

# Email Capitalization and CEO Ethos: Examining Online Responses to Yahoo's Layoff Email

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"He fired me, and didn't even respect me enough to capitalize his sentences!"

—Nancy L., ycorpblog.com

"What nerve that Jerry Yang has for not even bothering to use the Shift key  
in a circular email like that. Says everything about him, really."

—orangewedge, techcrunch.com

"How does shifting keys imply respect? ... you need serious help, get another cat."

—jon, ycorpblog.com

## Introduction

The economic downturn has hit nearly every industry, and high tech is no different. While jobs in the high tech sector remained relatively stable in 2007, layoffs began in earnest in Q4 of 2008. A *New York Times* article at the end of 2008 reported that "The plunge is so severe that some executives are comparing it with the dot-com bust in 2000, when hundreds of companies disappeared and Silicon Valley lost nearly a fifth of its jobs" (Vance, 2008). Estimates put the total 2008 job losses in the tech sector at 150,000, a 45% increase over layoffs in 2007 (Deagon & Datar, 2009). The first quarter 2009 was worse, with job cuts up another 27% over Q4 2008 (Carey, 2009).

One of the many high tech companies to shed jobs is Yahoo, a company that has let go approximately 3,200 employees in three rounds of layoffs that began late in 2008. Jerry Yang, the former Yahoo CEO, was at the helm for the first two rounds; under his leadership, the company laid off 1,500 in December, 2008, and another 1,000 in February, 2009. These two rounds of layoffs represented a nearly 15% cut in Yahoo's workforce (Liedtke, 2009).

Yang announced the first of these layoffs in two emails in 2008. Both layoff emails were picked up by blogs and made public in their entirety (Arrington, 2008; Baran, 2008; Carlson, 2008; Thomas, 2008; Yang, 2008). The first email was sent on October 21, 2008, and announced that the company would lay off 10% of its workforce by year's end, stating that "affected employees will be notified of layoffs in the next several weeks" (Arrington, 2008). The second email was sent on December 10, 2008, and announced that the layoffs were in process: "today, most of our layoffs in the US are happening" (Yang, 2008). When these emails were published in various blogs, readers posted comments about the layoffs,

creating an excellent opportunity to study various responses to the Yang's communication announcing the labor cuts.

While the focus of the comments varied, roughly 24% of the 435 comments concerned Jerry Yang's email style of using all lowercase. Many commenters were critical of the style because they claimed it was inappropriate for a number of reasons. Other responses were supportive of Yang's style, believing it to be either a positive way to deliver the message or unimportant to the content of the email. Regardless of the varying opinions, the respondents' focus on the use of lowercase is interesting for business communication research. As more business and organizational discourse occurs online, without the other types of cues that accompany face-to-face or verbal communication, it is increasingly important to attend to how familiar topics are communicated and understood in new media.

While some work in the business communication research and practitioner literature focuses on communication strategies for communicating about downsizing (e.g., Pfeil, Setterberg, & O'Rourke, 2003; Rhoades, Cahill, & Barnet et al., 2009; Timmerman & Harrison, 2005), there is an absence of research that examines responses to particular messages that convey news about layoffs. In this paper, I examine the responses to Jerry Yang's email to explore the relationship between his use of lowercase and his ethos as Yahoo's CEO.

### **Perception of Email in Organizations**

Email is increasingly the preferred method of communication within organizations. A recent study found that executives, in particular, would rather use email than other forms of communication media in the workplace. In a survey of 150 senior executives in large, US companies, 65% of respondents preferred email to face-to-face meetings (31%), paper memos (3%), or voicemail (1%) (OfficeTeam, 2007). While email offers many advantages such as convenience, immediacy, historical context, and a record of conversations, some research suggests that it is not sufficiently rich for communicating emotional or ambiguous information (Daft & Lengel, 1986; Zhu & White, 2009). However, other research argues that leaner media such as email can be effective for communicating complex information (Markus, 1994). Regardless, email is quickly becoming the media of choice for communicating both complex and mundane messages in organizations.

