CLICK HERE TO END HATE

Anti-Muslim Bigotry Online & How to Take Action
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Muslim Advocates is a national legal advocacy and educational organization working on the frontlines of civil rights to protect freedom for Americans of all faiths, through legal advocacy, policy engagement, and civic education, and by serving as a legal resource to promote the full and meaningful participation of Muslims in American public life.

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The quotes, posts, and screenshots that appear in this report have been dated and sourced as accurately as possible. The number of likes, followers, views, or other statistics related to pieces of content included in this report are current as of April 22, 2014, unless otherwise indicated. Please note that content or links may have since been modified, moved, or deleted, as content online and on social media platforms in particular evolve and change. The issues raised by the hateful content referenced in this report, however, remain a constant challenge in need of understanding and confrontation.
Dear Friend:

In the summer of 2012 an anti-Islam video denigrating Prophet Muhammad (P.B.U.H.) entitled The Innocence of Muslims was uploaded to YouTube. From that time until February 2014, the film had been viewed over one million times, and thousands of hateful comments about Islam and Muslims had been posted in response. The film also sparked demonstrations around the globe, in Egypt and in other Muslim-majority nations. In the United States, the film’s content raised questions about the permissibility of such hateful content and offensive depictions on the Internet, particularly on widely accessible social media platforms.

At the same time, Muslim Advocates heard from concerned American Muslims asking what could be done to counter hateful content online. As part of our program to combat anti-Muslim hate, we began to explore the issue and soon realized that this video was just one of many examples of online hate. While The Innocence of Muslims did not explicitly encourage violence towards Muslims, there are countless other examples online that do—making Internet hate a growing challenge that affects the everyday lives of American Muslims and, indeed, all Americans.

The Internet is a powerful tool, connecting the world and bringing instant information to anyone with a screen and keyboard. And while much progress and good is carried out through websites, blogs, and social media channels, in some cases, these very same outlets provide a platform for hate and threaten the rights, dignity, and safety of innocent Americans.

In the last few years, the number of Americans with an unfavorable view of Islam has grown and they now form a majority. During this same time, hate crimes and employment discrimination motivated by anti-Muslim bias have spiked and remain at disturbingly high levels. In addition, many politicians and public figures have used their profile and influence to spread fear and encourage violence against an entire group of people simply because of their faith. These voices are amplified on social media and help create a space for others to echo and build upon anti-Muslim sentiments and hate, and in turn foster an environment where it is acceptable, for some, to engage in acts of violence and discrimination.

This groundbreaking report documents the scope of anti-Muslim hate online, and offers tools for American Muslims and all Americans who reject fear and hate to report abusive content to Internet companies and to engage in effective counterspeech. In addition, the report explains Internet company policies and the limitations of the law to combat online hate. Finally, the report provides recommendations for Internet companies to ensure their platforms create safe communities online.

With these tools and resources, we can make our communities safer from bigotry and hate. It is my hope that Click Here to End Hate: Anti-Muslim Bigotry Online & How to Take Action will educate parents, students, youth, community leaders, activists, Internet companies, and policy makers about this emerging challenge and empower them to take the steps necessary to address it.

Thank you for reading.

Farhana Khera  
President & Executive Director  
Muslim Advocates
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Executive Summary

The Internet has fundamentally changed the way we communicate and consume information. A significant part of that transformation has been through social media. As of 2013, almost 75% of Internet users were active on social media. While the Internet and social media have provided the opportunity for more efficient communication and community building, they have also given a platform to those who purvey bigotry and hatred.

In particular, broader society has seen a significant increase in anti-Muslim hate. As public opinion polls as recent as 2010 indicate, a majority of Americans have a negative view of Islam. Evidence of that hate is further seen in opposition to mosque construction and expansion, employment discrimination against American Muslims, anti-Muslim rhetoric from public officials, and hate crimes such as vandalism of mosques, violence, and threats of violence. It should not be surprising, then, that anti-Muslim bigotry has found a strong voice on the Internet and social media.

