



BETWEEN WORDS AND IMAGES

VISUAL SATIRE, LIBEL LAW AND THE QUEEN CAROLINE AFFAIR

Andrew Bricker

ON THE EVE OF THE QUEEN CAROLINE AFFAIR, George Augustus Frederick, the Prince of Wales, was, to put it mildly, an unsympathetic figure. As the epitome of royal vice, *The Times* declared, the prince was widely known to “drink, wench and swear like a man who at all times would prefer a girl and a bottle to politics and a sermon.” Where did this image come from? In part the prince’s reputation as a lusty, gluttonous and profligate monarch in waiting was an obvious consequence of his own very public behaviour. But the widespread perception that the prince was a gouty gourmand and womanizer wastrel had also been propagated and reinforced by the thousands of satiric images that had appeared over decades and had been openly circulated across metropolitan London.¹ James Gillray’s pungent caricature *A Voluptuary under the Horrors of Digestion* (fig. 1) is an exemplary reduction of the prince’s many corporeal vices: there he sits, in an almost post-coital stupor, fork in mouth as his tenuously bound breeches labor against his pumpkin-shaped gut. From the 1780s on, the prince’s corpulent body was to be found on gruesome, almost anatomical public display, plastered up in dozens of

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¹ See Kenneth Baker, *George IV: A Life in Caricature* (London: Thames & Hudson, 2005).

print-shop windows. Onlookers, and especially foreigners, could hardly believe it. One visitor to London was shocked to discover that the print seller Hannah Humphrey's shop – “a manufactory [. . . for] throwing off libels against” the crown – was just yards from the Royal Palace.²



Figure 1

Such caricatures only confirmed what had become a running trope about the prince's rampant debauchery. By the time he was 18, even his father, George III, was wringing his hands over his eldest son's "love of dissipation" which was so routinely "trumpeted in the public papers."³ But what was one to do? The prince, it seems, had little interest in moderating his raging teen

² Diana Donald, *Age of Caricature: Satirical Prints in the Reign of George III* (New Haven: Yale University Press, 1996), 2.

³ *Court and Private Life in the Time of Queen Charlotte* (V. D. Broughton, ed.; 2 vols.; London: R. Bentley & son, 1887), 1:91.

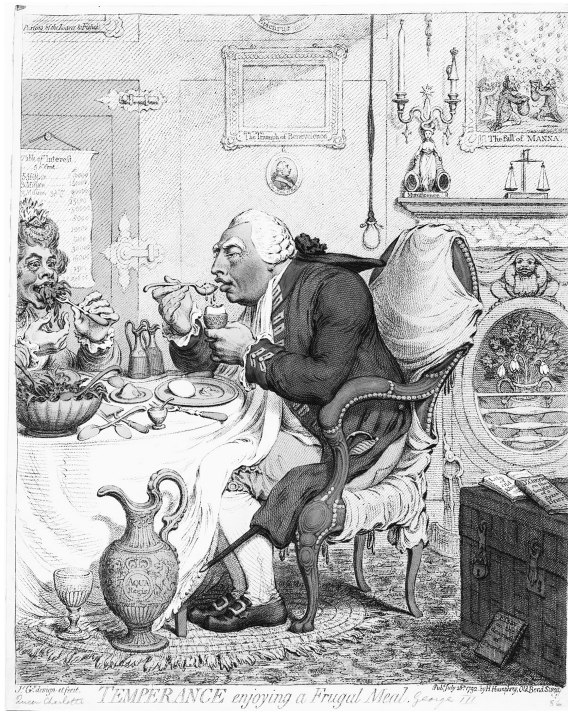


Figure 2

libido, often publicly taking on mistress after mistress, including the actress Mary “Perdita” Robinson and the courtesan Elizabeth Bridget Armitstead, before secretly marrying Maria Fitzherbert, a Roman Catholic widow six years his senior, in 1785. As the prince conceded in one letter, he was simply “rather too fond of wine and women.”⁴

The caricaturists agreed. For them, it all looked like a case of sulky extra-vagance against a moderate father and king, whom the poor prince found “so stingy” that he was “hardly allow[ed] three coats in a year.”⁵ The prince’s debauchery was only thrown into further relief by the king and queen’s moderation. Another Gillray caricature, *Temperance enjoying a frugal meal* (fig. 2), is so drily titled that we might need reminding that the king’s

⁴ *The Correspondence of George, Prince of Wales, 1770-1812* (A. Aspinall, ed.; 8 vols.; Oxford: Oxford University Press, 1963-71), 1:4.

