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Caroline Mala Corbin

University of Miami School of Law, ccorbin@law.miami.edu

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ESSAY: TERRORISTS ARE ALWAYS MUSLIM BUT NEVER WHITE: AT THE INTERSECTION OF CRITICAL RACE THEORY AND PROPAGANDA

Caroline Mala Corbin*

When you hear the word “terrorist,” who do you picture? Chances are, it is not a white person. In the United States, two common though false narratives about terrorists who attack America abound. We see them on television, in the movies, on the news, and, currently, in the Trump administration. The first is that “terrorists are always (brown) Muslims.” The second is that “white people are never terrorists.”

Different strands of critical race theory can help us understand these two narratives. One strand examines the role of unconscious cognitive biases in the production of stereotypes, such as the stereotype of the “Muslim terrorist.” Another strand focuses on white privilege, such as the privilege of avoiding the terrorist label.

These false narratives play a crucial role in Trump’s propaganda. As the critical race analysis uncovers, these two narratives dovetail with two constituent parts of propaganda: flawed ideologies and aspirational myths. Propaganda relies on preexisting false ideologies, which is another way to describe racist stereotyping. Propaganda also relies on certain ideals and myths, in this case, the myth of white innocence and white superiority. Thus, the Trump administration’s intentional invocation of both narratives amounts to propaganda in more than just the colloquial sense.

Part I illustrates each of the two narratives. Part II then analyzes them through a critical race lens, showing how they map onto two strands of critical race theory. Next, Part III examines how these narratives simultaneously enable and constitute propaganda. Finally, Part IV argues that the propagation of these false narratives hurts the nation’s security.

* Professor of Law, University of Miami School of Law; J.D., Columbia Law School; B.A., Harvard University. I would like to thank Pat Gudridge, Maggie McKinley, RonNell Anderson Jones, Stephen Schnably, and Alexander Tsesis for helpful comments. Thanks also to Jean Phillip Shami for excellent research assistance, and the students of the Fordham Law Review for their impeccable editing. This Essay was prepared for the Fordham Law Review symposium entitled Terrorist Incitement on the Internet held at Fordham University School of Law. For an overview of the symposium, see Alexander Tsesis, Foreword: Terrorist Incitement on the Internet, 86 FORDHAM L. REV. 367 (2017).
INTRODUCTION

When you hear the word “terrorist,” who do you picture? Chances are, it is not a white person.

While many of the essays in this symposium examine the conflict between our commitment to free speech and our need to secure the country against terrorists, this Essay will focus on speech about terrorists in the United States. More specifically, it will examine the depiction of terrorists through a critical race theory lens and through a propaganda lens.

In the United States, two common though false narratives about terrorists who attack America abound. We see them on television, in the movies, on the news, and currently, in government policy. The first is that “terrorists are always (brown) Muslims.” The second is that “white people are never terrorists.” These narratives likely influenced the image you conjure up in response to the opening question, “When you hear the word ‘terrorist,’ who do you picture?”

Different strands of critical race theory can help us understand these two narratives. One strand examines the role of unconscious cognitive biases in the production of stereotypes, such as the stereotype of the “Muslim terrorist.” Another strand focuses on white privilege, such as the privilege of almost never being labeled a terrorist.

These false narratives play a crucial role in government propaganda. Propaganda relies on preexisting false ideologies, which is another way to describe racist stereotypes. Propaganda also relies on certain ideals and myths, in this case, the myth of white innocence and white superiority.

Both false narratives—“all terrorists are Muslim” and “no whites are terrorists”—undermine rather than enhance our security. First, and most obviously, negative stereotypes jeopardize the security of Americans who are
Muslim or are perceived as Muslim. Second, the mistaken belief that white people are not terrorists results in security blind spots that make the United States less safe.

Part I illustrates each of the two narratives. Part II then analyzes them through a critical race lens, showing how they map onto two strands of critical race theory. Next, Part III examines how these narratives simultaneously enable and constitute propaganda. Finally, Part IV argues that the propagation of these false narratives hurts national security.

I. TWO FALSE NARRATIVES

It is not difficult to uncover two coexisting narratives about terrorism occurring in the United States. The first is the idea that “all terrorists are Muslim,” which sometimes even morphs into “all Muslims are terrorists.” The second is that “white people are never terrorists.” Neither are true. Despite the starkness of these summaries, they capture the general tenor of these widespread narratives.

There is not one universal definition of terrorism. This Essay follows (without necessarily endorsing) the meaning laid out in the USA PATRIOT Act, which defines “terrorism” as violent action that is intended to intimidate or coerce a civilian population or influence the government. That is, violence in the United States that is meant to inspire fear and is motivated by ideology rather than, say, financial gain.

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1. See, e.g., Nicholas J. Perry, The Numerous Federal Legal Definitions of Terrorism: The Problem of Too Many Grails, 30 J. LEGIS. 249, 249 (2004) (“The different proposed scholarly and legal definitions of terrorism are more numerous than the 150 knights seeking the grail, and definitional consensus has been at least as elusive as the Grail.”).

2. Cf Sudha Setty, Country Report on Counterterrorism: United States of America, 62 AM. J. COMP. L. 643, 646 (2014) (“The current Patriot Act definition of terrorism has a broad scope, and its reach exacerbates the uncertainty surrounding the application of conflicting definitions of terrorism, including the potential lack of notice to individuals as to whether they will be categorized as a terrorist and exactly what kind of conduct is prohibited.”).

   (A) involve acts dangerous to human life that are a violation of the criminal laws of the United States or of any State; (B) appear to be intended—(i) to intimidate or coerce a civilian population; (ii) to influence the policy of a government by intimidation or coercion; or (iii) to affect the conduct of a government by mass destruction, assassination, or kidnapping; and (C) occur primarily within the territorial jurisdiction of the United States.


A. "All Terrorists Are Muslim"

The idea that terrorists are Muslim is pervasive in the United States. Even before 9/11, a commentator could write that "the perception of Arabs as terrorists has come to dominate the public imagination."6 There is a long history of "Orientalism,"7 which positions Arab and Muslims as exotic, uncivilized, dangerous "others."8 Of course, "Arab" and "Muslim" are not interchangeable terms. In fact, in the United States, most Arabs are not Muslim, and most Muslims are not Arab.9 Nonetheless, terrorists are regularly linked to a racialized group now termed "Muslim,"10 which includes Muslims as well as those who appear Arab or Middle Eastern.11 Islam itself is presumed to be "inherently violent, alien, and inassimilable."12 The identification is not because Muslims are always responsible for terrorist attacks in the United States. As discussed in Part II.A, they are not. The reasons must be found elsewhere.

First, the depiction of Muslims on television and film is surprisingly limited.13 One analysis of over 900 Hollywood films concluded that Arab or Muslim men were usually represented as terrorists or other stock villains.14

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7. Edward Said, in his book Orientalism, established our current understanding of the word. See generally EDWARD SAID, ORIENTALISM (1978). Scholars point to Orientalism as the antecedent of today's Islamophobia. Ali, supra note 6, at 1035 ("Orientalism, or the process of Arab racialization, served as the precursor to ... Islamophobia."). Khaled A. Beydoun, Islamophobia: Toward a Legal Definition and Framework, 116 COLUM. L. REV. ONLINE 108, 115 (2016) ("Islamophobia is a modern extension of 'Orientalism,' a master discourse that positions Islam—a faith, people, and imagined geographic sphere—as the civilizational foil of the West.").

