people in relationships use and abuse drugs or alcohol without becoming a perpetrator of IPV, yet when IPV perpetrators victimize their intimates while under the influence, society often excuses the behavior (Ganley, 1998). Misconceptions such as this seek to minimize the victimization and provide a justification for the abuser.

IPV perpetrators are often portrayed as *under the influence*, *ill or "evil"* to alleviate blame. By casting the perpetrator in this light, we detach them from reality, allowing their harmful actions to be viewed as beyond their control. It is this detachment and cycle of justification that allow IPV perpetrators to be deemed as different from the rest of society (Garland et al., 2019). By absolving the perpetrator's responsibility, society fails to acknowledge abusers are able to control their abusive inclinations and ignores research documenting the calculated use of control the perpetrator chooses to employ when overpowering their victim (Garland et al., 2019; Peters, 2003).

A different way that IPV has been justified is by blaming the violence on the abuser's past victimization and linking their violence to a cycle of learned behavior. Researchers have found support that violent behavior is learned. More specifically, researchers have found that perpetrators of IPV often witnessed IPV during their childhood (Ernst, Weiss, & Enright-Smith, 2006; Ernst et al., 2009), and others suggest that individuals abused in childhood often perpetrate IPV in adulthood (Ernst et al., 2006; Roberts, McLaughlin, Conron, & Koenen, 2011). Society, however, cannot use these findings as a means to justify and excuse abuse (Ganley, 1998).

Witnessing IPV in childhood is not a determinate for perpetrating IPV later in life, it is likely a contributing factor rather than a justification for violence (Ernst et al., 2006, 2009; Roberts et al., 2011).

The Present Study

Prior research has emphasized the role of media in perceptions and attitudes towards a variety of topics, including violence and gender (Garland, Branch, & Grimes, 2016; Garland, Vollum, & Phillips, 2018; Rubin et al., 2001). Moreover, studies have considered how violence is depicted across various media platforms such as in comic books and music videos (Garland et al., 2019; Garland et al., 2018; Garland et al., 2016; Rhodes et al., 2017). As noted, music has a long tradition of addressing and often supporting violence including IPV. In order to expand upon this growing body of literature, the current study explores the depiction of IPV in modern music. More specifically, a content analysis methodology is employed to analyze if and to what extent modern, popular music lyrics (2000-2019) reinforce or deemphasize domestic violence information myths and to identify if and which myths remain prevalent. [2]

Method

Using a mixed methods approach, content analysis was conducted on lyrical content of popular songs over the past nineteen years (2000-2019). Content analysis has proven to be an unobtrusive measure allowing for the systematic identification, organization, description, and quantification of text, images, and in this case, modern music lyrics (Berg, 2004; Garland et al., 2019; Hesse-Biber & Leavy, 2006; Kraska & Neuman, 2011). Both manifest and latent lyrical content were examined. As outlined by Berg (2004), "Manifest content refers to those elements that are physically present and countable while latent content refers to an interpretive reading of the symbolism underlying the physically presented data" (p. 229). Thus, both explicit and implicit language was used to examine IPV in music lyrics. The authors utilized a manifest form of content analysis by addressing apparent, surface material presented in the lyrics such as sex of perpetrators and victims, as well as the type of violence involved. As variables such as emotional violence were much harder to recognize and define, latent analysis of the lyrics was used to identify themes not readily apparent within textual analyses. As consistently noted in the extant literature, latent content provides greater depth when assessing images and reactions to crime and victimization (Garland et al., 2016; Garland et al., 2018; Garland et al., 2018). Although latent content is viewed as a less reliable method of analysis as it is often subjective in nature (Garland et al., 2018; Hesse-Biber & Leavy, 2006; Kraska & Neuman, 2011), the researchers worked to establish inter-rater reliability within coding measures.

[2] While the passing of the Violence Against Women Act (1994) led to a heightened understanding of the threats of domestic violence and resulted in a decline in both fatal and non-fatal IPV incidents for men and women alike, societal acceptance of domestic violence myths remains. As support for policies have increased along with training and educational programs, it cannot be ignored that there has been a shift in acceptance toward IPV. Whether life imitates art or vice versa, the intent of this study is to examine IPV through a post VAWA lens and explore contemporary musical depictions of interpersonal violence in intimate relationships. Thus, the study focuses on the last 20 years.