Online Hate by Public Officials

Perhaps the most troubling form of anti-Muslim hate is that conveyed by public officials—the same people we entrust with the responsibility to uphold and enforce our laws, including freedom and equality for Americans of all faiths. Perpetrators range from members of congress to state and local politicians. They suggest American Muslims are somehow less American than other Americans and make negative statements on social media, which in turn provide a forum for constituents to add vitriol. Sometimes they even encourage violence, such as a Tennessee county commissioner who last year posted a photo of a man peering down the site of a shotgun with one eye closed, captioned “How to Wink at a Muslim.”

Speech by Hate Groups & Anti-Muslim Activists

Hate groups have also built a strong online presence. As of 2010, there were an estimated 11,500 hate-related sites, including websites, social network pages, and micro-blogs. Many anti-Muslim hate groups identified by the Southern Poverty Law Center use the Internet and social media to
spread their destructive agendas. One of the larger hate groups, Stop Islamization of America, has a Facebook page with over 18,000 members and helped organize a campaign against Park51, a proposed Muslim community center in lower Manhattan.

Individual activists, some of whom are associated with hate groups, cultivate their own brand of anti-Muslim hate. Infamous personalities, such as Pamela Geller, Brigitte Gabriel, and others, use their online following to spread hate and misinformation about Islam.

**Online Hate by Individuals**

Individuals without a public personality also contribute heavily to the flood of anti-Muslim hate on social media. For example, a map posted on Facebook showing the distribution of mosques in America prompted one individual to comment “let them put one in upstate south carolina and we wil [sic] burn it down.” Another posting of an image of two women walking down the street wearing headscarves, one of which had an American flag print in celebration of Independence Day, prompted two users to comment that they would choke her with the scarf.

**What the Law Says**

People often refer to comments like those described above as “hate speech,” when the comments denigrate a person’s race, religion, ethnicity, national origin, sexual orientation, or disability. Both within and outside of the law, hate speech does not have a universal definition. However, the challenge is often not how to define hate speech but how to treat it under the law and by social media platforms that some users employ to promote hate.

The starting point for understanding how online hate can be addressed is the First Amendment to the U.S. Constitution; however, it applies only to actions and restrictions imposed by the government, not private entities such as Internet and social media companies. In addition, in the overwhelming majority of cases, what many people consider hate speech is protected by the First Amendment. Certain exceptions to the broad free speech protections of the First Amendment do exist, but in relation to what might be called hate speech, the exceptions are very narrow.

**What Internet Companies Say About Hateful Content**

Because the First Amendment limits only government restrictions on speech, virtually all social media companies have created terms of service agreements or user policies that address hateful or abusive speech. For example, Facebook is committed to creating a safe and respectful community online and has an explicit policy prohibiting hate speech. YouTube similarly does not permit hate speech. Twitter currently maintains a more permissive policy that prohibits users from publishing “direct, specific threats of violence against others.”
What Users Can Do

Although the law provides few remedies to victims of hate speech, there are important steps they and others who reject bigotry can take to address online hate. The two most effective responses are reporting hateful content to the social media companies on whose platforms the hate speech appears and engaging in counterspeech.

This report provides step-by-step instructions on how to report content that violates social media companies’ policies. Although reported content will not always be removed from social media platforms, user reporting helps inform companies about offensive content online and also holds Internet companies accountable to their policies.

The other effective way to address hate speech is through “counterspeech.” The courts and civil society have long encouraged more speech as a response to offensive speech. When offensive, hateful content appears on a website or social media platform, a common and effective response employs the tradition of counterspeech.

This report cites several effective uses of counterspeech, including a classic example that occurred in 2012, after Newsweek published a controversial cover story with the headline “Muslim Rage.”

Conclusion & Recommendations

Given today’s widespread use of the Internet, all Americans should remain actively engaged and vigilant to prevent our freedom of speech from being abused. This report makes several recommendations for addressing online hate:

- Social media users should learn about user policies and reporting tools to report hateful content, and consider opportunities to engage in counterspeech. If users have been the target of threats, they should report them to law enforcement immediately.

- Faith and civic leaders and organizations should share this report and engage with colleagues, members, and interfaith partners in their communities about issues of online hate.