8. See Sahar F. Aziz, Sticks and Stones, the Words That Hurt: Entrenched Stereotypes Eight Years After 9/11, 13 N.Y.C. L. REV. 33, 35 (2009) (noting "the racialization of Arabs, Muslims, and South Asians as the 'terrorist other'").


10. "Racialization” has been defined as “the process by which a diverse group of people become lumped together by stigma, stereotype, and fear.” Amna Akbar, National Security’s Broken Windows, 62 UCLA L. REV. 834, 880 (2015).


12. Beydoun, supra note 7, at 111.


“A post-9/11 review of the United States film industry evinces the entrenchment of such stereotypes, as Arabs and Muslims are almost exclusively portrayed as terrorists or other negative characters rather than as everyday people with family and friends.”

As one frustrated commentator observed, American popular entertainment “ha[s] portrayed Arabs in a manner that would have caused outrage if applied to any other ethnic or religious minority in the United States.”

Second, we regularly witness the tendency to leap to the conclusion that Muslims were responsible for terror attacks. Take the U.S. media’s coverage of the recent massacre at a mosque in Quebec City, where the shooter killed six people and injured another nineteen. Early reports suggested that police were holding two men. And indeed they were—one born in Canada and one born in Morocco, a majority-Muslim country. Fox News tweeted out that there was a single Moroccan suspect: “Suspect in Quebec mosque terrorist attack was of Moroccan origin.” In fact, the gunman was the white French Canadian; the Moroccan-born man, Mohamed Belkhadir, was the one who had called the police when he heard shots. Far
from being guilty, Belkhadir had been trying to help people when the police detained him.24

Third, the news repeatedly links “Muslim” with “terrorism.” When terror attacks are perpetrated by Muslims, they receive significantly more media attention. One study, after controlling for variables like number of fatalities, found that Muslim attacks receive on average 449 percent more media coverage.25 Another study found that news about Muslims was generally news about terrorism: an analysis of news coverage by three major networks revealed that 75 percent of stories that focused on Muslims was about the Islamic State of Iraq and Syria (ISIS, or “Daesh”) or other militant groups.26

Fourth, although I am focusing on narratives rather than policy, it is worth noting that the U.S. government’s response to terrorism has disproportionately targeted Muslims.27 For example, the Antiterrorism and Effective Death Penalty Act of 1996 (AEDPA), passed after the 1995 bombing of a federal building in Oklahoma (which Muslims had nothing to do with), was enforced “almost exclusively” against the Muslim community.28 Moreover, the extensive counterterrorism measures that followed 9/11 have regularly singled out Muslims.29 All of these factors contribute to the “all terrorists are Muslim” narrative.

B. “No White People Are Terrorists”

The other common narrative is that white Christian extremists who commit terrorist attacks are not terrorists.30 There are exceptions. The Oklahoma bombing by a white Christian31 is generally considered to be an act of

24. Id. Even after the information proved inaccurate, Fox did not remove its tweet. Schladebeck, supra note 18. It tweeted a correction but nonetheless left the original intact. Id. Indeed, the tweet stayed up for nearly two days. Id. Only after the Prime Minister of Canada intervened did Fox remove it. Id.


26. Meighan Stone, Snake and Stranger: Media Coverage of Muslims and Refugee Policy, SHORENSTEIN CTR. ON MEDIA, POL. & PUB. POL’Y (June 22, 2017), https://shorensteincenter.org/media-coverage-muslims-refugee-policy/ [https://perma.cc/2LW2-GXMM]. The study also found that “[i]n reports where Muslims were the focus, only 3% of voices heard were those of Muslims.” Id.

27. Jerry Kang, Thinking Through Internment: 12/7 and 9/11, 9 ASIAN L.J. 195, 197 (2002) (“[W]e overestimate the threat posed by racial ‘others’ (in WW II, Japanese Americans; today, Arab Americans, Muslims, Middle Easterners, immigrants and anyone who looks like ‘them’).”).

28. Alia Malek, “Dying with the Wrong Name”: The Role of Law in Racializing and Erasing Arabs in America, 1 GEO. J.L. & MOD. CRITICAL RACE PERSP. 211, 245 (2009).


30. My use of “white Christian extremist” and related language intentionally parallels terminology applied to Muslims.

31. Moreover, this white Christian had ties to white supremacy. See, e.g., Mike German, Behind the Lone Terrorist, a Pack Mentality, WASH. POST (June 5, 2005),
Although there, too, the attack was initially blamed on Islamic terrorist groups.33

For the most part, though, “terrorist” was not a word applied to the white Christian responsible for the Quebec City attack.34 Nor is he alone in avoiding classification as a terrorist.35 That list also includes white Christians, often white supremacists, whose ideologies drove them to attack women’s health clinics,36 police officers,37 Jewish community centers,38 and Sikh temples.39 It includes the white Christian extremist whose slaughter of


33. Id.; see also Ali, supra note 6, at 1041 (recounting the assumptions of media, FBI, and politicians in the immediate aftermath of the Oklahoma bombing); Nagwa Ibrahim, The Origins of Muslim Racialization in U.S. Law, 7 UCLA J. ISLAMIC & NEAR E.L. 121, 139 (2009) (same).


35. Leonard Pitts, White-Extremist Terror Rare?: History Argues Otherwise, SEATTLE TIMES (Feb. 12, 2017), http://www.seattletimes.com/opinion/white-extremist-terror-rare-history-agues-otherwise/ [https://perma.cc/V6B7-8FQD] (listing examples and concluding “[w]hen white people do it, it is less likely to be perceived—or reported by news media—as terrorism”).


38. Mathis-Lilley, supra note 36 (noting that, in 2014, a virulent anti-Semite who believed the Jews were trying to destroy the white race attacked a Jewish Community Center and a Jewish retirement home in Overland Park, Kansas, killing three).

39. Terror from the Right, S. POVERTY L. CTR. (Nov. 1, 2015), https://www.splcenter.org/20100126/terror-right [https://perma.cc/J6V3-CVZB] (noting that, in 2012, a neo-Nazi white supremacist shot up a Sikh temple in Oak Creek, Wisconsin, killing six people). In addition, in 2015, a white man who praised Hitler and the Westboro Baptist Church shot up a movie theatre in Lafayette, Louisiana, killing two and wounding nine. Id.
nine African Americans at a Charleston, South Carolina, church in 2015 is widely recognized as a hate crime but not necessarily as terrorism. Yet, as former Attorney General Loretta Lynch noted, “Hate crimes are the original domestic terrorism.” Nevertheless, the terrorist label is usually reserved for when violence is perpetrated by a Muslim.

A Muslim guilty of violence who expresses admiration for previous mass shooters and writes “[t]hose whom allow their God to be mocked have no God” would instantly be labeled a terrorist. A white Christian guilty of violence who expressed admiration for the Charleston attacker and who wrote that very sentence, however, is not. Indeed, a Congressman flat-out proclaimed that white violence is just different. When asked about the Quebec City attack and, specifically, why the president is not “talking about the white terrorists who mowed down six Muslims praying at their mosque,” he responded: “I don’t know . . . . There’s a difference. You don’t have a group like ISIS or al Qaeda that is inspiring [attacks] around the world . . . . That was a one off.”


43. Jarvis DeBerry, Lafayette Shooter’s Journal Shows Overlap Between Terrorism and Mental Illness, TIMES-PICAYUNE (Jan. 16, 2016), http://www.nola.com/opinions/index.ssf/2016/01/lafayette_theater_shooter.html (recounting the entries in the diary of the Lafayette movie theatre shooter and asking how we would perceive a Muslim attacker who wrote the same thing).

