

## PART V

### *Days of Rage*

The soundest strategy in war is to postpone operations until the moral disintegration of the enemy renders the delivery of the mortal blow both possible and easy.

V. I. Lenin  
Russian Revolutionary Leader

The OIC wasted little time initiating its Ten-Year Programme to “combat Islamophobia” after it was ratified in late 2005. It began with a full-blown information campaign directed at a set of cartoons. On September 30, 2005, a Danish satirical newspaper called *Jyllands-Posten* published a series of unflattering cartoons depicting the Prophet Mohammed.<sup>1</sup> Outrage in the Muslim world quickly intensified, creating what has been called the Danish Cartoon Crisis.

On the heels of the OIC’s announcement of its Ten-Year Programme, which called for legislation and punishment for violations of Islamic law on slander and blasphemy, I noticed the addition of new players, an acceleration and intensification of provocative events, and an echo-chamber pointing in a single, unified direction. Something big was happening, and I could see the gathering storm. In January 2006, I sent emails to the Office of the Secretary of Defense, the Joint Chiefs of Staff, and the Special Operations Command warning of what was unfolding and explained their seriousness. At the time, nobody took the message seriously.

By mid-February, the Muslim world worked itself into such a convulsive rage that the Cartoon Crisis gained intense media attention. Later, I was asked to brief Special Operations Command’s (SOCOM) Strategic Communication Synchronization Conference in early March 2006. They asked me to explain how I had been able to warn them of these events by identifying and forecasting them with such precision before they occurred. The briefing brought the conference to a standstill.

The calculated manufacture of outrage is among the principle lines of operation that the OIC uses to implement its Ten-Year Programme of Action. The Cartoon Crisis was the prototype event in a campaign towards implementing Islamic principles of slander, giving rise to talking points and demands that have remained consistent through similar incidents. The rhetoric surrounding these events is identical, and will be described and analyzed in detail in the following pages. The challenge is to identify elements of messaging that find their way into what should be recognized as a sustained strategic communications and information operations campaign.

When taken together, I began to also recognize a convergence among the ummah, dawah, and jihadi elements within the Islamic domain. This convergence centered clearly on the Islamic law of slander and the effort to implement it globally. Dawah, jihad, and ummah entities worked together to move the ball forward, with each element

concentrating on its own principal function, from the nation-states and the supra-national OIC (the ummah) managing the meta-narrative, to the Muslim Brotherhood's Days of Rage as instigators (representing dawah), to the actual rioters infusing terror into the process (jihad). In these Programme of Action campaigns, it is important to take note that groups like al-Qaeda are only peripherally involved.

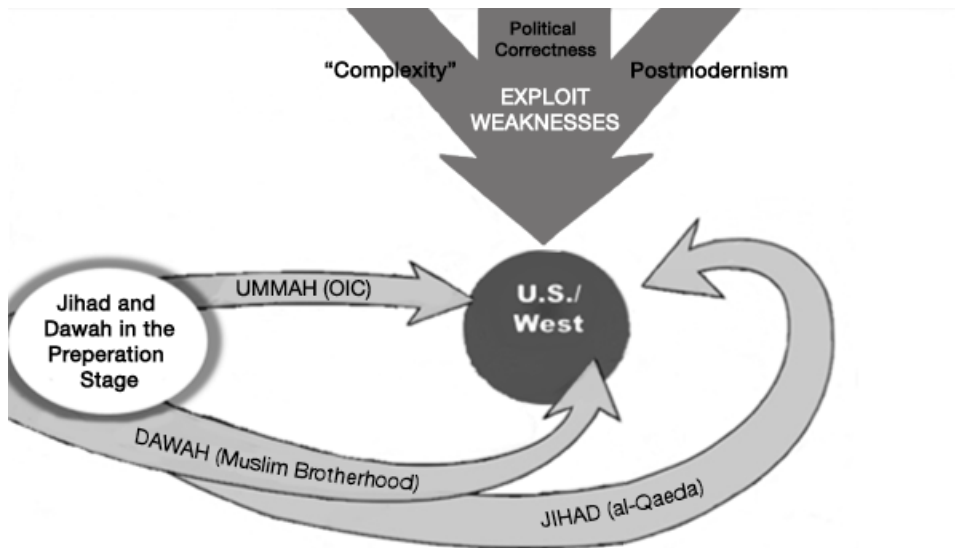
Throughout the contours of this convergence, there is a place for all three components of the Islamic Movement. The ummah entities identify the offense and establish the narrative, dawah entities demand compliance, and jihadis—in this scenario the incited mob—exact violence. For example, when Pope Benedict gave his lecture at a rarified Regensburg seminar, the ummah—represented by the OIC and leaders of its Member States—used this opportunity to attack him by calling his statements an outrage; dawah entities around the world amplified the message in order to incite Muslim groups to elevated levels of anger, agitating for a Day of Rage (tacitly sanctioned by the ummah); which created a permissive environment for jihadi violence—targeted rioting and murder. Yet no one is interested in pulling out their flowcharts and block diagram programs to connect these dots. Here is how the script unfolds:

- 1 *Ummah*: The OIC's Islamophobia Observatory presents material from real-time, so-called Islamophobic incidents, also known as infractions against Islamic law prohibiting slander.
- 2 *Ummah*: A suitable "crisis event" is chosen from this material—or manufactured outright—at the nation-state or OIC level. These events are always expressions of speech that, while violating Islamic notions of slander, have always been considered protected speech by the U.S. Constitution. A recognized narrative energizes the process and targets an offender.
- 3 *Dawah/Jihad*: The Muslim Brotherhood or other dawah entities use new and traditional media to foment outrage calculated to incite violence, called Days of Rage. These are followed very shortly by bursts of violence targeting the interests of the offending non-Muslim party or state.
- 4 *Ummah/Dawah*: An echo chamber of governmental, NGO, and Brotherhood entities amplify outrage and (a) demand apologies from the offending nation-state now intimidated; (b) use the opportunity to once again promote legislative solutions to curb blasphemy or slander against Islam; and (c) offer to play the "good cop" to avoid the actions of the "bad cops."

The dynamics of this convergence do not necessarily indicate—and do not require—that there be a formal chain of command and control authority. Enforcement comes from the functional roles each entity plays based on the line of operation it holds and its orientation to Islamic law.

When the OIC made "Defamation of Islam" its standard, the punishment for transgressing that standard became enforceable by the Islamic Movement's dawah entities. And, because the penalty for this crime can be death, according to shariah, it becomes permissive for jihadi entities to take action. Stated differently, the OIC's decision to declare the slander standard establishes a permissive environment. Given the functional orientation of dawah entities, they would see their role as enforcing that standard by providing warning to non-Muslims when a given event constitutes slander (according to Islamic norms). If the dawah condition goes unmet, a jihadi entity's functional orientation to Islamic law would require that action be taken.

Even as there may be no formal chain of command by Western estimations, an efficient form of command and control exists that is dependent on the requirements set by shariah, given the functional roles of the players. It is difficult to recognize the relationship without understanding the discipline-enforcing role that shariah brings to Islamic entities expressly acting in subordination to its rules.



The following table is a list of significant events stemming from the ratification of the OIC’s Ten-Year Programme of Action in December 2005. Notice the addition in 2009 of an important component to the dynamic, that of Western Action, in the form of actual Western legal support in enforcing that action.

2005	Ten-Year Programme of Action ratified
2006	<i>Day of Rage:</i> Danish Cartoon Crisis <i>Day of Rage:</i> Pope Benedict’s Regensburg Speech
2007	<i>Day of Rage:</i> Knighting of Salman Rushdie <i>Warning:</i> Pakistani demands on Rushdie and UK
2008	<i>Warning:</i> OIC targets Geert Wilders, presses for criminal prosecution
2009	<i>Western Action:</i> Geert Wilders charged with hate speech by Dutch court <i>Western Action:</i> U.S. co-sponsors UN Resolution on Defamation of Religions with OIC
2010	<i>Western Action:</i> U.S. government pressures Florida man for Qur’an burning
2011	<i>Day of Rage:</i> Qur’an burning in Afghanistan <i>Western Action:</i> U.S. Secretary of State makes Joint Remarks with OIC General Secretary
2012	<i>Day of Rage:</i> Riots around the Middle East in response to <i>Innocence of Muslims</i> film <i>Western Action:</i> U.S. jails <i>Innocence of Muslims</i> filmmaker

If the goal of the Islamic Movement and the OIC is to institute Islamic law—beginning with its notions of slander—in non-Muslim jurisdictions, this carefully orchestrated drama is incomplete without recognizing some corroboration from the target population, represented above as Western Action. With feckless Western leaders responding as the Days of Rage intended, we can add the final element to the dynamics of convergence:

- 5 *Dhimmi:* Representatives of non-Muslim states, either fearful of violent retribution or ideologically over-committed to ‘hate crimes’ curbs on free expression, apologize to the gravely offended among those in the Muslim community whose job it is to be outraged. Their actions usually range from (a) statements of condemnation of the offending speech that frame Muslim violence as the natural response; and (b) promises to advance OIC treaties that circumvent the plain meaning of the First Amendment. After the Benghazi attack of 2012, an outrageous new milestone was reached in the non-Muslim world, including (c) criminal punishments to appease Muslim demands, including prison time of what was otherwise protected speech.

The “dhimmi” label seems appropriate. Regardless of what non-Muslim leaders in the West convince themselves of concerning the actions they take—from tangible fear of violence to multicultural or “hate crimes” rationale—by caving to shariah curbs on free expression, our representatives are, in fact, bringing their populations under the sway of shariah. Their fears of violent retribution make them indistinguishable from non-Muslims in a state of abeyance. Kamali, in *Freedom of Expression in Islam*, records a traditional Islamic position on dhimmitude that captures this dynamic:

Imam al-Shafi’i is said to have held that the protected status of the *dhimmi* terminates when he commits blasphemy and that, consequently, he becomes an enemy of war (*harbi*), in which case the head of state is within his rights to punish him as such. Imam al-Shafi’i adds that in this matter the head of state has discretionary powers similar to he has with regard to prisoners of war, that is, over whether to kill the offender or ask for ransom, and over whether or not to expropriate his property.<sup>2</sup>

While our leaders choose to remain unaware of the consequences of their actions, they are nevertheless operating under degraded norms of free expression and imposing them on the population. Understood this way, the supranational campaign to stamp out Islamophobia actually represents a purposeful, directed hostile foreign assault on First Amendment free expression standards.

The Ten-Year Programme came in the wake of the OIC’s failed efforts to criminalize blasphemy on an international level. Since 2006, however, the OIC has harnessed the power of disparate elements of the Islamic community to this single purpose. The chapters that follow describe how the pieces fit together.

## Islamophobia

Both Islamic law and the intent to enforce it are real. Islamic principles of free expression—based on Islamic jurisprudence on slander, defamation, talebearing, and blasphemy—differ greatly from Western, or at least non-Muslim, conceptions of this fundamental human right. As we have seen in the case of slander, shariah also applies to the behavior of non-Muslims, both as non-Muslim subjects of the Islamic state and in jurisdictions in the dar al-harb. Given the imperative to spread shariah as the law of the land, it is only natural that an entity capable of such an effort throughout “the four corners of the world” engages in a campaign to do so.<sup>3</sup> As an organization that makes plausible claims to represent the Muslim Ummah, the OIC is well situated to embark on such a campaign to impose Islamic legal standards globally, beginning with the subordination of free expression to Islamic law.

The framers of the Cairo Declaration made a point of defining human rights *as* shariah. In the Islamic context, this is a valid equation. Yet the OIC’s use of the term “human rights” is also an indication that it understands the importance the West places on this language in global forums. This is not completely an issue of subterfuge. Today, many Islamic thinkers have so thoroughly assimilated the terminology of Western trans-national forums and high-level bureaucratic conferences that, in some elite circles, representatives of the Muslim world understand their own worldview as comfortably sitting in Western postmodernism narratives. Before he was a leading Middle Eastern studies expert, Edward Said was in the vanguard of literary deconstructionism. In a sense, Islamophobia is simply deconstructionism applied. Islamic law enters into the Western world through the diversity-friendly Islamophobia construct.