More recent research has looked at the specific relationship between social cues in email and reader responses. Byron and Baldrige (2007), for example, examined how email readers formed impressions of email senders based on the presence or absence of proper capitalization or emoticons. Their results indicated that proper capitalization and the use of emoticons were associated with more favorable impressions of email senders. However, Byron and Baldrige (2007), as well as other research that has focused on capitalization in email (e.g., Byron & Baldrige, 2005; Higgins, 1997), examined the use of *all caps* in a message as conveying joy, anger, or distinguishing parts of an email message. However, there is no evidence of research that focuses on the impact on readers of omitting capital letters at the beginning of sentences and proper nouns.

## Theoretical Framework

Ethos is an important area of concern for business communication research (Eckhouse, 1999; Kallendorf & Kallendorf, 1985). For example, in an earlier application of rhetorical principles to business communication, Kallendorf and Kallendorf (1985) emphasized the importance of ethos, which they define as “the image a writer or speaker projects to an audience” (p. 42). They argued that people in business innately understood the importance of ethos as evidenced by their attention to appearance (e.g., business attire, dressing for success) and communication strategies (e.g. the use of jargon) to fit the audience and situation. Ethos is a key term from classical rhetoric, and Kallendorf and Kallendorf (1985) importantly point out that a speaker “need not actually be a good person, but must only be *perceived as one*” (emphasis in original) (p. 42). Additionally, Eckhouse (1999) makes a useful distinction between ethos and reputation. While reputation is something that a rhetor brings to a speaking situation, “ethos ... cannot be separated from the *act of communication*” (emphasis added) (pp. 120-121). The study of ethos requires analytic attention to the communicative act, whether speaking or writing, which can provide insights into how communication impacts perception of the Aristotelian trinity of intelligence, character, and goodwill of a rhetor.

The increasing use of online communication, especially for more sensitive messages, has implications for the ethos of business communicators. As some past research has demonstrated, readers attend to various nonverbal cues in email or other online messages to assess the character of the writer. While a rhetorical critic can analyze a specific artifact to assess potentially effective or ineffective ethos moves, the analyst should, where possible, attend to the reception of the artifact by its audience.

The importance of reader reception in rhetorical criticism has been emphasized elsewhere by rhetoricians of science (e.g., Ceccarelli, 2001; Harris, 2005; Paul, Charney, & Kendal, 2001). For example, Paul et al (2001) contend that discourse analysis alone is insufficient to gauge rhetorical efficacy, and that “claims about rhetorical effectiveness are hollow without more precise definitions of what succeeding, falling short, or failing means” for a particular text (p. 380).

The Yahoo layoff email provides a particularly useful case for examining Jerry Yang’s ethos as perceived by an audience. First, blogs enable immediate, publicly available responses from readers. Second, some of the readers in this case focused on one particular rhetorical cue—the use of all lowercase—as the basis for their assessments of the writer. Third, the particular blogs where these memos appeared were all situated in the community of high technology organizations. So, while the responses were not isolated to Yahoo employees, they were likely from a general audience within the high technology community.

## Method

### Materials and Procedure

The first email, sent on October 21, 2008, was sent as an internal email through the company’s email system and likely released to bloggers by someone in the company (Arrington, 2008). The second email,

sent on December 10, 2008, was posted to *Yodel Anecdotal*, a company blog hosted on the Yahoo company website (Yang, 2008). Both emails are available online at [www.gawker.com](http://www.gawker.com). With the exception of one instance of the company name "Yahoo" in the first email, both emails were entirely in lowercase. The first email was about impending layoffs, and the second email was about the layoffs that were taking place. Both emails thanked employees and discussed the difficulty of the decision.

To gather the responses to the memos for analysis, I conducted a search on [google.com](http://google.com) for references to Jerry Yang's layoff emails. My search made use of the following search terms in various combinations: *Jerry Yang, Yahoo, layoff, layoff email, layoff memo, layoff announcement, job cuts*. This search resulted in hundreds of website references, including full online articles, weblogs, and single-line references in various technology web portal sites. Because I was particularly interested in viewer responses to the layoff emails, I narrowed my corpus to only those websites that specifically focused on the layoff emails (and not other topics), published the emails for viewers on the same page (rather than forcing users to click on another link to view the emails), and allowed online comments. This narrower focus resulted in five websites. Four of these websites published the first email from October 21, 2008, and two sites published the second email from December 10, 2008 (*Valleywag* published both emails). While the four websites are focused on high tech issues, they all allow anyone to post a comment. The four blogs that posted the first email were as follows:

1. *TechCrunch* (229 comments): "A weblog dedicated to obsessively profiling and reviewing new Internet products and companies" (<http://www.techcrunch.com>)
2. *Valleywag* (59 comments): "a Silicon Valley gossip blog" (<http://gawker.com>)
3. *The Silicon Valley Insider* (52 comments): "the leading online business news site for the digital age" (<http://www.businessinsider.com/alleyinsider>)
4. *WebGuild: Silicon Valley* (8 comments): "The WebGuild's mission is to organize information and services for the Web industry" (<http://www.webguild.org>)

The blog that posted the second email was as follows:

1. *Yodel Anecdotal* (55 comments): Yahoo's website that "provides insights into our company, our people, our culture, and the things that occupy our minds." (<http://ycorpblog.com>)
2. *Valleywag* (32 comments): "a Silicon Valley gossip blog" (<http://gawker.com>)

I read through all the comments, extracting only those that made specific reference to the use of lowercase, resulting in an initial corpus of 102 comments. I analyzed these 102 comments, separating them into three groups: those that were critical of Yang's use of lowercase, those that were supportive of it, and those that were either ironic, ambivalent, or difficult to determine. For the purposes of this paper, I focused only on the comments that were clearly critical or supportive, which resulted in a final corpus of 82 comments. Finally, I analyzed these 82 messages to assess patterns and themes.

There are limitations to the data that were collected. Chiefly, the respondents who respond to weblog sites may not be representative of all those who responded to the Yahoo emails, or of a larger

population more generally. However, the current study is exploratory and does not seek to generalize its findings. Rather, the sample is used to demonstrate the potential, rhetorical relationship between a particular style (lowercase) and the ethos of a writer (in this case, the CEO of Yahoo). Despite the limitations of the sample, the findings from this case may be transferrable as questions to pose to other, similar cases (Flyvbjerg, 2001; Stake, 1995).

To thematize the data, I conducted a preliminary analysis based on open coding in grounded theory (Strauss and Corbin, 1990). I examined the data for salient categories that were supported by the text, refining the number of categories to reduce overlapping characterizations where possible. To reconcile subtleties of difference when categories were combined, I created properties (subcategories) of each category. For this paper, I did not exclude any of the 82 quotes, but rather ensured that each quote was contained within a property of categorization. Consequently, some categories were more populated with textual evidence than others. At this stage in the analysis, my goal was to elicit all responses to the use of lowercase at a higher level of abstraction than the level of the quotation itself. Based on space constraints, I provide exemplars of each category and property rather than an exhaustive accounting of each quote drawn from the corpus.

## **Participants**

I identify the respondents by their screen name as published online. Even though the blogs are publicly accessible and therefore constitute public data, I used only first names with a last initial even if the entire last names appeared in the blog. All comments and screen names were copied verbatim, using the original term choices, style, and punctuation.

## **Critics of Lowercase**

There were three primary themes suggested by the comments of those who were critical of all lowercase. First, respondents indicated that Yang's style conveyed a lack of situational understanding; that is, respondents' argued that lowercase was inappropriate both for his position as CEO and for the topic of a layoff message. Second, respondents asserted that the absence of capital letters indicated a lack of respect for his employees. Third, respondents suggested that his use of all lowercase reflected negatively on him personally, indicating that he was poor CEO, stupid, childish, lazy, unable to use the "shift" key, and engaging in trendy, online behavior.

### **Lack of Situational Understanding**

One key theme that emerged was that the use of all lowercase indicated a lack of situational understanding on the part of the CEO. In response to several commenters who argued that this was simply Yang's writing style, one respondent said, "Sorry, but just because that's 'just his style' doesn't make it right" (blogger310, 2008). Other comments were more specific, arguing that the style was not appropriate to Yang's position as a CEO. As one person put it, "It looks awful coming from the CEO of a company in any sector" (Jeff, 2008), and another quipped, "A CEO writing with no caps? He should have signed off with - l8tr, Jerry" (franklin, 2008).