44. Id.


46. Id.

47. Id.
II. THE TWO NARRATIVES THROUGH A CRITICAL RACE THEORY LENS

Critical race theory—which Kimberlé Crenshaw has described as “challeng[ing] the ways in which race and racial power are constructed and represented in American legal culture and, more generally, in American society as a whole”48—has long focused on the ways in which racial subordination is perpetuated,49 even in a society where most people avoid overt racial animosity.50 Although the field has focused primarily on the black/white racial hierarchy, this Essay applies its insights to the brown Muslim/white Christian one. This Part first examines how unconscious cognitive processes perpetuate the racist stereotypes of the first narrative.51 Next, it explores the role white privilege plays in the second narrative.52

A. The “Terrorists Are Muslim” Stereotype

Unless you are an old-school first-generation racist, you know it is wrong to judge people more harshly because of their race or ethnicity, yet that is precisely what most of us do. Countless studies have documented how the same performance or behavior is evaluated very differently depending on the race of the actor.53 Identical résumés, save for the name, yield different callback rates depending on the perceived race of the applicant.54 Law partners evaluate

48. Kimberlé Crenshaw et al., Introduction to CRITICAL RACE THEORY: THE KEY WRITINGS THAT FORMED THE MOVEMENT xiii, xiii (Kimberlé Crenshaw et al. eds., 1995); see also Adrien Kate Wing, Conceptualizing Global Substantive Justice in the Age of Obama, 13 J. GENDER RACE & JUST. 705, 706 (2010) (“[Critical race theory] is a comprehensive study, developed primarily by law professors, of how race and ethnicity are perceived in society.”).


50. Although white supremacist rallies such as the one in Charlottesville, Virginia, in August 2017 might suggest otherwise, I assume, at least for the purposes of this Essay, that most people avoid overt racial hostility. See Ann C. McGinley, Policing and the Clash of Masculinities, 59 HOW. L.J. 221, 240 (2015) (“[W]hile certain groups in society continue to express racism overtly and consciously, eliminating overt racism is not sufficient because implicit or unconscious forms of racism still remain as a result of our history that are intractable and often invisible to white people.”).

51. See Frank Rudy Cooper, Our First Unisex President?: Black Masculinity and Obama’s Feminine Side, 86 DENV. U. L. REV. 633, 643 (2009) (“A second tenet of critical race theory is that the racial status quo is often perpetuated by bias that is implicit rather than explicit.”).


54. See, e.g., Marianne Bertrand & Sendhil Mullainathan, Are Emily and Greg More Employable Than Lakisha and Jamal?: A Field Experiment on Labor Market Discrimination,
the same writing sample more harshly when it is attributed to a black associate compared to a white associate.\textsuperscript{55} Black law associate "Thomas Meyer" earned a 3.2 out of five and was criticized as "average at best and needing a lot of work" while white law associate "Thomas Meyer" was rated 4.1 and praised for his "potential and good analytical skills."\textsuperscript{56} School children shown a cartoon of one boy poking another boy sitting in front of him were more likely to describe the poking boy as mean and threatening when he was black but playful and friendly when he was white.\textsuperscript{57} There are countless studies like these yielding similar results.\textsuperscript{58}

These discriminatory assessments are not necessarily intentional. Rather, they are likely the result of unconscious cognitive processes. Because our minds are overwhelmed with information, they have developed certain cognitive shortcuts to help process all that information.\textsuperscript{59} While often accurate, these shortcuts can also lead to predictable errors.\textsuperscript{60}

One of these cognitive shortcuts is reliance on categories.\textsuperscript{61} For example, once we categorize something as a cat, we can assume a panoply of information about it with very little thought, and much of it will be accurate. At the same time, as with other cognitive shortcuts, reliance on categorization means we will make predictable mistakes. A predictable error when we categorize by race is the use of inaccurate stereotypes.\textsuperscript{62} Consequently, when we hear "terrorist," we unconsciously associate it with all manner of information, including, as it so happens, brown and Muslim perpetrators.

Moreover, once people have certain stereotypes in place, confirmation bias sets in. That is, people tend to notice, process, and remember information in

\textsuperscript{55} Debra Cassens Weiss, \textit{Partners in Study Gave Legal Memo a Lower Rating When Told Author Wasn't White}, A.B.A. J. (Apr. 21, 2014, 12:09 PM), http://www.abajournal.com/news/article/hypothetical_legal_memo_demonstrates_unconscious_biases [https://perma.cc/TGU4-2AJE]. In both cases, the partners were told that Thomas Meyer wrote the writing sample. \textit{Id.} But half of the partners were told the associate was white while the other half was told he was black. \textit{Id.}

\textsuperscript{56} \textit{Id.}


\textsuperscript{58} See, e.g., Corbin, \textit{supra} note 53.


\textsuperscript{60} \textit{Id.} at 1296.

\textsuperscript{61} Krieger, \textit{supra} note 57, at 1188 ("To function at all, we must design strategies for simplifying the perceptual environment and acting on less-than-perfect information. A major way we accomplish both goals is by creating categories.").

\textsuperscript{62} \textit{Id.} ("According to this view, stereotypes, like other categorical structures, are cognitive mechanisms that \textit{all} people, not just 'prejudiced' ones, use to simplify the task of perceiving, processing, and retaining information about people in memory. They are central, and indeed essential to normal cognitive functioning.").
a way that confirms their preexisting beliefs. Because of their preexisting stereotypes, the law partners found around six spelling and grammar errors in black Thomas Meyer’s writing but only around three in white Thomas Meyer’s. Confirmation bias also affects memory: chances are that, three months later, the partners would remember the errors black Thomas Meyer made and the good points white Thomas Meyer made.

Indeed, once stereotypes take hold, they can be so strong that we may “remember” stereotype-consistent acts that did not even occur. This cognitive error may explain how White House Spokesperson Kellyanne Conway “remembered” the Bowling Green massacre by two Iraqi refugees—an incident that existed only in the imagination of Kellyanne Conway.

This short discussion focuses only on implicit racial bias and not the explicit racism that seems increasingly more visible. Moreover, this is just

63. Elizabeth Thornburg, Cognitive Bias, the “Band of Experts,” and the Anti-Litigation Narrative, 65 DePaul L. Rev. 755, 785-86 (2016) (“Confirmation bias leads us to find and interpret information in a way that supports preexisting hypotheses and to avoid information or interpretations that support alternate possibilities. It can also take the form of giving greater weight to information supporting a position one has taken or remembering that supporting information more readily than information that disconfirms the belief.”).

64. Weiss, supra note 55 (finding an average of 5.8 errors in black Thomas Meyer’s writing versus 2.9 errors in white Thomas Meyer’s writing).

65. Krieger, supra note 57, at 1208 (“[O]nce a target individual has been perceived as a member of a particular category, people are more likely to remember the target as exhibiting attributes and behaviors commonly associated with that category.”).

66. See, e.g., Linda Hamilton Krieger, Civil Rights Perestroika: Intergroup Relations After Affirmative Action, 86 Calif. L. Rev. 1251, 1258-76 (1998); Krieger, supra note 57, at 1208 (“Indeed, once we have developed stereotypic expectancies of a person, we even tend to ‘remember’ stereotype-consistent behaviors that did not actually occur.”).

