After the Paris attacks: responses in Canada, Europe, and around the globe

Author(s)	Toope, Stephen J.; Iacobucci, Edward
Imprint	University of Toronto Press, 2015
Extent	1 electronic text
ISBN	9781442630000, 9781442630017, 9781442630024
Permalink	https://books.scholarsportal.info/uri/ebooks/ ebooks3/utpress/2015-06-02/1/9781442630024
Pages	40 to 53

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4 A Tale of Two Massacres: *Charlie Hebdo* and Utoya Island

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On July 22, 2011, Anders Behring Breivik, a self-described Christian crusader, claiming to be a member of a trans-European network called the "Knights Templar," killed seventy-seven people in Norway. The home-made bombs he placed in government buildings in downtown Oslo killed eight, but more crucially, provided him cover to proceed undetected to his main target, a youth camp sponsored by Norway's Labour Party, where he massacred sixty-nine youth using small arms. He was captured alive, and after a public trial, sentenced to life imprisonment.¹ While there was no question of his guilt, there was a significant issue as to whether he was legally responsible for his conduct or whether he suffered from some mental defect that precluded a finding of criminal guilt. The court, however, concluded he was sane (or sufficiently sane) at the time of his conduct to be convicted criminally for his actions. Ironically, however, it was the prosecution that argued for Breivik's insanity, while it was the defence that insisted he was sane, acting out, in their words, "a radical political project" to defend a Christian Europe from the threat of multiculturalism, Islam, and communism (Lewis 2012); indeed, his defence team even argued that a judicial finding of insanity would deprive him of his right to take responsibility for his actions and thereby transform essentially political action into something pathological.

On January 7, 2015, Cherif and Said Kouachi, two brothers, Frenchborn, but of Algerian descent, made their way into the offices of the

¹ A life sentence in Norway amounts to twenty-one years, subject to possible extension upon a judicial finding that the defendant remains a threat to society.

satirical French magazine Charlie Hebdo, killing twelve people, including several of its most famous cartoonists. Another attacker, Amedy Coulibaly, apparently acting in coordination with the Kouachi brothers, attacked a kosher grocery store, taking several customers hostage and killing four. French anti-terrorism police eventually cornered all three suspects and killed all three in a simultaneous raid on January 9. Since the attackers all died, they cannot explain what drove them to kill, but it was quickly assumed that the Kouachi brothers targeted Charlie Hebdo in order to retaliate against that magazine's repeated satirical portrayals of the Prophet Muhammad. As a result of this interpretation of the attackers' motives, the assault quickly became elevated from a crime, or even an ordinary terrorist attack, into a symbolic attack against the French Republic itself. Internationally, the assault against Charlie Hebdo was interpreted as an assault against the sacred, if deeply contested, value of free speech. Charlie Hebdo, which had been reportedly struggling for many years financially, suddenly become the symbol of a heroic republic standing firm against fascism, with all patriotic citizens required to pledge their allegiance in the fight against this new fascism by reproducing the hashtag #JeSuisCharlie. The French attackers, unlike Breivik, were not understood to be acting for political reasons (or political reasons intelligible in a modern state), but only to vindicate an atavistic theological doctrine regarding the punishment of blasphemy and blasphemers.

The circumstances that produced both massacres were in many ways similar: both Breivik and the Kouachi brothers and Coulibaly believed they were engaged in an existential battle for the soul of humanity, and that their actions, even if illegal, were ultimately justified by the higher logic of this cosmic struggle. They also believed that they were fighting on behalf of their own people at the same time that they were accusing the very people they were defending of having failed to display sufficient vigour in the fight against the cosmic enemy. Transnational communication and ideological networks provided both sets of attackers with the ideological motivation (and perhaps more) to carry out their attacks.

