Justice in Panels: Exploring Law's Limits and Moral Tensions through Graphic Narratives

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Abstract

This article explores the use of comics and graphic narratives as tools for teaching and studying constitutional law, with particular attention to their capacity to illuminate the "dark side" of legality. The contribution argues that graphic narratives provide a critical laboratory for reflecting on legal dysfunctions, the limits of legal regulation, and the ways in which legal norms may reproduce exclusion and discrimination. Through their visual and narrative language, comics are especially effective in dramatizing the instability and ambiguity of legality, enabling students to confront the tension between formal legality and substantive justice in a more immediate and engaging manner than conventional doctrinal approaches often allow.

Keywords: constitutional law; legal education; comics and law; graphic narratives; legal dysfunctions.

[A] INTRODUCTION

This contribution explores the use of comics as a tool for teaching and studying constitutional law. It engages in a critical discussion of legal dysfunctions, focusing in particular on the limits of legal regulation and the ways in which legal norms may perpetuate discrimination. This article argues that graphic narratives are uniquely suited to constitutional education because they dramatize the instability of legality. Beyond their utility as pedagogical aids, we contend that comics serve as a critical laboratory for exposing legal failures and the "dark side" of the law, allowing students to navigate the complex boundary between formal legality and substantive justice in ways that traditional doctrinal teaching cannot.

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Using Michael Asimow's metaphors of the mirror and the lamp, the article shows how comics simultaneously mirror social perceptions of law and contribute to shaping shared imaginaries of justice (Asimow 2018). The tension between law and morality is often presented as a clash between distinct normative systems. While these systems may at times intersect, they seldom align fully. Each of them, whether legal, moral, or religious, provides a framework of norms intended to guide individual conduct. In this article, we will begin by sharing some details about our experience studying and teaching law through comics and other graphic narratives (such as manga and anime). We will then highlight why the dark side of legality is a particularly fitting theme to explore through these media. We will share our experience by illustrating the work of the Sant'Anna Legal Studies (STALS) project, a research initiative established in 2009 at the Scuola Superiore Sant'Anna in Pisa, which has organized various activities on law and pop culture for several years.

[B] LAW AND COMICS IN THEORY AND PRACTICE

When teaching and researching comics we should always keep in mind that they are works of fiction. We read them, first and foremost, as enthusiasts and fans, not as lawyers. A further caveat is that trying to apply real-world law to these stories makes little sense: judged under ordinary criminal law, many of the heroes we admire would quickly be convicted of multiple offences. For this reason, we have never found such an exercise particularly meaningful. Our concern is therefore not with the scholarship that examines how comics are regulated as artistic products—the *law of art*—but rather with the ways in which comics represent legal institutions, constitutional ideas, and the language of the law—the *art of law* (Gomez Romero & Dahlman 2012).

As law professors, we have often observed that students tend to be more fascinated by characters who defy the law than by those who strictly adhere to it. The category of "outlaw" in this sense goes beyond conventional villains and frequently includes superheroes—or even protagonists more generally. This is a *cliché* that we also find in Western movies—just think of the 1976 movie *The Outlaw Josey Wales* starring (and directed by) Clint Eastwood. This preference is partly explained by the corrupt or dysfunctional systems of authority within which these figures act. Against this backdrop, our contribution examines how comic books can serve as a productive lens through which to explore the darker dimensions of legal systems. Comics have the capacity to reach wide,

often non-specialist audiences, which makes them particularly effective for legal education beyond the university classroom—an especially valuable function in times of democratic backsliding and the weakening of constitutional safeguards. This area of inquiry connects with established scholarly traditions, including law and popular culture, law and movies, and cultural legal studies, as well as the broader domains of law and literature and law and humanities. Influential contributions in this field include *When Law Goes Pop: The Vanishing Line between Law and Popular Culture* (Sherwin 2000), *Law, Culture and Visual Studies* (Wagner & Sherwin 2014), *Graphic Justice: Intersections of Comics and Law* (Giddens 2015a), and *The Law of Superheroes* (Daily & Davidson 2012).