67. Although Conway claimed she made an honest mistake, it was a mistake she had made before, suggesting that the “Bowling Green Massacre” may be better characterized as an example of intentional propaganda rather than cognitive error. Brian Stelter, Kellyanne Conway’s “Bowling Green Massacre” Wasn’t One-Time Slip-Up, Cosmo Reveals, CNN (Feb. 6, 2017), http://money.cnn.com/2017/02/06/media/kellyanne-conway-bowling-green-massacre-cosmopolitan/index.html [https://perma.cc/E7KE-LJGZ].


the tip of the cognitive-error iceberg. It does, however, help to explain the persistent discriminatory stereotype of the Muslim terrorist even by those who have no conscious antipathy toward Muslims, like many Hollywood movie-makers, news reporters, and you and me.70

B. The White Privilege of Never Being a Terrorist

While unconscious discrimination helps explain the “terrorists are Muslim” narrative, white privilege helps explain the “white people aren’t terrorists” one. Discrimination and privilege are two sides of the same coin, that coin being a racialized hierarchy.

What is white privilege? Peggy McIntosh defines it as “an invisible package of unearned assets that I can count on cashing in each day, but about which I was ‘meant’ to remain oblivious.”71 White privilege is essentially various benefits that white people enjoy, usually without even realizing it, that people of color do not. Examples run the gamut. As a white person, I can buy “nude” stockings that match my skin72 or go to the movies and see lots of people whose race is the same as mine.73 As a white person, I can wander in an upscale boutique or board an airplane without raising any suspicion.74 Additionally, “[w]hen I am told about our national heritage or about ‘civilization,’ I am shown that people of my color made it what it is.”75

Today, I want to add to that list: Even if I use violence within the United States to intimidate a civilian population, odds are I will not be called a terrorist.76 Rather than immediately becoming a demonized “other,” I would...
remain an individual, albeit a deeply troubled one. The dehumanization of the Muslim perpetrator happens in an instant. The white Christian perpetrator, on the other hand, always retains his humanity.

Even after committing heinous acts of violence, we see these white Christians depicted as human beings, not terrorist "others."77 The media describes their childhood and shows us their graduation photos, not their mug shots. They are shy, quiet young men78 or charming Southern gentlemen.79 At school, they sang in the choir or played varsity sports.80 They have favorite songs and favorite movies.81 One reporter described the white Christian terrorist responsible for the Charleston massacre as "an often-silent, awkward housemate who liked to watch ‘Oprah’ during the day and loved

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77. Sarah Ruiz-Grossman, Former Neo-Nazi Says It’s on White People to Fight White Supremacy, HUFFINGTON POST (Apr. 24, 2017, 5:56 PM), http://www.huffingtonpost.com/entry/life-after-hate-christian-piciolino-white-supremacist-exit-skinhead_us_58fa36e4e4b0189c5acae1a [https://perma.cc/STS2-R44D] ("There really is no difference between what happened in Charleston... and what happened in San Bernardino. They’re both terror attacks based on ideologies of extremism—yet we still don’t call it terrorism when it’s white extremism.")


sappy movies such as ‘Titanic’ and ‘Stand by Me.’”82 These white Christian killers have families: much loved families,83 all-American families,84 grieving families.85 The Charleston County magistrate noted that “[w]e have victims, nine of them. But we also have victims on the other side . . . . There are victims on this young man’s side of the family.”86

Time and again, attention is paid to the individual mental health of these white Christian extremists.87 “With non-Muslims, the media bends over backwards to identify some psychological traits that may have pushed them over the edge. Whereas if it’s a Muslim, the assumption is they must have done it because of their religion.”88 As a white terrorist, the main assumption made about my motive is that some personal trauma must have triggered my violence. In contrast, like a stock villain in a movie, the Muslim perpetrator

82. Marc Fisher, Lone Wolf Extremists Like Dylann Roof Are Easy to Develop but Hard to Track, WASH. POST (June 25, 2015), https://www.washingtonpost.com/politics/lone-wolf-extremism-easy-to-form-difficult-to-track/2015/06/25/121d981e-19e7-11e5-93b7-5edd056ad8a_story.html [https://perma.cc/R6D2-FZEW].


86. Id.


88. Scott Shane, In US, Homegrown Radicals More Deadly Than Jihadis, BOS. GLOBE (June 24, 2015), https://www.bostonglobe.com/news/nation/2015/06/24/homegrown-radicals-more-deadly-than-jihadis/oEjyadC7Tdz5WGLULgUM/story.html (quoting Abdul Cader Asmal, a retired physician, in Boston); see also Arjun Singh Sethi, Attacks Like Portland’s Will Keep Happening Unless We All Fight White Supremacy, WASH. POST (May 29, 2017), https://www.washingtonpost.com/posteverything/wp/2017/05/29/attacks-like-portlands-will-keep-happening-unless-we-all-fight-white-supremacy/ [https://perma.cc/CW73-DSL8] (“White suspects who perpetrate mass atrocities are often humanized and described as shooters and mentally ill lonewolves. They’re seen as holding personal grievances and capable of rehabilitation. But when the suspect is Muslim, brown, black or a combination thereof, they are often described as terrorists, who are deliberately evil, inspired by collective grievance, incapable of intervention.”).
has no backstory, no grieving family, his motive is clear enough. My argument is not that white terrorists are never mentally ill; many are. But so too are many Muslim terrorists. However, the presumption of white innocence means that for white terrorists we look to mental illness for explanations in a way that we do not for nonwhite terrorists.

The bottom line is that white Christian extremists remain individuals—"lone wolves" suffering in some individualized way—as opposed to an interchangeable member of a terrorist conspiracy. For example, one of South Carolina’s senators characterized the Charleston terrorist as just "a whacked-out kid."89 Indeed, he insisted that “[t]here are real people who are organized out there to kill people in religion and based on race; this guy’s just whacked out.”90 Because these attacks are categorized as one-offs,91 other white Christian men are spared the profiling that brown Muslim men are subjected to. Moderate white Christians are also spared the expectation of having to condemn every act of violence by extremist white Christians.92

Some might argue that unlike Muslim terrorists, white terrorists are not motivated by an ideology or trying to intimidate a civilian population. But they would be wrong. Like their Ku Klux Klan forefathers, white Christian terrorists often subscribe to an ideology of white supremacy and act to instill terror in communities of color.93

For example, the Charleston terrorist left a 2000-word racist manifesto94 and explicitly stated that he wanted to start a race war.95 One witness testified that during the shooting he yelled, “You rape our women and you’re taking

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90. Id.
91. See, e.g., Scott, supra note 45 (reporting that Wisconsin Congressman Sean Duffy described the 2017 Quebec City attack on a mosque as a “one off”).
93. Alternatively, it is not a racial hierarchy but a gender hierarchy or some combination thereof that motivates the Christian white terrorist. See, e.g., supra note 36 (describing the attack on Planned Parenthood); see also infra note 178 (explaining that the attack in South Carolina was intended to “protect” white women).
94. See Johnson, supra note 41.
over our country. And you have to go.”

During an interview he elaborated: “I had to do it because somebody had to do something . . . Black people are killing white people every day on the street, and they are raping white women. What I did is so minuscule to what they’re doing to white people every day all the time.”

He was never charged with terrorism. According to then-FBI Director James Comey, “Terrorism is [an] act of violence done or threatened in order to try to influence a public body or citizenry. So it’s more of a political act. And again, based on what I know so [far], I don’t see it as a political act.”