Sample

The data for the current study was obtained using a purposive sampling technique to evaluate the presence of IPV myths in modern music. Using an inductive process, the sample was obtained by examining various internet lists, wikis, blogs, and listservs (e.g. Songfacts, Spinditty, etc.) for the presence of IPV within the lyrics of differing music genres. Songs were selected if they involved an incident of interpersonal violence between two people who were currently or previously involved in a significant intimate relationship ($n = 59$); songs addressing other forms of domestic violence were excluded (see Table 1). Thus, cases where violence was perpetrated by a parent, sibling, or other family member were omitted from the analysis. Based on information obtained from Statistica (2018), the sample was drawn from the top five musical genres noted by consumers within the United States: rock, pop, country/folk, R&B, and rap/hip hop; some categories were combined as they are often used interchangeably. Popular genres of an instrumental (e.g. jazz or classical) or international nature (e.g. Latin or KPop) as well as less popular genres that are not considered mainstream were excluded from analysis. More specifically, songs that were primarily aired on social media sources (e.g. YouTube) and did not receive mainstream radio play (e.g. Christian Rock) were not included in this analysis. Additionally, songs in which abusive relationships were not the specific lyrical focus and only presented a passing reference to the phenomenon (e.g. *Crazy in Love*), songs used as anthems for IPV survivors (e.g. *Roar*), and non IPV-related songs that were represented by music videos containing images of IPV (e.g. *No More Drama*) were also excluded from the analysis.

Table 1. Sampled Songs (n = 59)

Song	Primary Artist: Race/Sex	Year	Song	Primary Artist: Race/Sex	Year
Never No More	Aaliyah (B/F)	2001	Gunpowder and Lead	Miranda Lambert (W/F)	2007
Oh, Mother	Christina Aguilera (W/F)	2006	What She Had To	Lonestar (W/M)	2006
I'm OK	Christina Aguilera (W/F)	2002	For the Love of a Daughter	Demi Lovato (W/F)	2010
Rain on Me	Ashanti (B/F)	2003	Black and Blue	Mindy McCready (W/F)	2005
The Last to Say	Atmosphere (BR/M)	2011	The Little Girl	John Michael Montgomery (W/M)	2001
Miss Me More	Kelsea Ballerini (W/F)	2018	Hands Clean	Alanis Morissette (W/F)	2002
Holy Water	Big and Rich (W/M)	2004	Saturday Night	Natalia Kills (BR/F)	2013
And Then You Kissed Me	The Cardigans (W/F)	2003	His Hands	Jennifer Nettles (WF)	2014
Ultraviolence	Lana Del Ray (W/F)	2014	Never Again	Nickleback (W/M)	2001
Girl	Destiny's Child (B/F)	2004	Karate	Brad Paisley (W/M)	2013
Façade	Disturbed (W/M)	2008	Revenge	Papa Roach (W/M)	2000
Goodbye Earl	Dixie Chicks (W/F)	2000	Jar of Hearts	Christina Perri (W/F)	2011
Kim	Eminem (W/M)	2000	Hot N Cold	Katy Perry (W/F)	2008
Love the Way You Lie	Eminem (W/M)	2010	Family Portrait	Pink (W/F)	2001
Space Bound	Eminem (W/M)	2010	Me and Emily	Rachel Proctor (W/F)	2004
Stan	Eminem (W/M)	2000	Face Down	Red Jumpsuit Apparatus (W/M)	2004
Superman	Eminem (W/M)	2002	Cold Case Love	Rihanna (B/F)	2009
Wonderful	Everclear (W/M)	2000	Love on the Brain	Rihanna (B/F)	2016
Redneck Crazy	Tyler Farr (W/M)	2013	Man Down	Rihanna (B/F)	2011
Kiss with A Fist	Florence + The Machine (W/F)	2009	Russian Roulette	Rhianna (B/F)	2009