⁵ *Ibid.*, 1:75.



Figure 3

dinner is nothing more than two soft-boiled eggs. As Christopher Hibbert has remarked, "It was as though his parents' dull, domestic way of living, and their constant criticism of his extravagance, incited him to further dissipation and expenditure."⁶ In the face of such abstemiousness, one can only imagine how quickly those same caricatures of the besotted prince in various stages of degeneracy came to mind.

By the time of the Queen Caroline Affair in 1820 – his foolhardy and vindictive effort to divorce his estranged wife, Caroline of Brunswick – the Prince of Wales, now George IV, was also something less than a wholly sympathetic victim of marital infidelity (fig. 3). In one image by George Cruickshank from 1820 we see the mirthless slump of the pickled prince (fig. 4). The appended couplet drives home the seeming visual and verbal leitmotifs that had come to define him as a prince:

⁶ Christopher Hibbert, "George IV (1762-1830), king of the United Kingdom of Great Britain and Ireland, and king of Hanover," in *Oxford Dictionary of National Biography* (2 Apr. 2019).

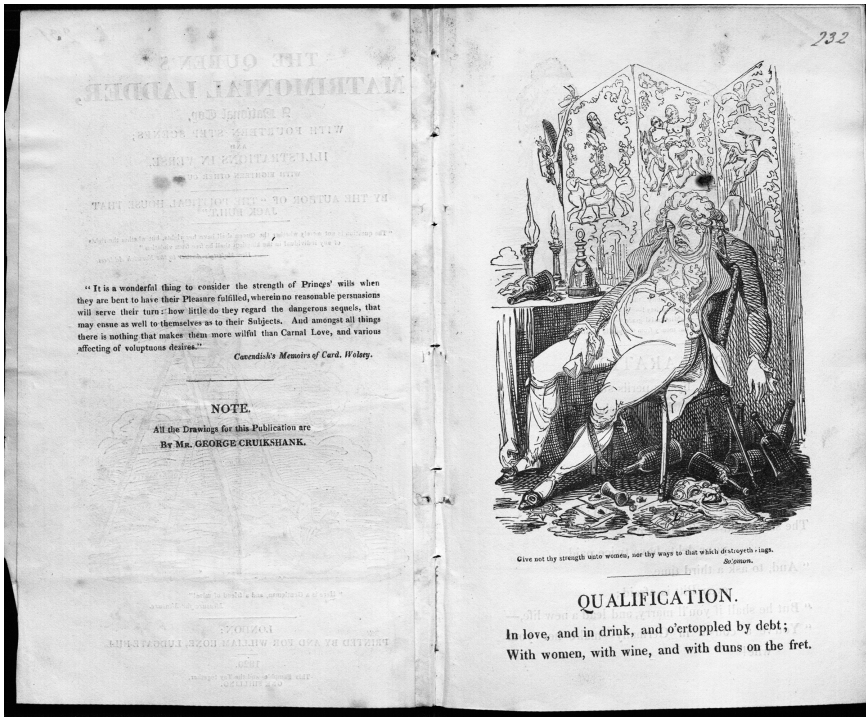


Figure 4

In love, and in drink, and o'ertopped by debt;
With women, with wine, and with duns on the fret.

In visual satires from this period, the drunken slouch had itself become a physiological metonym for the prince, one repeated again and again, with the heir to the throne always on the verge of sliding off some chair in the bloated ecstasy of his port-soaked gluttony.