The term “Islamophobia” emerges from the chain of “phobias” that left-leaning minority-rights groups affix as clinical-sounding descriptors to critics of their agendas. Islamophobia is not descriptive, however, for it is purposefully imprecise; it is used chiefly as a blunt rhetorical object, impugning the motives and mental state of those at whom it is hurled. The construction “-phobia” nearly always suggests an irrational or unfounded fear that is linked

to a mental pathology. The Mayo Clinic defines it as “an overwhelming and **unreasonable fear** of an object or situation **that poses little real danger.**”<sup>4</sup>

Abdur-Rahman Muhammad, a “former radical Islamist,” said that the Brotherhood-associated International Institute for Islamic Thought (IIIT) developed the concept of Islamophobia, as it is currently used, in the 1980s to “emulate the homosexual activists who used the term ‘homophobia’ to great effect. He said the group meeting at IIIT saw ‘Islamophobia’ as a way to ‘beat up their critics.’”<sup>5</sup> The OIC has taken control of the term’s usage and retains control of its application for use in hostile information campaigns. The term “Islamophobia” has become, in effect, a brand that is managed by the OIC. When we see the word Islamophobia we should instantly be aware that it represents an OIC campaign package that seeks its implementation internationally and, through the support of the Brotherhood in America, domestically through front groups that, as the Explanatory Memorandum says, “adopt Muslims’ causes domestically and globally . . . and support the global Islamic State wherever it is.”<sup>6</sup>

In the non-Muslim world, Islamophobia has also been closely associated with the efforts of a left-leaning independent research and social policy agency since the mid-1990s called the Runnymede Trust. Founded in London in 1968 as a think tank dedicated to domestic race relations, the group’s focus eventually shifted away from combatting anti-Semitism to researching and advocating for the increasing population of Muslims in Britain. In 1996, it formed the Commission on British Muslims and Islamophobia, publishing *Islamophobia: A Challenge for Us All* the following year.

Conflating ideological elements with racial matters, *Islamophobia: A Challenge for Us All* set the tone for pseudo-analysis in the decades to come. The OIC, in its Third OIC Observatory Report (2010),<sup>7</sup> favorably relied on *Islamophobia: A Challenge for Us All*, going so far as to link to a brochure that prominently displayed the notorious “closed view/open view” Islamophobia matrix.<sup>8</sup> The book argues that “Islamophobia refers to unfounded hostility towards Islam,” which it claims leads to “hostility in unfair discrimination against Muslim individuals and communities and to the exclusion of Muslims from mainstream political and social life.”<sup>9</sup> While the book reflects the political activism of the Runnymede Trust, it also resembles an information operation campaign plan to impose a narrative by favoring “open views” that reflect diversity and multicultural standards over targeted “closed views” that reflect prevailing views that were to be – and still are – disfavored. In Runnymede’s simplistic but effective paradigm, everyone is supposed to be “open” and should be made to feel isolated and looked down upon when “closed.” Throughout the paper, “closed views” of Islam are contrasted with “open views” along a very suspect and subjective axis. For example,

*Closed View:* Islam seen as a single monolithic bloc, static and **unresponsive to new realities.**

*Open View:* Islam seen as **diverse and progressive**, with internal differences, debates and development.

In chameleon-like fashion, Runnymede casts Islamophobia as the modern equivalent of anti-Semitism.<sup>10</sup> It also provides a disparaging definition of Christians in an effort to genericize the term “fundamentalism,” assigning the term a negative connotation.<sup>11</sup> One suspects that Runnymede would harshly criticize this approach as a form of Islamophobia if it were directed at an Islamic practice as opposed to a Christian one.

Of course, Runnymede recognizes that “Islamophobia” lacks a coherent definition and that its associated narratives are hostile; it’s inherent in the design. To deflect these criticisms, *Islamophobia: A Challenge for Us All* places these concerns in the mouths of its critics so that it can acknowledge these truths while at the same time dismissing them. From the mouth of the “critic”, what we really have is the mission statement of the Islamophobia initiative back in 1997:

The term [Islamophobia] is not, admittedly, ideal. Critics of it consider that its use panders to what they call political correctness, that it stifles legitimate criticism of Islam, and that it demonises [sic] and stigmatizes anyone who wished to engage in such criticism.<sup>12</sup>

Watching the interplay between left-leaning groups like Runnymede Trust and the OIC (or the Brotherhood), it's important not to lose sight of the fact that Islamic scholars have established the knowability of Islamic law based on the unchanging revelation of the Qur'an, the hadith, and scholarly consensus. Describing the "fixed inner sphere" of Islamic law as "diverse and progressive"—meaning, presumably, that no system exists for enforcing the stability of the doctrine over time—is incorrect. While there are variations across the schools of Islamic jurisprudence, the range of possible legal opinions is circumscribed and does not affect those aspects of shariah that are relevant to national security, such as jihad and the relations between Muslims and non-Muslims.

Starting with its first report on the subject in 1996, the OIC has relied on the Runnymede Trust for its application of Islamophobia. But Runnymede's calculated ambiguity about the term's precise meaning persists. At a September 2013 meeting of the Organization for Security and Co-operation in Europe (OSCE) in Warsaw, former Runnymede staffer Robin Richardson—author of *Guidelines for Educators on Countering Intolerance and Discrimination against Muslims: Addressing Islamophobia through Education*—conceded again that, in regard to the word Islamophobia, "terminology is important and we've got the wrong terminology. . . . I'm not ashamed that our language isn't good enough."<sup>13</sup>

Lost in its own ideology, or perhaps because of it, Runnymede is in the position, as we have seen with its tortured use of "open" and "closed" views, of trying to maintain a postmodern narrative that supports the OIC's Islamophobia initiative. It is through the scientism of groups like Runnymede that the -phobia construction is able to mask shariah initiatives that seek to criminalize not just expression but thought in postmodern terms. To accomplish this, the OIC expanded the definition of the postmodern use of terms like racism. In November 2007, OIC Secretary General Ekmeleddin Ihsanoglu decried

**defamatory** campaigns that seek to incite a particular civilization against another, thereby inflaming violence, hatred and extremism, and ultimately leading to terrorism.

As reiterated by the OIC, the international community must counter **campaigns of calumny against Islam** and Muslims to prevent the spread of Islamophobia which attempts to cause a rift between civilizations, a situation that has become a **new form of racial discrimination**.<sup>14</sup>

By casting Islamophobia as a new form of racism, the OIC masks Islamic submission campaigns in narratives calculated to appeal to politically correct audiences. Runnymede serves this purpose. The goal is to criminalize Islamic notions of slander in non-Muslim jurisdictions. Furthermore, according to the OIC, defamation "seeks to incite a particular civilization against another," the so-called "rift between civilizations"—in other words, silence is being demanded under threat of violence. In this language, one begins to see the shifting of responsibility for acts of violence from the perpetrator to the victim. The word "calumny" used here must be understood as it is defined in Islamic law. The insistence that "the international community must counter campaigns of calumny against Islam and Muslims" constitutes a state-sponsored demand that non-Muslim jurisdictions implement shariah doctrines of slander against its non-Muslim citizens.

Consider the final communiqué of the Third Extraordinary Session of the Islamic Summit Conference in 2005. Remember, because it was a summit, it consisted of the heads of state of the OIC Member States. The excerpt below is from Section II, "In the Political Field":

The Conference underlined the need to collectively endeavor to reflect the noble Islamic values, counter Islamophobia, **defamation of Islam** and its values and desecration of Islamic holy sites, and to effectively coordinate with States as well as **regional** and **international** institutions and organizations to **urge them to criminalize this phenomenon as a form of racism**.<sup>15</sup>

That expansive definition of racism—“based on discrimination and **disparagement** on a cultural, rather than biological basis”—was on display at the 2001 Conference of Foreign Ministers in Bamako, Mali. In a section titled, “Contemporary Forms of Racism”:

Contemporary forms of racism are based on discrimination and disparagement on a **cultural, rather than biological basis**. In this content, the increasing trend of Islamophobia, as a distinct form of xenophobia in non-Muslim societies is very alarming.<sup>16</sup>

The term “disparagement” is an indicator that the OIC understands criticism of Islam as a “contemporary form of racism.” As we have seen in *Reliance*, the Islamic view of disparagement is essentially defined as slander when it comes to things related to Islam or Muslims. In this case, the relevant language on talebearing is worth reviewing: “A person should not speak of anything he notices about people besides that which benefits a Muslim . . .”<sup>17</sup>

Note that “racism” as defined by the OIC falls under the category, “Contemporary Forms of Racism”—which does not comport with standard notions of racism because it has nothing to do with biology or race. The next paragraph makes it clear that the desired outcome is the “elimination” of such “disparagement,” i.e., speech:

The Committee for the Elimination of Racial Discrimination and the Commission on **Human Rights** along with its subsidiary bodies and mechanisms, **have an important guiding role in the elimination of the contemporary forms of racism**. All governments should cooperate fully with the Committee and the Special Rapporteur on the Contemporary Forms of Racism, Racial Discrimination, Xenophobia and Related Intolerance with the view to enabling them to fulfill their mandates and to examine the incidents of **contemporary forms of racism, more specifically discrimination based on religion, including against Islam and Muslims**.<sup>18</sup>

So “contemporary forms” of racial discrimination are actually based on something else entirely. Obviously, this is not the racism that United States Code was written to enforce. The 2001 OIC Bamako document continues:

The World Conference considers that the **defamation of an individual’s religion** provides the basis of, legitimates [sic] and inevitably leads to the **manifestation of racism, including in their structural forms**, such as **Islamophobia** against the adherents of that religion. Furthermore, the **defamation of religions**, including its denial is a primary source of both **the persistence and mutation of racism**. UN organs and specialized agencies should therefore strengthen their collective efforts together with the relevant intergovernmental organizations, such as the OIC, to implement programmes and **undertake initiatives to combat the defamation of religions and manifestations of this in any form**.<sup>19</sup>

The OIC’s alarming description of Islamophobia as “a contemporary form of racism” is echoed by others in the Islamic community. Former Personal Representative to the OSCE, Turkish Ambassador Ömür Orhun, currently serves as Adviser of the Secretary General of the OIC on “Combating Discrimination and Promoting Human Rights.” In 2011, Orhun authored a paper titled, “Challenges Facing Muslims in Europe.” It was subsequently endorsed by the OIC and posted on its website in English. Just like Runnymede, Orhun spoke of the lack of a commonly agreed upon definition of Islamophobia just before providing the OIC’s more expansive (and official) one:

Islamophobia needs but lacks a commonly agreed definition. It has often been defined as “fear or suspicion of Islam, Muslims, and matters pertaining to them.” **I think that this is a rather narrow definition**. I prefer to base my definition on the following concepts:

“Islamophobia is a **contemporary form of racism** and xenophobia motivated by unfounded fear, mistrust and hatred of Muslims and Islam. Islamophobia is also manifested through intolerance, discrimination and **adverse public discourse against Muslims and Islam**. Differentiating from classical racism and xenophobia, Islamophobia is mainly based on radicalization [sic] of Islam and its followers.”<sup>20</sup>

Underneath the purported lack of a “commonly agreed definition” of Islamophobia, there invariably rests a very concrete definition that is explicitly based on OIC constructs. At this point, it makes sense to apply the 24/25 Rule: Since the OIC has made clear that “Shari’ah is the only source of reference for . . . explanation or clarification” on matters of human

rights, it can only point to Islamic standards of slander and punishment. Because so few understand the interplay between the postmodern narrative and shariah, predominantly non-Muslim international bodies have allowed their discussion on Islam to be controlled by entities that define human rights according to shariah and, in the process, have implemented those standards. For the OIC,

Defamation = Racism = Defamation of Religions = Islamophobia

At the center of this process is the left/Islamist alliance. Allowing left-leaning multicultural organizations like Runnymede to take point in the development and implementation of Islamophobia narratives in Western venues introduces a measure of ambiguity that provides ummah entities like the OIC with room to maneuver. In many respects, the Runnymede relationship perfectly reflects the thinking behind the 1982 Muslim Brotherhood document, seized in Lugano, Switzerland, that holds that, in order for “gradual efforts aimed at gaining control of local centers through institutional action in furtherance of establishing an Islamic power [government] on earth”<sup>21</sup> to succeed, they must “avoid the Movement hurting itself with major confrontation”<sup>22</sup> early on. They do this by resorting to the “principle of temporary cooperation” through “limited contacts between certain leaders, on a case-by-case basis, as long as these contacts do not violate the [shariah] law”—but they “must not give them allegiance or take them into confidence.”<sup>23</sup> For the OIC, Runnymede is a tool to be used for a purpose and disposed of when no longer needed.