Black Water	Ruth Gerson (W/F)	2010	Dirty Laundry	Kelly Rowland (B/F)	2013
Still	Macy Gray (B/F)	2000	Justified Black Eye	Tony Sly (W/M)	2004
Too Beautiful	He is We (W/F)	2018	Tell Me Why	Taylor Swift (WF)	2006
Hush	Hellyeah (W/M)	2014	Call Me Guilty	Jazmine Sullivan (B/F)	2008
Cherry Wine	Hozier (W/M)	2014	Rusted from the Rain	Billy Talent (W/M)	2009
Thank You	Jamelia (B/F)	2004	Church Bells	Carrie Underwood (WF)	2015
Nobody Wins	Jodeci (B/M)	2015	All of the Lights	Kanye West (B/M)	2010
Jealous	Nick Jonas (W/M)	2014	Be Your Shadow	The Wombats (W/M)	2015
Gangsta	Kehlani (B/F)	2016	Sad	XXXTentacion (B/M)	2018
Praying	Kesha (W/F)	2017			

*Only the race and sex of the primary vocalist were noted in cases that included bands, featured artists, etc. Race: Biracial (BR), Black (B), and White (W); Sex: Male (M) and Female (F)

Coding

Based on prior research and subject knowledge, the authors used an inductive approach to establish the variables used in the analysis. After the variables were established, the authors individually coded song lyrics. Coding was conducted primarily via manifest content within the songs, although, some songs which contained greater underlying, symbolic messages pertaining to IPV were coded via latent content analysis. Songs providing questionable outcomes within the coding were verified through the use of song information websites (e.g. Songfacts.com, Songmeanings.com, wiki.com). As noted, only songs specifically addressing IPV with lyrics that either explicitly or implicitly depicted the phenomenon were used. Instances where song lyrics contained ambiguity within the coding framework were informally addressed through inter-rater reliability between the authors to minimize subjectivity and improve consistency throughout the sample.

Common IPV myths, found by the authors through prior research and IPV websites, were utilized in the coding process for the song lyrics in the sample (n = 59). Variables were used to identify song characteristics, demographics, behaviors, and myths present. The songs were categorized and coded using the following variables: genre of music (country/folk = 0, pop =1, rock = 2, rhythm and blues (R&B) = 3, hip hop/rap = 4); perspective of song (offender = 0; victim =1; other = 2); sex of perpetrator (male = 0; female = 1), sex of victim (male = 0; female = 1); emotional violence (no = 0; yes = 1), physical violence (no = 0; yes = 1), sexual violence (no = 0; yes = 1); victim outcome (victim left the perpetrator = 0, victim stayed with the perpetrator or returned = 1, perpetrator killed the victim = 2, victim killed the perpetrator = 3); victim fought back (no = 0; yes = 1); presence of substances (no = 0; yes = 1); and child present (no =0; yes = 1). Qualitative data was also collected to address myths used, explanation of victim outcome, and specific lyrics used to illustrate these themes and explanations. Once the coding process was complete, data was organized and cataloged for analysis.

Results

Analyses were broken down into two parts. First, the study examined depictions of IPV in relation to music genre. Second, the examination of IPV myths in music was broken down into four major themes: general IPV myths, myths about victims, myths about perpetrators, and intimate partner homicide. General IPV myths further examined issues surrounding what was considered IPV, who was portrayed as the IPV victim, others who may be indirectly affected by domestic violence, music genres, and IPV.

Music Genre

Of the 59 songs examined, the majority of songs addressing IPV consisted of rock (25.4%) and country/folk (22.0%) genres (see Table 2). While these genres have a documented history of including violence against women, many of these songs addressed the problems of IPV rather than supporting the behavior. Rather than using justifications for IPV inherent in songs such as *Delia's Gone* (Cash, 1994) and *Papa Loved Mama* (Brooks, 1992), modern music often reflects the abuse suffered and the consequences that result from such behavior. The sex of the artist and the perspective of the song was reflective of the inherent themes addressed within the lyrics. Of the 59 songs sampled, the majority of the artists were female. Thus, this may explain the sympathetic view towards IPV. Approximately 63% (n = 37) of the artists were female with 37.3% (n = 22) of the sample being male. The majority (55.9%) of the lyrics were from the perspective of the victim (n = 33) indicating a possible exposure to domestic violence or an attempt to educate individuals on the dangers of IPV. As many of the lyrics were written by actual victims who witnessed (e.g. Christina Aguilera) or experienced IPV (e.g. Rihanna), victim-based lyrics were written from the vantage point of addressing the perils of IPV. While 55.9% of the sample was written from the perspective of the victim, 27.2% (n = 16) was written from the perspective of a third party, who often witnessed IPV as a child. For instance, Christina Aguilera sings of her father's abuse of her mother, and later herself, in *Oh Mother*.