Those physiological repetitions, though, served a larger function than just cruel-hearted ribbing. In the general absence of verbal clues in visual satire, the repetition of caricatured physiologies provided onlookers with a way to identify satiric targets. Such creative repetitions, the representational reduction of men down to their physical traits, in effect created a visual shorthand for a familiar cast of public figures. The Whig MP Charles James Fox, for instance, was known by eternal five o'clock shadow and gelatinous belly (fig. 5), just as Sir Robert Walpole's hookish nose provided



Figure 5

a pointed physiognomic link between the Prime Minister and Punch, another supposed trickster. Such physiological distillations and distortions paradoxically produced “a more-like likeness,” as Amelia Rauser has put it.⁷

Verisimilitude, moreover, was wholly beside the point (the very genre of “caricature,” from the Italian *caricare* – “to charge” the features – presupposed such grotesque distortions). Print after print needed only to emulate earlier physical mockeries, creating what I have called elsewhere visual satire’s “closed system of representation.”⁸ Even when a physiological mnemonic

⁷ Amelia Rauser, *Caricature Unmasked: Irony, Authenticity, and Individualism in Eighteenth-Century English Prints* (Newark: University of Delaware Press, 2008), 15.

⁸ Andrew Benjamin Bricker, “After the Golden Age: Caricature, Libel, and the Deverbalization of Satire,” *Eighteenth-Century Studies* 51:3 (Spring 2018), 317.

failed, though, there was always a “hieroglyph” or pun that might coax the viewer along – Fox, for instance, was often literally depicted as a fox (though Thomas Pelham-Holles, the Duke of Newcastle, in an Aesopian twist, was a goose, the fox’s dupe).

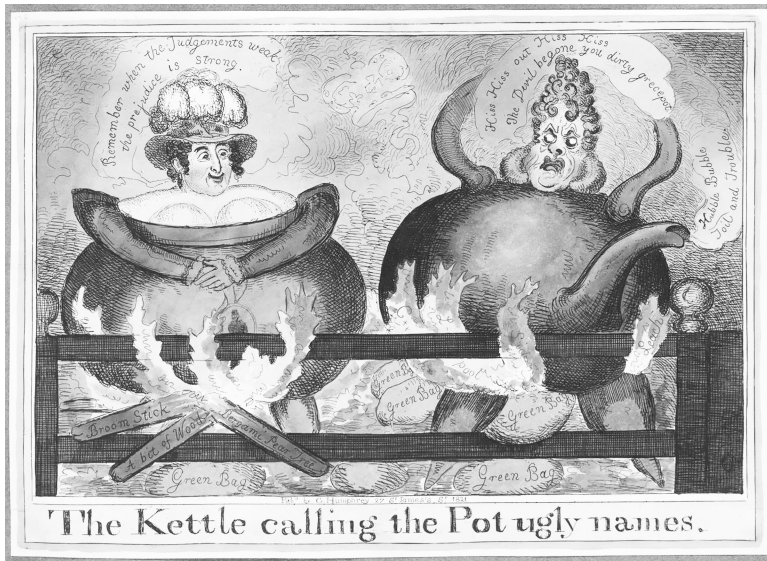


Figure 6

The Queen Caroline Affair added more visual fodder to the great scandal machine of the satiric press in the 1810s. The question remains, however, whether the trial was an important historical event or merely a welcome distraction – an ugly rummaging around, no doubt, in the royal bedchamber, but also a seemingly meaningless and ultimately irresolvable inquiry into the sex lives of two monarchs who had done little to dissemble their shared lubriciousness, as the caricaturists happily pointed out (fig. 6). In this regard, the Queen Caroline Affair carried a whiff of what Naomi Klein has called the “shock doctrine”: the way in which the U.S. government has used the panicked haze of emergencies and disasters, and the ensuing anxiety and chaos, to push through unpopular agendas.

A similar and even functional obfuscation occurred on the eve of the Queen Caroline Affair. By the time George IV came to the throne in 1820, the country was suffering from widespread unrest. A growing radicalism had

begun to spread, partially in response to both the widespread economic collapse that followed the end of the Napoleonic Wars in 1815 and the famine that had been exacerbated by the first Corn Laws. That discontent was only heightened in the summer of 1819, when some 15 people were killed and hundreds more injured after the regent authorized the use of force in dispelling a largely peaceful crowd in St. Peter's Fields in Manchester. The Peterloo Massacre, as it came to be known, was simply the most visible manifestation of a new king violently bumbling his way to the throne. As Christopher Hibbert has written, the regent was "widely held responsible for the repressive measures that the government introduced to combat the intermittent outbreaks of violence, the revolutionary gatherings, and threats against the established order which had been troubling the country since the conclusion of the war with France." In this regard, the entire nine-month Queen Caroline Affair was a welcome respite and provided the government, as Thomas W. Laqueur has put it, with an opportunity "to mask the serious behind the trivial."⁹ Between June 1820 and January 1821, in fact, "virtually no other political issue found its way into publication."¹⁰

