A Maneuver around the Modified Manipulation Argument

1 Introduction

In his recent article "A New Approach to Manipulation Arguments," Patrick Todd seeks to

reframe a common incompatibilist form of argument often directed against compatibilist theories

of moral responsibility. Known as manipulation arguments, these objections rely on cases in

which agents, though they have met standard compatibilist sufficient conditions for moral

responsibility, have been manipulated in such a way that they fail to be morally responsible for

their behavior (typically these cases involve putative blameworthiness). Traditionally, in order to

get a manipulation argument off the ground, an incompatibilist must bring forth the intuition that

a manipulated agent is *not at all* responsible for her behavior. Todd argues that this is an

unnecessarily heavy burden—the incompatibilist need only produce the intuition that the

presence of manipulation *mitigates* ascriptions of responsibility. Though innovative, Todd fails to

present his modified manipulation argument in a way that poses a true threat to the compatibilist.

Indeed, by introducing a scalar conception of moral responsibility, Todd gives the compatibilist

the tools necessary to better handle the incompatibilist's original manipulation argument. In this

paper, I first present Derk Pereboom's version of the manipulation argument, and then go on to

analyze Todd's imaginative reformulation of this argument. Next, I leverage a compatibilist

rejoinder and go on to conclude that Todd's intriguing alterations to the manipulation argument

can be accommodated by a compatibilist theory.

2 Pereboom's "Four Cases" Manipulation Argument

There are many versions of the manipulation argument, but they all share a common purpose and

argumentative form. First, the incompatibilist describes an agent who meets some proposed set of

compatibilist sufficient conditions for moral responsibility, yet is intuitively non-responsible for

her behavior. In these cases, the agent in question has been significantly tampered with, such that

a great deal of her beliefs, character traits, and desires are different than they would have been

had she not been manipulated (McKenna 2008). Next, the incompatibilist argues that there is no

relevant difference between the manipulated agent and any other agent whose beliefs, character

traits, and desires are determined. Thus, given the truth of determinism, normal agents are not

morally responsible for their actions, just as the manipulated agent is not responsible for hers. In

other words, the incompatibilist seeks to conclude that there is no relevant difference between

manipulation and determinism—both undermine moral responsibility. Though there are many

ways an incompatibilist can go about accomplishing this goal, manipulation arguments share a

common structure. Michael McKenna provides a helpful formulation:

> 1. If S is manipulated in manner X to A, then S does not A of her own free will
> and is therefore not morally responsible for A'ing.
> 2. An agent manipulated in manner X to A is no different in any relevant respect
> from any normally functioning agent determined to do A from (CAS) [the
> compatibilist-friendly agential structure].
> 3. Therefore, if S is a normally functioning agent determined to A from CAS, she
> does not A on her own free will and therefore is not morally responsible for
> A'ing (McKenna 2008, 143).

In this paper, I will focus on Derk Pereboom's "four-case" manipulation argument, not

only because it is the version Todd utilizes in his essay, but also because it targets a conjunction

of four possible compatibilist conditions for moral responsibility, and is thus one of the most

comprehensive attacks. Specifically, I will compare Case 2 and Case 4, which is the pivotal move

in Pereboom's argument and the comparison on which Todd relies. Consider Pereboom's Case 2:

> Plum is like an ordinary human being, except that a team of neuroscientists has
> programmed him at the beginning of his life to weigh reasons for action so that
> he is often but not exclusively rationally egoistic, with the consequence that in
> the circumstance he now finds himself, he is causally determined to undertake
> the reasons-responsive process of deliberation and to possess the set of first- and
> second-order desires that result in his killing White. Plum does have the general
> ability to regulate his behavior by moral reasons, but in his circumstances the
> egoistic reasons weigh heavily for him, and as a result he is causally determined
> to murder White. Nevertheless, he does not act because of an irresistible desire.
> (Fischer et al. 2007, 75).