But there were also significant differences, not least in the reaction to the attacks. Breivik's attack was not taken to represent anything other than himself. There were no massive international rallies in support of Breivik's victims, nor did international leaders fly en masse to Oslo to mourn the victims as martyrs to a noble international ideal, like multicultural tolerance, for example. While numerous articles pointed out the role that organized anti-Islam advocacy groups, particularly in the United States, played in supplying Breivik with the ideas he used to fill his 1500-page manifesto, "2083: A European Declaration of Independence," the media were not filled with hand-wringing about radicalization among young white men, nor was there a call to establish systematic surveillance of right-wing websites or intellectual networks, or to shut down their sources of funding.²

Needless to say, there was no wave of arrests or preventive detention of right-wing – or perceived right-wing – European extremists in the wake of Breivik's atrocity. In short, despite the magnitude of the killings, it did not produce a sense of crisis, emergency, or self-criticism among liberal European or North American political and cultural elites. Indeed, so localized were the effects of the Utoya Island massacre that it had already disappeared from our collective consciousness by the time that the *Charlie Hebdo* attack took place. Mike Morrel, a former CIA deputy director and acting CBS news "senior security consultant," confidently (but apparently in a state of amnesia) declared on CBS news in the immediate aftermath of the shooting, "This is the worst terrorist attack in Europe since the attacks in London in July of 2005. We haven't lost this many people since that attack" (CBS 2015).

How can we account for the differences in the cultural treatment of the Utoya Island massacre and the *Charlie Hebdo* attack? The University of Toronto's Law School and Munk School, after all, did not convene a symposium called "After Breivik" or the like to consider the aftermath of the Utoya Island massacre. Clearly, politics matter, and from a political perspective, Muslim political violence is profoundly more salient in its effects on the political culture than the political violence of non-Muslims. Indeed, the different reactions to violence committed, or threatened, by Muslims and non-Muslims recently played itself out in Canada, when the justice minister, Peter MacKay, assured Canadians that a plot in Halifax to kill large numbers of Canadians, which the police successfully prevented, was not terrorism because it was just a bunch of "misfits" who were not motivated by "culture." At the same time, and apparently in response to the actions of two individuals with

² The Center for American Progress, however, has prepared a series of reports exposing right-wing networks, their interrelationships, and their private sources of funding, which contributed \$57 million to anti-Muslim organizations and ideologues in just 2011 and 2012.

only a very marginal relationship to the Canadian Muslim community, Martin Rouleau, who ran his car into two Canadian soldiers, killing one (CTVNews 2014), and Michael Zihaf-Bibeau, who, acting alone, killed a Canadian soldier at Parliament Hill (Wingrove, Chase, and Curry, 2014) (and perhaps also in response as well to the *Charlie Hebdo* attack), the Canadian government is seeking to pass Bill C-51, which by all accounts represents a potentially grave threat to the civil liberties of Canadians. The salience of politics, and the way political elites choose to respond to acts of mass violence, clearly has substantial consequences. Politics matters not just because the policy choices made in the immediate aftermath of attacks inscribe certain narratives into our collective memories, but also because the policies those decisions bring in their wake continually reaffirm those events as justification, even when, as in the case of the United States, the original precipitating event took place over a decade ago.

When states respond to acts of terrorism exclusively from the perspective of national security, as appears to be the approach of the current Canadian government, they not only create a particularistic – and often exclusionary - national rhetoric in an attempt to justify a muscular national security posture, they introduce new bureaucracies that enjoy levels of funding that exceed any rational evaluation of actual risk. A pair of economists have estimated that post-9/11 expenditures by the United States on security through 2011, for example, can be justified on a cost-benefit basis only if one believes that in their absence, an incident of the magnitude of the 9/11 attacks on the Twin Towers would have occurred yearly, or that an attack on the scale of the 7/7 attacks on the London Underground would have occurred more than thirty times a vear (Stewart and Mueller 2011). And like other governmental bureaucracies, the new national security bureaucracies, once established, have institutional interests in the continuity of the policies that justify their budgets. This internal pressure creates perverse incentives to expand the emergency to widen the circle of potential enemies that must be defeated, if only to justify the outsized budgets.