A key aspect of this scholarship lies in the distinctive visual potential of comics, which powerfully conveys legal meanings. The use of popular culture in legal pedagogy has been persuasively defended by Asimow in his 2018 contribution to the *Journal of Legal Education*, where he invoked the dual metaphors of the mirror and the lamp (Asimow 2018). According to his analysis, popular culture both reflects dominant social values, albeit in ways mediated by entertainment and profit, and simultaneously shapes public perceptions and collective imaginaries. The same ambivalence applies to comics, manga, anime, and graphic narratives more generally (Petersen 2010). On the one hand, their familiarity can support students' engagement with legal dynamics and reduce the knowledge gap between teachers and learners, providing a shared cultural background. On the other hand, the representations of law they offer are often simplified and tend to reproduce common stereotypes.

While Anglo-American academia has developed a substantial body of work in this area (Giddens 2015b), in continental Europe such contributions remain relatively rare (Goffaux-Callebaut 2024)—making interventions like the present one all the more significant.

Our interest in using comics as a teaching tool for high school and university classes on the role of law and legality has been the result of a long journey that began before the pandemic. It developed through a series of virtual and in-person seminars that allowed us to connect with a group of scholars interested in how the relationship between law and justice is portrayed in comics and other forms of popular culture.

In recent years, we have organized a series of events devoted to the intersection of law and pop culture. While primarily aimed at an academic audience, these initiatives have been open to the public and have brought together scholars and non-lawyers to discuss the relationship between

law and morality in fictional worlds, often focusing on iconic characters such as Batman and Daredevil.

The positive reception of these events led to further collaborative initiatives,[1] including an online conference[2] and a major conference organized with the Italian Society of Comparative and European Public Law (*Diritto pubblico comparato ed europeo*), which resulted in a collective volume on the representation of legal traditions in pop culture. This line of research was further developed in two recent edited books on law in graphic narratives (Martinico & Ruotolo 2024; 2025). These books were also presented at Lucca Comics and Games in 2025, including a panel discussion with the American film and comic book writer Jeph Loeb, further highlighting the dialogue between legal scholarship and the creative industries.

Building on these experiences, our research has also extended beyond academia, including outreach activities in high schools in Tuscany, in connection with Lucca Comics and Games. Across these different contexts, a common concern has emerged: the way in which popular narratives represent legal institutions, often exposing tensions, distortions, or outright dysfunctions.

The following pages build on this background and focus on these dysfunctions in selected pop culture products—primarily anime and comics—in order to highlight their broader legal significance.

[C] EXPLORING THE DARK SIDE OF LAW THROUGH COMICS (AND MANGA)

The anime *My Hero Academia: Vigilantes* is set five years before the events of the more famous *My Hero Academia* by Kōhei Horikoshi (2014-2024) and is an adaptation of the manga *Vigilante: My Hero Academia Illegals* by Hideyuki Furuhashi (2016). While it is a spin-off, it is a particularly interesting work for exploring the relationship between law and morality in the world of heroes. As is well known, the uniqueness of the *My Hero Academia* universe lies in the fact that heroes and superpowers are the rule rather than the exception. In this story, in fact, 80% of the population possesses "Quirk", or special powers, and ordinary people without Quirk are the minority. Even the villains are often endowed with Quirk and crime-fighting relies primarily (though not exclusively) on heroes who

[1] The STALS website is available here.

[2] Law, Justice, and Pop Culture: An Interdisciplinary Dialogue. See the Sant'Anna Legal Studies YouTube channel.

are registered by law and hold a special government-issued licence. Alongside them is the police force, composed mainly (but not exclusively) of ordinary people. The main characters of *My Hero Academia: Vigilantes* are Koichi Haimawari, a university student, and Kazuho Haneyama, a street artist. At the beginning of the story, they are rescued by and become apprentices to the vigilante Knuckleduster, alias Iwao Oguro, a middle-aged man without a Quirk (though we learn from the manga that he once had one).[3] Knuckleduster is fully aware that he operates outside the law and employs violent methods in an effort to fight crime, particularly the spread of a dangerous drug (the "Trigger") that has contributed to an increase in villains in the city. Some (Edmundson 2025) have compared Knuckleduster to Batman, and he does resemble the Dark Knight in his lack of superpowers and his blunt methods. However, on closer inspection, the comparison is not entirely accurate. Batman has the enormous financial resources of his *alter ego*, Bruce Wayne, at his disposal and is recognized by the Justice League (which he co-founded and of which he is a part-time member) as a highly respected hero—even if tensions occasionally arise.[4]