Would we consider Plum to be morally responsible for killing White? Pereboom and other

incompatibilists think not, despite the fact that Plum meets a variety of compatibilist conditions

for responsibility. In fact, the incompatibilist often contends that if anyone is responsible for

White's murder, it is the neuroscientists, not Plum. These are the intuitions that the

incompatibilist relies on to get the manipulation argument off the ground, and these are the

intuitions that the compatibilist must accommodate. Pereboom then compares Case 2 to Case 4, in

which causal determinism takes the place of the team of neuroscientists:

> Case 4: Physicalist determinism is true, and Plum is an ordinary human being,
> generated and raised under normal circumstances, who is often but not
> exclusively rationally egoistic (exactly as egoistic as in [Case 2]). Plum's killing
> of White comes about as a result of his undertaking the moderately reasons-
> responsive process of deliberation, he exhibits the specified organization of first-
> and second-order desires, and he does not act because of an irresistible desire. He
> has the general ability to grasp, apply, and regulate his behavior by moral
> reasons, but in these circumstances the egoistic reasons are very powerful, and
> together with background circumstances they deterministically result in his act of
> murder (Pereboom 2001, 115).

According to Pereboom, there is no relevant difference between the two cases on the basis of

which we ought to consider Plum to be responsible in Case 4 but not Case 2. Thus, Pereboom

concludes, manipulation and determinism undermine our attributions of moral responsibility in

exactly the same way, regardless of whether an agent fulfills compatibilist conditions for

responsibility.[1]

Of course, in responding to this version of the manipulation argument the compatibilist

could attempt to resist the second premise by presenting a morally relevant difference between

Case 2 and Case 4. She could argue that there is some aspect of Case 2 that undermines Plum's

ability to fulfill all of the compatibilist's responsibility conditions. For example, Alfred Mele

argues that the neuroscientists' tampering in Case 2 makes it such that Plum is unable to develop

an appropriate procedure for weighing reasons, and such a capacity is required for a moral agent

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[1] It is important to note that the incompatibilist is not arguing that all instances of manipulation
present problems for the compatibilist. The incompatibilist and compatibilist both agree that the
relevant cases of manipulation at issue are those that do not undermine any compatibilist
conditions for moral responsibility. In this paper, I will deal only with these relevant cases of
manipulation.

to be an appropriate target of responsibility ascriptions (Mele 2005). While such a strategy may initially succeed in staving off a specific version of the manipulation argument, all an incompatibilist needs to do in response is make a slight change to the case so the agent fulfills any additional responsibility conditions the compatibilist deems appropriate. McKenna cautions against such "soft-line" compatibilist replies for this very reason (McKenna 2008). Rather, McKenna argues that compatibilists ought to take the "hard-line" by granting the similarities between Case 2 and Case 4 and conceding that both the manipulated and determined versions of the agent fulfill all appropriate compatibilist conditions for responsibility. Indeed, in many cases, taking the hard-line often involves resolving any problematic dissimilarities that the incompatibilist includes in her presentation of the argument—that is, one pursuing the hard-line can attempt to help the incompatibilist along with her case by supplementing it so that it truly does fully encompass all compatibilist conditions sufficient for free and responsible action. From here, the hard-liner should resist premise one. Doing so does not require proving that an agent so manipulated *does* act freely and *is* morally responsible. All that is required is that the crucial premise be cast into doubt, and this can be established simply by showing that it is not clear that an agent so manipulated *does not* act freely and *is not* morally responsible (McKenna 2008). I share McKenna's views on the dialectic of the debate, and intend on taking a hard-line in responding to Todd.

3 Todd's Attempt to Lessen the Incompatibilists' Burden

In "A New Approach to Manipulation Arguments," Todd argues that incompatibilists have been shouldering an unnecessarily heavy burden in their deployment of manipulation arguments. Traditionally, to get a manipulation argument off the ground an incompatibilist must provide a case in which an agent meets all compatibilist conditions for moral responsibility, but who strikes the reader as *not at all* responsible for her action. But, Todd argues, an incompatibilist needs much less than this in order to undermine the compatibilist. The incompatibilist need only

illustrate that a manipulated agent is somewhat less responsible for his action than we would judge him to be had he not been manipulated.

To illustrate, Todd relies on Pereboom's Case 2. Instead of beginning with a scenario that includes a description of the neuroscientists, Todd argues we ought to first describe only Plum's grisly murder of White, in full detail, and ask the reader:

> Q1 On a scale from 1 to 10, rate how much blame Plum deserves for killing White, where 0 is no blame at all, and 10 is the most blameworthy you can imagine someone being (Todd 2011, 129).

Next, the incompatibilist should introduce the wrinkle that a team of neuroscientists manipulated Plum in such a way that killing White was causally determined. Traditionally, the next question would be phrased:

> Q2 Having now found out about the role of the neuroscientists played in programming Plum, do you still think Plum deserves blame for killing White? (Todd 2011, 130).