Accountability in this context is twisted: because declaring complete victory over the "enemy" is never an option, the national security bureaucracy faces the constant need to produce a never-ending series of "trophies" to demonstrate their continued relevance to the public. Unsurprisingly, ever more obscure groups, e.g., the notorious "Khorasan Group" (Brennan 2014), seemingly appear out of nowhere as targets

for the U.S. drone war, only to disappear, without further explanation, just as quickly. Likewise, the U.S. Department of Justice, in combination with the FBI, continues to pursue dubious sting operations against what are predominantly young, confused, and alienated Muslim males who, although often lacking the means to engage in political violence, are vulnerable to manipulation by a government agent into becoming a part of a bogus terrorist plot. The principal effect is to convince the public that the government is efficient in rooting out the hidden terrorist threat (Greenwald 2015). Indeed, in the years immediately following 9/11, the FBI was under tremendous pressure to find al-Qa'ida "sleeper cells," who were presumed to be hiding in plain sight within the American-Muslim community. It was as though senior administration officials were acting under an algorithm that predicted a certain number of terrorists, given a certain number of Muslims in a particular region, and demanded that the FBI produce suspects in accordance with that algorithm. U.S. federal prosecutors, using the inchoate crime of "material support for terrorism," prosecuted not only the hapless and clueless, but also groups and individuals closely associated with peaceful Palestinian solidarity work (McConnell 2009). The U.S. Supreme Court facilitated this approach because, in a bit of Orwellian interpretation, it accepted the government's interpretation of the term to include even non-lethal, immaterial support for terrorism (Fadel 2010a, 2010b).

This hyper-vigilance targeting Muslim communities in Western democracies is contrasted with the relative nonchalance that governments of liberal democracies have demonstrated towards the problem of right-wing white supremacist groups, even though intelligence data indicate that white supremacists in Canada, for example, have accounted for more terrorist attacks than Muslims (Boutilier 2015). It would nevertheless be surprising if Canadian security agencies don't adopt the same dubious strategies as their American counterparts against Muslim populations in the event that C-51 becomes law.

This disturbing dynamic of the security response to terrorism is amply demonstrated by the arc of the "war on terror" in the United States. Despite official protests to the contrary, U.S. policies adopted after 9/11 clearly targeted Muslim populations in the United States, without any need for particular evidence of actual wrongdoing beyond the fact that they were Muslims, or from Muslim-majority countries. Muslims at large were identified as a vague but a very real and endemic threat to national security. This threat would be permanently resolved only when Muslims adopted a different set of values, when they accepted a "reformed" Islam whose values would be modern and liberal. Crucially, Muslims would also have to blithely accept the current distribution of global economic, political, and military power and the subordinate position of Muslims and Muslim states within it. And, of course, only the national security state can determine whether the needed reformation has proceeded sufficiently to justify dismantling itself.

The great irony, of course, is that even as the most sophisticated and expansive surveillance operation in human history has been deployed against Western Muslims, the FBI failed to prevent either the underwear bomber from boarding a plane to Detroit, despite the fact that his own father went to the U.S. embassy in Nigeria to warn them, or the Boston Marathon bombings from occurring, despite the fact that Russian intelligence warned the United States about one of the attackers. French security services seem to suffer from the same bizarre combination of omniscient surveillance combined with incompetence in processing the data they acquire: all the *Charlie Hebdo* attackers had been under the surveillance of French intelligence, but the security services nevertheless failed to discover the conspiracy before it was too late. Similarly, Canadian security agencies were unable to prevent either of the October 2014 attacks, despite the fact that both attackers were known to the security apparatus.

The need to "convert" Muslims to the right values is openly expressed in a pair of book-length studies by the RAND Corporation published in the wake of 9/11, "Civil Democratic Islam," and "Building Moderate Muslim Networks." The authors of these studies attempted to classify the Muslim public into various theological groups along a scale of dangerousness, determined exclusively by perceived levels of religiosity. The authors ranked possible Muslim interlocutors with the government as falling into four broad categories: religious modernists, religious traditionalists, fundamentalists, and secularists. Of possible interlocutors, the fundamentalists were the worst; traditionalists were acceptable, but only if there were no choice but to deal with them, and even then, only to keep them as credible opponents of fundamentalists; modernists were to be promoted as the "face of contemporary Islam"; and, although secularists were to be defended case by case, the authors advised the government to support "secular civic and cultural institutions and programs" (Benard 2003, 47-8).