The majority of critics, however, argued that the lowercase style was inappropriate for the topic of a layoff or other formal management communication that affected the lives of employees. Consider the following:

Seriously? When I send notes or short messages I don't obey grammar or punctuation but when you're sending it to several thousand employees, you don't bother? That's unprofessional, even for a hip company (Dave, 2008)

... seriously, is a shift key too much to ask when thousands are losing their jobs? This is probably the last e-mail they'll ever see from him, and it kind of leaves a bad impression on someone who will have to worry about feeding their family over the next few weeks (Nancy L., 2008)

Wow, what a way to destroy morale (if there was any of it left). Now 100% is worried about losing their jobs until they announce the actual people. And to be told in an email without capitalization... wow (jon, 2008)

Using the shift key requires that little extra effort, which is why you leave it out in informal communication - it isn't a stylistic choice. Just more effective... hence, not nice here" (Martin, 2008).

### **Lack of Respect for Employees**

Critics also argued that the use of all lowercase was insulting and disrespectful of employees. For example, one person stated, "What an insult to your employees to write in lowercase" (George of the Jungle, 2008), and another said, "I think it's rather insulting and look (sic) stupid, too" (Johann, 2008). Another noted that the practice was rude: "He always uses lowercase ... I always felt it was a little rude. 'Hey I'm too busy to use the shift key'" (David B., 2008). Several critics specifically emphasized that Yang's style was disrespectful. Consider the following:

I'm sorry, but an email of this nature written all in lowercase is so disrespectful (Ann, 2008).

I agree, it is disrespectful, especially for an announcement that hurts people's lives (Mary, 2008).

...it [using capitalization] shows a level of effort and respect that Yahoo's CEO clearly doesn't have (JMac, 2008).

### **Negative Reflection on Yang**

Finally, in addition to conveying a misread of the situation and a bad attitude toward employees, critics also argued that the use of all lower case reflected poorly on Jerry Yang himself. For example, a number of critics said that his writing style was indicative of his problems as a CEO:

Yang puts about as much effort into running his company as the e-mail he wrote to notify 10% of his staff they can't feed their families anymore (JMac, 2008).

Had I known he wrote in all lower caps, I never would have invested ages ago. Seriously folks, all lower case AND running a company? (Ryan, 2008).

God, this guy is pathetic. Way to burn and destroy any morale that was left, Jerry! What an amazing manager and corporate steward! Plus, he's unable to use a computer well enough to capitalize and punctuate properly! (CaliforniaCajun, 2008).

In addition to being a bad CEO, critics also charged that his use of lowercase portrayed him as stupid. For example, one person asked, "What kind of moron writes in all lower-case?" (bob, 2008), and another claimed, "ANOTHER PIECE OF EVIDENCE THAT JERRY YANG IS JUST ONE OF THE MANY SILICONE VALLEY BUBBLE MORONS. I THINK ALL THESE CAPITALS HAVE MADE UP FOR AND SOME, FOR ALL THE CAPS JERRY THE DICK DIDN'T USE" (Websterphreaky, 2008).

The charges of stupidity were often connected to assertions of childishness: "It probably doesn't matter since he can hardly write an English sentence anyway, but if I got that email without knowing who is was from I'd assume it was sent by a twelve-year old" (bob, 2008), and "every time there is a message from jerry it always comes in lowercase ... comes over as so infantile ... i hate lowercase. just writing this makes me feel ill!" (William, 2008). One commenter, responding to another's defense that one could simply read the email content irrespective of the style in which it was written, said, "What gets lost in simply reading Jerry's memo is the child-with-speech-impediment voice in his head when he wrote it. I wold (sic) personally kick Yang in the balls for not using caps in this memo" (pepelicious, 2008).

In other instances, critics argued that the use of lowercase was indicative of Yang being lazy and either unwilling or unable to use a keyboard. For example, one respondent noted, "talk about being intellectually lazy. The laziness and greed you have is what has put the company into the position it is today" (GET LOST JERRY, 2008). Other responses were similarly critical: "Is Jerry too clever for case or just too lazy?" (bob, 2008); "It surprises me that someone who heads a large corporation doesn't use proper grammar. I call it laziness" (Cindy, 2008).

Part of this laziness is attributed to issues specific to the shift key. For example, one person wrote, "Is Jerry's Shift key missing?" (TheEnd, 2008). Despite the ironic tone of those who commented on the functionality of the shift key, others were more direct: "He wrote 'the YEES survey' and he properly capitalized Bain & Co., so clearly the Shift and/or Caps Lock keys are working..." (blogger310, 2008). Another commenter was incredulous: "The CEO of Yahoo can't use a shift key? Yeah right" (Jacob, 2008).