It was the moment she took his name.
He took his anger out on her face.

Table 2. Descriptive Findings (n = 59)

	n	%
Variables		
Genre		
Country/Folk	13	22.0%
Pop	12	20.3%
Rock	15	25.4%
R&B	9	15.3%
Rap/Hip Hop	10	16.9%
Song Perspective		
Offender	10	16.9%
Victim	33	55.9%
Other	16	27.2%
Offender/Victim Sex		
Male/Female	52	88.1%
Female/Male	6	10.2%
Both	1	1.7%
Abuse Type		
Emotional	40	67.8%
Physical	47	79.7%
Sexual	2	3.4%
Victim Fought Back		
No	47	79.7%
Yes	12	20.3%

Substances Present		
No	49	83.1%
Yes	10	16.9%
Child Present		
No	44	74.6%
Yes	15	25.4%
Victim Outcome		
Left	22	37.3%
Stayed or Returned	24	40.7%
Perp Killed Victim	4	6.8%
Victim Killed Perp	7	11.9%
Not Specified	2	3.4%

Genre and Race

Ten of the 59 cases were written from the perspective of the offender. While rap/hip-hop (16.9%; n = 10) and rhythm and blues (15.3%; n = 9) were the least likely to address IPV, most songs written from the perspective of the offender were classified within these two genres. Of these 10 cases that addressed IPV from the offender perspective, 60% of these songs were classified as either rap/hip hop (n =5) or rhythm and blues (n = 1). Consumers must be cautious with these results as these genres are seemingly representative of minority populations indicating that minorities, especially Black males, are promoting IPV. However, when the songs were examined, five rap/hip hop songs were recorded by a White male, Eminem. Of the sampled lyrics, 73% were performed by a White vocalist. Thus, not only are the majority of IPV songs performed by White artists, but even when offenders are promoting abuse, it is largely from the perspective of a White perpetrator. As most crime especially interpersonal victimization is intra-racial, the artists, regardless of genre reinforce that IPV is not a reality for minority populations. While myths often support the notion that only certain people are victims, the literature is clear that minorities, particularly minority women, are commonly IPV victims and that interracial and minority couples often have higher rates of IPV (Black et al., 2011; Fusco, 2010; Martin et al., 2013).

IPV Myths

While the race of victim and offender could not be discerned beyond the artist performing the song, the data indicate that modern music reinforces, at least partially, common domestic violence myths within the literature. Consistent with the bulk of empirical research on IPV, data indicate that females were the victim in the majority of the songs analyzed. Specifically, females were victims in 52 (88.1%) of the 59 cases examined with the perpetrator being male in the respective cases. While this is consistent with much of the literature, the sample does acknowledge that males can be victims of IPV with female perpetrators placed in the role of the abuser (n = 6; 10.2%). An additional case, *Kiss with a Fist*, involved both parties as being identified as the primary abuser. Thus, while females are primarily the victims of IPV, the myth that only women can be victims and men can only be perpetrators is somewhat dispelled. For instance, Hozier's *Cherry Wine* (2014) sings of a female perpetrator and a male victim.

The way she tells me I'm hers and she is mine
Open hand or closed fist would be fine
The blood is rare and sweet as cherry wine.

The data, however, indicate that myths regarding sexual orientation are upheld. All the songs evaluated identified opposite sex partners. Thus, not only does the data support that women are more likely to be victims rather than perpetrators of IPV, but the songs examined also perpetuate the myth that these acts are committed exclusively within heterosexual relationships.