That is perhaps one way to interpret the entire affair. Here's another: the prince, in his self-involved la-la land of wine, women and song, never fully understood the rapid publicization of private life that occurred during the last half of the eighteenth century, especially through the medium of visual satire.¹¹ The intense shift to personal satire after 1760 also entailed a radical change in the supposed ethics of privacy, and might be thought of as a response to the new and emerging perception that an individual, and especially a politician, ought be measured by both their public identity and their private moral failings.¹² As Horace Walpole observed with a shrug of the shoulders, "Ministers are, and ought to be lawful game."¹³ We might even

⁹ Thomas Laqueur, "The Queen Caroline Affair: Politics and Art in the Reign of George IV," *Journal of Modern History* 54 (Sept. 1982), 417.

¹⁰ Tamara Hunt, "Morality and Monarchy in the Queen Caroline Affair," *Albion* 23:4 (Winter 1991), 701.

¹¹ Michael Rosenthal, "Public Reputation and Image Control in Late-Eighteenth-Century Britain," *Visual Culture in Britain* 7:2 (Winter 2006), 69.

¹² Shearer West, "The Dearly Macaroni Prints and the Politics of 'Private Man,'" *Eighteenth-Century Life* 25:2 (Spring 2001), 178.

¹³ Horace Walpole, *Memoirs of the Reign of King George III* (Derek Jarrett, ed.; 4 vols.; New Haven: Yale University Press, 2000), 4:183.

say that the prince – and then regent, and then king – never fully understood the extent to which his public image hardly belonged to him.

Given the open nastiness of such prints, one perhaps wonders why George IV, or the royal family more generally, did not simply turn to the courts to shut down their most vicious visual critics. The American Minister in London, for instance, was surprised that “this tempest of abuse[, . . .] thousands of fiery libels against the King and his adherents, and as many caricatures, [. . . were] borne for several months without the slightest attempt to check or punish” the press or print sellers.¹⁴ Part of the reason the crown did not respond is because there was very little, legally speaking, that they could officially do. This is perhaps surprising. As Philip Hamburger has shown, following the lapse of the Press Licensing Act in 1695, which had required pre-publication censorship of all printed matter, the government increasingly turned to the courts and the broad umbrella of libel laws to regulate the press through post-publication prosecution.¹⁵ The authorities and courts had worked in concert to develop an array of doctrines and procedures for the courtroom interpretation of verbally ambiguous satires in particular. As a result, satirists were routinely subject to prosecution across the entire eighteenth century.¹⁶

But this insistence on verbal evidence had also accidentally driven libel law into a rut, making the prosecution of visual materials largely impossible. Eighteenth-century rulings had focused almost exclusively on satire’s *verbal* qualities, ignoring the then comparatively minor field of visual satire. By focusing so intently on verbal reference, libel law itself had become “path dependent,” as legal historians put it: the development of courtroom interpretive procedures had accidentally and effectively foreclosed the possibility that reference could also be understood in visual terms.¹⁷ As a result, those same procedural developments could not be applied to later visual satires,

¹⁴ Richard Rush, *Memoranda of a Residence at the Court of London [...] from 1817 to 1825* (Philadelphia: Carey, Lea & Blanchard, 1833), 311.

¹⁵ Philip Hamburger, “The Development of the Law of Seditious Libel and the Control of the Press,” *Stanford Law Review* 37:3 (February 1985), 725.

¹⁶ Andrew Benjamin Bricker, “Libel and Satire: The Problem with Naming,” *English Literary History* 81:3 (Fall 2014), 889-921.

¹⁷ Oona A. Hathaway, “Path Dependence in the Law: The Course and Pattern of Legal Change in a Common Law System,” *Iowa Law Review* 86:2 (2001), 601-65.

which contained fewer and fewer words and tended to operate not by language but by repetition, juxtaposition and intimation. As I have argued elsewhere, satire itself underwent a process of *deverbalization* during this era: caricaturists often made at most punning and increasingly sparing use of words as the eighteenth century wore on.¹⁸ As a result, visual satires from this period are best understood, in David Francis Taylor's words, as "an intermedial cultural form": "structures that are themselves constituted through the enmeshing of images and words, the appropriation and parody of literary scenes and tropes, and often-dense networks of allusions to other cultural texts, practices, and traditions."¹⁹ This intermedial density only complicated the prosecution of caricaturists, for the most libellous aspects of such prints were usually visual, not verbal, and often irreducible to readily prosecutable language.