What makes the spin-off *My Hero Academia: Vigilantes* particularly intriguing is the role of unregistered heroes—known as vigilantes—who fight crime despite operating outside the law. For our purposes, a dialogue at the end of the first episode is especially revealing. Detective Naomasa Tsukauchi admonishes a fellow officer, Tamakawa Sansa, after he utters the line: "We can't complain if they stop a villain." The detective responds: "Be careful thinking like that. The laws are there for a reason. It doesn't matter if you're dealing with a villain or not … taking the law into your own hands demands punishment."[5] As harsh and bitter as it may sound, the detective's words make sense: from a formal legal standpoint, the law cannot be broken, regardless of the motives of those who violate it (with narrowly defined exceptions established by the legal system itself, such as defences in criminal law). From this perspective, both villains and vigilantes are outlaws. Yet in a context where legal and moral systems frequently overlap, the position of a vigilante is far more complex. These are individuals who act outside the law, yet do so in pursuit of justice. In the following sections, we will explore cases where different regulatory systems collide and examine the stances taken by famous heroes towards the law in their stories.

[3] Indeed, in the past, he operated as a professional hero, known by the alias "High-Speed Hero: O'Clock".

[4] See, for instance, *JLA: Tower of Babel* by Mark Waid.

[5] See *My Hero Academia: Vigilantes*. Season 1, episode 2, "Takeoff".

[D] WHEN NORMATIVE SYSTEMS COLLIDE. THE CASE OF DAREDEVIL

Can legality and justice ever fully coincide? What is the ideal conception of justice to which one should aspire? Is it even meaningful to think of justice in purely abstract terms? From where do judges derive the authority to administer justice, and does their work invariably fulfil the aims set by the legal system?

In Daredevil's case, the answer to this last question is clearly negative. Matthew Murdock/Daredevil repeatedly finds himself drawn into situations where his intervention is deemed necessary to deliver a form of justice distinct from that provided by the law. Daredevil provides a compelling jurisprudential case study because he embodies the procedural limitations of the law; his dual identity as a lawyer and vigilante directly interrogates the tension between procedural truth and actual justice.

This vision of justice "beyond" the law—embodied by a superhero who acts precisely to secure what he perceives as true justice—creates a connection between Daredevil and other costumed heroes. Yet their motivations often differ, shaped by the narrative decision about the formative event that defined their path—the example of Batman is very telling in this respect (Giddens 2015b).

This divergence in motivation also shapes Daredevil's own portrayal: he emerges as a tormented figure, perhaps because he appears more "human" and "real" than many other superheroes. His inner turmoil may in part stem from a religious dimension (Negri 2024)—an element largely absent from most superhero backstories—which is particularly evident in two key scenes from the 2003 film. The first, the film's opening sequence, shows the wounded hero descending into the nave of a large Catholic church. Later, we see him in the confessional, where the priest pointedly reminds him that justice can never be reduced to mere revenge.

Although this religious perspective on justice is compelling, it cannot be pursued further here. The reference to law instead calls for attention to the persistent tension between legality and justice. In Daredevil's world, the legal system is driven by the imperative to resolve cases and deliver a verdict—whatever the investigative shortcomings and regardless of whether the outcome is substantively correct, someone must be held responsible.

This dynamic will be familiar to jurists. It echoes the distinction between historical truth and procedural truth: in most legal systems,

considerations of judicial economy require that decisions be based on the available evidence, even if it is incomplete. As a result, the "actual" truth may remain elusive, replaced instead by what is merely "plausible"—a form of truth that is, at best, approximate.

Daredevil's heroic identity takes shape precisely through this stance: he resists the legal order in the name of justice and truth. This positioning invites reflection on the presumed correlation between law and justice, as well as on the relationship between evil and illegality. Put differently, unlawful acts are not inherently "evil"; in certain circumstances, they may serve the attainment of what could be called "true" justice.

From this angle, the superhero appears as an *a-legal* figure, exposing the complexity of the law–justice relationship by operating outside the law—either in its absence or in contexts where it is deeply indeterminate. In doing so, the superhero effectively acts as a surrogate for the legal order, projecting a law of justice that highlights the gaps in existing natural or positive law.

On closer examination, the tension between law and justice is already present before Daredevil's decision to act against—or in place of—the legal system. It is inscribed in his very being, most notably in his disability. His blindness makes him a living embodiment of justice, traditionally depicted as blind, symbolising impartiality and the absence of bias[6] (Prosperi 2008; Resnik & Curtis 2011).