- Parents and students should engage school administrators about their concerns with the use of the Internet and social media platforms and the impact on their child at school and immediately inform school administrators about bullying in school. Also, they should learn about the school’s policies on cyberbullying or Internet use at school or during school hours in the event that a threatening or harmful situation involving other students arises. Parents and students can visit the U.S. Department of Education website at www.ed.gov for more information about bullying.
• Internet companies should:
  ◦ Develop and maintain an understanding of sensitivities that relate to American Muslims and other communities targeted by hate groups;
  ◦ Track and record the frequency at which reports are based on hateful content, particularly as it relates to a person’s faith;
  ◦ Affirmatively state company policy on hate speech and threatening speech;
  ◦ Continue to enhance tools designed for reporting content;
  ◦ Review all content reported by users to determine whether content violates company policies; and
  ◦ Promptly notify users who have reported content violations of the outcome of the company’s review and provide a clear explanation of the evaluation process used by the company.

Finally, the White House should convene a national-level dialogue on hate against religious communities and invite Internet companies to participate in discussions addressing online hate.
INTRODUCTION

“If there is even one more act of Muslim terrorism, it is then time for Americans to start slaughtering Muslims in the streets, all of them.”
@PatDollard

“Yes, they’re evil. Let’s kill them all.”
@ErikRush

Hate and threats of violence directed at Muslims have disturbingly become all too common in the United States. Since the September 11, 2001 attacks on the World Trade Center and Pentagon, anti-Muslim bigotry and hate have infected many facets of our culture, from media coverage to political discourse to social media.

In 2010, nearly a decade after 9/11, a Public Religion Research Institute study found that 49% of Americans believe the values of Islam are incompatible with the American way of life,¹ and 53% of Americans say their opinion of Islam is either “not too favorable” (22%) or “not favorable at all” (31%).² This societal anti-Muslim sentiment has coincided with an increase in the number of acts of violence and discrimination targeting American Muslims, including hate crimes, opposition to mosques, reports of employment discrimination, and anti-Muslim rhetoric by public officials.

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of Americans believe the values of Islam are incompatible with the American way of life

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31%
not favorable at all

Americans’ opinion of Islam:
Anti-Muslim sentiment came to a head in the summer of 2010, as media outlets provided daily, and sometimes seemingly nonstop, coverage of the growing opposition to Park51, a proposed Muslim community center in lower Manhattan, which critics associated with the World Trade Center site. Widespread media coverage of the controversy, coupled with bigoted statements by public officials, conveyed to American Muslims that their entire faith was being blamed for the acts of a criminal few. It also demonstrated how purveyors of anti-Muslim hate could command public and media attention for months. Perhaps more disturbingly, while they had once resided primarily in the remote reaches of the blogosphere, television, and radio, they had now secured a platform in both mainstream media and social media.

The power of the Internet has fundamentally changed how we consume information. There was a time when people expressed their hatred in private or within social circles, but the Internet has dramatically changed the way we share ideas and interact with others. In fact, social media has become the most effective online tool to convey viewpoints and information rapidly. An increasing number of Internet users are active on social media—73% as of 2013. The ubiquitous use of social media through computers, phones, and tablets has created opportunities for groups to rapidly generate and proliferate hate, without time for reflection and collective processing. Hateful and inaccurate information can become more potent as it is amplified and permanently stored online. Thus, the use of the Internet presents a new paradigm for our nation’s unique and long-cherished commitment to religious freedom and the fundamental right to express oneself.

The free speech legal doctrines that protect the protester on a public street corner rarely apply in the online context, since forums such as Facebook, Twitter, and YouTube are controlled by private companies, not the government. As a result, these Internet companies often have their own policies that govern content on their platforms, including limitations on hateful and abusive speech, and they enforce compliance with those policies.

This report highlights examples of the many different forms of hate that are found online. Although the law will rarely require that material be removed from the Internet, there are important steps that Internet users can take to respond effectively to hate speech online: namely, reporting hateful and abusive speech to Internet companies and countering offending speech with speech that challenges the message of hate. This report also walks readers through the reporting process for leading social media platforms and provides specific examples of counterspeech that have been used to respond to hateful speech. When done right, both reporting and counterspeech can be effective methods to combat online hate.

This report focuses on anti-Muslim content found on Facebook, YouTube, and Twitter because they are three of the largest social media platforms in the U.S. today. However, there are many websites and platforms in use, all rising and falling in popularity, and all with their share of users and posts expressing hateful or bigoted views. This report highlights some prominent examples of anti-Muslim animus online, with the goal of empowering users to respond to such views regardless of site, application, or platform.