An example of how this ambiguity creates room for maneuvering arose at that same 2013 OSCE Conference in Warsaw. As noted, original Runnymede staffer Robin Richardson acknowledged that the group’s definition of Islamophobia was seriously defective. Seeing that the Islamophobia narrative was under direct public assault in an international forum, Umut Topçuoğlu, Counselor to the Permanent OSCE Delegation of Turkey, played on the ambiguity by seemingly distancing the Islamophobia discussion from the OIC’s while suggesting a retreat from the Islamophobia definition:

You, Sir, mentioned that the Turkish delegation provided a definition of Islamophobia which came from the Organization of Islamic Cooperation [that] my delegation provided in some previous sessions or meetings on tolerance and non-discrimination [that] was formulated by a retired Turkish ambassador, Mr. Ömür Orhun. . . . But the point is that the definition was formulated by someone who has deep experience in these affairs and who actually worked within the OSCE in these affairs, so I think saying it’s an OIC definition is really sort of distorting the facts.<sup>24</sup>

Yet even with all the contrived confusion, Counselor Topçuoğlu could not help but tip his hat to the real status of Islamophobia when, a few days later, he said,

One other thing I wanted to mention is I keep hearing “the official definition brought by the Turkish Delegation, the official definition of the Turkish Delegation,” now, the definition you’re referring to . . . of course there is no official agreement among the OSCE States . . . as long as you go on saying “the official definition by Turkey, the official definition by Turkey,” well, I mean, you’re doing our advertising, maybe it’ll become the official definition.<sup>25</sup>

Because Turkey is an OIC Member State and Ambassador Orhun represented Turkey at both the OSCE and the OIC, the 24/25 Rule demands that analysts understand that Orhun’s treatment of Islamophobia is consistent not only with regard to the OIC’s definition of Islamophobia but also with Turkey’s treatment of Islamophobia in such international forums as the OSCE. (For a more detailed discussion on how the OIC interoperates with left-leaning groups like Runnymede in international forums, Appendix 2 “The OSCE” is a case study that provides greater detail on the events of that forum.)

Islamophobia provides the OIC with a linguistic mechanism to advance its contention that any criticism of Islamic doctrine, Islam’s leading figures, and Islamic practices—however barbaric or true—constitutes a hate crime, “defamation of Islam” based on a new form of racism.

As we will soon see, Islamophobia is immediately associated with an OIC initiative to criminalize the speech of non-Muslims in non-Muslim jurisdictions through the auspices of the United Nations. Since at least 2005, we have



been on formal notice that the term Islamophobia is under the active control of state actor foreign powers. As a foreign instrument that seeks enforcement through extralegal means over the First Amendment, the OIC's campaign should be understood to be hostile, as should all activities that facilitate it. As Josef Pieper warned, once a foreign power controls a country's speech, it will ultimately control its thought.

#### THE ISLAMOPHOBIA OBSERVATORY AND ITS TARGETS

As mandated by the Ten Year Programme of Action in December 2005, the OIC called for the creation of an "Islamophobia Observatory," which charged with monitoring and reporting all issues of Islamophobia on an annual basis.<sup>26</sup> It is essentially a state-sponsored collection effort targeting non-Muslims living in non-Muslim jurisdictions, including the United States, for the purpose of intimidation and attacking their free speech rights. Ihsanoglu expressed satisfaction with the "daily, 24-hour documentation of every single occurrence" of Islamophobic speech.<sup>27</sup> The Observatory, together with its reports, is a documentation process in furtherance of creating pretexts to launch multi-tiered information campaigns.

The Islamophobia Observatory represents the OIC's capability to determine whether countries like the United States, itself beholden to the First Amendment, are in compliance with OIC requirements to enforce the Islamic law of slander (that would violate the integrity of the First Amendment). This is important because, in order to enforce OIC-directed law in foreign jurisdictions, it has to be able to develop accurate assessment tools to measure a country's conformance to its standard.

By May 2006, the Middle-Eastern press announced the standing up of the Islamophobia Observatory in Jeddah, Saudi Arabia. At the Senior Officials' Preparatory Meeting to the 33<sup>rd</sup> Session of the Islamic Conference of Foreign Ministers (i.e., a meeting of real state actors), OIC Secretary General Ihsanoglu said that the aim of the Observatory was "to tackle the issue of Islamophobia head on."<sup>28</sup>

The OIC's annual *Observatory Reports on Islamophobia* purports to offer "a comprehensive picture of Islamophobia as it exists mainly in contemporary Western societies."<sup>29</sup> The first *Observatory Report* was released in March 2008,<sup>30</sup> the second in May 2009,<sup>31</sup> the third in May 2010,<sup>32</sup> and the most recent in June 2014.<sup>33</sup>

The OIC's Observatory has been issuing Islamophobia Reports on a regular basis since its creation. Properly understood, the OIC Islamophobia Observatory mission represents a collection effort by a foreign state actor directed against, among others, American citizens inside the United States when exercising their constitutionally protected speech. It is a hostile act. The titles of the reports state that they are presented to OIC foreign ministers in council, which demonstrates that these *Observatory Reports* reflect state action. For example: *Seventh OIC Observatory Report on Islamophobia October 2013–April 2014*, Presented to the 41<sup>st</sup> Council of Foreign Ministers, Jeddah, Kingdom of Saudi Arabia, 18–19 June 2014.<sup>34</sup>

#### RESPECT FOR ALL RELIGIONS, SO LONG AS THEY ARE ALL ISLAM

Let's re-examine the first passage from the Ten-Year Programme of Action. The first item under the heading "Combating Islamophobia" says:

Emphasize the responsibility of the international community, including all governments, to **ensure respect for all religions** and combat their defamation.<sup>35</sup>

"Ensure respect for all religions"? This sounds good. It seems inclusive, both interfaith and multicultural; it is something that all of us can support. But remember there is the requirement to follow the 24/25 Rule. Per the Cairo Declaration, because the OIC definition of "human rights" is shariah, we must consider the statement "ensure re-

spect for all religions and combat their defamation” in light of Islamic law to understand what the OIC means. This statement is located in a section titled “Combating Islamophobia,” which should serve as an indicator.

To start, Islamic law does not allow for the actual recognition of other religions. The Qur’an—and Islamic law—recognizes *only Islam*. Surah 3 tells us that

Allah said, “If anyone desires a religion other than Islam (submission to Allah),<sup>418</sup> **never will it be accepted of him; and in the Hereafter He will be in the ranks of those who have lost All spiritual good.**” (Qur’an 3:85)

Translator Yusuf Ali footnotes this passage with commentary #418:

The Muslim position is clear. The Muslim does not claim to have a religion peculiar to himself. **Islam is not a sect or an ethnic religion.** In its view all Religion is one, for the Truth is one. It was the religion preached by all the earlier Prophets. It was the truth taught by all the inspired Books. In essence it amounts to a consciousness of the Will and Plan of Allah and a joyful submission to that Will and Plan. **If anyone wants a religion other than that, he is false to his own nature, as he is false to Allah’s Will and Plan.** Such a one cannot expect guidance, for he has deliberately renounced guidance.

If the Qur’an—which is the basis of all Islamic law—tells us that any religion other than Islam is “false,” what does the OIC mean when it proposes, “to ensure respect for all religions and combat their defamation”? Further, in light of the 24/25 Rule, what can the OIC consider as other religions? In the section titled “Abrogation of Previously Revealed Religions,” *Reliance* relies on hadith to shed some light on this question. In a rigorously authenticated hadith from Muslim, it says:

By Him in whose hand is the soul of Muhammad (pbuh), any person of this Community, **any Jew, or any Christian who hears me and dies without believing** in what I have been sent with **will be an inhabitant of hell.**<sup>36</sup>

What does “defamation of religion” not consist of? If published Islamic law is the criterion, then Book W, Section 4, “The Finality of the Prophet’s Message,” in *Reliance* tells us that “**Islam is the final religion** that Allah Most High will never lessen or abrogate until the Last Day.”<sup>37</sup> For our purposes, the most important part is in paragraph 2 of Section 4:

(2) **Previously revealed religions were valid in their own eras**, as is attested to by many verses in the Holy Koran, **but were abrogated by the universal message of Islam**, as is equally attested to by many verses of the Koran. Both points are worthy of attention from English-speaking Muslims, who are occasionally exposed to erroneous theories advanced by some teachers and Koran translators **affirming these religions’ validity but denying or not mentioning their abrogation**, or that it is **unbelief (kufr)** to hold that the remnant cults now bearing the names of formerly valid religions, such as “Christianity” or “Judaism,” are acceptable to Allah Most High after He sent the final Messenger (Allah bless him and give him peace) to the entire world. This is a matter over which there is **no disagreement among the scholars . . .**

Firmly stated as read, it becomes even more powerful when understood in light of the shariah we’ve already covered. Given that “denying or not mentioning” the abrogation of the other religions is described as “unbelief (*kufr*),” this rule tells us that anyone who thinks Christianity or Judaism is acceptable is subject to accusations of apostasy. When Section 4.1(2) is parsed with a proper application of the 24/25 Rule, the statement is boldly dispositive on three important points: (1) that all other religions have been abrogated; (2) that it is apostasy to believe otherwise; and (3) that this is a universally held doctrine within the Sunni world because there is consensus among the scholars—*ijma*. This explains the statement that “it is unbelief (*kufr*) to hold that the remnant cults,” such as Judaism or Christianity, are “acceptable.” What does *Reliance* mean by “unbelief”? As described in the chapter on “Apostasy from Islam,”<sup>38</sup> in Book O, “Justice,” Section 8, “Apostasy from Islam,” we read that

Leaving Islam is the ugliest form of unbelief and the worst. (o8.0) **Whoever Voluntarily Leaves Islam Is Killed.** When a person who has reached puberty and is sane voluntarily apostatizes from Islam, **he deserves to be killed.** (o8.1)<sup>39</sup>

This principle in Islamic law is neither obscure nor outdated. As of 2006, first-grade students in Saudi Arabia are taught that “Every religion other than Islam is false.”<sup>40</sup> When stating this position, the text specifically relies on the Quranic verse we already encountered, Verse 3:85.

God said, “If anyone desires a religion other than Islam (submission to Allah), never will it be accepted of him; and in the Hereafter He will be in the ranks of those who have lost All spiritual good.” (Qur’an 3:85)

Published Islamic law, relying on recognized authority that cites authoritative hadith, validates the plain reading of Qur’an 3:85. That verse establishes the set of all religions recognized as valid by Islam as limited to Islam alone. This knowledge should influence our understanding of phrases like “respect for all religions” in a section on “Combating Islamophobia” when used by an entity that speaks for the Ummah (which the OIC emphatically says it does). When an entity that is explicitly beholden to Islamic law speaks of “defamation of religion,” it means defamation of Islam, and *only* defamation of Islam. Read with this understanding of what constitutes religion, the 2012 statement of a Turkish minister that “Christianity has ceased to be a religion but has become a culture of its own”<sup>41</sup> not only does not seem ridiculous, it actually makes sense.