RAND's policy recommendations were an express call to manipulate the doctrines of a religious tradition in the service of the state's policies, a position that hardly seems consistent with a liberal state's ostensible commitment to neutrality in matters of religion. The report therefore focuses exclusively on intra-Muslim disputes on issues of concern to Western liberals, such as polygamy, Islamic criminal law, women's rights, and the rights of minorities, but is completely silent on any of the political grievances that Muslim political actors use to justify their violence against the United States and its Western allies (PBS Newshour 1996, 1998). Policymakers' incessant focus on the nature of Islamic theological and ethical doctrines without any consideration of politics is emblematic of the prior decision that it is inconceivable that Muslims, as a group, possess the capacity to make collective political claims against the West in general, and the United States in particular. Alternatively, even if they do possess such capacity, those complaints need not be taken seriously, either because they lack merit on their face, or because the claimants are too weak to press their positions.

Everything that we have seen emerge from Paris in the wake of the Charlie Hebdo massacre suggests that the French political elite have wholeheartedly embraced the anti-terrorism model developed in the United States; the French have even taken to calling the Charlie Hebdo massacre "France's 9/11." The dominance of the security state model in the French state's immediate policy response is manifested in its decision to ramp up both security pressure and ideological pressure on the French Muslim community by aggressively prosecuting scores of Muslims and other dissidents for inchoate associational or expressive crimes, such as allegedly expressing sympathy for terrorism. Such is the case of the French comedian Dieudonné M'bala M'bala, who said "Tonight ... I feel like Charlie Coulibaly." Muslims are also encouraged to embrace *laïcité* by abandoning anything that marks them as "Muslim" (Boston Review 2015). Some measures are simply absurd, such as the decision of some French municipalities, in the name of laïcité, to refuse to make available non-pork options in schools, while others border on fascism, like the arrest of an eight-year-old who allegedly expressed sympathy for the "terrorists" at school. Unsurprisingly, the political class's embrace of the security response has had the all-toopredictable effect of strengthening the French extreme right; the same risk is surfacing in Canada (Hébert 2015).

The incessant demand for Islamic theological reform quickly operationalizes itself into what amounts to a modern inquisition. In such a climate, outward indicators of religiosity, political views, or both, serve as a proxy for dangerousness and therefore justify casting a broad net of surveillance over what otherwise would be viewed as citizens' constitutionally protected activities. Whether intended or not, Muslim populations certainly experience these policies as inquisitions, with the attendant risks of alienation such policies generate (Siddiqui 2015). Security services have justified their pervasive surveillance of Muslim populations by adopting the "conveyor-belt" model of radicalization. According to this model, radicalization begins with what appears to be innocuous steps, such as attending a mosque for daily prayers or protesting American policy in the Middle East, but then, perhaps imperceptibly, the person is moved, as if he or she is on a "conveyor belt," toward increasingly extreme positions until he or she is tempted to use violence against neighbours (Patel 2011).

Once a person or a group is placed in the crucible of an inquisition, however, the target cannot escape unscathed, because it is impossible to prove the bona fides of one's claims. Because it is impossible to verify the sincerity by which Muslims profess their commitment to civic values, they are subjected to practical tests intended to show that they have sufficiently abandoned their religious identities and accepted their subordinate place in the body politic. It is from the perspective of an inquisition that we should understand the social role of *Charlie Hebdo*'s offensive cartoons of the Prophet Muhammad. Far from a daring act of blasphemy (is there anything *less* blasphemous in Western civilization than insulting the Prophet Muhammad?), *Charlie Hebdo*'s cartoons were purely an exercise of social power, in this case, by a secular republican elite who wished to show French Muslims that it could deride them and their most cherished *private* beliefs without that minority having any power to stop them.

The precise goal is to separate "good" Muslims from "bad" ones. But, like the inquisitor who tried in vain to determine the sincerity of those who had been coerced into Catholicism, French republicans can never be certain of Muslims' loyalty: even if the French Muslim expresses restraint, and indeed does not even protest the cartoons, the republican observer suspects that the Muslim's outward restraint could very well mask a hidden resentment of the republican insistence that he abandon his religious sensitivities. Our suspicion of his insincerity means we must continually renew the test to ensure his or her continued fidelity to the republic. The drawing of the offensive cartoons, just like the national security concerns that drive wars outside the state and the draconian security measures internal to it, must therefore continue until we are sure that the Muslims in our midst have given up any pretences that it is possible to be a faithful Muslim and a good citizen of the republic. The inquisition must continue until the faithful Muslim reveals himself to be a bad Muslim by renouncing Islamic garb, halal food, and other markers of difference.