Yet there is no question that the massacre was intended to intimidate. As with many terrorists, the Charleston shooter targeted a house of worship—a space where people ought to feel safe. Moreover, black churches such as Emanuel African Methodist Episcopal Church in Charleston have a long history as forces for racial equality, a history that no doubt infuriates white supremacists. Consequently, as Anthea Butler has noted, “Black churches have long been targets of white supremacists who burned and bombed them in an effort to terrorize the black communities those churches anchored.”

In case anyone doubted that the white Christian terrorist intended to instill fear, he told one survivor that he was letting her live so she could tell the world about him. According to an expert, leaving someone behind as a messenger is “a textbook terrorist act.”

Like the Ku Klux Klan lynchings of the past, the Charleston shooting appears designed not just to kill individuals but to create terror among African-Americans.”


98. Downie, supra note 95.

99. See supra notes 19–24 and accompanying text (describing an attack on a mosque); see also infra notes 113–14 and accompanying text (describing the attack on a Sikh temple).


103. Phillips, supra note 76 (“[R]egarding intimidation of a wider audience, the shooter reportedly left one person alive to spread the message. This was a textbook terrorist act.”).

There are plenty of other examples. The white Christian extremist who traveled to New York City to kill black men because “he was angered by black men mixing with white women” and he hoped murder would deter white women from relationships with black men. The white Christian in Kansas who mistook two Indian men for Middle Easterners and shot them after yelling “get out of my country.” The white supremacist in Portland, Oregon, a supporter of a “White homeland,” who killed two men on a train when they interrupted his anti-Muslim tirade against two teenage girls, one in a hijab. The white Christian who murdered six worshippers at a Sikh temple—a neo-Nazi skinhead and member of white supremacist heavy metal bands who “spoke of the need for securing a homeland for white people


108. Ben Rosen, White Racist Accused of Fatal NYC Stabbing Charged with Terrorism, CHRISTIAN SCI. MONITOR (Mar. 28, 2017), https://www.csmonitor.com/USA/2017/0328/White-racist-accused-of-fatal-NYC-stabbing-charged-with-terrorism [https://perma.cc/69PU-UJXT] (“Well, if that guy feels so strongly about it, maybe I shouldn’t do it,” he said, imagining how he wanted a white woman to think.”); see also Moynihan & Brown, supra note 105 (“Most chillingly, Jackson said he had traveled to New York from Baltimore intending to kill numerous black men, imagining that the bloodshed would deter white women from interracial relationships.”).


112. Wang, supra note 110.

113. Michael Laris et al., Gunman in Wisconsin Was Deeply Involved in White-Supremacist Music Scene, WASH. POST (Aug. 6, 2012), https://www.washingtonpost.com/world/national-security/gunman-in-wisconsin-was-deeply-involved-in-white-supremacist-music-scene/2012/08/06/5ba0b82-ff8b-11e1-8fc5-a7dcf1fc61d_story.html/ [https://perma.cc/ELC7-Z4J3] (“This guy was in the thick of the white-supremacist music scene. He was not a fringe player. He was well known in the scene and played in some of the best-known bands.”).
and referred to all non-whites as "dirt people." The white Christian who gunned down a black guard at the U.S. Holocaust Memorial Museum and was known to the Anti-Defamation League as "a longtime white supremacist anti-Semite" and Holocaust denier. The founder and former grand dragon of the Carolina Knights of the Ku Klux Klan who shot and killed three people on the eve of Passover near a Jewish community center and a Jewish retirement home and boasted, "[b]ecause of what I did, Jews feel less secure." Nor are these examples exhaustive.

In short, for these terrorists, their ideology is white supremacy and their violent acts are meant to terrorize and reassert that supremacy. One terrorist expert wrote that there is no definition of terrorism that the Charleston shooting fails to satisfy: "There is no criterion or definition [of terrorism] that this incident does not plainly and fully meet . . . . Were I teaching such a course next year, I would begin with this Charleston event as a textbook example of domestic terrorism." And yet, the Charleston shooter, like other white Christian extremists, is not routinely referred to as a terrorist, and other white Christian men are not profiled or expected to denounce him. That is white privilege.

III. THE TWO NARRATIVES THROUGH A PROPAGANDA LENS

This section examines the intersection between critical race theory and propaganda, and Trump's propaganda in particular. The critical race deconstruction of these two narratives reveals two constituent parts of

114. Romell, supra note 83.


117. La Ganga et al., supra note 79.


120. See, e.g., supra note 39 and accompanying text. This Essay does not, for instance, list all the white Christian extremists who attacked abortion providers and health clinics. See, e.g., infra notes 173–74.

propaganda: flawed ideologies and aspirational myths. Thus, Trump and his administration's intentional invocation of both narratives amounts to propaganda in more than just the colloquial sense.

A. Racism as "Flawed Ideological Belief" of Terrorist Propaganda

As with terrorism, there is not a single definition of propaganda. It may even lack negative connotations, though that is not how I use it here. As traditionally understood, especially in relation to demagogic propaganda, the speaker and audience are not engaged in an exchange of ideas. Rather, the audience is the speaker's target, with the speaker talking at his audience, not conversing with them. The ultimate goal is to help the speaker, not necessarily the audience. For purposes of this discussion, propaganda's most important characteristic is its manipulativeness. While "manipulative" is another contested term, in propaganda it usually means intentionally undermining reasoned analysis. "To be effective, propaganda must constantly short-circuit all thought and decision."

Lies are a well-known example of manipulation, and some of the best-known propaganda techniques involve blatant fabrications. A demagogue might insist that lies are true or that the truth is "fake news." The aim may be to repeat these falsehoods so often that they take on the veneer of truth, or the point of such disinformation may be "to distort information so that no
one knows what to believe."131 In short, "[i]f you don’t like the facts, invent your own," represents one classic propaganda technique.132

However, propaganda does not have to be false.133 Other manipulative techniques besides lying are familiar from advertising. Many involve the intentional exploitation of the type of cognitive errors mentioned earlier.134 With affective priming, for example, advertisers link their product with something audiences already like (such as fun! friends! beautiful women!), creating a positive association for their own products.135 Repeated exposure then cements the association.136 These techniques lead viewers to draw conclusions about the product that they would not have drawn with more thorough deliberation.137

Note that propaganda (or least successful propaganda) depends upon preexisting beliefs. "[P]ropaganda cannot create something out of nothing.... [I]t must build on a foundation already present in the individual. ... Propaganda is confined to utilizing existing material; it does not create it." In the example above, the advertisement makes you like its product by associating it with something that you already liked.

Demagogic propaganda in particular depends upon flawed preexisting ideological beliefs.139 Flawed ideologies are deeply held beliefs that are inaccurate. Racial ideologies, with their inevitable stereotypes, represent a paradigmatic example of a flawed ideological belief system. When linked to

131. Bryan Schatz, The Kremlin Would Be Proud of Trump’s Propaganda Playbook, MOTHER JONES (Nov. 21, 2016, 11:00 AM), http://www.motherjones.com/politics/2016/11/trump-russia-kremlin-propaganda-tactics/ [https://perma.cc/XT5C-H9A3]; see also Judge, supra note 129 ("The methodology of fake news isn’t to convince anyone exactly what the truth is, but to make people doubt that the truth exists, or that it can ever be known.").

132. Schatz, supra note 131. Of course, this is only one of many tactics. See, e.g., Danielle Kurtzleben, Trump Embraces One of Russia’s Favorite Propaganda Tactics—Whataboutism, NPR (Mar. 17, 2017, 5:02 AM), http://www.npr.org/2017/03/17/520435073/trump-embraces-one-of-russias-favorite-propaganda-tactics-whataboutism [https://perma.cc/B8NM-8STU] ("President Trump has developed a consistent tactic when he’s criticized: say that someone else is worse.").