When assessing the meaning of OIC statements, legal documents, and resolutions, it is crucial to use Islamic definitions of terms when they arise. In fact, the 24/25 Rule must be applied. Considering shariah on the subject of religions other than Islam, we now know what the OIC means by “respect for other religions.” In other words, the OIC does not recognize the legitimacy of other religions, specifically Judaism and Christianity. This is true as a matter of published Islamic law. Perhaps the manipulation of terms and concepts with known dual meanings when dealing with non-Muslim audiences is an example of *Reliance’s* admonition “to employ words that give a misleading impression, meaning to intend by one’s words something this is literally true, in respect to which one is not lying, while the outward purport of the words deceives the hearer”<sup>42</sup> instead of lying.

## Days of Rage

The Danish Cartoon Crisis erupted in September 2005 after the Danish newspaper *Jyllands-Posten* published a series of twelve caricatures that depicted Islam’s prophet, Mohammed. Commissioned as part of the paper’s editorial campaign to highlight the debate about criticism of Islam and self-censorship in Denmark, the images included the now-famous caricature of Mohammed with a bomb-shaped turban; another poked fun at the Islamic promise of seventy-two virgins awaiting the faithful who die in jihad. Diplomatic protests from Islamic countries and death threats from Muslims who believe Islam forbids the depiction of Mohammed began within days of their publication, but widespread violent protests only broke out across the Muslim world months later in February 2006, after a delegation of Danish imams<sup>43</sup> toured Muslim capitals in an effort to stir up outrage.<sup>44</sup>

Days of Rage are calculated spasms of anger in the Muslim Street; they are violent protests where people have been killed. These events are intended to inculcate fear and to bring demands for apology to the fore, and they operate on the same principle as spousal abuse: the abuser threatens a population that, if you say what the abusers say is not permitted, hostile action will be taken and innocent people will be terrorized, hurt, and maybe even killed. The resulting violence is always the victim’s fault. “Stop me before I kill again.”

The Islamophobia/Day of Rage narrative was set. On January 29, 2006, *Arab News* reported that the General Secretary of the OIC had put the West on notice of their violation of Islamic law using the phrase, “the civilized boundaries of freedom.”

The OIC represents fifty-seven countries and Ihsanoglu said the Muslim world expected an apology. It is legitimate—it is the legitimate expectation of 1.3 billion Muslims that perpetrators of blasphemy who have transgressed the civilized boundaries of freedom redress the situation by extending an unqualified apology,<sup>45</sup>

That same day, the *Bahrain Tribune Daily* also quoted Ihsanoglu’s bellicose comments on the cartoons:

The angry reaction in the Muslim world . . . is mainly due to the premeditated and deliberate attack on the revered person of the prophet, whose holy position, message and teachings were maliciously and calculatingly sacrilege by the so called defenders of freedom.<sup>46</sup>

As the Secretary General of the OIC, it can reasonably be said that Ihsanoglu speaks for the organization’s fifty-seven Member States—several of which are considered allies in the War on Terror. As other examples are provided, please note the use of the term “unqualified apology,” as this term conveys the sense of an ultimatum. Pakistani Prime Minister Nawaz went even further:

The exiled former prime minister said the Muslim fury could spread further if the advocates of so-called freedom of expression failed to offer unconditional apology. He said **the culprits must be punished** and the **civilized countries must enact clear legislation** to check such incidents in the future. Nawaz said the UN Charter of universal ethical principles and even the Constitution of Denmark did not permit **hurting the feelings** of the people of other faiths.<sup>47</sup>

From the *Turkish Daily News*, we have the following comments from Tayyip Erdogan, the widely touted “moderate” Prime Minister of Turkey:

Turkish Prime Minister Erdogan, in a letter to world leaders, warns of “a dangerous escalation in tension over the publication of the caricatures of the Prophet Mohammed in European newspapers that is **threatening global peace and stability**.” He said in his letter that “**Muslims could not be expected to tolerate** their Prophet being insulted in a manner that goes well beyond limits of criticism and said, “No culture has the right to insult sensitivities of another culture.”<sup>48</sup>

The Chairman of the Saudi Foreign Affairs Committee in the Majlis al Shura (Consultative Council), Dr. Bandar al Ayban, told the Arabic London daily *Asharq Al-Awsat* that

[the Saudi government] **does not accept anything that harms Islam and the Prophet** or that destroys the friendly relations that link the Muslim world and the West, **under any pretext**.<sup>49</sup>

Mohammad Hamdan, the head of Norway’s Supreme Islamic Council, gave voice to some rather threatening language on the Muslim Brotherhood-affiliated IslamOnline. The “grave consequences” comment made the threat explicit.

The SIC condemns in the strongest possible terms the publishing of such offensive cartoons. These caricatures do no good for Muslims, Christians or even atheists, but will only shake that national unity to its foundation. **Editors should not take free speech as an excuse to insult a certain religion; otherwise they risk an extremist response** from the offended, which carries grave consequences.<sup>50</sup>

As the Cartoon Crisis continued to escalate, *Arab News* reported on the words of Saudi Sheikh Ali al-Hudaify, Imam of the Prophet’s Mosque in Medina:

He said many people in the past had tried to defame the Prophet: “They were thrown in the dustbin of history and nobody remembers them.”<sup>51</sup>

None of these citations came from al-Qaeda or al-Qaeda-like jihadi groups. Indeed, the sentiments expressed were mainstream state actors in the Ummah. Also note that the threatening language emanating from state actors is strikingly similar to that of non-state actors like the Muslim Brotherhood.

Not every article that uses the Day of Rage narrative explicitly calls for this kind of protest; these events usually come in clusters, and only a few authoritative Islamic figures have the stature within the Ummah to make credible and influential headlines pronouncing it. As the Muslim Brotherhood's chief jurist, Yusuf al-Qaradawi is one such figure.

As noted earlier, Qaradawi is not only the chief jurist of the Muslim Brotherhood, but also the founder and head of the European Council for Fatwa and Research, president of the International Association of Muslim Scholars. By inciting Muslims to "rage for the sake of Allah" on February 3, 2006 in connection with the Cartoon Crisis, Qaradawi defined what would soon become recurring Days of Rage.

**"The nation must rage in anger.** It is told that Imam Al-Shafi'i said: 'Whoever was angered and did not rage is a jackass.' We are not a nation of jackasses. We are not jackasses for riding, but lions that roar. We are lions that zealously protect their dens, and avenge affronts to their sanctities. We are not a nation of jackasses. **We are a nation that should rage for the sake of Allah, His Prophet, and His book.** We are the nation of Muhammad, and we must never accept the degradation of our religion. . . . **"We must rage, and show our rage to the world . . ."**<sup>52</sup>

Even *Arshak al-Aswat* acknowledged the role of the Muslim Brotherhood in organizing the Days of Rage associated with the Cartoon Crisis.

"The Muslim Fury," one newspaper headline screamed the other day. "The rage of Islam sweeps Europe," said another. "The clash of civilizations is coming," warned one commentator. As you might have guessed, all that refers to the row provoked by the publication of cartoons of the Prophet Muhammad in a Danish newspaper four months ago. . . . The "rage machine" was set in motion when the Muslim Brotherhood, which is a political and not a religious organization, called on its sympathizers in the Middle East and Europe to take the field. A "fatwa" was issued by Yussuf al-Qaradawi, a Brotherhood sheikh with a program on the *Al Jazeera* television channel that is owned by the Emir of Qatar.<sup>53</sup>

Let's take this apart. Qaradawi has one of the Sunni Muslim world's most popular television shows, with an estimated audience in the tens of millions. He not only calls for a Day of Rage, he issues a fatwa sanctioning it under Islamic law. Al Jazeera broadcasts across the entire Muslim world. Hence, not only does formal Muslim leadership in the form of heads of state legitimize the Days of Rage, the position is reinforced by the Muslim Brotherhood. For Qaradawi's fatwa to be broadcasted, state actors had to permit it to be aired. From the beginning, the ummah and dawah entities are converged on the Islamophobia campaign.

Like the OIC itself, Days of Rage are not limited to the Sunni Muslim world. The *Bahrain Tribune* reported the Iranian president's praise for the violent protests state radio.

A leading Iranian scholar yesterday praised Muslims' "holy rage" against the publication of the Prophet Mohammed (peace be upon him) cartoons and accused the US of backing insults to Islam. The caricatures are at the heart of an international row that has seen angry and increasingly violent protests across the Muslim world, where any depiction of the Prophet is considered blasphemous. "Thank Allah the Islamic nation has shown itself well, it is a holy rage," Hojatoleslam Ahmad Khatami said in his Friday prayers sermon, carried live on state radio. . . . Khatami urged Muslims to "press on with your holy rage until you make them regret."<sup>54</sup>

The Shia Iranian president sounds just like Salafi Sunni Qaradawi. This is the language of deliberate incitement. These are threats of real violence made by state actors against the citizens of a non-Muslim state actor for lawful actions taken within its jurisdiction.

As the Islamic world became increasingly incited to anger by the cartoons, violent riots broke out in Muslim communities across Africa, the Middle East, and as far east as Indonesia. The protests lasted for weeks and resulted in the deaths of more than two hundred people.<sup>55</sup> The Danish embassy in Damascus was burned down.<sup>56</sup> The number-two man of al-Qaeda, Ayman al-Zawahiri, broadcasted a call for Muslims to boycott Denmark, Norway, France, Germany, and others that he claimed had “insulted the Prophet Mohammed.”<sup>57</sup>

The campaigns incorporated physical intimidation, including direct threats of violence against individual “offenders,” and Days of Rage calculated to intimidate leadership. On January 30th, the OIC and the Arab League jointly called for a UN resolution and even suggested sanctions.<sup>58</sup> As the OIC is an inter-governmental organization, the Ten-Year Programme is state action directed against the people living in non-Muslim jurisdictions. It is in this context that one should recognize that Ihsanoglu had no problem manufacturing mob rage as a means to directly assault freedom of expression. Days of Rage have been the enforcement mechanism of the Ten-Year Programme since January 2006. As Ihsanoglu said:

I do not blame the people who demonstrate but rather I blame those who motivate these people, and as I said, we have extremists on this side and there are extremists on the other side, and it is required of us that we follow the voice of sound mind in dealing with these people . . . the most important point here is that we have succeeded in the period since 2005 (the publishing of the Danish cartoons) succeeded internationally in that we issued reports from the Human Rights Council of the UN on how to deal with such issues . . .<sup>59</sup>

Turning a treaty on its head (and getting away with it), those driving the Day of Rage campaigns are guilty of the very “advocacy of national, racial or religious hatred that constitutes incitement to discrimination, hostility or violence” that the International Covenant on Civil and Political Rights actually “prohibited by law.”<sup>60</sup>

Perhaps it’s not surprising that those most adherent to Islamic law condemned the cartoons. But this goes much farther than that; they were raging against a non-Muslim jurisdiction that does not define slander or blasphemy against Islam or its prophet as illegal. What these acts signaled is that they want Islamic law to be enforced in non-Muslim countries. The language—and the legal principles on which it is based—is reasonably clear; it attempts to make defamation of Islam a crime, with Islamic law controlling the definition of “defamation.” When Islamic leaders accuse non-Muslims of defamation, they are denying them the right to even talk about Islam beyond what Islam permits.