Traditionally, the incompatibilist would answer 'no' to this question, and maintain that most readers would concur, while the compatibilist, Todd reasons, must respond 'yes' in order to defend her conditions of responsibility. However, according to Todd, incompatibilists need not convince readers that Plum is not at all responsible for killing White; they only need to illustrate that we find him to be less responsible after the manipulation becomes salient than when it was opaque. If readers merely revise, instead of abandon, their judgments of blameworthiness, this will be enough to support the incompatibilist's argument—it illustrates that manipulation can mitigate attributions of responsibility.

However, as Todd sees it, conceding that pertinent cases of manipulation mitigate responsibility is not open to the compatibilist. The compatibilist, Todd argues, must maintain that Plum is equally blameworthy in both conditions. If they grant this variability, they then grant that manipulation can mitigate attributions of moral responsibility, even if pertinent compatibilist conditions for responsibility are fulfilled. According to Todd, such a concession is not acceptable; granting the mitigating role of manipulation is also to grant the mitigating role of determinism,

illustrating that determinism and moral responsibility are not compatible after all. So, rather than

rely on the intuition that a manipulated agent is *not at all* responsible for his behavior, the

incompatibilist needs only to argue that the manipulated agent is *less* responsible than had he not

been manipulated. Similarly, on Todd's view, the compatibilist must now argue that not only is

the manipulated agent responsible, but she is exactly as responsible as she would have been had

she not been manipulated. In order to reflect this new division of ground in the manipulation

debate, the relevant question after the manipulation is revealed should not be Q2, but rather:

> Q3 Having now found out about the role the neuroscientists played in
> programming Plum, on a scale from 1 to 10, rate how much blame Plum deserves
> for killing White, where 0 is no blame at all, and 10 is the most blameworthy you
> can imagine someone being.

Now, recall the original form of manipulation arguments. First, the incompatibilist must provide a

case in which an agent meets a pertinent set of compatibilist sufficient conditions for moral

responsibility, yet we intuitively do not blame her for her behavior. Todd has attempted to lessen

the burden of the incompatibilist in this step of the argument by arguing that if readers lower the

degree to which they hold Plum responsible, then the incompatibilist has successfully made the

first move of a manipulation argument. After providing an argument for the symmetry between

manipulation and determinism conditions (a move I intend to grant), the incompatibilist need only

conclude that determinism undermines compatibilist conditions for responsibility, and thus

compatibilism is false. Todd calls this the Modified Manipulation Argument (MMA):

> 1. If blameworthiness is mitigated for Plum in Case 2, blameworthiness is
> mitigated if mere causal determinism is true.
> 2. If blameworthiness is mitigated if mere causal determinism is true then
> compatibilism is false.
> 3. Blameworthiness is mitigated for Plum in Case 2.
> 4. So, Compatibilism is false (Todd 2011, 132).

On MMA, the compatibilist looks to be in even worse shape than originally thought. Now they

must not only contend that Plum is responsible, but also that he is exactly as responsible as he

would be had he not been manipulated. Todd labels this stance a commitment to the "*No*

Difference Thesis: Case 2-style manipulation should make no *difference* to one's judgment of how much blame Plum deserves for killing White" (Todd 2011, 131, emphasis in original).

Of course, such a hard-line response is not the only option open to the compatibilist, but as per McKenna's analysis, it is often the most effective and sustainable. However, the way Todd has characterized the compatibilist's hard-line option leaves her with little ground other than foot stomping, such that no undecided reader would be convinced by her compatibilist retort. In this paper, I attempt to open a new dialectical strategy that the compatibilist can mount against the newly deflated incompatibilist burden, one that both effectively staves off the incompatibilist and possesses intuitive appeal.

4 A Wrinkle in Todd's Modified Manipulation Argument

Before providing a compatibilist retort to MMA, it is important to clarify the modifications Todd has made to the form of the manipulation argument. Initially, it appears as though Todd only intends to redefine the success conditions of the manipulation argument. He argues that an incompatibilist need not illustrate that a manipulated agent is not at all responsible for a given action, only that manipulation mitigates our ascriptions of responsibility. In order to reflect this shift, an incompatibilist need only modify the questions presented after the relevant cases—as opposed to asking if an agent is responsible full stop, the questions would ask to what extent the agent in question is responsible. However, Todd goes beyond modifying the questions; he alters the presentation of the cases as well.