This report is designed to be a guide for:

- Anyone who uses the Internet and social media platforms to communicate with friends and colleagues;
- Leaders of mosques or other faith and civic organizations that use social media sites to publicize events and share updates;
- Parents who have children who use the Internet and social media; and
- Students in middle school, high school, or college using social media for daily interactions with their peers.
Every minute 100 hours of video are uploaded to YouTube, and every day there is an average of 58 million tweets and about 4.75 billion pieces of content shared on Facebook. Given the staggering amount of content created, uploaded, or posted online, it is impossible for social media companies to proactively review each piece of content found on their platforms. In addition, the mass accessibility of social media sites makes it difficult to know exactly how many pieces of anti-Muslim hate are transmitted every second of every day. But we do know, even anecdotally, that the problem exists in many different forms.
Some of the most problematic perpetrators of online hate are public officials, hate groups and anti-Muslim activists, and private individuals. The following pages include examples of their hateful content.

**Online Hate by Public Officials**

We have entrusted public officials with the responsibility to uphold and enforce our laws, including freedom and equality for Americans of all faiths. In recent years, however, public officials have engaged in offensive and dangerously misinformed dialogue about Islam and Muslims. In 2011, U.S. Representative Peter King (R-NY), then-Chair of the U.S. House Committee on Homeland Security, held a series of hearings that were intended to further stoke suspicion of American Muslims as a threat to our nation’s security. The next year, U.S. Representatives Michele Bachmann (R-MN), Trent Franks (R-AZ), Louie Gohmert (R-TX), Thomas Rooney (R-FL), and Lynn Westmoreland (R-GA), requested that the State, Homeland Security, Defense, and Justice Departments investigate American Muslims working within those agencies, calling into question their loyalty to the United States. In 2013, U.S. Senator Rand Paul (R-KY) alleged that Muslims have waged a “worldwide war on Christianity” and that “Christians should be prepared for war.”

When public officials make bigoted statements, particularly on their own social media pages or accounts, their comments can be viewed by hundreds of thousands of people instantly. Such rhetoric and sentiment shapes public opinion, sending a clear message that it is appropriate to demonize—and even engage in an act of violence against—a group of Americans simply because of their faith.
The following are some examples of how public officials use social media to promote anti-Muslim views.

**Barry West**

Barry West, a county commissioner in Coffee County, Tennessee, posted the adjacent image and caption in April of 2013.

The post suggests that Muslims should be targeted and shot. When asked about the image, Commissioner West said: “I’m prejudiced against anyone who’s trying to tear down this country, Muslims, Mexicans, anybody.” Apart from the obvious bigotry underlying the sweeping statement that people of the Islamic faith or of Mexican national origin are trying to hurt America, his post was particularly troubling for Muslims in Tennessee, who have witnessed a string of hate crimes targeting their community in recent years. The Islamic Center of Murfreesboro in Rutherford County, Tennessee, which has faced severe opposition to its construction and development, including repeated vandalism of signs on its property, arson, and a bomb threat, expressed concerns that Commissioner West’s post incites further hatred and violence against American Muslims.

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**DOCUMENTING HATE TO EDUCATE**

In February 2011, protesters gathered outside the Yorba Linda Community Center in Orange County, California, the location of a Muslim charity event. During the rally, Councilwoman Deborah Pauly made a number of anti-Muslim and threatening comments, including that she knew “quite a few Marines who [would] be very happy to help these terrorists to an early meeting in paradise.” Protesters also used hateful and inflammatory language to denigrate Prophet Muhammad and Islam such as “Muhammad was a child molester, Muhammad was a pervert . . . Muhammad was a fraud . . . Muhammad was a false prophet.” The protest and comments created fear and intimidated the men, women, and children walking past the protest to enter the event hall. Subsequently, the Greater Los Angeles Area office of the Council on American-Islamic Relations (CAIR-LA) uploaded a video entitled “Hate Comes to Orange County” on YouTube to inform people about Pauly’s statements and the protest. This is an example of how to turn an incident of hate into an opportunity to educate others.
Scott DesJarlais

Also in Tennessee, U.S. Representative Scott DesJarlais (R-TN) posted on Facebook his “deep” concerns regarding approval of the Islamic Center of Murfreesboro’s cemetery in his district. The negative sentiment Rep. DesJarlais directed at the mosque’s facility provided a convenient opportunity for others to use his Facebook page as a place to display their bigotry.