The inquisition(s) to which Muslims are subjected are not limited to France, but can be found in numerous jurisdictions claiming to be liberal. In the United States, the price Muslims must pay for an invitation to the White House to mark the Islamic month of fasting is that they must break their fast with the ambassador of a country, Israel, that the overwhelming majority of Muslims believe was born out of colonialism, is fundamentally racist, and is involved in an ongoing campaign of ethnic cleansing against a largely Muslim population, at the same time as they are being lectured about its unquestionable right of self-defence.³ All the while, they are expected to maintain a stoic silence and pretend that no insult occurred. Potential immigrants from Muslim-majority countries to the European Union, meanwhile, are expected to demonstrate their internalization of "European" values of gender equality and sexual autonomy by, for example, watching movies of gay couples kissing in public without visible irritation or other expression of objection. European Muslims in general, and French Muslims in particular, cannot reasonably expect the national judiciaries to push back against the politicians. The French judiciary, it is true, resisted popular legislation targeting Islamic garb, but post-9/11 decisions of the European Court of Human Rights have made it abundantly clear that not only can European states regulate Islamic dress in virtually any fashion they see fit, they are also authorized to regulate Islam, including its public dissemination, because Islam itself is viewed as being inconsistent with European public order. With the ECHR endorsing the applicability of the principles of "militant democracy" to Islam and Muslims, it is hard to see any limits to the anti-Muslim measures that might be adopted in Europe (Macklem 2006).⁴

³ Indeed many of the U.S. Muslim organizations that sent representatives to that event soon found themselves at the receiving end of vociferous criticism from the United States, and at times, the international Muslim community (Rydhan 2014; al-Khatahtbeh 2014).

⁴ A very recent decision of Germany's federal constitutional court striking down a state rule prohibiting school teachers from wearing an Islamic head scarf, however, may suggest that this argument should not be generalized to all European states (*World-Post* 2015).

Western governments will no doubt resist my analogy between the tactics of the Spanish Inquisition and post-9/11 security policies in North America and Europe. But it seems indisputable that since 9/11 Muslims have been marked out for special treatment in liberal democracies, whether de facto, as in the United States, or de jure, as in Europe. In some respects this has had its intended effects: to a large extent, established Muslim organizations – to the extent they exist – have virtually ceased playing any role that could be deemed to be critical of Western governments. While the right continues to accuse them of being soft on terrorism, in fact these organizations often fall over each other in their attempts to disassociate themselves and Islam from political violence. The irony, of course, is that the more Muslim leaders in the West denounce political violence in the name of Islam, the more right-wing non-Muslims, on the one hand, accuse them of engaging in tagiyya (dissimulation), and the more liberal non-Muslims accuse them of having a "cotton-candy" or "politically correct" view of their religion (Wood 2015). The complete impotence of Western Muslim leadership to resist the national security policies of Western states, despite their eagerness to cooperate with the authorities at all junctures, has had the more serious practical effect of undermining any credibility that these organizations might have in persuading alienated Western Muslims from sympathizing with or engaging in politically motivated violence in the name of Islam.

If the goal of policy is to reduce the risk of politically motivated violence, Norway's treatment of Breivik offers a more hopeful model than the security-state model adopted by the United States following 9/11, and followed by most Western democracies. Instead of using the attack to mark the threshold of a new order, the political system should treat the attack simply as the actions of the individuals responsible for it under ordinary principles of applicable law. This would mean accepting the political legitimacy of Muslim demands, not in the sense that they must be granted, but that they are to be scrutinized using the same criteria that apply to any political demands, not extraordinary criteria that apply only to Muslim demands on the theory that Islam represents an existential threat to liberal democracy. If liberal democracies can recognize extreme right-wing political parties, surely they are capable of withstanding any imagined threat posed by Muslims, who account for only a small segment of their population.