Recall Pereboom's Case 2 and Case 4. We are asked to compare the responses to Case 2, which describes Plum as a manipulated agent, and Case 4, which presents a determined version of Plum. In contrast, Todd asks us first to respond to a case in which Plum is described as neither manipulated nor determined. Todd then argues that our ascriptions of responsibility in regards to this case ought to be compared to the ascriptions made in response to Pereboom's Case 2. Whereas Pereboom and others who run the manipulation argument rely on a comparison between a case featuring manipulation and a case featuring determination, Todd utilizes the comparison

between a case featuring an unfettered agent and one who is manipulated. So, when Todd argues that the compatibilist is committed to the No Difference Thesis, he means that the compatibilist is committed to there being no difference in reactions to an unmanipulated Plum and a manipulated Plum. This is a very different commitment than the one that is called for in the original formation of the manipulation argument, which requires a hard-line compatibilist to maintain that there is no difference between our ascriptions of responsibility to a manipulated agent and a determined one. In the next section, I will illustrate how the compatibilist is not at all committed to the No Difference Thesis in regards to the Modified Manipulated Argument.

5 A Compatibilist Retort to Todd

It is possible for the compatibilist to reject the No Difference Thesis, while still taking the hard-line.[2] That is, the compatibilist can argue that case 2-style manipulation, as well as determinism, can mitigate our ascriptions of responsibility without giving the game to the incompatibilist. Todd acknowledges that a compatibilist could reject the No Difference Thesis, but he wonders: "…if the compatibilist admits that determinism itself is mitigating, a fair question is, in virtue of what?" (Todd 2011, 131). It is this question I intend to explore in the remainder of the paper.

It is an open dialectical strategy to treat responsibility as a scalar concept as Todd does. A compatibilist could eagerly admit that even agents who meet the minimal compatibilist standards for responsibility can be more or less responsible and blameworthy than other agents

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[2] To be clear, a hard-liner need not reject the No Difference Thesis. In this paper, I am exploring just one strategy against the Modified Manipulation Argument. Another very common strategy is to take issue with Todd's conflation of blameworthiness and responsibility. Notice that Q1, Q2, and my reconstruction of Q3 are framed in terms of blameworthiness. But it is not at all clear that blameworthiness and responsibility go hand in hand. A compatibilist could argue that even if readers revise the degree to which they blame Plum for killing White, such a revision does not necessitate a revision in ascriptions of responsibility. Fischer takes on this distinction in his response to Pereboom (Fischer et. al. 2007). However, I again appeal to McKenna's remarks on such a strategy—one can easily imagine a scenario in which Plum meets both conditions for blameworthiness and responsibility (McKenna 2009, 7). Thus, though I find the conflation of blameworthiness and responsibility somewhat troubling, this distinction will not bear on my argument in this paper.

who also meet these minimal standards. Some agents are determined to be more reasons-responsive than other individuals, or to have a greater role in shaping their own values and desires, and it is in virtue of these determined facts about their lives that they become more blameworthy (and praiseworthy) than agents who are determined to be less reasons-responsive or formative in the development of their values and desires. This is not to say that those who are determined to be less reasons-responsive or to play a lesser role in the formation of their values and desires than other agents are not at all responsible. It is possible to meet the threshold of responsibility while still failing to be *maximally* responsible or blameworthy. As McKenna articulates: "When satisfied and acted upon, CAS is supposed to be *minimally sufficient* for acting freely and being morally responsible even in conditions in which determinism is true" (McKenna 2012, 149 emphasis added).

Just as agents can be determined to be more or less responsible, manipulation can have precisely the same effect. Let's return to Todd's construal of the Modified Manipulation Mrgument. In the first case, the reader is presented with no evidence as to Plum's diminished agential capacities. We are told only that Plum has committed an incredibly grisly murder. After the reader evaluates the degree to which Plum is blameworthy in this condition, she is then asked to read a version of Pereboom's Case 2, which describes the manipulative role of the neuroscientists at the beginning of Plum's life. Because of the neuroscientists' meddling, Plum, we might suppose, is not as responsive to moral reasons as he would have been had he not been manipulated, as for example, in Todd's first case. And we might very well suppose something similar when reflecting upon an agent who is determined as in comparison with one who is not. These suppositions need not undermine Plum's ability to be responsible or blameworthy, even granting that they do impede the *degree* to which we hold him responsible. Now, if Plum was determined, as opposed to manipulated, to be less reasons-responsive or play a lesser formative role in the development of his desires and values than other agents, the compatibilist can issue the same response: though he is responsible, we can hold him responsible to a lesser degree than