These are just a few examples of the views expressed in response to Representative DesJarlais’ post:

- Douglas Smith: YUP! Sharia law around the corner, but it will be hard to enforce with true Tennesseans, as far as the cemetery, isn’t there a dump near the VA?
  January 24 at 10:33am · Like · 6

- Bethany Martin: Why did the state allow a mega mosque to begin with. They are hubs for f**k*n*sm. Something needs to be done about those f**k*n* training camps around the country. There is one near Oak Ridge.
  January 24 at 10:37am · Edited · Like · 6

- Paul Ballard: If you people would read the Quran you would know a lot of what they believe in is illegal in the United States. They don’t like Christian. They want to take over world. The mosque and the muslims and Islam and the cemetery should not be in the United States Of America. Scott and all American’s better wake up.
  January 24 at 11:11am · Like · 6

- Chad Johnson: Islam is not a religion, and they dont bury their dead correctly and it could have adverse effects on the water tables and be a health issue...I advise we litigate this out until they cant afford to build it, should be no problem finding lawyers to do that.
  January 24 at 12:07pm · Like

- John Crotty: Wrong, Don, you are being LIED to. Muhammed is the “perfect human example” according to Haddith. So, a raping murdering, illiterate pedophile is their “example”. You need to educate yourself as to what this “religion” really says.
  January 24 at 12:01pm · Like · 3
Speech By Hate Groups & Anti-Muslim Activists

Hate groups were among the Internet’s earliest users, and today their presence online is unwavering. There were an estimated 11,500 hate-related sites including websites, social network pages, chat forums, and micro-blogs in 2010. The Southern Poverty Law Center, which tracks hate groups, has identified a number of active anti-Muslim hate groups, many of which have used the Internet and social media platforms to spread their destructive agendas.

Stop Islamization of America

Stop Islamization of America (SIOA) has propagated fear and falsehoods about Islam and Muslims since its formation in 2009. One of the group’s early initiatives involved a highly publicized campaign in New York opposing Park51, a Muslim community center in lower Manhattan. More recently, SIOA ran a series of anti-Muslim ads on public transportation in major cities including New York, San Francisco, and Washington, D.C. One ad read: “In any war between the civilized man and the savage, support the civilized man. Support Israel. Defeat Jihad.”

SIOA’s Facebook page recently linked to a blog post by activist Pamela Geller (see adjacent image), discussing a Muslim woman’s lawsuit against a gym that would not allow her to wear a headscarf while exercising. In response, users made degrading comments.
United States Defense League

United States Defense League (USDL) was founded in 2012 with a mission to “educate and unite Americans on understanding Islam and exposing Sharia Law for the inhumane treatment of women, honor killings, teaching Islam in public schools and other stealth ways it is creeping in to our society.”

The page has become a repository for anti-Muslim views, including genocidal references to Muslims. Below are examples of comments by individual users on USDL’s Facebook page:

United States Defense League

facebook

22,964 Likes
6,959 Talking about

The Counter Jihad Report

www.counterjihadreport.com

A blog entitled, “The Counter Jihad Report,” with over 990,000 hits since 2011, has countless posts filled with anti-Islam and anti-Muslim ideas. The Counter Jihad Report Facebook page states that “Islam is at war with Western Civilization” and calls upon followers to educate themselves, share what they have learned and “get involved.”