The lyrics in songs such as *Love the Way You Lie* are indicative of societal interpretations of IPV and the myths that surround toxic relationships. While real-world IPV is traditionally depicted as physical, data from this study reinforce the idea that IPV is almost always physical in nature with other forms of violence being ignored, overlooked, or minimized. As all sampled songs included some form of IPV, the myth that IPV is only comprised of physical violence was to some degree supported. Within the sample, just under 80% of the songs portrayed physical violence. In contrast to common myths, 67.8% of the sampled songs included references to emotional violence. The majority of these were combined with some form of physical abuse underscoring the multifaceted nature of IPV while simultaneously highlighting the prioritization of physical abuse over emotional violence. Although Florence Welch (Florence and the Machine) has on the record maintained that *Kiss with a Fist* (2008), a song noted for its extremely violent lyrics, is not about physical violence but psychological, it is evident that the emotional/psychological abuse inherent in IPV is often dismissed. There, however, are songs that only address emotional abuse such as Kelsea Ballerini's *Miss Me More* (2017).

I retired my red lipstick
'Cause you said you didn't like it.
I didn't wear my high heel shoes
'Cause I couldn't be taller than you.
I didn't want to lose my friends But now it is hard to even find them.
It's what you wanted, ain't it?
It's what you wanted.

Songs such as Ballerinis', in contrast to Welch's interpretation of IPV, help highlight the importance of recognizing emotional and psychological abuse as it is often a precursor to physical violence (Schumacher & Leonard, 2005). In contrast, sexual violence was only present in 3.4% of the sample, which is consistent with the myth that depicts IPV as not sexual in nature. This myth likely originates from the historical legal precedent that men cannot rape their wives.

As noted, IPV perpetrators are rarely held accountable for their actions as their behaviors are often attributed to a mental defect or viewed as being provoked into reacting violently (Garland et al., 2019). Songs such as Katy Perry's *Hot-N-Cold* note the "bi polar" nature of relationships as they foster a cycle of dysfunction. While mental illness was not directly measured, songs such as Destiny's Child 2004 release, *Girl*, notes the willingness to forgive the perpetrator for his behavior with the victim often placing the responsibility for IPV on themselves.

I can't let him go because he needs me
It ain't really him its stress from the job
And I ain't making it easy

Additionally, characterizing abusers as under the influence of drugs and alcohol is a common excuse to alleviate responsibility (Garland et al., 2019; Garland et al., 2016). In this study, 16.9% (n = 10) of the cases analyzed involved the use of substances. Songs such as *Church Bells* and *Never Again* highlight the link between substance abuse and violence, and while seemingly not attempting to place blame on the victim, it is inferred that the perpetrator does not engage in such behaviors while sober.

Some of the most prevalent IPV myths blame victims for their own abuse by citing their inability to fight back or "simple" failure to leave the relationship. Of the songs examined, only 12 cases (20.3%) indicate that the victim fought back. While Brad Paisley's 2013 country hit, *Karate*, depicts an abused woman learning a marital art to defend herself against her abusive husband, this is not reality. While women may choose to fight back, some do not and if they do, they do not necessarily leave their abuser. Over 40% of the songs sampled depicted the victim staying in or returning to the relationship. Victims of abuse often return for varying reasons ranging from fear to children being in the home (Cruz, 2003; Eckstein, 2011; Humphreys, 2003; Murray, 2008; Tebo, 2005). Roughly one-quarter (25.4%) of the songs reflected a child being present, which is a common reason cited in the literature on why women do not leave abusive relationships (Eckstein, 2011; Murray, 2008). Although the reasons for staying are vast, 37.3% of the victims in the sampled songs were able to successfully leave their abusers.

Within this study, it is often fear that seemingly prevents victims from leaving, and it is here where the myth of choice is presented to consumers and reinforced as a willing involvement in a toxic and violent relationship. While only 6.8% of the sample indicated that leaving their abusers resulted in fatality, the threat of violence is a real and valid reason for staying in an abusive relationship. As evident in Eminem's *Love the Way You Lie*, the fear of leaving a violent relationship is all too real (Thaller & Messing, 2013).

If she ever tries to fucking leave again
I'ma tie her to the bed/
and set the house on fire.