Moreover, this very peculiarity invites reflection on the specific relationship between persons with disabilities and access to justice—a fundamental human right that is, in practice, often marked by significant shortcomings. While this issue cannot be examined in detail here, it has been the subject of dedicated studies, which reveal the dense conceptual and axiological layers that—often unconsciously—forge our (re)interpretation of the intricate nexus between justice and disability.[7]

At a broader level, the relationship between Daredevil, law, and justice is inherently ambivalent, shaped by multiple tensions and contradictions. In his civilian life, Matt Murdock[8] practises as a lawyer, observing the formalities and rituals that define the courtroom—most notably those

[6] It should be noted that although the depiction of blindfolded justice is the most widespread, it is nevertheless not the only one.

[7] Cf Dorfman (2016). In recent times, the Court of Justice of the European Union has also considered the issue: Court of Justice of the European Union, C-824/19, *Komisia za zashtita ot diskriminatsia* commented upon by Addis (2022).

[8] Consider, for example, the version of the character in *Daredevil: Yellow* (Loeb & Sale 2001-2002).

embodied in the rules of due process (Rosen 2019: 379). Nevertheless, a challenge to the law—or, more precisely, to a particular conception of it—is always present, manifesting in different ways. Daredevil/Murdock confronts the justice system both from the outside and from within. As Daredevil, he operates beyond the courtroom, openly exposing the system's partiality and, in his own way, *delivering justice* through extra-legal means, albeit not without grappling with profound ethical dilemmas.

Conversely, as Matt Murdock the lawyer, he challenges the justice system from the inside. Here his opposition takes the form of resisting procedural abuses—such as delaying tactics or the exploitation of vulnerable parties—aligning himself with a deontological ideal of the "good lawyer" (Luban 1983). Indeed, as a lawyer, Matt Murdock draws on abilities that are, on closer inspection, extraordinary—such as detecting the heartbeat of witnesses on the stand to discern whether they are lying. Through these means, he seeks to remain honest and ethically consistent within a system in which proximity to power and the pervasive influence of money often foster corruption. Considered alongside the previous point, this element highlights a central question in legal ethics: the relationship between an individual's moral character and their professional competence. Put simply, can a good person also be a (good) lawyer (Thunder 2006)?

Finally, and in an even more radical way, Daredevil contests the rationality of the law from within the very setting—the courtroom—where rationality is traditionally regarded as a cornerstone of the legal order, serving to present the law as the only conceivable framework. Through his actions, the superhero shows that criticism of the existing legal system can be both appropriate and necessary. As a lawyer, Matt Murdock is bound to deploy rational argument, remaining faithful to the lessons of his father, a boxer murdered by organized crime for refusing to fix a match. From him, Murdock learned to rely on intellect rather than brute force—an ethos that resonates with the law's own purpose of prohibiting the unjustified use of violence.

Yet Murdock's practice is not untouched by emotion. At night, he releases the very force he appears to restrain during the day, in the public sphere. This restraint, however, is more apparent than real: the impulse to resort to force is never entirely absent, occasionally even jeopardizing his clients' interests when his secret identity intrudes upon his professional life.

This duality reveals yet another way in which Matt Murdock/Daredevil challenges the law—or, more precisely, its "legal architecture", which

rests on the separation of roles and powers. By day, he is a lawyer; by night, a judge. Such a conflation of functions, from a legal standpoint, marks a clear departure from the principles of the liberal rule of law. It raises the question: can this blurring of roles genuinely serve the cause of justice? And what becomes of judicial impartiality—long considered one of the rule of law's essential foundations—when the same individual acts as both advocate and adjudicator?

[E] WHEN NORMATIVE SYSTEMS COLLIDE. THE CASE OF BATMAN

As we shall see, Batman serves as a critical constitutional lens through which to examine the state's monopoly on violence. His stories explore the risks of systemic corruption and the "liminal legality" that arises when the rule of law slides into mere rule by law. In Gotham's infernal setting, the idea of law as a vehicle of justice appears almost untenable, corrupted as it is at every level—including within the police. This is starkly illustrated in *Batman: Year One* (Miller 1987), which portrays the early days of Lieutenant Gordon. Upon his arrival in the city, Gordon is partnered with Detective Arnold John Flass, whose conduct epitomizes the rot within the force. Encounters with figures like Flass lead Gordon to reassess, from the outset, the role that Batman might play in confronting Gotham's decay:

> He's a criminal. I'm a cop. It's that simple. But—but I'm a cop in a city where the mayor and the commissioner of police use cops as hired killers … he saved that old woman, he saved that cat, and he even paid for that suit (Miller 1987).