133. STANLEY, supra note 122, at 41–43.


135. With propaganda the reverse may be true: for example, certain politicians will intentionally link “welfare” to “urban African-Americans,” something their particular audience already dislikes. STANLEY, supra note 122, at 138.

136. These cognitive errors occur even when audiences are aware of them. See, e.g., Cass R. Sunstein, Hazardous Heuristics, 70 U. CHI. L. REV. 751, 760 (2003) ("[M]aking people aware of an anchor’s effect does not reduce anchoring . . . .").

137. Corbin, supra note 134, at 358.


139. STANLEY, supra note 122, at 4 ("[H]armful propaganda relies upon the existence of flawed ideologies present in a given society."); see also id. at 43 ("[P]ropaganda depends for its effectiveness on the presence of flawed ideological belief.").
identity, as racial ideologies are, these ideologies become stronger still. Not surprisingly, these deep-seated and flawed beliefs interfere with rational analysis.

Trump's propaganda exploits our flawed racial ideology. A hallmark of the demagogue, after all, is appealing to people's prejudices. Trump's propaganda builds on preexisting racial ideologies, most obviously by mobilizing racialized Muslim stereotypes. If he were to imply that all inside traders or hackers were Muslim, such a claim would probably be met with incredulity, or at least puzzlement. It would not resonate. To suggest that all terrorists are Muslim, however, draws upon centuries of negative stereotypes of Muslims and Arabs as volatile, uncivilized "others" who bear "us" ill will.

Trump's propaganda then reinforces this association by mobilizing other reliable cognitive errors such as the availability error. Due to the availability error, people evaluate probability based on the examples that most easily come to mind. The Trump administration's terrorism propaganda intentionally exploits this predictable cognitive error by making the stereotype of the Muslim terrorist the most readily available image of "terrorist" and "Muslim."

The demonization of Muslims was well underway during Trump's campaign, at which time he supported a ban on Muslims entering the

140. Id. at 196 ("[B]eliefs that are connected to our identity will be emotionally dear to us in ways that beliefs unconnected to our identity are not.").

141. Flawed ideologies derail deliberation, in part, because they trigger intense emotions. Id. at 46 ("Flawed ideologies characteristically lead one to sincerely hold a belief that is false and that, because of its falsity, disrupts the rational evaluation of a policy proposal."). The argument is not that causing an emotional reaction automatically makes it manipulative propaganda. "Propaganda is not simply closing off rational debate by appeal to emotion; often emotions are rational and track reasons." Id. at 48. Rather, the argument is that the propaganda may be manipulative because it invokes unreasonable emotions that stem from a flawed ideology. Id.

142. Cf. Bennett & O'Rourke, supra note 124, at 62 ("[P]ropaganda takes advantage of our natural inclination to conserve cognitive energy . . . . Propaganda promotes and functions best on a 'mindless' audience (i.e., one devoting little thought to the message) . . . ." (citing ANTHONY PRATKANIS & ELLIOT ARONSON, AGE OF PROPAGANDA: THE EVERYDAY USE AND ABUSE OF PERSUASION (2001))).


144. For example, Trump falsely claimed that he saw Muslims in New Jersey celebrating the fall of the World Trade Center on 9/11: "There were people over in New Jersey that were watching it, a heavy Arab population, that were cheering as the buildings came down. Not good." Lauren Carroll, Fact-Checking Trump's Claim That Thousands in New Jersey Cheered When the World Trade Center Tumbled, POLITIFACT (Nov. 22, 2015, 6:17 PM), http://www.politifact.com/truth-o-meter/statements/2015/nov/22/donald-trump/fact-checking-trumps-claim-thousands-new-jersey-ch/ [https://perma.cc/9CKD-D79W]. This claim was rated a "Pants on Fire" falsehood. Id.
United States and a registry of Muslims already here.\(^{145}\) From the outset, he equated Islam with terrorism.\(^{146}\) For example, in March 2016, Trump said during a CNN interview, “I think Islam hates us.”\(^{147}\) When asked whether “there [is] a war between the West and radical Islam, or between the West and Islam itself,” he answered: “It’s very hard to separate. Because you don’t know who’s who.”\(^{148}\) In that same interview, he also complained that the United States had “allowed this propaganda to spread all through the country that [Islam] is a religion of peace.”\(^{149}\)

As president, Trump continues to do everything in his power—which is now considerable—to ensure that people associate terrorism with brown Muslims. At his inauguration, he swore that he would “unite the civilized world against Radical Islamic Terrorism” and “eradicate [it] completely from the face of the Earth.”\(^{150}\) His “America First Foreign Policy” promises to focus on “American national security.”\(^{151}\) And what, according to the president, must we prioritize to stay safe? “Defeating ISIS and other radical Islamic terror groups will be our highest priority.”\(^{152}\) The people he appoints to high-level positions seem to share this view.\(^{153}\) For example, Trump’s short-lived national security advisor, Michael Flynn, tweeted, “Fear of Muslims is RATIONAL.”\(^{154}\)

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152. Id.


Trump’s tweets—arguably his favorite mode of communication—are likewise revealing. Trump straightaway tweets about attacks by Muslims anywhere in the world. After attacks in Paris, Manchester, and London, to name just the most recent incidents, his condemnation of the Muslim terrorists was immediate and unequivocal. When the White House released a list of seventy-eight overlooked acts of terrorism between September 2014 and December 2016, it focused solely on attacks perpetrated by “radical Islamists.” Although Trump’s exclusive spotlighting of Muslim terrorists is widely recognized as misleading, it is not necessarily labelled as propaganda. But as history shows, some of the most successful propaganda attacks a dangerous “other.”

B. White Innocence as “Myth” of Terrorist Propaganda

At the same time that Trump jumps at the chance to instantly condemn Muslim terrorists, his response to white Christian terrorists is either nothing, or at best, a tepid or generic message days later. He made no public statement about the Quebec City massacre of Muslims in January 2017. In February

158. See, e.g., Donald J. Trump (@realDonaldTrump), TWITTER (June 3, 2017, 4:17 PM), https://twitter.com/realDonaldTrump/status/871143765473406976 (“We need to be smart, vigilant and tough.... We need the Travel Ban as an extra level of safety!”) [https://perma.cc/GXU6-WWVY].  
160. As Hitler himself wrote: “[T]he efficiency of the truly national leader consists primarily in preventing the division of attention of a people, and always in concentrating it on a single enemy.” Kenneth Burke, The Rhetoric of Hitler’s ‘Battle,’ in READINGS IN PROPAGANDA AND PERSUASION: NEW AND CLASSIC ESSAYS, supra note 124, at 149, 150.  
161. Taylor, supra note 156 (noting that Trump’s personal Twitter account was silent about the Quebec City massacre despite the fact that it “has posted 16 times since the shooting, and the official POTUS account on the same service tweeted or retweeted other messages 30 times”). Trump did call Canada’s prime minister. Jeremy Berke, Trump Calls Trudeau to Offer Condolesences for Quebec Mosque Shooting, BUS. INSIDER (Jan. 30, 2017),
2017, six days passed162 before Trump reacted to a white Christian extremist in Kansas who yelled “get out of my country” and killed an Indian engineer he mistook for Iranian.163 Days also passed before Trump acknowledged the murder of the two Good Samaritans defending teenagers (one Muslim) from a white supremacist in May 2017.164 After much public pressure he finally tweeted, but only a boilerplate message from his official account,165 not a fiery one from his more widely followed personal account.166 Most recently, Trump failed to condemn as a terrorist the white Christian extremist167 at the August 2017 “Unite the Right” rally168 in Charlottesville who drove his car into a crowd of counterprotestors, killing one and injuring nineteen.169 (Indeed, Trump doubled down on his narrative of white innocence when,


162. Anand Giridharadas, A Murder in Trump’s America, ATLANTIC (Feb. 28, 2017), https://www.theatlantic.com/politics/archive/2017/02/srinivas-kuchibhotla-alok-madansani/518160/ [https://perma.cc/NH2G-49LH] (“President Trump has found time to condemn multiple different episodes of ‘Saturday Night Live,’ an individual movie actor, a local union leader in Indiana, a range of news outlets, and military contractors he fears are fleecing the United States. He has taken the time to condemn a terrible thing that never happened in Sweden. But he waited six days to condemn the terrorism in Kansas.”).