That visual satires were so resistant to prosecution is even more surprising when we consider how effectively eighteenth-century courts had come to handle forms of verbal ambiguity in trials for libel. Early on, verbal irony presented a problem because it created textual evidence that seemed, on its face at least, to mean the opposite of what it said. How was one to prove, for instance, that overt praise like "Be Wise as *Somerset*" was actually veiled mockery? In *R. v. Browne* (1706),²⁰ the courts turned precisely to this interpretive issue and installed something similar to what we today call the obscenity test. As United States Supreme Court Justice Potter Stewart explained in *Jacobellis v. Ohio* in 1964, obscenity cannot be effectively defined, "But I know it when I see it."²¹ In a similar way, the courts found in *Browne* that juries should employ a "sociocentric" view of irony — a kind of "I know it when I see it" philosophy of ironic intention. The ruling in *Browne* was undergirded by a clear sense that ironic meaning is produced by a community of readers, rather than a simple and mechanistic set of verbal signals. Strangely, the courts failed to imagine a similar doctrine for interpreting visual materials. For some reason, when presented with a caricature, jurors were prohibited from simply finding it libellous or not. The alternative —

¹⁸ Bricker, "After the Golden Age," 306.

¹⁹ David Francis Taylor, *The Politics of Parody: A Literary History of Caricature, 1760-1830* (New Haven: Yale University Press, 2018), 10, 4.

²⁰ *R. v. Browne* (1706), 90 English Reports 1134.

²¹ *Jacobellis v. Ohio*, 378 U.S. 184, 197 (U.S. Supreme Court 1964) (Stewart, J., concurring).

that parliament pass a bill making caricatures defamatory – was seemingly impossible. By the latter half of the eighteenth century, any government attempt to regulate the press, no matter how reasonable, inevitably triggered accusations of an ever-encroaching despotism. As David Hume remarked in 1741, the liberty of the press was “a common right of mankind.”²²

Procedural issues aside, victims also knew that prosecutions for satiric materials often made for bad public relations. As Adam Smith observed, “taking notice of a libell makes the [victim] appear more probably to be guilty than if he had despised them.”²³ Hence the response – even non-response – of the crown. Despite “the most unmeasured attacks on the Royal Family,” one journalist remarked looking back on the whole affair, “prosecution was never thought of for a moment.”²⁴ Victims knew, for instance, that if one were to lose a case then the implicit impression was given, though not legally justified, that the accusations were true. More troublingly, a suit always brought unwanted attention on the attack itself, drumming up interest and spurring on sales. As one legal commentator observed, animosity and publicity were as likely to be quashed by such actions as “fire can be extinguished by adding fewell into it.”²⁵ When all had been tallied up, most victims concluded that the drawbacks of a trial simply outweighed its benefits.

A public indifference to the press was also the express policy of Queen Caroline. Like her estranged husband, she too played a starring role in the prints of this era – many of which were venomous satires, steeped in misogyny, that were part of “a wider debate,” as Cindy McCreery has put it, “over women’s role in English society.”²⁶ In 1832, Thomas Denman, the solicitor-general for Caroline during her trial, explained that throughout the Affair they had intended to “leav[e] obscene publications, however offensive,

²² David Hume, “Essay of the Liberty of the Press,” in *Essays, Moral and Political* (Eugene F. Miller, ed.; rev. ed.; Indianapolis: Liberty Fund, 1987), 604, note d.

²³ Adam Smith, *Lectures on Jurisprudence* (R. L. Meek, D. D. Raphael, and P.G. Stein, eds.; Oxford: Clarendon Press, 1978), 125.

²⁴ *The Edinburgh Review*, no. 135 (April 1838), 51.

²⁵ John March, *March’s Actions for Slander and Arbitrements* (2nd ed.; London: Elizabeth Walbanck, 1674), 9.

²⁶ Cindy McCreery, *The Satirical Gaze: Prints of Women in Late Eighteenth-Century England* (Oxford: Clarendon Press, 2004), 2, 6.