The fear generated by this overt intimidation campaign had its intended effect: capitulation and compliance with Islamic law on slander and blasphemy. The repercussions continued long after the initial publication of the cartoons, including a 2010 assassination attempt against Kurt Westergaard, the Danish artist who created the cartoons. Armed with an axe and a knife, a Somali Muslim man with possible connections to al-Qaeda broke into Westergaard’s home on New Year’s Day 2010 with intent to kill.<sup>61</sup> In March 2008, protests broke out anew after several Danish newspapers reprinted the cartoons following the arrest of several suspects who were accused of plotting another assassination attempt against Westergaard.<sup>62</sup>

In the 2009 book about the Cartoon Crisis called *The Cartoons That Shook the World*, Danish-born author Jytte Klausen, a professor of politics at Brandeis University, accepted Yale University Press’s decision not to publish the cartoons.<sup>63</sup> To its credit, Denmark held firm in support of a free press. For Yale, on the other hand, cries for academic freedom ring increasingly hollow.

Days of Rage are coordinated information campaigns that operate at the leadership level. Besides the “unqualified apology” meme, other talking points emerged from the Cartoon Crisis worth reviewing, starting with “hurt feelings.”

#### “HURT FEELINGS” OF A BILLION MUSLIMS

In the midst of the Cartoon Crisis, the rhetoric of “hurt feelings” crept into many statements of outrage from Muslims worldwide. The expression is not just used in sanctioned Days of Rage narratives; it has become a steady part of the rhetoric of Islamic grievance and usually indicates that one is being accused of violating Islamic slander laws. Beginning in December 2005, the *Arab News* reported:

“Those cartoons are very offensive to every Muslim feeling, and to Islam as a religion,” said Abdel Moeti Baoumi, a theology professor at Al-Azar University in Cairo. “Do you expect Muslims to remain silent or rise and defend their religion?”<sup>64</sup>

From an editorial in the *Pakistani Observer*, the “hurt feelings” meme was advanced in conjunction with an ominous threat that “no Muslim can bear with such acts of provocation,” acts which can only be off-set by the oft-demanded “unqualified apology”:

The **religious sentiments of Muslims the world over have been hurt** as a result of the publication of blasphemous cartoons in newspapers in Denmark and some other European countries. The ongoing protest demonstrations and violent incidents is an **unambiguous proof of the fact that no Muslim can bear with such acts of provocation**. . . . These newspapers should tender **unqualified apology** to the Muslims to defuse the tension that has gripped the whole world.<sup>65</sup>

Another missive, in Karachi’s *The News*, spoke of “hurt feelings,” with a similarly threatening tone:

It says over **1.5 billion Muslims** are followers of the prophet Muhammad and **their sentiments were hurt** by the publication of the cartoons. They demanded that the Pakistan government to sever diplomatic ties with the European countries.<sup>66</sup>

It is possible that the phrase “hurt feelings” reflects an Islamic term of art that conveys a harsher point that is lost in translation. There seems to be something more being communicated than mere “hurt feelings.” The phrase is used as preparatory language in anticipation of intensified activity—in the event that groveling apologies are not forthcoming.

The “hurt feelings” narrative has been employed since the Cartoon Crisis. The attack on Pope Benedict’s speech at Regensburg in September 2006 provides another example:

Mimi Daher, a Muslim woman working in the ABC Jerusalem bureau, explained that the Grand Mufti in Jerusalem reflected this cultural mindset today when he said, “Muslims have to express their anger. Was the pope expecting Muslims to clap their hands to him while **hurting their faith and prophet?** Of course not. We call on Muslims throughout the world to react in a disciplined manner, according to our Islamic faith.” As Gerjes reminded me, when the cleric al-Qaradawi called for a **day of rage** . . .<sup>67</sup>

The U.S. Conference of Catholic Bishops conducts outreach to the Muslim Brotherhood, the very organization that Qaradawi leads. The language of “hurt feelings” was invoked again in January 2011 when Pope Benedict raised concerns about the Pakistani blasphemy laws that served as the rationale for assassinating a Christian Pakistani governor.

The pope has given a statement today that has not only **offended the 180 million Muslims** in Pakistan, it has also **hurt the sentiments of the entire Islamic world**,” said Hafiz Hussain Ahmed, a senior leader of Jamiat-e-Ulema-e-Islam.<sup>68</sup>

From the very beginning, those on the receiving end of Day of Rage campaigns—those in the West exercising their free expression—are routinely met with a phrase that paralyzes reason: “There are more than 1.x billion Muslims, and we just want to live in peace (unless . . .)”<sup>69</sup>

For example, on January 13, 2006, the *Arab News* quoted Dr. Abdullah al-Turki, Secretary General of the Muslim World League, who “warned of the negative consequences if the Danes did not conform to the demand to apol-

ogize by stating that ‘such incidents anger over **1.5 billion Muslims who want to live in peace and harmony** over the world.’”<sup>70</sup>

This is the language of intimidation, similar to the language endured by women with battered wife syndrome. “You hurt my feelings. I’m bigger than you. It is your fault if I beat you up.” Just like a global battered wife, the non-Muslim world is supposed to submit under threat of actual violence that will be forthcoming.

Intimidation by numbers also serves a secondary purpose. For the postmodern West, the sheer number of those that clamor for prohibitions on insulting Islam is enough to coerce them into thinking that the goal of world peace cannot be achieved without the cooperation of that billion-plus. Down this road, free speech will be put to a popular vote and, in so doing, will be denied as a universal right. After all, if our most fundamental freedoms are simply a custom or preference—and ones that prevent us from living in harmony with 1.x billion of our fellow human beings—is it really that important?

Remember the words of the head of the OIC taking note of the buzz phrases:

It is the legitimate expectation of **1.3 billion Muslims** that **perpetrators of blasphemy** who have **transgressed the civilized boundaries** of freedom redress the situation by extending an **unqualified apology**.<sup>71</sup>

What is “legitimate” about this? The OIC is stating what constitutes “civilized” behavior in the context of “free speech” in reference to Western jurisdictions. Why is this allowed? From *The News* (Karachi) on February 11, 2006:

It said **over 1.5 billion Muslims** are followers of the Prophet Muhammad (SAW) and **their sentiments were hurt** by the publication of the cartoons. They demanded the Pakistan Government to sever diplomatic ties with these European countries.<sup>72</sup>

The OIC continues this “hurt feeling/1.x billion Muslims” narrative to this day. The Sixth OIC Observatory Report on Islamophobia, issued in December 2013, reported that the OIC had issued a resolution in November 2012 “condemning in the strongest possible terms the reprehensible release of the film ‘Innocence of Muslims’ on *YouTube* as a deliberate act of incitement to hatred that has **deeply offended more than a 1.5 billion Muslims** and all peoples of conscience around the world.”<sup>73</sup> The report also noted a June 2013 speech that OIC General Secretary Ihsanoglu gave to UN diplomats in Geneva, Switzerland, on the “**alarming increase in Islamophobic incidents** like the Utoya massacre in Norway, the burning of Quran by the Florida Pastor and release of the reprehensible trailer on *YouTube* [that] **continue to hurt the religious sentiments of over 1.5 billion Muslims**.” He added, “the political leadership of OIC Member States has been calling for immediate remedial action.”<sup>74</sup> From his comments, it is evident that Ihsanoglu recognized that state action was taken to demand punishment where, in two instances, Days of Rage occurred.

Because the “1.x billion Muslims” is an OIC talking point, attention should be given whenever senior U.S. national security leaders make reference to it. When this happens, notice how the phrase carries a sense of futility and defeat, like when the general says, “There are 1.x billion Muslims. . . . What do you expect us to do?” Watch for it. The next time you hear a national security decisionmaker start a sentence with “there are 1.x billion Muslims,” the next thing coming out of his or her mouth will be defeatist. This talking point was constructed to convey defeat to those willing to be intimidated. When our senior leaders say it, they are already beaten in their own minds. It is the sound of submission.

#### THE POPE AND *THE SATANIC VERSES*

On September 12, 2006, Pope Benedict XVI—who was once a professor and vice rector at the University of Regensburg, Germany—delivered to a group of scholars a speech that came to be known as his Regensburg Address.



Entitled “Faith, Reason, and the University: Memories and Reflections,” the text was an erudite reflection on the role of reason rather than violence in the inspiration of faith. The speech sparked a violent reaction from the Muslim world because of a reference to words of the 14<sup>th</sup>-century Byzantine emperor Manuel II Paleologus.<sup>75</sup> Benedict quoted the emperor, speaking at a time when Constantinople was under siege from rampaging Islamic armies, as saying, “Show me just what Mohammed brought that was new, and there you will find things only evil and inhuman, such as his command to spread by the sword the faith he preached.”<sup>76</sup>

Pope Benedict XVI was accused of slandering Islam. As noted, the Muslim Brotherhood—through its most prominent spokesman, Qaradawi—condemned him and called for a Day of Rage.

Consistent with the cartoon crisis earlier, subsequent to Pope Benedict’s remarks concerning Islam on 12 September 2006, Muslim Brotherhood scholar Yusuf al-Qaradawi called for “*Yaum al-Ghadab*”—a Day of Rage, that led to a weekend of riots and killing that included shooting a nun in the back.<sup>77</sup>

Again, this is the same Muslim Brotherhood that the USCCB conducts its outreach to the Muslim community. Soon, representatives of both dawah and ummah entities joined Qaradawi in publically inciting the Islamic world to violence. On September 31, 2006, *Pravda* reported:

Haken al-Mutairi, Secretary General of Kuwait’s Umma party asked Pope Benedict to immediately apologize “to the Muslim world for his calumnies against the Prophet Muhammed and Islam.” The remarks have also drawn fire from Turkey’s highest religious authority, reported Agence France-Presse. “The remarks reflect the hatred in his heart. It is a statement full of enmity and grudge,” Ali Bardakoglu, the head of Turkey’s religious affairs directorate said.<sup>78</sup>

Some of the harshest condemnation of the Pope’s remarks came from Salih Kapusuz, deputy leader of the ruling Turkish Justice and Development Party (AKP), who said that Benedict would go down in history “in the same category . . . as [Benito] Mussolini and [Adolf] Hitler,” adding that Benedict’s comments were a deliberate attempt to “revive the mentality of the Crusades.”<sup>79</sup> Muslim leaders in Iran, Kuwait, Morocco, and Pakistan also condemned the Pope’s remarks, demanding an apology and clarification. In Iran, Ahmad Khatami, a hardline cleric in Qom, warned, “If the Pope does not apologize, Muslims’ anger will continue until he becomes remorseful.”<sup>80</sup> This issue is still unresolved. As recently as March 2012, Al-Jazeera unsuccessfully tried to get the Vatican to step back from Pope Benedict’s Regensburg comment.<sup>81</sup>

A surge of violence erupted across the Muslim world and a jihadi entity sprang to action, with Catholic communities in Africa and the Middle East bearing the brunt of the Days of Rage. A seventy-year-old Italian nun was shot four times in the back at the school where she worked in Mogadishu, Somalia; she later died in the hospital. Multiple churches in the West Bank were attacked with firebombs and burned.<sup>82</sup>

The effort to trample Western free speech on the topic of Islam is not just directed against governing entities; through skillful manipulation of the “interfaith dialogue” narrative, it also targets religious non-Muslims who are encouraged to view their Islamic interlocutors through the lens of their own religious worldviews. Institutional leadership of the Muslim world later responded to the Pope’s Regensburg address with an initial 2006 “Open Letter” to Benedict that was signed by thirty-eight shariah scholars.<sup>83</sup>

For many in the non-Muslim world, the global furor over Salman Rushdie’s fourth novel, *The Satanic Verses*, was their first exposure to the limits of free expression in Islam. His story should have served as the canary in the coalmine. Rushdie’s 1988 book was a work of fiction that featured Islam’s prophet abandoning monotheism to appeal to three goddesses worshipped in pre-Islamic Mecca. Rushdie, a citizen of the UK from India, used this source material for his work of fiction, winning numerous awards for *The Satanic Verses* worldwide.