163. Id. Trump’s generic message was, “We are a country that stands united in condemning hate and evil in all its forms.” Id.


165. President Trump (@POTUS), TWITTER (May 29, 2017, 7:51 AM), https://twitter.com/POTUS/status/86920443341828961 [https://perma.cc/85SX-HQQN] (“The violent attacks in Portland on Friday are unacceptable. The victims were standing up to hate and intolerance. Our prayers are w/ them.”).

166. Lucy Westcott, Portland Stabbing: Donald Trump Finally Responds amid Public Outcry, NEWSWEEK (May 29, 2017), http://www.newsweek.com/portland-stabbing-trump-responds-public-outcry-617076 [https://perma.cc/UMW7-C3X3]. Trump exhibited the same pattern following other terrorizing attacks by whites of nonwhites. For example, even after terrorism charges were brought against the white supremacist who stabbed an innocent man in New York City in March 2017, Trump remained silent. Rosen, supra note 108 (explaining that the killer was “indicted on Monday on rare state charges of murder as terrorism”); see also supra notes 105–08.


168. Charlottesville and a ‘New Generation of White Supremacists,’ supra note 167 (“The organizer of [the] Unite the Right rally, Jason Kessler, described the gathering as being part protest over removing of Confederate symbols, and part ‘advocating for white people.’”).

instead of unequivocally denouncing white supremacists at the rally,\textsuperscript{170} he insisted that there were “very fine people on both sides.”\textsuperscript{171}

Consistent with this approach, Trump’s terrorism list omitted attacks by white Christian extremists during the stated time frame, including the Charleston massacre, the movie theatre shooting in Lafayette, Louisiana,\textsuperscript{172} and the Planned Parenthood clinic shooting in Colorado Springs, Colorado.\textsuperscript{173} In fact, the Global Terrorist Database—the most comprehensive catalogue of terrorist events—lists a total of thirty-nine terrorist attacks in the United States in 2015.\textsuperscript{174} Trump ignored all but four of them.\textsuperscript{175}

This pattern not only strengthens the link between Muslim and terrorist, but also strengthens the second narrative of white innocence. That is, Trump’s propaganda also draws on and reinforces the other strand of our flawed racial ideology. In general, propaganda does not just identify enemies, it is also aspirational. It has cherished ideals.\textsuperscript{176} It creates myths.\textsuperscript{177} When you think of Nazi propaganda, the demonization of Jews went hand in hand with the mythologizing of Aryans and the ideal of the (powerful, virtuous) Aryan homeland.


\textsuperscript{172} \textit{See supra} note 39 and accompanying text.


\textsuperscript{174} Five 2015 attacks were coded as abortion related. \textit{See Incidents over Time}, GLOBAL TERRORISM DATABASE (June 2017), \url{https://www.start.umd.edu/gtd/search/Results.aspx} [https://perma.cc/6SGS-YD2U].

\textsuperscript{175} See Wagner, \textit{supra} note 157.

\textsuperscript{176} \textit{See STANLEY, supra} note 122, at 51 (“Propaganda . . . essentially exploits an ideal.”); \textit{see also id.} at 52 (“[Propaganda] is a kind of speech that fundamentally involves political, economic, aesthetic, or rational ideals, mobilized for a political purpose.”).

\textsuperscript{177} \textit{See Ellul, supra} note 128, at 18 (“The propagandist tries to create myths by which man will live.”).
One of the most enduring myths in the United States is the myth of white innocence, white purity, and, at its core, white superiority. These myths about whiteness—the myths that critical race theory exposes and deconstructs—are precisely the ones being revered, vaunted, and propagated. Indeed, the success of Trump’s propaganda may lie with his appeal to white Christian superiority. He is, after all, not invoking just any myth but one that is intertwined with his target audience’s identity. The audience’s emotional attachment to this myth makes it difficult to revise and susceptible to manipulation.

Finally, as should be apparent, Trump’s terrorist propaganda not only reflects racist ideology but also helps perpetuate it. In other words, this kind of “demagogy can also contribute to the formation of the very flawed ideological beliefs that mask its demagogic nature.”

IV. BOTH NARRATIVES COMPROMISE SECURITY

By intentionally invoking these narratives in the name of national security, these narratives actually undermine it. Indeed, they might even qualify as a particular type of propaganda known as “undermining propaganda.” “Undermining propaganda involves a kind of contradiction between ideal and goal. It’s an argument that appeals to an ideal to draw support, in the service of a goal that tends to erode the realization of that ideal.”

The intent of this Part is not to provide a comprehensive account but rather to briefly sketch out some of the harmful consequences of this kind of propaganda.

A. The Dangers of the “Terrorists Are Muslim” Narrative

The first narrative causes incalculable harm to Muslim Americans and, increasingly, anyone who is perceived to be Muslim. The harm includes both material and dignitary injuries.

The material harms caused by government policies premised upon these false stereotypes are fairly obvious. While not new, there are high levels of racial profiling and surveillance of the Muslim community.

178. More than one white supremacist justified his violence on the ground that black men were sullying white women’s purity, providing an example of how racism and sexism intersect. Wade, supra note 96; see, e.g., supra notes 94–97 and accompanying text (explaining the justifications of the Charleston terrorist); supra notes 105–08 and accompanying text (explaining the justifications of the NYC terrorist).

179. See Ellul, supra note 128, at 18 (“Without giving a metaphysical analysis of the myth, we will mention the great myths that have been created by various propagandas: the myth of race...”).


181. STANLEY, supra note 122, at 78.

182. Id. at 53; see also id. at 70 (“[U]ndermining propaganda crucially involves appeal to a cherished ideal, usually a political ideal, which it then in fact tends to undermine.”).