Figure 7

to perish in their obscurity. [. . . For] to prosecute would have been to play the game of the libellers.”²⁷ In this regard, Caroline’s legal restraint was remarkable, especially in the face of such wildly cruel images as *Bat, Cat & Mat* (1821), in which a squat, almost commedia dell’arte queen, goofy rictus of a vacant smile, is sandwiched between Bartolommeo Bergami, her muscular Italian consort and supposed lover, and her lawyer (fig. 7). “How happy I could be with either,” she exclaims.

Even with the courts a non-starter and parliament unable to make further statutory encroachments on the press, the crown still had at its disposal a few legal and extra-legal options. Early on, like those before him, the

²⁷ M. Dorothy George, *Catalogue of Personal and Political Satires Preserved in the Department of Prints and Drawings in the British Museum* (12 vols.; [London]: British Museum, 1870-1954), 9: xlv, n1.

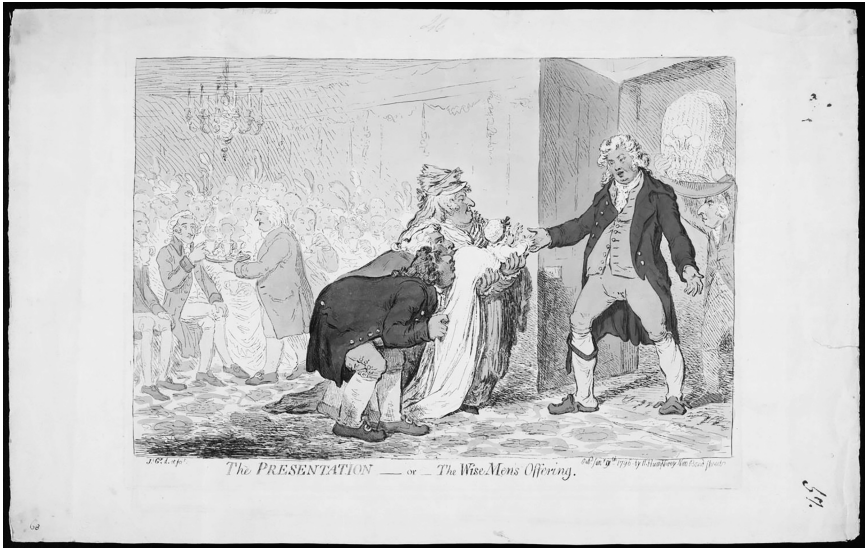


Figure 8

prince had hoped the courts might control the satirists, though he had to settle for stern warnings. Gillray and the print seller Samuel William Fores, for instance, were reprimanded for their travesty of religious art, *The Presentation, or, Wise Men's Offering* (1795) (fig. 8), a satire on William Pitt and the Prince of Wales. The two were arrested for blasphemy, though the prosecution went nowhere.²⁸ Counter-propaganda was another possibility. The king in fact paid visual satirists like Henry Wigstead and Thomas Rowlandson to fight fire with fire on his behalf.²⁹ Buying up the most offensive prints also provided an option. By the time of George IV's death, the royal collection had swelled to some 2,750 caricatures. But the king eventually came to the obvious conclusion that this only encouraged print sellers to produce more prints in greater numbers.³⁰ In one print from 1819, for in-

²⁸ Donald, *Age of Caricature*, 166.

²⁹ Sir John Soane's Papers, VIII.c, f. 5, Soane Museum Archives. See Matthew Payne and James Payne, *Regarding Thomas Rowlandson, 1757-1827: His Life, Art and Acquaintance* (London: Hogarth, 2003).

³⁰ Kate Heard, "The British Royal Family and Satirical Prints, 1760-1901," in *Collecting Prints and Drawings* (Andrea M. Gáldy, ed.; Cambridge: Cambridge Scholars Publishing, 2016), 146.

stance, a drunken Prince of Wales, comically riding a female cook, blurts out in his ecstasy, “If the rascals caricature me, I’ll buy em All up d--me” (fig. 9). In the end, like a certain would-be despot in a certain white house, George IV simply resorted to bribery on a massive scale.³¹ Between 1819 and 1822, the king paid out some £2,600 to print sellers and artists to suppress individual works.³² George Cruikshank, for instance, signed a receipt for £100 pounds, promising “not to caricature His Majesty in any immoral situation.”³³ These payouts also seemingly worked: many of the largest print sellers and the most prominent caricaturists slowly turned away from anti-monarchical satire.³⁴