A few years later, in *Batman: Year Two* Gordon—now promoted to commissioner—frames the relationship between the Gotham police and Batman as one of cooperation. Yet, despite this understanding, the Dark Knight remains apart from the force, operating "strictly on his own" (Barr & Ors 1987):

> Gordon: "I can't speak for the department of twenty years ago, but the Batman works WITH the police force. Not against us."
>
> Interviewer: "And is this 'Batman' an authorized representative of force?"
>
> Gordon: "No, he operates strictly on his own. But he's offered me his services." (Ibid).

In *Batman: The Dark Knight Returns* (Miller & Ors 1986), Gordon—now at the twilight of his career—openly concedes that he has "bent

and sometimes broken" the rules precisely to work with the vigilante of Gotham.[9]

In order to collaborate with Gotham's vigilante, Batman—and this is precisely what makes him so intriguing to legal scholars—must be understood as a figure who operates outside the framework of the rule of law, thereby directly challenging the Weberian idea of the state's monopoly on the legitimate use of force. Yet his actions are undeniably guided by a pursuit of justice. A particularly revealing moment of this tension emerges in *Batman: The Long Halloween* (Loeb & Sale 1996-1997), where Gordon and Dent, still serving as Gotham's district attorney, await Batman on one of the city's emblematic rooftops—a scene that crystallizes the uneasy interplay between law and justice in this narrative world. As Thomas Giddens observes (2015b), what we encounter here is a genuine triumvirate: Gordon (representing the police) and Dent (the legal system) refuse to act until Batman—the embodiment of justice—arrives, underscoring that law is powerless without being animated by a pursuit of justice. Within this framework, Gordon and Dent persuade Batman to target mobster Carmine Falcone, but only within the boundaries of legality. Gordon is explicit: "I'll let you bend the rules but we cannot break them. Otherwise, how are we different from him?" This notion of bending without breaking epitomizes the liminal legality that Batman reluctantly embraces. Yet, to those who confine themselves to a purely legalist perspective, Batman appears little different from the criminals he hunts. Indeed, the theme of Batman's "closeness" to the Joker runs like a thread through the narrative from 1939 to the present. Apart from the oft-invoked prohibition against killing (not consistently present in the earliest depictions of the Dark Knight), the two figures share more than one might expect—a parallel the Joker himself makes explicit in *Batman: The Killing Joke*. In the animated adaptation (Liu 2016, which diverges in some respects from Alan Moore's graphic novel), a telling moment unfolds when Gordon—kidnapped and brutalized by the Joker and his men—is confronted with a series of questions:

> What should be done with someone who has no regard for the law?
>
> Someone who treats people like meat?
>
> A man who has no problem brutalizing his fellow man to get his way?
>
> What would you do to a man who breaks the laws you are sworn to uphold?
>
> A monster who ignores everything you stand for?

[9] "I don't think he can possibly know how much I bent and broke the rules for him, all these years." *Batman: The Dark Knight Returns* (Miller & Ors 1986).

To this barrage of provocations, Gordon—chained, stripped bare, and mockingly adorned with the oversized wig of a British judge—responds: "If it were up to me, I'd throw the book at him," meaning that he would impose the maximum penalty. In that very moment, the Commissioner hurls at the Joker a massive volume titled *The Law*, which had been placed at his side, turning the metaphor into a literal act. However, the Joker parades behind a Batman "cardboard cutout" and with a Mephistophelean smile clarifies that he was not talking about himself, but about Batman, his true *alter ego,* who has means not so different from his opponents:

> Truth is, Commissioner, the man on trial here you consider your friend.

Indeed, aside from the well-known prohibition on killing, Batman and the Joker share more similarities than one might initially assume. In that moment, the Joker's aim is precisely to demonstrate that anyone—after a single catastrophic day—can be pushed beyond their limits and lose control.

> All it takes is one bad day. That's how far the world is from where I am, just one bad day. You had a bad day once, am I right? Oh, I know I am. I can tell. You had a bad day and everything changed. Dressing up like a flying rat doesn't hide it, it screams it! You had a bad day and it drove you just as crazy as everyone else only you won't admit it! (Liu 2016).