In addition to threats and actual violence, perpetrators use self-harm as a means to control their victims and make them stay. Perpetrators often threaten to kill themselves (e.g. *Kim)*, and while this is often confused for manipulation, the threat of suicide indicates a legitimate risk to both victims and perpetrators as is illustrated in John Michael Montgomery's country ballad, *The Little Girl (2000)*, where "daddy" kills his wife and then himself. While these are only words, the reality is that IPV is unquestionably linked to intimate partner homicide. Data indicate that women are not only more likely to be victims of IPV but also are more likely than males to be victims of intimate partner homicide (Zahn, 2003). Regardless of genre, the data for this study indicate that women were the victim in all instances (n = 4) of intimate partner homicide where self-defense was not presented as a motive. For instance, in Eminem's 2000 release of *Kim*, the lyrics clearly address the reality of violence that plagues those involved in an abusive relationship and the possibility, or at least threat, of death.

Don't you get it bitch? No one can hear you!
Now shut the fuck up and get what's comin' to you!
You were supposed to love me!
Now bleed bitch, bleed! Bleed bitch, bleed! Bleed!

Not surprisingly, half of the songs involving the murder of an intimate partner were written by the artist Eminem, who was involved in a toxic relationship allowing himself a unique perspective in his artistry. While intimate partner homicide is a known risk for those experiencing IPV, victims seeking revenge and killing their perpetrators does not "fit" the narrative of domestic violence. Nevertheless, within the sample 11.9% of victims

(n = 7) sought revenge and killed or planned to kill their abusive partners. In all of these instances, the "perpetrator" was female, and the lyrics suggested that these women were employing homicide as a form of self-defense. In the sample, firearms (e.g. *Call Me Guilty, Man Down*) and poison (e.g. *Church Bells, Goodbye Earl*) were often the method used in the plot to dispose of their abusive partners. Miranda Lambert sings in Gunpowder and Lead (2008) about protecting herself and getting revenge on her abusive husband.

> *I'm goin' home, gonna load my shotgun*
> *Wait by the door, and light a cigarette*
> *If he wants a fight, well, now he's got one*
> *And he ain't seen me crazy yet*
> *He slapped my face, and he shook me like a rag doll*
> *Don't that sound like a real man?*
> *I'm going to show him what little girls are made of*
> *Gunpowder and lead*

These types of lyrics may indicate to listeners that victims of IPV have a boiling point in which they may act out in self-defense. Songs such as *Gunpowder and Lead* (Lambert, 2008), *Goodbye Earl* (The Dixie Chicks, 2000), and *Church Bells* (Underwood, 2016) may offer hope to those who have been abused, and in most cases, their justice comes without consequence. This myth, likely reinforced by The Burning Bed narrative, illustrates that women cannot necessarily *fight back* without using deadly force; however, "revenge" killings are seldom viewed as self-defense.

Discussion and Conclusion

The current study analyzed instances of IPV in modern music to determine which common IPV myths could be identified and supported within this form of media. Westbrook (2009) determined that perceptions about IPV, victims, and abusers are often influenced by misconceptions and false beliefs known as domestic violence information myths. Unlike many other popular culture genres (e.g. comic books, television series), songs that addressed IPV were not inherently supportive of the phenomenon but rather used it as a means to bring attention to the issue. This may be a result of art imitating life as many of the sampled lyrics were written by or for individuals who had experienced or witnessed some form of IPV. Although, it may also be attributed to broad shifts in social conversation and attitudes over the years, rather than just specific to the music industry. Of the songs examined, 55.9% were from the perspective of the victim, 16.9% were from the perspective of the offender, and 27.2% were from the perspective of a third party such as a friend or a child.

It is not lost on the authors that songs such as *Love the Way You Lie* are performed by artists, one as a perpetrator and one as a victim, who have documented real-life experiences with IPV. The manner in which these depictions are portrayed, however, are often based on genre. Rock, country/folk, and pop music made up approximately 68% of the songs that addressed IPV. Notably, country/folk music has a long history of storytelling addressing the everyday lives of White America (Baleo, 2015). More recently, music, in general, has not only addressed the daily trials and fears of violence but has enabled female performers to have their voices heard to spotlight IPV from the female perspective (Baleo, 2015; Green, 2017). As the majority of songs within the sample were written from the standpoint of the victim, it is apparent there has been a shift in focus regarding depictions of IPV. The echoes of male centric narratives on domestic violence (e.g. *Delia's Gone*) have been replaced by the songs of female artists and their supporters illuminating society of the actual issues involved in such relationships (Green, 2017).