Finally, some critics asserted that Yang's use of lowercase was a move to be trendy or to assert his power within the high tech community. For example, in response to those questioning why Yang would use all lowercase in this kind of a message, one person commented, "I suppose because it's meme, and

kewl, and tech, and..." (Jeff, 2008), and another asked, "Is Jerry too clever for case...?" (bob, 2008). Another person implied that he used lower case because he could as a CEO: "how lame is the "no caps" thing ? i'm using no caps here, because i'm a f\_\_\_-ing [edited term] ceo....hear me roar" (Wade, 2008).

### **Supporters of Lowercase**

There were far fewer supporters than critics; nonetheless, three primary themes surfaced amongst the commenters who supported Yang. First, supporters argued that lowercase was just Yang's normal writing style. Second, supporters asserted that there were positive benefits of his using lowercase, such as softening the tone of the message and being able to type faster with less stress on the body. Even when supporters did not extol the benefits of lowercase, they argued that content was more important than the style. Third, some of Yang's supporters criticized the commenters as being oversensitive to such a minor issue.

### **Yang's Normal Writing Style**

Several people noted that the use of all lowercase was consistent with how Yang wrote most of his correspondence and further implied that, as a norm, it was not appropriate as a target of criticism:

Jerry always sends emails in lowercase (AlbertaChrysaor, 2008).

All of his internal emails are sent sans-caps. I don't think it's disrespectful, just the way he communicates (Zach, 2008).

I do agree that it would have been much better if Jerry had used caps in his email, especially after seeing that he used them in his introductory note in his post. But this does not mean the man should be attacked! It's just his email-writing-style (Dany B. – Lebanon, 2008).

Regarding Jerry's notes in all-lowercase: every Yahoo knows that Jerry always writes like that. Having sent an e-mail in a different style would only tell people that he didn't write it. Remember, this mail was sent to Yahoos, not to any other audience (rafael j., 2008).

### **Positive Reflection on Yang**

Some respondents thought the use of lowercase reflected well on Yang because either because there were positive benefits of the practice, or because the content of the message was far more important than its style. For example, one person reflected that lowercase had the effect of softening the message: "the use of lower key (sic) at all words can be hushing the words down, in a humble way in this case" (Kindian, 2008). One respondent pointed out that not using the shift key could have ergonomic benefits for writers: "maybe jerry isn't the only one at yahoo typing in lowercase. think about how much typing they do on a daily basis. i'm sure it has health benefits to reduce keystrokes" (other side of the coin, 2008), and another said, "engineers typically type millions of lines of code. (sic) and when you type all

day long. (sic) doing it in lowercase indeed enables one to type faster. try it yourself. you might like it” (Holt, 2008)

Beyond noting some of the benefits of lowercase, several commenters asserted that content was respectful and sincere, and as such was much more important than style. Consider the following:

In my view, the underlying elements of Jerry’s post seem to be professional courtesy, sensitivity, appreciation, and respect to his ex-colleagues. As such, the content - as opposed to style - should be the main subject of discussion here (Gurol, 2008)

adding capitalizations wouldn’t have changed the content of his letter which was very heartfelt and sincere (Tyson, December 10).

this is a purely personal choice. shouldn’t judge one’s content based on its form (veryverygut, 2008).

why do people care? its a tech company. the message gets accross (sic) no? (MBoogie, 2008).

Even if supporters did not specifically emphasize the importance of content over the style, they asserted that capitalization was unnecessary. As one person said, “the internet doesn’t need capital letters to operate, folks” (Holt, 2008), and another noted, “for those who insist of (sic) shift keys, which part of the world are u from? modern typography has given up upper case since 1920s.” (veryverygut, 2008). One comment summed it up this way: “get over it. you can still understand what is typed without punctuation” (getoverit, 2008).

### **Negative Reflection on Yang’s Critics**

In some cases, commenters expressed negative attitudes towards Yang’s critics, suggesting that they were stupid and oversensitive. While not all of the negative comments expressed explicit support for Yang, such support was often implied. For example, some comments portrayed the critics as stupid: “‘why didn’t he use the shift key’ - what a bunch of moaning idiots” (Akmed, 2008). Another said, “Hopefully none of the folks offering up ‘obvious’ advice on this post end up as your next CEO” (Chris B., 2008). Another commenter ridiculed what he called the “lower case conspiracy”:

There are always people who look past the real story and look for conspiracies when there are none. In this case it’s the “lower case conspiracy” ... The same kinds of people believe that NASA faked Apollo or that the Holy Grail is in a crate, stacked on top of a disassembled UFO in a big CIA warehouse near Area 51. I.e. They are idiots (Akmed, 2008).