Practically, this demand means that Muslims should be granted the same access to public support of religion that is available to other European religions but not presently offered to Muslims: if speech restrictions apply to protect other religions, then they must also apply to protect Muslims; if private ordering is permitted to regulate certain aspects of family law generally, then Muslims ought to be allowed to do the same within the same limits that apply generally; if non-Muslims are allowed to express solidarity with non-citizens on the ground of religious affinity, then so too Muslim expressions of solidarity with foreign Muslims ought not to be suspicious. If Muslims are free to criticize Islamic doctrines only, but not liberalism - whether in its ideal form or in its imperfect embodiments - it is implausible, even delusional, to expect Muslims to develop their own principled responses to marginalization, discrimination, imperialism, and other forms of domination that are consistent with democratic civility. Unfortunately, with each new terrorist incident, and each new war, the choices that Western policymakers are offering Muslims are fast-narrowing to either that of Avan Hirsi Ali or Anwar al-Awlaki. This "with us or against us" approach, however, will lead only to increased religious persecution of Muslims, increased religiously motivated violence, or both.

While rejecting the path of the security state seems like an obvious and easy choice, I am not particularly optimistic that policymakers will show greater wisdom today than they did fourteen years ago. Instead of "militant democracy" that acts against a relatively powerless minority, we need politicians with the courage to act militantly to defend the political centre, which still exists in liberal democracies, even as it has failed to find sufficiently passionate defenders. Unfortunately, I suspect the exact opposite will take place, with more and more politicians engaging in demagogic rhetoric, either out of irrational conviction, or in a vain effort to appease the right. As a result, things will likely become much worse for Western Muslims generally, but especially for European Muslims. Unless we can sincerely say #JeSuisCharlie and #JeSuis-Ahmad,⁵ then more repression, more *Charlie Hebdos*, and more Breiviks await us in the not too distant future.

^{5 #}JeSuisAhmad was a hashtag that many French Muslims, and Muslims worldwide, adopted in response to the *Charlie Hebdo* massacre to honour the French-Muslim policeman whom the *Charlie Hebdo* attackers executed after wounding him on the street following the massacres in the office of *Charlie Hebdo*.

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REFERENCES

- Ali, Wajahat, Eli Clifton, Matthew Duss, Lee Fang, Scott Keyes, and Faiz Shakir. 2011. *Fear Inc.: The Roots of the Islamophobia Network in America*. Center for American Progress, https://cdn.americanprogress.org/wpcontent/uploads/issues/2011/08/pdf/islamophobia.pdf.
- Benard, Cheryl. 2003. *Civil Democratic Islam: Partners, Resources and Strategies*. Santa Monica, CA: RAND, National Security Research Division, http:// www.rand.org/content/dam/rand/pubs/monograph_reports/2005/ MR1716.pdf.
- *Boston Review.* 2015. "Forum: After Charlie Hebdo," March 3, http://www .bostonreview.net/forum/john-bowen-france-after-charlie-hebdo.
- Boutilier, Alex. 2015. "CSIS Highlights White Supremacist Threat Ahead of Radical Islam." *Toronto Star*, March 15, http://www.thestar.com/news/ canada/2015/03/15/csis-highlights-white-supremacist-threat-ahead-ofradical-islam.html.
- Brennan, Kate. 2014. "Exclusive: U.S. Renews Air Campaign against Khorasan Group." *FP: The Cable*, 6 November, http://foreignpolicy.com/2014/11/06/ exclusive-u-s-renews-air-campaign-against-khorasan-group/.
- CBS News. 2015. "French Newspaper Killings Is Worst Terrorist Attack in Europe since 2005, CIA Insider Says," January 7, http://www.cbsnews. com/videos/french-newspaper-killings-is-worst-terrorist-attack-in-europesince-2005-cia-insider-says/.
- *The Center for American Progress.* 2015. "Fear Inc.: Explore the \$57 Million Network Fueling Islamophobia in the United States," https://islamophobianetwork.com/.
- CTVNews. 2014. "Suspect in Attack on 2 Soldiers in Quebec 'Had Become Radicalized': PMO," October 20, http://www.ctvnews.ca/canada/suspectin-attack-on-2-soldiers-in-quebec-had-become-radicalized-pmo-1.2062419.
- Duss, Matthew, Yasmine Taeb, and Ken Gude. 2015. *Fear, Inc. 2.0.* Washington, DC: Center for American Progress, https://cdn.americanprogress.org/wp-content/uploads/2015/02/FearInc-report2.11.pdf.
- Fadel, Mohammad. 2010a. "The Supreme Court and Material Support for Terrorist Organizations." FP: The Middle East Channel, March 10, http:// foreignpolicy.com/2010/03/10/the-supreme-court-and-material-supportfor-terrorist-organizations/.
- 2010b. "The Supreme Court's Troubling Decision on 'Material Support.""
 FP: The Middle East Channel, June 23, http://foreignpolicy.com/2010/ 06/23/the-supreme-courts-troubling-decision-on-material-support/.
- Greenwald, Glenn. 2015. "Why Does the FBI Have to Manufacture Its Own