Ironically, of the songs from the offender's outlook (n = 10), half were in the rap/hip-hop genre. While the literature often accuses rap/hip hop of being overly misogynistic, the findings of this study were interesting as these conclusions were not necessarily consistent with previous literature (Armstrong, 2001; Frisby & Behm-Morawitz, 2019; Ling & Dipolog-Ubanan , 2017; Weitzer & Kubrin, 2009). As examinations of violence are often covertly based on race, this study did not support previous ideas about rap/hip hop and IPV. Just over 25% (n = 19) of the songs often associated with minority populations (e.g. rap/hip hop; R&B) addressed issues of IPV, over two-thirds of that sample addressed IPV from the perspective of the victim rather than the offender. Of the rap/hip hop songs addressed from the perspective of the offender, the majority of songs were from the perspective of the artist/offender Eminem, a White rapper, who has a history of perpetuating violence against women in his lyrics.

Further analysis somewhat dispelled the myth that only certain people are victims of IPV. While the race of victims and offenders could not be determined beyond the race of the performer, it is apparent that regardless of race anyone may experience IPV even if musical genres are not reflective of this. The literature overwhelmingly depicts victims of IPV as women and perpetrators as men (Breiding et al., 2014; Hamberger, 2005; Menard et al., 2009; Tjaden & Thoennes, 2000). However, men can be victims and women perpetrators of IPV (Houry et al., 2008; Robertson & Murachver, 2007). Consistent with the literature, over 88% of the sample included a female victim and a male perpetrator; just over 10% of women included in the sample were portrayed as perpetrators who abused a male victim. Only one song depicted both parties as co-occurring perpetrators and victims. There was evidence that lyrics support the myth that IPV only affects heterosexual individuals with all sampled songs depicting opposite sex couples. Thus, modern music partially reinforces the myth that only certain groups can be victims of IPV. In reality, regardless of race, gender identity, or sexual identity, any group can be affected by IPV.

Consistent with domestic violence myths, physical violence was depicted as the most prevalent form of IPV. Approximately 80% the sampled lyrics referenced physical violence. However, data from the study indicate that while sexual violence was seemingly dismissed as a form of IPV, emotional/psychological abuse was duly noted for victims. This study partially rejects the myth of IPV only being comprised of physical violence even if societal myths surrounding marriage and sex remain. Literature shows that repeated psychological manipulation and emotional abuse are often interwoven with physical violence in an effort to manipulate and control victims (Outlaw, 2009). This finding is more complex than it appears as emotional abuse is often noted as a precursor to physical abuse (Schumacher & Leonard, 2005). If you remove cases that involve both physical and emotional abuse, only four cases addressed emotional/psychological abuse alone. These songs highlighted the psychological damage that being involved in such relationships creates including mental health issues. It is unknown whether art reflects reality or vice versa, but it cannot be ignored that such words are reflective of the inherent problems associated with IPV. For instance, Marshall Mather's (aka Eminem) ex-wife, Kim, who was often the target of abuse in his lyrics, allegedly attempted suicide after watching him abuse a blow-up doll on stage while he performed the eponymous song with his fans chanting in support. Based upon Eminem's lyrics alone, it is unlikely that this emotionally abusive act was a single incident. While physical abuse is serious, the failure to acknowledge the multidimensional nature of IPV greatly undermines its seriousness and the long-term consequences that can result.

While the music sampled highlighted the consequences inherent in IPV, victim-blaming myths remained pervasive. Victim-blaming myths such as *victims can leave a violent relationship* or could at least *fight back* if they wanted the violence to stop are prevalent throughout the sample. Over 40% of the sample indicated that the victim stayed or returned to an abusive relationship. Children being present in the home, fear, and love were the most common rationales for why the victim stayed or returned to the relationship. While these victim blaming myths were somewhat upheld, it appears that more victims, at least in song, are increasingly leaving relationships where IPV is present and that artists recognize some of the complexities inherent in exiting an

abusive relationship. If art reflects societal norms, there is hope as 37.3% of the sampled lyrics within this study noted that the victim successfully left the violent relationship. Reasons for leaving varied from just having enough to the perpetrator victimizing the children.