these other agents. Furthermore, if Plum were to possess the same reasons-responsiveness due to indeterministic processes, the compatibilist can argue that he is every bit as responsible as the manipulated and determined versions of Plum. This is a perfect example of a hard-line response. The compatibilist grants that (suitable) manipulation, along with determinism, affect our ascriptions of responsibility symmetrically. And, given a scalar notion of responsibility, the compatibilist can even grant that manipulation, along with determinism, mitigate our ascriptions of responsibility, without actually undermining them. In short, manipulation and determination by no means absolve agents of their crimes, if these agents do in fact meet the minimal standards of responsibility, but once the responsibility-threshold is met, a compatibilist can make room for degrees.

Once the compatibilist adopts a scalar model of moral responsibility with a responsibility-threshold, she can easily respond to MMA by denying premise 2: "If blameworthiness is mitigated if mere causal determinism is true, then compatibilism is false" (Todd 2011, 131). Compatibilists can grant that it is possible for both manipulation and determinism to mitigate attributions of blameworthiness and responsibility without also granting that individuals cannot be blameworthy or responsible. In response to Todd's question: "why does determinism mitigate the amount of blame our bad actions call for, or the amount of punishment they deserve?" the compatibilist has a ready answer. Though individuals can be determined to be more appropriate loci of blame and punishment than other agents, it is not in virtue of determinism alone that this is the case. Rather, some agents, due to deterministic circumstances, do not develop a sensitivity to moral reasons that is as robust as other agents. By the same lights, other agents, again due to deterministic circumstances, have a heightened ability to respond to moral reasons, rendering them even more blameworthy for bad actions than other agents who meet only the minimum standards for responsibility. Notice that both responsible and non-responsible agents are completely determined; the difference in the two cases lies in *how* these agents are determined.

Thus, by understanding responsibility as a scalar concept, the compatibilist can mount a new assault against those who wield Todd's version of the manipulation argument. Compatibilists need not be saddled with the burden of insisting that Plum is just as responsible as he would have been had he not been manipulated. They only need to argue that responsibility is a scalar concept with a threshold. Both determined and manipulated Plum meet the threshold for blameworthiness, for both fulfill the minimally sufficient compatibilist conditions for moral responsibility. However, both determined and manipulated Plum are not *maximally* responsible. Both manipulated and determined Plum are not as responsible as they would have been if they had not been manipulated or determined in such a way as to constrain their ability to respond to reasons or to take a role in the development of their own values and desires. In this way, the compatibilist can both explain why Plum is indeed responsible and why readers are prone to reducing the degree to which they blame Plum once the manipulation is discovered.

6 Real World Attributions

An incompatibilist may argue that such a compatibilist strategy is a slippery slope. If the compatibilist grants that manipulation and determinism can mitigate judgments of responsibility, then the compatibilist is granting the potential for determinism to undermine these judgments. An incompatibilist could argue that such a strategy cannot hope to be stable, for it is bound to collapse into incompatibilism.

Recall, however, the compatibilist need not grant that determinism or manipulation in themselves are enough to undermine judgments of responsibility. Rather, it is how an agent is so determined or manipulated that affect our judgments. Just as Plum is manipulated or determined in such a way as to make him less capable of fully embodying certain compatibilist criteria, other agents can be determined or manipulated in such a way as to more fully embody them. Take, for example, McKenna's powerful discussion of a woman who loses a parent to leukemia at a young age.

Whether for good, rational reasons or not, suppose those experiences settled for

that child what would become her deepest unsheddable values about how to live. And suppose that as a mature adult she acts upon them. Does she do so unfreely?... According to her, she regards this not as an impediment of her freedom and her responsibility or, one might say, her dignity, but as a condition of it. Thus was she so made. But as she sees it, it surely does not undermine her free and responsible agency. It makes it (McKenna, 2008, 156).

This woman's values, though completely determined by past events beyond her control, allow her to go beyond the minimally sufficient standards for moral responsibility and truly embody these conditions. Such an agent, though equally as determined as Plum, is simply freer than he could perhaps ever hope to be. Thus, the compatibilist is not granting that determinism can undermine ascriptions of responsibility full stop; its mitigating powers are completely dependent on what aspects of an individual are determined. In so doing, the compatibilist has conceded nothing of substance to the incompatibilist such that she has cause to worry that her account will collapse into incompatibilism—one can grant determinism's mitigating role in attributions of moral responsibility without also granting that determinism is incompatible with moral responsibility.