This is not the only instance in which Batman finds himself placed on trial; one need only recall the iconic 1994 animated episode "Trial". On that occasion, a jury composed of Gotham's most infamous criminals—hardly an impartial panel—faces a question posed by none other than Judge Joker:

> Did the criminals of Gotham create Batman or did he create them?

This, of course, is a *tòpos*—a recurring motif that reappears, unsurprisingly, across the narratives of heroes and superheroes alike, from *Superman* to *Dragon Ball*: to what extent are these figures the source of crisis rather than the remedy to the decline of the systems they inhabit? With this question in mind, the following section will seek to explore what justice truly means in the world of Batman. In *Batman: The Killing Joke*, one of the Joker's central aims is to demonstrate that Batman himself deserves to stand condemned, even to the harshest penalty. Time and again, Batman reveals a tendency to place his own conception of justice—at times barely distinguishable from vengeance—above the law. Yet for Batman, justice extends beyond mere revenge, as illustrated in *Batman: Year Two* (Barr & Ors 1987), when Joe Chill—the man who murdered Bruce Wayne's

parents—reenters the story. To confront Gotham's previous vigilante, the Reaper, Batman reluctantly agrees to an uneasy alliance with Chill. At times, his desire for vengeance seems to overshadow his commitment to justice. During preparations for an ambush against the Reaper, the two engage in a tense exchange, and Batman, unmasking himself as Bruce Wayne, appears poised to kill Chill. However, Chill is ultimately killed by the Reaper, who arrives on the scene to confront the Dark Knight, sparing Batman from crossing that line. The Reaper (Judson Caspian, in *Batman: Year Two*: Barr & Ors 1987) is another pivotal figure for understanding the role of law in Batman's world. He returns to Gotham because he perceives Batman as weak, constrained by his own "code"—*Thou shalt not kill*. Yet Batman and the Reaper share certain traits, notably their instrumental use of fear—the Reaper's ominous battle cry, "Fear … the Reaper", is a case in point—and their past affection for Rachel Caspian, Judson's daughter and Bruce's former fiancée, who ultimately chooses a religious life after her father's death.

Two critical differences, however, set them apart: the Reaper has no faith in the law, and he does not hesitate to take the lives of criminals. It is precisely this willingness to decide life and death that marks him as a fully-fledged criminal in the eyes of both Batman and Gordon.

Still, Batman is not infallible and occasionally risks crossing his own ethical boundaries. A notable example occurs in *Batman: Hush* (Loeb & Sale 2002-2003), when Commissioner Gordon intervenes to prevent him from killing the Joker, underscoring the profound distinction between Batman and the supervillains he confronts. The crucial boundary that separates Batman from the criminals, in Gordon's view, is his strict adherence to the *Thou shalt not kill* rule. Gordon embodies the appeal to whatever vestiges of legality remain in the Batman universe, a theme recurring throughout many stories. For instance, in *Batman: The Killing Joke*, he urges the Dark Knight to apprehend the Joker "by following the rules"—*by the book*.

Batman: The Dark Knight Returns (Miller & Ors 1986) provides a striking example: in just a few pages, we move from a scene where—after defeating the leader of the mutants—the aging Batman is ironically hailed as their new leader. Though his physique betrays the passage of time, the Dark Knight's charisma remains undiminished. After breaking a gun—firearms being notably rare in Batman's arsenal—he appears to align, at least symbolically, with the cause of order itself, delivering a line of remarkable resonance:

> Tonight, we are the law. Tonight, I am the Law (ibid).

Statements such as these place Batman in direct tension with the Weberian conception of the state, as John Ip notes (2011: 226) "Batman, of course, works outside the law and outside the system. His vigilante actions are illegal since he infringes the state's monopoly on the legitimate use of force." How, then, should we interpret the declaration, "Tonight I am the Law"? Does it signify private justice, a breach of the rule of law, or simply the actions of a criminal fighting crime? The complexity deepens a few pages later, in a heated confrontation with Superman—a scene that would later inspire Zack Snyder's *Batman v Superman: Dawn of Justice* (2016)—where Batman explicitly labels both himself and Superman as criminals. In Jay Oliva's animated version, this passage unfolds through a straightforward exchange between our heroes.