Muslim”\(^\text{184}\) has joined “driving while Black” to describe the extra burden Muslims, or people thought to be Muslim, face in day-to-day living.\(^\text{185}\) The “travel ban,” Trump’s attempt to fulfill his campaign promise to bar Muslims from entering the country, has obviously exacerbated these burdens. While ostensibly targeting new Muslim immigrants and refugees, the ban has wreaked havoc on many American Muslims.\(^\text{186}\) Amnesty International collected stories about its impact, which ranged from “my marriage is in limbo” to “I was forced to leave my baby with a friend” to “I’m too scared to leave the country again.”\(^\text{187}\)

This stereotyping causes intangible harms as well. Leti Volpp has argued that one aspect of citizenship is being considered part of the American body politic.\(^\text{188}\) Instead, Muslims exist as a vilified “other” in their own home. They do not feel like they truly belong. “Identified as terrorists and . . . disidentified as citizens,”\(^\text{189}\) you do not enjoy full citizenship.\(^\text{190}\) In addition, Muslims do not feel safe. In January 2017, one in three U.S. Muslims reported feeling afraid for their safety because of white supremacist groups.\(^\text{191}\) The endless anxiety is exhausting: “We’re very resilient, but we also have to comfort our children. We have to figure out if my place of

\(^{184}\) The profiling may be by the government itself (for example, TSA agents) or countenanced by the government. Fredrick Kunkle, Advocates Say Complaints of ‘Flying While Muslim’ Often Go Nowhere, WASH. POST (Oct. 28, 2016), https://www.washingtonpost.com/news/tripping/wp/2016/10/28/advocates-say-complaints-of-flying-while-muslim-often-go-nowhere/ [https://perma.cc/J9A3-2V4S] (“Federal law gives captains and flight crews authority to remove an airline passenger if they have a reasonable belief that the person poses a safety risk . . . .”).


\(^{188}\) Id. at 1576; see also id. at 1594 (“In the American imagination, those who appear ‘Middle Eastern, Arab, or Muslim’ may be theoretically entitled to formal rights, but they do not stand in for or represent the nation. . . . Thus, one may formally be a U.S. citizen . . . but one will stand outside of the membership of kinship/solidarity that structures the U.S. nation.”).

worship is safe on Friday. How will I be treated at work? There's an emotional exhaustion."

This unease is not without foundation, as the government's perpetuation of these stereotypes encourages suspicion and hostility. "Trump has essentially given everyone permission to say the hateful things that they've been thinking. . . . Trump has basically mainstreamed Islamophobia." Anti-Muslim groups and anti-Muslim attacks have increased. Some have turned violent, like the Islamophobic rants that began with "get out of my country" and ended in the murder of two people in Portland, Oregon, and one person in Olathe, Kansas.

Children have been targets as well. Forty-two percent of U.S. Muslims have said their school-age children had been bullied because of their faith—a rate that is four times the rate of the general population. And a quarter of the time the bullying has been by their teachers. According to an American Civil Liberties Union complaint, one school teacher told her eleven-year-old student, a Muslim Somali refugee: "I can't wait until Trump is elected. He's going to deport all you Muslims . . . . Muslims shouldn't be given visas. They'll probably take away your visa and deport you. You're going to be the next terrorist, I bet."


193. Beydoun, supra note 7, at 121 ("[S]tructural Islamophobia mobilizes private animus.").

194. Johnson, supra note 146 (alteration in original).


197. Tharoor, supra note 19.

198. See supra notes 109–12 and accompanying text.


201. Ochieng, supra note 199.
Propaganda has consequences, and one of the consequences of propagation of the terrorist Muslim stereotype is the dehumanization and terrorization of Muslim Americans, as well as Americans perceived as Muslim, which sweeps in Arabs, Middle Easterners, and Southeast Asians.\textsuperscript{202}

\textbf{B. The Dangers of the "No White People Are Terrorists" Narrative}

The second narrative is also dangerous, as it leads to ignoring the threat posed by radicalized white Christians. Make no mistake, white supremacists and other right-wing ideologues pose a serious threat. Yet this threat will be missed if all attention is focused on Muslims.

Various studies on terrorist attacks in the United States found that Muslims are not responsible for most of them. One study that analyzed the information from the Global Terrorism Database found that of the eighty-nine attacks in the United States that occurred from 2011 to 2015, Muslims were responsible for eleven attacks, or 12 percent.\textsuperscript{203} A Government Accountability Office report found that of the eighty-five extremist incidents that resulted in death since September 12, 2011, right-wing violent extremists were responsible for sixty-two (73 percent) while radical Islamic violent extremists were responsible for twenty-three (27 percent).\textsuperscript{204} Other studies corroborate this finding.\textsuperscript{205}

\begin{footnotesize}
\begin{itemize}
\item\textsuperscript{202} In a masterstroke of propaganda, a White House spokesperson used the Quebec City terrorist attack of Muslims to further anti-Muslim propaganda: The mosque attack is “a terrible reminder of why we must remain vigilant and why the President is taking steps to be proactive and not reactive on issues of national security.” Rebecca Joseph, \textit{Sean Spicer Hints Quebec City Mosque Shooting Justifies Trump Travel Ban}, \textit{Global News} (Jan. 30, 2017), http://globalnews.ca/news/3214989/sean-spicer-hints-quebec-city-mosque-shooting-justifies-trump-travel-ban/ [https://perma.cc/4QL5-42UU].
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Those responsible for public security are primarily concerned about right-wing extremism. A recent survey asked local police departments and sheriffs’ offices what they considered to be the most pressing terrorist threat in the United States. Twice as many law enforcement officers listed right-wing terrorists compared to Muslim ones. As one expert noted, “the reality is the most significant domestic terror threat we have is right wing extremism.” It is certainly the greatest threat to law enforcement: “Of the 45 police officers killed by domestic extremists since 2001, 10 were killed by left wing extremists, 34 by right wing extremists and one by domestic Islamic extremists.”

Yet this very real danger is poised to be overlooked. A former FBI agent once cautioned, “A fixation upon Arabs and Muslims as the only source of terrorism runs the very real risk of missing out on opportunities to use undercover stings and other traditional law enforcement to prevent acts of terrorism by other groups.” For example, although the White House did not carry out its plan to rename the Department of Homeland Security’s “Countering Violent Extremism” program as “Countering Radical Islamic Extremism,” the Trump administration nonetheless is revamping it to focus on “radical Islam” and not on, for example, white supremacists. As one expert concluded, the Trump administration’s “approach to security has less to do with facts than with racialized fears.”

207. Id. (polling 382 police and sheriff departments around the country and asking them to list the three biggest threats from violent extremism).
208. Id. Notably, 74 percent of those surveyed listed violence from the right-wing “sovereign citizen” movement, close kin to the white supremacist one, while 39 percent listed Al Qaeda-inspired violence. Id.
210. ADL: Limiting Scope of Countering Violent Extremism Programs Places Nation at Risk, supra note 205.
211. ANTI-DEFAMATION LEAGUE, A DARK AND CONSTANT RAGE: 25 YEARS OF RIGHT WING TERRORISM IN THE UNITED STATES 1 (2017) (listing 150 incidents and noting that “[r]ight-wing extremists have been one of the largest and most consistent sources of domestic terror incidents in the United States for many years, a fact that has not gotten the attention it deserves”).
215. Mythili Sampathkumar, Majority of Terrorists Who Have Attacked America Are Not Muslim, Study Finds, INDEPENDENT (June 23, 2017), http://www.independent.co.uk/news/world/americas/us-politics/terrorism-right-wing-america-muslims-islam-white-supremacists-
These false narratives, exacerbated by the current administration’s propaganda, make us less safe, thereby completely undermining the propaganda’s ostensible goal of national security. In other words, we are all put in jeopardy. To make matters worse, this propaganda may not simply ignore right-wing terrorism but actually foster it.

CONCLUSION

Trump did not invent these two terrorism narratives. He and his administration, however, have successfully exploited them. And the narratives lend themselves to exploitation. First, propaganda relies on flawed ideologies such as racial stereotypes. Second, propaganda relies on myths, such as the myth of white innocence and white supremacy. The two sides of the coin of racial hierarchy match up with two basic components of propaganda. The consequences are not more but less safety. The propaganda also makes us lesser in other ways that have contributed to the strength of our nation: it makes us less welcoming, less inclusive, and less diverse.