Beyond the assertions of stupidity, several comments focused on critics’ oversensitivity to something that was not important. Consider the following:

Those of you griping over his typing style need to get over yourselves. We're not the Era of Miss Manners anymore ... Unless you have succeeded at leading a huge company under the circumstances Yahoo faced, you glass house dwellers should stop throwing stones about his leadership and writing style (Tyson, 2008).

As for the grammar police, if he had capitalized his letter, I suppose none of you would have anything to comment on in this blog post then? If Jerry Yang decided to change his writing style to suit your demands, you would all be fine? Nitpicking much? (Chris B., 2008).

How does shifting keys imply respect? Juha, you need serious help, get another cat (ron, 2008).

## **Discussion**

Jerry Yang's layoff memos constitute an act of communication that gave rise to his ethos as a rhetor. The preceding analysis isolated one aspect of that communicative act to which readers responded: the use of all lowercase. Based on the responses to this characteristic of his message, readers made judgments about the three components Aristotle deemed necessary for creating good ethos through communication: intelligence, character, and goodwill.

### **Intelligence**

Yang's critics associated his use of lowercase with a sign that he lacked intelligence. Despite other potential indications of his intelligence on which they could have drawn, they asserted that the lack of capitalization provided evidence that Yang was a moron, childish, and otherwise intellectually challenged. Interestingly, his supporters did not laud the virtues of Yang's intelligence so much as argue that the critics were themselves stupid, idiotic, and oversensitive for responding so strongly to something they thought was so trivial.

### **Character**

Both sides drew conclusions about Yang's character based on the use of lowercase. Critics pointed to the email style as an indication that he lacked the proper character to be a CEO of a large company. Specifically, critics said the memo indicated that Yang was lazy, greedy, unprofessional, and insincere because of his efforts to appear trendy and hip. Supporters, however, argued that his good character was evident in the content, irrespective of style, that revealed him to be respectful, sensitive, sincere, heartfelt, conscientious, and a successful leader. Additionally, his supporters underscored that his style was simply normal for him and thus any other style would have been insincere.

### **Goodwill**

Many of the responses addressed what the writing style indicated about Yang's goodwill. Critics charged that the use of lowercase was insulting, disrespectful, cavalier, and insensitive toward employees, particularly given the gravity of job losses during a bad economy. Supporters, however, claimed that the

style demonstrated conscientious attention to tone, and that it supported a norm based on sensitivity to health considerations, concerns that are particularly salient in the high tech industry. Supporters also pointed to Yang's goodwill efforts that were particularly notable given the turbulence of high tech in general and at Yahoo specifically.

### Conclusions and Implications

Email and other forms of electronic communication media are thoroughly instantiated in today's organizations. In the absence of other forms of input, organizational members are turning to nonverbal cues in various organizational texts to provide insight into the credibility of messages. This case demonstrates how one characteristic of written communication—the use of all lowercase—can impact reader responses and lead to judgments of the sender.

Ethos is a critical consideration in business communication, particularly for executives who are communicating electronically to wide audiences with ever-greater frequency. While there were both supporters and critics of Yang's email style, the majority of comments indicated that his use of all lowercase reflected negatively on his intelligence, character, and goodwill.

In addition to the findings of this case specifically, this study has broader implications for business communication research. First, the increased availability of online comments provides a rich data source for tapping into audience reception of organizational texts. These responses are an important component in rhetorical criticism, in business communication as elsewhere. Second, the increase in online communication in business calls for more research that investigates the nuances of impression formation of electronic messages. This study supports other research that explores how readers tune into various social and nonverbal cues when assessing senders of messages. Finally, this work calls attention to the relevance of rhetorical theory and the importance of ethos for business communicators. In the wake of so many character failures in the financial industry and others, Aristotle's observation is as true now as it ever was: "We might almost affirm that his character [ethos] is the most potent of all the means to persuasion" (Aristotle, quoted in Eckhouse, 1999, p. 119).

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