> Clark Kent: "Why do you always have to be like this? You played right into their hands last time, when the parents groups and subcommittees came after us, you're the one they pointed to. You act like a criminal."
>
> Bruce Wayne: "We are criminals, Clark. We always have been. You're still one too. Only difference is you have a boss." (Oliva 2012-2013).

These two passages appear contradictory, yet they coexist within the same narrative. One might be tempted to interpret Batman's actions as akin to the exercise of constituent power. However, as David Graeber convincingly argues, this reading is problematic:

> Insofar as there is a potential for constituent power then, it can only come from purveyors of violence. The supervillains and evil masterminds, when they are not merely indulging in random acts of terror, are always scheming of imposing a New World Order of some *kind or another … Superheroes resist this logic. They do not wish to conquer the world—if only because they are not monomaniacal or insane. As a result, they remain parasitical off the villains in the same way that police remain parasitical off criminals: without them, they'd have no reason to exist. They remain defenders of a legal and political system which itself seems to have come out of nowhere, and which, however faulty or degraded, must be defended, because the only alternative is so much worse* (Graeber 2012: emphasis added).

In *Batman: The Long Halloween* (Loeb & Sale 1996-1997), the Dark Knight places his trust in Dent and, above all, Gordon, yet he remains deeply sceptical of the broader "system". This is evident in the way Batman himself describes Gordon in these scenes:

> Jim Gordon is a good man. He and the police do the best they can with limited resources. But, Gotham City needs Batman (Loeb & Sale 1996-1997).

The city requires a vigilante willing to operate within the liminal legality discussed earlier, precisely because corruption is so deeply entrenched. This is why Batman is prepared to bend those legal boundaries in the pursuit of justice—distinct from mere revenge—responding to the inherent inadequacy of the law itself:

> He implies that going outside the legal system is ethically justified when the system is broken, a message that explicitly challenges the rule of law. *Bruce seeks to punish people for breaking the law, but his vigilantism sends the message that the law is insufficient. Batman's very existence undermines people's faith in the societal norms he seeks to uphold* (Glew 2022: emphasis added).

This brings us back to what we saw in the case of Knuckleduster, but it takes on particular significance in a context of systemic corruption—a dynamic we do not encounter in the world of *My Hero Academia: Vigilantes*. After all, in one of the early Batman stories, our hooded crusader responded to those who complained about the difficulty of solving the case (Batman, after all, began as a detective) by candidly stating that "if you can't beat them 'inside' the law, you must beat them 'outside' it—and that's where I come in!" (*The Case of the City of Terror*, Kane & Finger 1940)

In both cases, the law is portrayed as a tool that can be abused—particularly in corrupt contexts, such as Gotham—and is shown to be insufficient on its own to guarantee justice, even when the fight against crime is entrusted to superheroes with extraordinary powers. After all, law is a human creation, and in this respect, the stories of Batman and Knuckleduster take on special significance, as they depict, more than others, humans waging their crusade with nothing but their own flesh and resolve, and blood.

[F] FINAL REMARKS

From an educational point of view, discussing constitutional law through the stories of comic book characters produced some unexpected insights. In particular, in secondary school classes there was a heightened awareness of the historical nature of law: the rules that govern our societies—as noted above—are human creations and therefore subject to tensions and even sudden changes.

At times, the discussion took unforeseen turns. For example, the relationship between the various ideas emerging in the adventures of the Dark Knight and the concepts of justice, revenge, deviance, and law—as well as the tension between justice and law—was transposed from the streets of Gotham to online life, prompting some participants to

reflect on the limits of what has been described in the literature as digital vigilantism (Trottier 2017).

Participants also frequently focused on aspects of human existence that legal scholarship has only recently begun to explore. In this respect, particular attention during lectures and seminars was given to the concepts of vulnerability and the "vulnerable subject" (Fineman 2010). As already noted, these stories invite us to question specific forms of subjectivity. These are just two of the many insights highlighted by those who joined our attempt to discuss the constitution and law through graphic narrative. The common thread running through our experience—reflected, ultimately, in this essay—is that engaging very young people with the principles of constitutionalism requires the ability to tap into their passions and cultural references without paternalism. This approach helps reveal that law—particularly constitutional law—is neither static nor inherently "right," but rather the product of a continuous effort to balance diverse social and political demands, an effort that must be examined critically, with attention to its rationale and history. And whether in Gotham, Hell's Kitchen, or the real world, the risk confronting the legal order is the same: losing sight of the rule of law and sliding into mere rule by law.

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