Eventually, during the nineteenth and twentieth centuries, the law developed procedures for handling defamatory images. For Queen Caroline and George IV, however, those innovations came too late. Moreover, by the time of their respective deaths, in 1821 and 1830, the visual market had already begun a shift away from single-sheet political caricatures. As Diana Donald has argued, by the 1830s the market for such satires had simply dried up, all part of a “slow process of decline.”³⁵ Satirists of the early nineteenth century had in turn discovered new and more profitable markets for their talents: illustrated children’s books, family magazines, literary periodicals, triple-decker Victorian novels, underground pornography and “the expanding horror market which focused on sensational murders and sex crimes,” as Marcus Wood has shown.³⁶ The death of visual satire in the 1830s – and especially the decline of single-sheet ad hominem caricatures

³¹ John Wardroper, *Kings, Lords and Wicked Libellers: Satire and Protest, 1760-1837* (London: John Murray, 1973), 213.

³² For George’s bills and payments, see GEO/MAIN 51382, Royal Archives and HO73, National Archives. For help in sorting out George IV’s print-collecting activities, I would like to thank Martha Kennedy of the Library of Congress and Kate Heard, Senior Curator of Prints and Drawings, of the Royal Collection Trust at Windsor Castle.

³³ M. Dorothy George, *English Political Caricature, 1793-1832: A Study of Opinion and Propaganda* (Oxford: Clarendon Press, 1959), 188.

³⁴ Vic Gatrell, *City of Laughter: Sex and Satire in Eighteenth-Century London* (New York: Walker & Co., 2007), 536-540.

³⁵ Donald, *Age of Caricature*, 184.

³⁶ Marcus Wood, *Radical Satire and Print Culture, 1790-1822* (Oxford: Clarendon Press, 1994), 270.

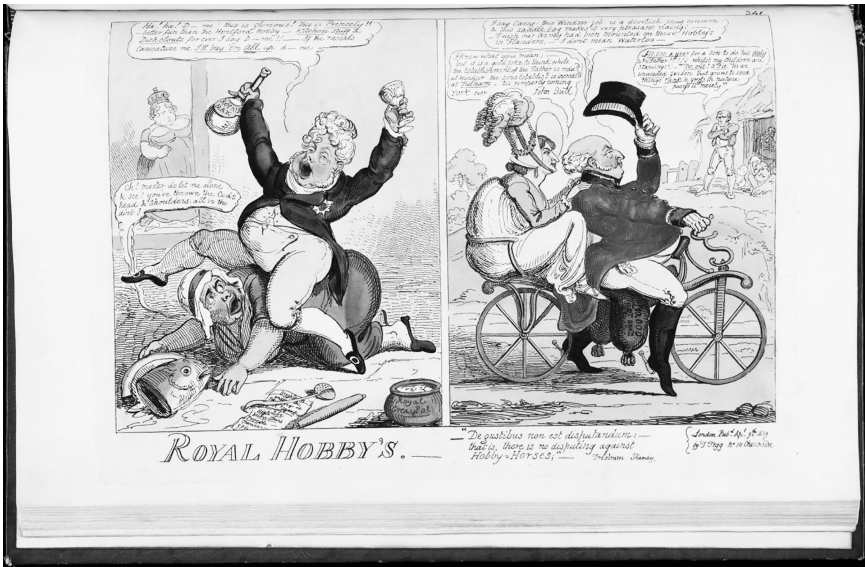


Figure 9

like the hundreds if not thousands that had circulated around the Queen Caroline Affair – was largely a product of market forces, not legal ones; visual satirists only moved on to new media after the broadest base of consumers had finally soured on the chest thumping, finger pointing and muckraking. Moreover, throughout this period, visual satirists and print sellers were able to duck the authorities. Bribery simply offered the most efficacious response: the lone effective method in a legal culture that privileged words over images and where procedural rules for delimiting verbal ambiguity were impossible to co-opt for delimiting visual semantics. That was the lesson, at least, that the once incorrigible prince came at last to understand, when he very publicly attempted to divorce his wife, the queen.

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