Notice that the compatibilist's scalar model cannot adequately account for Todd's revised Case 2 unless it relies on the existence of a responsibility-threshold. It is not enough for the compatibilist to argue that responsibility comes in degrees; they must also argue that there is some minimum standard for responsibility, one that is met by fulfilling the compatibilist's conditions for responsibility. Without this threshold, it really does look like the compatibilist's account becomes unstable, for the theoretical work the responsibility conditions are doing would be replaced by the extent to which an individual is determined. An incompatibilist may worry about the adoption of a scalar model of moral responsibility along with such a responsibility-threshold. He may argue that responsibility is either something that comes in degrees or does not. To add a threshold in order to respond to MMA is simply ad hoc. There is no independent reason to adopt such an account.

However, if we study how individuals actually go about assigning praise, blame, and responsibility, we will find an independent reason to prefer a scalar theory with a responsibility-

threshold—it best explains our own behavior. It really does appear that we utilize a scalar model along with a responsibility-threshold in making attributions of responsibility. First, we investigate to see if an individual has met a certain threshold for responsibility, and then, once it is established that she in fact does pass such a benchmark, we go about establishing *how* responsible she is. Nowhere is this clearer than in the justice system. It is quite common for individuals, after being found guilty of a crime, to present mitigating evidence to the jury in order to receive a reduced sentence. Clarence Darrow's famous defense of Leopold and Loeb serves as a helpful example (Sellars 1926). After Richard Loeb and Nathan Leopold plead guilty to the murder of a young man, Darrow presented a summation utilizing the thesis of determinism in order to reduce their sentence from death to life in prison.

> Nature is strong and she is pitiless. She works in her own mysterious way, and we are her victims. We have not much to do with it ourselves. Nature takes this job in hand, and we play our parts…What had this boy to do with it? He was not his own father; he was not his own mother; he was not his own grandparents. All of this was handed to him. He did not surround himself with governesses and wealth. He did not make himself. And yet he is to be compelled to pay (Sellars 1926, 169).

After Darrow's twelve-hour closing argument and two weeks of deliberation, the boys were sentenced to life in prison. Notice that highlighting the extent to which individuals are determined does not undermine the judgment that the boys were *responsible*, it only serves to illustrate that they deserved a lesser sentence than death. Again, there is nothing inconsistent in attributing responsibility to an agent while at the same time recognizing that the agent is not *maximally* responsible. In fact, we do it all the time.

7 Reassessing the Scales

Of course, one response left open for the incompatibilist is to argue that the features of Case 2 not only *mitigate* Plum's responsibility for killing White, but they also *undermine* such an ascription. An incompatibilist may insist that Plum simply cannot be responsible for killing White, even though he has met the compatibilist conditions for responsibility. Though I find such a response counter-intuitive, nothing in this paper has taken such a rejoinder off the table. But notice,

mustering such a reply is just to return to the original dialectic of Pereboom's manipulation

argument. It remains the incompatibilists' burden to illustrate that Plum is not responsible for his

crime. It is simply not enough to argue that his responsibility is mitigated. Without providing a

compelling reason to agree that the manipulated Plum is not responsible, the incompatibilist

cannot get the manipulation argument off the ground. Thus, though Todd's reformulation of the

manipulation argument is innovative, it is not capable of lessening the incompatibilists'

dialectical burden.

References

Fischer, J., Kane, R., Pereboom, D., & Vargas, M. (2007). Four views of free will.
     Malden, MA: Blackwell.

McKenna, M. (2008). A hard-line reply to Pereboom's four-case manipulation argument.
     Philosophy and Phenomenological Research*, 77,* 142-159.

McKenna, M. (2009). Compatibilism & desert: critical comments on four views of free
     will. Philosophical Studies*, 144,* 3-13.

McKenna, M. (2012). Moral responsibility, manipulation arguments, and history: Assessing the
     resilience of nonhistorical compatibilism. Journal of Ethics, 16, 145-174.

Mele, A. (2005). A critique of Pereboom's 'four-case argument' for incompatibilism.
     Analysis, 65*,* 75-80.

Pereboom, D. (2001). Living without free will. Cambridge University Press.

Sellars, A. (1926). The Loeb-Leopold Case. Clark, NJ: The Lawbook Exchange, Ltd.

Todd, P. (2011). A new approach to manipulation arguments. Philosophical Studies*,* 153,
     127-133.