Rushdie's book was offensive to Islam in a way that non-Muslims might find difficult to understand. Rather than disrespectfully mocking, lampooning, or criticizing Mohammed, the book depicted Islam's prophet in a way that would undermine the doctrinal validity of Islam's core teachings. For this reason, it was a clear violation of Islamic law. As an apostate from Islam, Rushdie had no standing in the Muslim world. On February 14, 1989, Iran's Supreme Leader, Ayatollah Ruhollah Khomeini, issued a short fatwa condemning Rushdie—and anyone involved with the book's publication—to death:

The author of *The Satanic Verses*, a text written, edited, and published **against Islam, against the Prophet of Islam, and against the Koran**, along with all the editors and publishers aware of its contents, are condemned to capital punishment. I call on all valiant Muslims wherever they may be in the world to execute this sentence without delay, **so that no one henceforth will dare insult the sacred beliefs of the Muslims.**<sup>84</sup>

The songwriter Cat Stevens (now Yusuf Islam), a convert to Islam, endorsed the Iranian fatwa in a speech in London during the controversy. Asked about Khomeini's pronouncement urging Rushdie's execution, Stevens answered that, "He must be killed. The Qur'an makes it clear—if someone defames the Prophet, then he must die."<sup>85</sup> Khomeini's fatwa served as a declaration of the worldwide violence that followed. While the moniker "Days of Rage" had yet to be used by Qaradawi, the carnage was the same. Tens of thousands protested violently in the Islamic world; thousands were injured and scores were killed.<sup>86</sup> Furious protests began in Muslim countries and made their way into non-Muslim countries. Stores that sold copies of *The Satanic Verses* were targeted and threatened; several were firebombed, including the offices of a community newspaper in New York that published an editorial supporting the right to publish and read the book.<sup>87</sup>

Prior to most of the worldwide outrage, the London-based Islamic weekly *Impact International* carried an editorial about *The Satanic Verses* signed by its then-publisher, Hashir Faruqi.<sup>88</sup> The piece was intended to amplify a campaign by the Muslim community in England led by the UK Action Committee on Islamic Affairs (ACIA), an umbrella group of Brotherhood-linked organizations. Faruqi's editorial echoed the ACIA's list of three demands directed at Penguin, Rushdie's publisher. Run under the title, "Publishing Sacrilege is Not Acceptable," the piece is representative of more than just the efforts of a local pressure group; the rhetoric employed by Faruqi demonstrates the continuity of message from 1989 to today.

Muslim organisations in Britain are, therefore, asking Penguin: (1) To withdraw and pulp all the copies of *The Satanic Verses* and to undertake not to reprint it in the future. (2) **To offer unqualified public apology to the World Muslim community.** (3) To pay damages equal to the returns received from the copies already sold in Britain and abroad.

Failing which they are asking Muslim authorities to freeze all Penguin and Viking business in their jurisdictions and to exempt from copyright law such titles as may be needed for educational purposes. The book should be banned in any case, **but banning is meaningless unless it is accompanied by deterrent measures.**<sup>89</sup>

The piece quotes the then-secretary general of the OIC, illustrating the group's shariah-based agenda on blasphemy long before the Ten-Year Programme.

**These demands have been supported by the Secretary General of the 46-nation Organisation of the Islamic Conference (OIC), Syed Sharifuddin Piozada, who has called upon member states to 'take strong measures to ensure that this book is withdrawn from circulation by its publisher immediately and its copies are destroyed' and 'the blasphemous book and its author must be banned from entry into all Islamic countries'.**

Perhaps it would be more salutary if the author is allowed **to enter into Islamic jurisdiction and be prosecuted under relevant law.**<sup>90</sup>

The "relevant law" is clearly the Islamic legal prohibition against slander and blasphemy. For the OIC Secretary General, it's not an issue that requires clarification, nor did he seem to believe that, in any case, Rushdie would

emerge from such a prosecution as anything but guilty. Prefacing the remark with “perhaps it would be more salutary,” Faruqi indicated that the proper way of doing things is according to a known legal standard. Finally, he concluded by bemoaning the refusal of then-Prime Minister Margaret Thatcher to ban *The Satanic Verses*: “Definitely [the UK government does] not seem to be willing to think much of the **deeply hurt feelings within the Muslim community.**”<sup>91</sup>

This brings us to the summer of 2007. After it was announced that Rushdie was to be knighted by Queen Elizabeth II for his work in literature, the global Islamic protests began afresh. This time, the OIC’s Ten-Year Programme was in place to amplify the disparate efforts. Almost immediately, the intimidation began as the author was burned in effigy or protested against in Malaysia, Kuwait, Afghanistan, India, Iraq, Egypt, Pakistan, and elsewhere. In Egypt, the Parliamentary speaker condemned the government in London, describing its supposed misdeed as worse than the traumatic offenses that launched the Cartoon Crisis. “To honor someone who has offended the Muslim religion,” he said, “is a bigger error still than the publication of caricatures attacking the Prophet Mohammed.”<sup>92</sup> Hundreds in Pakistan’s capital city of Islamabad chanted, “Our struggle will continue until Salman Rushdie is killed!”<sup>93</sup> At the same protest, Fazalur Rehman, a Taliban-supporting Islamic cleric and leader of the opposition in Pakistan’s parliament, demanded that Britain “withdraw the knighthood and hand Rushdie to Pakistan to be **punished under Islamic laws.**”<sup>94</sup>

Perhaps no country was as aggressive on the world stage in response to the Rushdie knighthood as Pakistan. The Pakistani Foreign Ministry summoned the British High Commissioner in Islamabad.

Salman Rushdie has been a controversial figure who is known less for his literary contribution and more for his **offensive and insulting writing which deeply hurts the sentiments of Muslims** all over the world. Conferment of a knighthood on Salman Rushdie shows an **utter lack of sensitivity** on the part of the British government.<sup>95</sup>

In addition to using many now-familiar OIC narratives associated with the Days of Rage campaigns, the Pakistanis upped the ante by framing their complaint in the language of international law. At the same meeting, the Foreign Ministry alerted the British of their potential violation of UN Security Council Resolution 1624, meant to “enhance dialogue and broaden understanding . . . [to prevent] **the indiscriminate targeting of religions** and cultures.”<sup>96</sup> By this point, it should be clear that there is very little daylight between the OIC’s messaging and that of its Member States.

The comments of Pakistan’s Religious Affairs Minister were even more startling than the Foreign Ministry’s. It made news around the world. As the *Washington Times* reported:

Pakistan yesterday condemned Britain’s award of a knighthood to author Salman Rushdie, and a **Cabinet minister said the honor provided a justification for suicide attacks.** “This is an occasion for the world’s 1.5 billion Muslims to look at the seriousness of this decision,” Mohammed Ijaz ul-Haq, religious affairs minister, said in parliament. “**The West is accusing Muslims of extremism and terrorism. If someone exploded a bomb on his body, he would be right to do so unless the British government apologizes** and withdraws the ‘sir’ title,” Mr. ul-Haq said. . . . “The ‘sir’ title from Britain for blasphemer Salman Rushdie has **hurt the sentiments of the Muslims across the world.**”<sup>97</sup>

It may sound strange that on the one hand the Pakistani Religious Affairs Minister Mohammed Ijaz ul-Haq calls for suicide attacks, and on the other he takes exception to accusations of “terrorism and extremism.” To Westerners, it seems like just another rant or, worse, an example of cognitive dissonance at some pathological level. But is that really the case? With the information we have discussed on Islamic law of slander and terrorism, you may recognize that ul-Haq is making a specific series of rational statements that conform to shariah. Let’s break it down:

- 1 A Pakistani cabinet minister in parliament said the knighthood awarded to Salman Rushdie provided a justification for suicide attacks. *Warning and formal notice is issued.*

- 2 Mohammed Ijaz ul-Haq is the Pakistani Religious Affairs Minister. In an Islamic Republic, the Religious Affairs Minister holds a powerful position. As important, he is the son of Zia ul-Haq, the country's president from 1978 until his death in 1988.<sup>98</sup> This means that a very powerful cabinet minister in Pakistan's parliament, who is part of a very powerful family, said that England's action provides a justification for suicide attacks. *The "fatwa" is issued by a minister with authority in parliament.*
- 3 To the charge that the West is accusing Muslims of extremism and terrorism, ul-Haq responds that a Muslim undertaking a suicide mission is "right to do so" and that it is not terrorism because it does not involve the killing of Muslims without right. *As was demonstrated in the discussion on Abrogation and later concerning the OIC, terrorism is defined strictly according to Islamic law. If Muslims are not targeted, strictly speaking, there may be no terrorism.*
- 4 The Pakistanis argued that a suicide mission in this case would not be extremism because notice was provided and time allotted for the knighthood to be withdrawn. *Because there was warning, it cannot be considered extreme.*

Because ul-Haq gave the UK notice, if the British authorities were to fail to comply with this demand, after a decent interval, action was justified. That is what happened. The British did not rescind Rushdie's Knighthood. Days later, Pakistani doctors in the UK loaded their upscale Mercedes with explosives, ready to commit acts of murder in downtown London. At the same time, a Pakistani medical school student in northern England tried to blow up a vehicle at the Glasgow airport.<sup>99</sup> Thankfully, they were apprehended. There is a bloody history for those associated with *Satanic Verses'* translation. For example, Japanese scholar Hitoshi Igarashi was stabbed to death in July 1991 for translating the book; Italian translator Ettore Caprioli was wounded by a knife attack that same month; in July 1993, Turkish publisher Aziz Nesin printed extracts from the book and was cornered in a hotel by rioters, who then set fire to the building and killed thirty-seven people, though Nesin escaped; and Norwegian translator William Nygaard was shot three times and seriously wounded in October 1993.<sup>100</sup>

There may have been no operational link between the Pakistani minister and the Pakistanis apprehended in the UK ready to unleash kinetic violence. An ummah element spoke, and jihadi elements agreed and therefore responded. No conspiracy was necessary, aside from a common understanding of shariah by those who agreed with a ruling that creates a duty to act. So was an order issued, and was it carried out? Yes and yes. A call for action was issued by a person holding state power. It was quite specific, with specific qualifications and specific consequences. There was nothing incoherent about it. And it was not al-Qaeda, the Taliban, or the Muslim Brotherhood. Rather, it was a Coalition Partner.

There is a price to pay for adopting analytical processes that disassociate clearly associated events. Were those apprehended in the UK poor madrassa children given rucksacks and told to run from Pakistan to the UK and blow themselves up because of issues of economic deprivation? No? That is the narrative we use to control our understanding of jihadi events. As our national security decisionmakers fixate on theoretical models to define the enemy, they are consistently left with conclusions that do not solve. Models that explain terrorist events through the lens of economic deprivation insist that all terrorism is a product of economic circumstances, which turns our focus on destitute and manipulated madrassa children. Of course, what is taught in Pakistani madrassas is also taught in all Pakistani schools, including the most prestigious, as part of the mandatory curriculum. As Federal Minister of Education (and retired Pakistani Lt. General) Javed Ashraf Qazi stated, "jihad will stay in the text books because it is an integral part of Islamic teachings and Muslim beliefs."<sup>101</sup>

Fidelity to narratives provides the façade behind which the national security community finds cover for its refusal to undertake fact-based threat development. As we will see, it does this in furtherance of its aversion to slandering Islam. When doing so, it conforms to Islamic law.

## GEERT WILDERS ON TRIAL

As we are beginning to see, the OIC seeks to assist the implementation of its Ten-Year Programme of Action by manufacturing events in order to shock and intimidate. The trial of Geert Wilders in the Netherlands is an example of a high-profile attempt to impose Islamic speech standards on a high-profile non-Muslim in a non-Muslim jurisdiction through the judicial offices of that country's legal system. "By their hands!"