Domestic violence myths often support that victims are always passive in their relationships and if they wanted the abuse to stop, they would simply fight back. This sample was largely supportive of the notion that victims of IPV do not defend themselves. Of the 59 cases analyzed, only 12 cases (20.3%) indicated that the victim fought back. The problem with this rationale is that most people are not violent especially towards people they love. Fear of the perpetrator is also a reality. While songs such as Brad Paisley's *Karate* indicate that women can fight back to end IPV, this leads to a false sense of not only justifying violence but that the secondary violence will stop there. As noted in the literature, victims of IPV are often most at risk when the abuser sees a threat or literal shift in the balance of power, especially when leaving (English et al., 2003). These attempts to regain power can often be fatal.

Almost 19% of the cases examined resulted in intimate partner homicide, which reinforces why many victims cannot simply "choose" to leave. It is interesting that within this sample, the victim was more likely to engage in intimate partner homicide, or what should be classified as self-defense, than the abuser. Of the 59 cases sampled, the victim engaged in intimate partner homicide in 11.9% of the cases compared to the 6.8% of the abusers. While homicide at the hands of an abuser is a reality, it appears as if this sample, largely due to the support of victims, emphasized the killing of an abusive partner as a means of self-defense. Despite many victims being fearful of their abuser, lyrics suggest that women should fight back. In over half of the cases in which the victim responded with violence, fighting back involved deadly force indicating that the choice to leave may require leaving by any means necessary. The depiction of "revenge" killings in music indicates acceptance of murdering an abusive partner. Women, at least in modern music, no longer must remain the victim (Baleo, 2015).

While consumers of popular culture often rally around real or fictionalized victims when they murder their abusive partners and equate this to freedom (e.g. The Burning Bed), the realities of these actions are not liberating but more likely to ensure the victim is at minimum, prosecuted. Proving self-defense is unlikely especially in instances where abuse victims cannot unequivocally prove themselves in immediate and imminent danger at the time of the homicide. As battered women syndrome is not allowable as a justification for self-defense, the standard of "imminent danger" continues to be applied (Follingstad et al., 2015). Regardless of public support, acquittals or leniency in sentencing is not the norm for victims of IPV (e.g. Jacqueline Smalls, Taylor Partlow, Wendy Maldonado, and Nicole Addimando), who kill their abusive partners. *Earl* may have had to die, but women, who kill their abusive spouses rarely remain unpunished by the criminal justice system. Even if victims are not sentenced, prosecution means lengthy involvement in the criminal justice system, which often results in a form of revictimization (Follingstad et al., 2015).

Limitations and Future Research

While the current research adds to the literature on the representation of domestic violence myths in popular culture, specifically the pervasiveness of IPV within modern music, this study is not without limitations. As content analysis is unable to establish causality, the true impact of song lyrics for listeners is unknown (Berg, 2004; Kraska & Neumann, 2011). While inter-coder reliability was implemented to reduce issues of validity and reliability, content analysis has proven to be subjective and often left to interpretation by researchers (Kraska & Neumann, 2011). Further, as the study focused primarily on mainstream music due to it having the greatest reach and overall impact on listeners, the sample may not be representative of musical genres outside of the selection criteria (e.g. Christian, bluegrass, or death metal). As these genres may present a

varied portrayal of IPV, future research may want to investigate religious and overtly aggressive genres in order to obtain a more representative sample that is comprehensive of the distinct categories within modern music.

The current study concentrated on the most common issues addressing general and specific domestic violence myths present within the most popular music distributed in the last two decades. While other myths may have been present, they were not addressed (Garland et al., 2019). Future research should consider exploring additional myths represented in music, as well as consider expanding the timeline examined to compare historical musical depictions to those presented in contemporary songs (e.g., 1970 to current date). This may reveal even more insight into the evolution of musical portrayals of IPV. Despite these limitations, the data determined that while myths remain present within modern music lyrics, there is hope for change as domestic violence myths are being dispelled due to the increase in female artists addressing the issue from the perspective of the victim. While these progressive portrayals, at least to some extent, change the nature of portrayals of IPV, consumers must be careful in their interpretations as the promotion of violence through self-defense does not always result in a positive outcome. Future research should be expanded to address not only IPV, but other forms of violence in the domestic setting and the reinforcement of myths across contexts in the home environment. Additional research should be conducted on how lyrics affect listeners' perceptions of IPV and criminal justice policy and law.

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