Plots If Terrorism and ISIS Are Such Grave Threats?" The // Intercept, February 26, https://firstlook.org/theintercept/2015/02/26/fbi-manufacture-plots-terrorism-isis-grave-threats/.

- Hébert, Chantal. 2015. "Conservatives Risk Trapping Themselves in Own Web of Fear: Hébert." *Toronto Star*, March 10, http://www.thestar.com/news/canada/2015/03/10/conservatives-risk-trapping-themselves-in-own-web-of-fear-hbert.html.
- al-Khatahtbeh, Amani. 2014. "Why We Called for a Boycott of the White House Iftar." *Huffington Post*, July 24, http://www.huffingtonpost.com/ amani-alkhatahtbeh/boycott-of-the-white-house-iftar_b_5615167.html.
- Lewis, Mark. 2012. "At Trial's End, Lawyers Say Norway Killer Not Insane." New York Times, June 22, http://www.nytimes.com/2012/06/23/world/ europe/oslo-killers-lawyers-say-he-is-sane.html?ref=topics.

Macklem, Patrick. 2006. "Militant Democracy, Legal Pluralism, and the Paradox of Self-Determination." International Journal of Constitutional Law 4:488.

- McConnell, Scott. 2009. "Holy Land Foundation Trial Reflects Misguided US Policy towards Hamas." Mondoweiss, May 29, http://mondoweiss .net/2009/05/holy-land-foundation-trial.
- PBS Newshour. 1996. "Bin Laden's Fatwa," August 23, http://www.pbs.org/ newshour/updates/military-july-dec96-fatwa_1996/.
- 1998. "Al Qaeda's Second Fatwa," February 23, http://www.pbs.org/ newshour/updates/military-jan-june98-fatwa_1998/.
- Patel, Faiza. 2011. "Rethinking Radicalization." Brennan Center for Justice, New York University School of Law, June 14, http://www.brennancenter .org/blog/rethinking-radicalization.
- Rydhan, Irfan. 2014. "Ramadan 2014: White House Iftar and Learning to Play the Game." Patheos, July 25, http://www.patheos.com/blogs/ altmuslim/2014/07/ramadan-2014-white-house-iftar-and-learning-toplay-the-game/.
- Siddiqui, Haroon. 2015. "Harper Senators Hold McCarthyesque Hearings." *Toronto Star*, March 4, http://www.thestar.com/opinion/commentary/ 2015/03/04/harper-senators-hold-mccarthyesque-hearings-siddiqui.html.
- Stewart, Mark, and John Mueller. 2011. "Ten Years and \$1 Trillion Later, What Has All Our Security Spending Achieved?" Nieman Watchdog: Questions the Press Should Ask, June 2, http://www.niemanwatchdog.org/index. cfm?fuseaction=ask_this.view&askthisid=00512.
- Waslin, Michele. 2012. "DHS's NSEERS Program, While Inactive, Continues to Discriminate." Immigration Impact, June 28, http://immigrationimpact.com/2012/06/28/dhss-nseers-program-while-inactive-continues-to-discriminate/.

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- Wingrove, Josh, Steven Chase, Bill Curry, and Jill Mahoney. 2014. "Attack on Ottawa: PM Harper Cites Terrorist Motive." *Globe and Mail*, October 22, http://www.theglobeandmail.com/news/national/parliament-shooting/ article21217602/?page=all.
- Wood, Graeme. 2015. "What ISIS Really Wants." *Atlantic*, March, http://www.theatlantic.com/features/archive/2015/02/what-isis-really-wants/384980/.
- WorldPost. 2015. "In Germany, High Court Overturns Headscarf Ban for Teachers," March 13, http://www.huffingtonpost.com/2015/03/13/ germany-headscarf-ban_n_6863336.html?ir=World&ncid=fcbklnkushpmg 00000014.