With an increase in immigration from Islamic countries and a high immigrant birth rate, the religious and cultural demographics of Holland are changing rapidly. An embrace of multiculturalism has, in the country's largest cities, empowered a Muslim minority that resists integration with Dutch society. This includes embracing Islamic law. Consequently, the Netherlands has experienced a spate of shariah-based assassinations, beginning with the openly homosexual Dutch politician and critic of Islamic immigration Pim Fortuyn in 2004.<sup>102</sup>

That same year, director Theo van Gogh collaborated with then-politician and former Muslim Ayaan Hirsi Ali on *Submission*, a short film criticizing Islamic doctrine and the treatment of women under shariah.<sup>103</sup> After the release of that film, Van Gogh was murdered on the street in broad daylight by a young Muslim. His crime was defaming Islam.<sup>104</sup> The assassin—calling himself the "Emir of the Muhajideen"—left two long letters, filled with Quranic verses and death threats addressed to the film's co-producer, Hirsi Ali.

Since your appearance in the Dutch political arena you have been constantly busy criticizing Muslims and terrorizing Islam with your statements. . . . With these hostilities you have unleashed a boomerang effect and you know that it is only a question of time until this boomerang will seal your fate. . . . Islam will be victorious through the blood of the martyrs. They will spread its light in every dark corner of this earth and it will drive evil with the sword if necessary back into its dark hole . . . .<sup>105</sup>

Shortly thereafter, Hirsi Ali moved to the United States, and she is still not safe in the Netherlands.<sup>106</sup> Even though she was an elected political figure in her adopted European country, she was told to fend for herself, as the local police could not protect her from potential Muslim assassins in the Netherlands.

On Ali's arrival in America, CAIR's communications director Ibrahim Hooper told reporters, "we believe that [Ayaan Hirsi Ali] will bring an increase to the level of anti-Muslim bias in this country that we saw her bring to the situation in Europe."<sup>107</sup> Hooper's condemnation can be understood as support of the view that Ali had violated Islamic law. When Muslim Brotherhood entities accuse someone of slander, there is reason to view the accusation as a threat against her safety, if not her life.

Van Gogh's assassin sent another threatening letter, in addition to one to Hirsi Ali. The second letter was addressed to Dutch politician Geert Wilders. "You must know Wilders," he wrote, "that Allah has sent the Messenger Mohammed (vzmh) with the Qur'an to warn you and your kind about **the consequences of your repugnant actions.**"<sup>108</sup> Like Hirsi Ali, Wilders was being warned of the consequence of violating Islamic law. Following Van Gogh's murder, both politicians implemented around-the-clock personal security that has continued for nearly a decade.<sup>109</sup>

Geert Wilders is a Member of Parliament from the Netherlands, and the founder and leader of one of the country's largest political parties, the Party For Freedom.<sup>110</sup> In 2007, Dutch intelligence and security officials reportedly demanded that Wilders "tone down" his rhetoric with regard to Islam. He refused.<sup>111</sup> In 2008, he told a hostile interviewer at *The Guardian*, "I have a problem with Islamic tradition, culture, ideology. Not with Muslim people."<sup>112</sup>

In 2008, Wilders released a short film called *Fitna*, named after the Quranic concept that describes the type of internal upheaval that upsets the well being of the ummah. In terms of content, *Fitna* is a criticism of Islamic doc-

trine in pastiche form; Quranic exhortations to violence are interspersed with newspaper clippings and graphic video of bloodshed committed by Muslims in the name of Islam.

“It’s like a walk through the Koran,” [Wilders] explains in a sterile conference room in the Dutch parliament in The Hague, security chaps hovering outside. “My intention is to show the real face of Islam. I see it as a threat. I’m trying to use images to show that what’s written in the Koran is giving incentives to people all over the world. On a daily basis Moroccan youths are beating up homosexuals on the streets of Amsterdam.”<sup>113</sup>

Even before the release of *Fitna*, prominent far-leftist Doekle Terpstra took to *De Telegraaf*, the largest paper in the Netherlands, and agitated against Wilders. “Geert Wilders is evil,” he pronounced, “and evil has to be stopped.”<sup>114</sup> Following this exhortation, death threats against Wilders intensified.<sup>115</sup> A coalition of radical leftist and Muslim groups soon demanded criminal prosecution of the filmmaker, littering the Dutch legal system with lawsuits and complaints. One Danish imam sought 55,000 Euros from Wilders to compensate for what he referred to as his “hurt feelings.”<sup>116</sup>

At first, Dutch prosecutors conceded that, while “offensive,” Wilder’s “comments can be made in a political debate.”<sup>117</sup> By the next year, however, the Dutch government bowed to pressure from Islamic groups. After the prosecutors decided not pursue Wilders, the Dutch court that would hear his case demanded his prosecution. They ordered him to stand trial for “inciting hatred” in his public statements and for making *Fitna*: “In a democratic system, hate speech is considered so serious that it is in the general interest to draw a clear line.”<sup>118</sup> Note how closely this language maps to the OIC narrative. He was charged with, “**insulting** as well [as] substantially **harm[ing] the religious esteem** of the Islamic worshippers.”<sup>119</sup> The bias of the judges was so brazen that, in October 2010, “an appeals panel at the Amsterdam District Court . . . ordered judges in the trial of MP Geert Wilders to step down, agreeing with Wilders’ lawyers that the judges were biased.”<sup>120</sup> In 2011, the Institute for Multicultural Affairs (FORUM) looked back on the case and summarized the appeals court’s rationale:

the appeals court was of the opinion that the majority of the comments were defamatory, as they **attacked the essential religious dignity** of Muslims. According to the court of appeal, **by attacking the symbols of Islam, Wilders in fact harmed Muslims themselves.**<sup>121</sup>

How biased were the judges? Wilders’ first selection of expert witnesses—slated to include Theo van Gogh’s assassin—intended to show that the statements of Islamic doctrine and quotes from the Qur’an he was being tried for expressing were true as a matter of fact and a matter of Islamic law. The court denied Wilders his witnesses.

“It is irrelevant whether Wilder’s witnesses might prove Wilders’ observations to be correct,” the [Dutch Public Prosecution] stated, “what’s relevant is that **his observations are illegal.**”<sup>122</sup>

For such a ruling to come out of a Western court is shocking. It not only constitutes an assault on the truth, but also an assault on thought itself. Remember, Western notions of slander hold that being correct about something is a defense against liability. The new standard on Islamophobia sees this principle eviscerated. When disallowing Wilder’s panel of experts, the judges essentially stipulated to the factual basis of his claims while asserting that they were nevertheless “illegal.” *PressTV*, the Iranian government’s news agency, likewise reported on the Dutch prosecution’s harsh posture to free speech arising out of the same issue:

But prosecutor Birgit van Roessel said that “expressing his opinion in the media or through other channels is not part of an MP’s duties.”<sup>123</sup>

What would a Member of Congress think if told that “expressing his opinions” through media outlets was not a part of his congressional duty? The Dutch court was forcing the prosecution of a man for saying something it knew to be true. While this seems alien from a Western legal perspective, it does align the Dutch court with the OIC position on Islamophobia, which is designed to enforce Islamic laws of slander at the expense of the free speech rights

of Dutch citizens. This is not limited to the Netherlands. In April 2014, a British politician was arrested for “religious or racial harassment” in Hampshire when a member of the public took offense at his quoting Winston Churchill.<sup>124</sup>

Can quoting Islamic law in a critical but accurate manner qualify as slander? Returning to Book R, “Holding One’s Tongue,” in *Reliance of the Traveller*, we learn the following:

. . . quoting someone’s words to another in a way that worsens relations between them. . . .The above define slander and talebearing. As for the ruling on them, it is that they are unlawful, by the consensus . . . of Muslims.<sup>125</sup>

We have already learned that scholarly consensus on a point of law means that the Sunni community recognizes this concept as being fixed in law and not subject to change. The clause that merits our attention now is this one:

(3) The Muslim is the brother of the Muslim. He does not betray him, lie to him, or hang back from coming to his aid. **All of the Muslim is inviolable to his fellow Muslim: his reputation, his property, his blood.** (r2.6)

This tells us that the Islamic concept of slander is at least in part specifically oriented toward Islam and Islamic identity; it concerns who is allowed to participate in it and who is not. This is a different understanding of slander than we have in the West. Analyzing defamation in the context of shariah is important, because the OIC says its mission is to “[p]rotect and defend the true image of Islam and to combat defamation of Islam.” Our reading of Islamic law tells us what is meant by defamation when the OIC makes such a claim. As defined in shariah and stated by the OIC, it is entirely possible that someone can say something that is entirely true about Islam *but that does not benefit Islam*. In such a case, that person would still be guilty under Islamic concepts of defamation and subject to potentially severe punishment.

In his speech at the 35th Session of the Council of Foreign Ministers of the OIC, Secretary General Ihsanoglu described how Wilders’ film *Fitna* related to free speech. He acknowledged that the film was purposefully used to target known “freedom of expression” standards:

They have also started to look seriously into the question of **freedom of expression from the perspective of its inherent responsibility**, which should not be overlooked.<sup>126</sup>

What is the “inherent responsibility” of free expression as understood according to the 24/25 Rule? The “inherent responsibility” is Islamic notions of slander and blasphemy. When the OIC, its Member States, or subordinate elements speak of “freedom of expression,” the term is exclusively controlled by the Cairo Declaration, which in turn ratifies Islamic law. The Cairo Declaration only allows for “freedom of expression” that is *not* “contrary to the principles of shariah.” This necessarily holds true for the OIC and its Member States, as well.

When the Secretary General of the OIC talks about targeting *Fitna*, he is speaking on behalf of the heads of state of the fifty-seven Member States. Ihsanoglu’s statement was intended to bring the full weight of the Muslim world against Geert Wilders through the best efforts of his own country’s court system.

It took until June 2011 for Wilders’ trial to result in acquittal.<sup>127</sup> Why? Because (Islamic sensitivities notwithstanding) it was obvious that Wilders’ statements were true. Even so, Dutch citizens are now on notice that their courts believe that they are under some obligation to enforce Islamic speech standards against them. This is true even if the prosecutors themselves aren’t aware of it.

The OIC wasted little time in voicing its displeasure with the trial’s unfavorable outcome. Through the Iranian government’s news outlet, *Press TV*, Ihsanoglu and the OIC Foreign Minister openly demanded conformance to OIC requirements. After all, it does no good to force a show trial only to lose. The OIC denounced the outcome of the case, blaming a number of Dutch politicians for supporting Islamophobia. The article went on to quote the OIC Foreign Minister:

Repeated cases of insult to individuals or their beliefs by people, organizations or radical groups, especially when supported by governments, are **unacceptable and cause a grave concern**.

What is the “grave concern”? Is this a threat of violence?

**Wilders has taken a dangerous path**, endangering the peace and harmony of civilizations by spreading hate against Islam and Muslims in his own country as well as in other European countries. . . .

Insult to Islam and to the honored Prophet of Islam Hasrat Muhammad (PBUH), has reached a stage that can no longer be tolerated under any pretext including freedom of speech.<sup>128</sup>

There is a not-so-thinly veiled threat here. Indeed, it is a threat on top of a demand. The OIC Secretary General was telling the Dutch that its ruling was unacceptable and that they must take action—or else. Of course, under normal circumstances, Wilders would never have been prosecuted in the first place. His acquittal in Amsterdam was significant, not just for the victory of free speech principles over the OIC’s Islamophobia agenda; it was also a demonstration of the encroachment and manipulation of traditional Dutch notions of tolerance by a vocal minority of immigrants. This vocal minority was heavily supported in its effort, from abroad by the OIC and in the Netherlands by the far-left. The very language of the prosecution echoes the OIC narrative. The Geert Wilders case should be understood to be a part of the OIC’s attempt to implement its Ten Year Programme of Action.

All the examples in Part V bespeak an active, hostile information campaign designed to subordinate and subvert Western free speech rights to Islamic law of slander through intimidation and violence by state actors. The trial of Geert Wilders was the first test case for the criminal prosecution of individuals in non-Muslim countries for reasons of shariah. Recall the words of OIC Secretary General Ekmeleddin Ihsanoglu on the issue in June 2008:

In confronting the Danish cartoons and the Dutch film “Fitna,” we sent a clear message to the West regarding **the red lines that should not be crossed**. As we speak, the official West and its public opinion are all now well-aware of the sensitivities of these issues. They have also started to look seriously into the question of freedom of expression from the perspective of its inherent responsibility, which should not be overlooked.<sup>129</sup>



- <sup>1</sup> Anderson, John Ward. "Cartoons of Prophet Met with Outrage," *Washington Post*, January 31, 2009. <http://www.washingtonpost.com/wp-dyn/content/article/2006/01/30/AR2006013001316.html>
- <sup>2</sup> Kamali *Freedom of Expression in Islam*, 236.
- <sup>3</sup> Siddiqi, Shamim A. *Methodology of Dawah Ilallah in American Perspective*. (Brooklyn, New York: Forum for Islamic Work, 1989).
- <sup>4</sup> "Phobia: Definition," The Mayo Clinic, January 7, 2011. <http://www.mayoclinic.org/diseases-conditions/phobias/basics/definition/CON-20023478>
- <sup>5</sup> IPT News, "Moderate Muslims Speak Out on Capitol Hill," October 1, 2010, <http://www.investigativeproject.org/2217/moderate-muslim-speak-out-on-capitol-hill>
- <sup>6</sup> Mohamed Akram, Explanatory Memorandum, 18.
- <sup>7</sup> Third OIC Observatory Report on Islamophobia, OIC Observatory, May 2009 to April 2010, OIC Observatory, 22 May 2010, [http://www.oic-oci.org/uploads/file/Islamophobia/2010/en/Islamophobia\\_rep\\_May\\_22\\_5\\_2010.pdf.pdf](http://www.oic-oci.org/uploads/file/Islamophobia/2010/en/Islamophobia_rep_May_22_5_2010.pdf.pdf), 7. Cited hereafter as Third OIC Observatory Report on Islamophobia, OIC Observatory, May 2009.
- <sup>8</sup> Summary "Islamophobia a Challenge for us All," The Runnymede Trust, undated, URL: <http://www.runnymedetrust.org/uploads/publications/pdfs/islamophobia.pdf>, accessed 5 June 2010.
- <sup>9</sup> "Islamophobia – A Challenge for Us All," The Runnymede Trust, Runnymede, UK, 1997, (available in PDF at) URL: <http://www.divshare.com/download/launch/9605806-94b>, accessed 19 August 2014, 4. Cite hereafter as "Islamophobia – A Challenge for Us All," The Runnymede Trust, 1997.
- <sup>10</sup> "Islamophobia – A Challenge for Us All," The Runnymede Trust, 1997, 4.
- <sup>11</sup> "Islamophobia – A Challenge for Us All," The Runnymede Trust, 1997, 7.
- <sup>12</sup> "Islamophobia – A Challenge for Us All," The Runnymede Trust, 1997, 4.
- <sup>13</sup> "Torpedoing 'Islamophobia'," Center for Security Policy, 29 September 2013, transcript of OSCE Human Dimension Implementation Meeting Warsaw, Side Event Convened by the ODIHR Tolerance and Non-Discrimination Department: "Educational Initiatives and Approaches for Addressing anti-Semitism and Intolerance against Muslims," 24 September 2013. <http://www.centerforsecuritypolicy.org/2013/09/29/torpedoing-islamophobia>
- <sup>14</sup> OIC International Conference on Terrorism: Dimensions, Threats and Countermeasures—Concluding Observations from the Chair, 15-17 November 2007, Tunis, at 2, at URL: [http://www.oic-oci.org/english/article/terrorism\\_concl-en.pdf](http://www.oic-oci.org/english/article/terrorism_concl-en.pdf).
- <sup>15</sup> "Political Field," Final Communiqué of the Third Extraordinary Session of the Islamic Conference "Meeting the Challenges of the 21<sup>st</sup> Century, Solidarity in Action, Makkah al-Mukarramah, 5-6 Dhul Qa'Adah 1426H (7-8 December 2005), URL: <http://english.savefreespeech.org/?p=403>.
- <sup>16</sup> "Contemporary forms of Racism," Twenty-Eighth Session of the Islamic Conference of Foreign Ministers, Bamako.
- <sup>17</sup> Keller, *Reliance of the Traveller*, at § r3.1
- <sup>18</sup> "Defamation of Religions," Reports of the Secretary General on the Legal Affairs Submitted to the Twenty-Eighth Session of the Islamic Conference of Foreign Ministers, Bamako, Republic of Mali, 4-8 Rabi-ul-Thani, 1422H (25-29 June, 2001) at <http://www.oic-oci.org/oicnew/english/conf/fm/28/28-ICFM-SG-Rep-en/28-ICFM-LEG-D-en.htm>. Cited hereafter as Twenty-Eighth Session of the Islamic Conference of Foreign Ministers, Bamako.
- <sup>19</sup> "Defamation of Religions," Reports of the Secretary General on the Legal Affairs Submitted to the Twenty-Eighth Session of the Islamic Conference of Foreign Ministers, Bamako, Republic of Mali, 4-8 Rabi-ul-Thani, 1422H (25-29 June, 2001).
- <sup>20</sup> Ambassador Omur Orhun, "Challenges Facing Muslims in Europe – 2011-03-01," *Arches Quarterly*, Vol. 4 Edition 8, Spring/Summer 2011, Posted on OIC's Official UN portal "Organization of Islamic Cooperation – Permanent Observer Mission to the United Nations in New York, 1 March 2011, URL: <http://www.oicun.org/74/20120116050228155.html>, accessed 29 September 2013.
- <sup>21</sup> *The Fifth Point of Departure*, Toward a Worldwide Strategy for Islamic Policy (*Points of Departure, Elements, Procedures and Missions*), 1 December 1982, seized in November 2001 raid of Muslim Brotherhood leader Yusuf Nada's residence in Campione de Italia, Switzerland (Lugano).
- <sup>22</sup> *The Eight Point of Departure*, Toward a Worldwide Strategy for Islamic Policy (*Points of Departure, Elements, Procedures and Missions*), 1 December 1982, seized in November 2001 raid of Muslim Brotherhood leader Yusuf Nada's residence in Campione de Italia, Switzerland (Lugano).
- <sup>23</sup> *The Seventh Point of Departure*, Toward a Worldwide Strategy for Islamic Policy (*Points of Departure, Elements, Procedures and Missions*), 1 December 1982, seized in November 2001 raid of Muslim Brotherhood leader Yusuf Nada's residence in Campione de Italia, Switzerland (Lugano).

- <sup>24</sup> “Torpedoing ‘Islamophobia,’” Center for Security Policy, 29 September 2013, transcript of OSCE Human Dimension Implementation Meeting Warsaw, Side Event Convened by the ODIHR Tolerance and Non-Discrimination Department: “Educational Initiatives and Approaches for Addressing anti-Semitism and Intolerance against Muslims,” 24 September 2013, URL: <http://www.centerforsecuritypolicy.org/2013/09/29/torpedoing-islamophobia/>, accessed 30 September 2013.
- <sup>25</sup> Partial Transcript, OSCE Side Event “How Bad Definitions Violate Fundamental OSCE Commitments,” International Civil Liberties Alliance (ICLA), English, Opera Room, OSCE Human Dimension Implementation Meeting, Warsaw, Poland, 26 September 2013.
- <sup>26</sup> Section 2, Article VII, “Combating Islamophobia,” The Third Extraordinary Session of the Islamic Summit, Makka Al-Mukarama, Kingdom of Saudi Arabia, *Organization of the Islamic Conference*, 7-8 December 2005, at <http://www.oic-oci.org/ex-summit/english/10-years-plan.htm>. **Reads:** Affirm the need to counter Islamophobia, through the establishment of an observatory at the OIC General Secretariat to monitor all forms of Islamophobia, issue an annual report thereon, and ensure cooperation with the relevant Governmental and Non-Governmental Organizations (NGOs) in order to counter Islamophobia. Cited hereafter as Article VII, “Combating Islamophobia,” The Third Extraordinary Session of the Islamic Summit.
- <sup>27</sup> Transcript, “Ekmeleddin Ihsanoglu, Secretary General of the Organization of the Islamic Cooperation,” *Khaleejia TV*, Jeddah, 10 November 2012 (as captured as “Interview with Leader of OIC 2012, captured by *Vladtepesblog.com*, posted on *MRCtv* 5 January 2013), URL: <http://www.mrc.tv/videos/interview-leader-oic-2012>, accessed 22 January 2013.
- <sup>28</sup> “Observatory on Islamophobia Established from our Correspondent,” *KhaleejTimesOnline*, 8 May 2006, [http://www.khaleejtimes.com/DisplayArticle.aspx?xfile=data/middleeast/2006/May/middleeast\\_May178.xml&section=middleeast&col=](http://www.khaleejtimes.com/DisplayArticle.aspx?xfile=data/middleeast/2006/May/middleeast_May178.xml&section=middleeast&col=)
- <sup>29</sup> “Sixth OIC Observatory Report on Islamophobia,” *Organization of Islamic Cooperation*, Presented to the 40<sup>th</sup> Council of Foreign Ministers, Conakry, Guinea,” 9-11 December 2013. [http://www.oic-oci.org/oicv2/upload/islamophobia/2013/en/islamophobia\\_report\\_2013.pdf](http://www.oic-oci.org/oicv2/upload/islamophobia/2013/en/islamophobia_report_2013.pdf)
- <sup>30</sup> First OIC Observatory Report on Islamophobia, OIC Observatory, 13 March 2008, [http://www.theunity.org/en/index.php?option=com\\_docman&task=cat\\_view&gid=41&Itemid=14](http://www.theunity.org/en/index.php?option=com_docman&task=cat_view&gid=41&Itemid=14).
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- <sup>36</sup> Keller, *Reliance of the Traveller*, Book W “Notes and Appendices” at w4.3 “The Abrogation of Previously Revealed Religions,” at 848.
- <sup>37</sup> Keller, *Reliance of the Traveller*, Book W “Notes and Appendices” at w4.0 “The Finality of the Prophet’s Message (from a1.5),” at 846.
- <sup>38</sup> Keller, *Reliance of the Traveller*, Book O “Justice,” o8.0 “Apostasy from Islam,” at o8.0 at 595.
- <sup>39</sup> Keller, *Reliance of the Traveller*, Book O “Justice,” § o8.0 “Apostasy from Islam (*RIDDĀ*),” at §§ o8.0 and o8.1.
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- <sup>42</sup> Keller, *Reliance of the Traveller*, at § r8.2
- <sup>43</sup> Belien, Paul, “The Cartoon Hoax,” *The Brussels Journal*, 7 February 2006. <http://www.brusselsjournal.com/node/775>. **NOTE:** And indicator that this activity was designed to build up was addition of data to ensure the sought after rage. A group of Danish Muslim imams, frustrated with what they viewed as a lack of response in Denmark, compiled a dossier of images in a deliberate attempt to incite violence during a January 2006 tour of Muslim countries. They took with them not only the original twelve cartoons as published in *Jyllands-Posten*, but added three more that were not part of the original set. The imams included these deliberately because of what they perceived would be most offensive to the Mus-

lim Ummah. For example, one of the added cartoons was a faxed image of a man wearing a pig-snout and presented by the imams as depicting Mohammad. In fact, the photo had nothing to do with either the original cartoons or Islam at all; it was merely a photo of a French clown performing at a pig festival.

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