In a blog post titled “No Common Ground,” one of many discussing opposition to the Islamic Center of Murfreesboro in Tennessee, the author states: “The barbaric ideology of Islam can no longer be tolerated in America, and we must facilitate its change or its self-destruction through direct ideological and philosophical confrontations.” Opponents of the mosque filed a private lawsuit to block the Center’s construction, arguing that Islam is not a religion. The U.S. Department of Justice later intervened to enforce the Religious Land Use and Institutionalized Persons Act, a federal law that protects religious institutions from unduly burdensome land use regulations.
Bare Naked Islam
www.barenakedislam.com

A blog named “Bare Naked Islam,” which is hosted by WordPress.org26 and has over 51 million reported hits27 since 2008, states that it is designed to show readers and viewers the “dark side of Islam.”28

ONLINE HATE GOES BEYOND THE WEB

In January of 2013, law enforcement authorities planned to offer heightened protection for Muslims taking part in “Texas Muslim Capitol Day” at the state Capitol in Austin after being notified of threats made on the notorious anti-Islam blog Bare Naked Islam.29 Threats included statements such as the ones to the right.

In November of 2011, Bare Naked Islam was criticized for allowing individuals to make comments threatening mosques, particularly a mosque in Falls Church, Virginia. For example, one individual claiming to have issues with the mosque wrote, “I want Muslim blood on my hands.”

A big bunch of muzzies all in one place eh?? Why not give em a warm Texas welcome . . . How do you Americans say? LOCK AND LOAD!

Call out the texas militia and kill or capture all participants. What in hell is going on in texas?

Screw Moderation!! Every One of them should be looking over his/her shoulder.

Comments posted on barenakedislam.com

Blogs and websites dedicated to spreading anti-Muslim hate
www.jihadwatch.org
freedomdefense.typepad.com
atlashrugs2000.typepad.com
muslimsagainstsharia.blogspot.com
www.actforamerica.org
The following are examples of well-known anti-Muslim activists with a significant online presence through various web pages they use to gather supporters and spread hate.

**Pamela Geller & Atlas Shrugs**

Pamela Geller is a well-known figure in anti-Muslim activist circles. Geller founded “Atlas Shrugs,” a blog she uses to voice hateful conspiratorial views about Islam and Muslims. In 2010, she partnered with fellow anti-Muslim activist, Robert Spencer, to lead SIOA. Through her work with SIOA, Geller became known as the public face of opposition to the Park51 community center in New York. She has also made many appearances on Fox News to comment on Islam, Sharia (i.e., Islamic religious law), and the supposed threat they pose to American values.

**Anti-Muslim Hater Geller’s Post Inspires Plot to Bomb Mosque**

Robert James Talbot, Jr., created a Facebook page called American Insurgent Movement (AIM) and sought to recruit like-minded people interested in “walking away from [their lives] . . . to stop the regime.” He used the page to solicit supporters, discuss what he planned to do, and to share his hateful opinions. After Pamela Geller posted information on her blog about construction plans for a new mosque in Memphis, Tennessee, AIM linked to the post on its Facebook page, describing it as a “mission”:

On March 27, 2014, FBI agents arrested Talbot in Texas for allegedly plotting to use explosives and weapons to blow up mosques and other buildings.
Brigitte Gabriel & ACT! for America

Brigitte Gabriel is the founder of ACT! for America and the author of two controversial books portraying Islam as a threat to America, *Because They Hate: A Survivor of Islamic Terror Warns America* and *They Must Be Stopped: Why We Must Defeat Radical Islam and How We Can Do It*.36 Gabriel believes that all Muslims are radical, and devout Muslims are terrorists.37 *The New York Times* has said about Gabriel: “She presents a portrait of Islam so thoroughly bent on destruction and domination that it is unrecognizable to those who study or practice the religion.”38

Gabriel has used her Twitter account to talk about Islam as a threat and the diverse support for ACT! for America, as shown in the images to the right.

ACT! for America was founded in 2007 and purports to defend Western civilization, “as opposed to the authoritarian values of Islamofascism, such as the celebration of death, terror, and tyranny.”39 ACT! for America claims to have over 875 chapters around the country with 279,000 members. The group actively grows its base, including hosting a series of meetings and trainings about best practices and communicating anti-Muslim messages.40 ACT! for America also participates in many leading conferences and Tea Party events around the country to reach broader audiences.41

A video uploaded to YouTube captures an individual at an ACT! for America information table in Florida stating in part:

“*Their foot baths, I love pissing in them . . . The Qur’an makes worthless toilet paper. It just kind of scratches my ass a little bit.*”42
Pastor Terry Jones of Stand Up America declared the 2010 anniversary of 9/11 “International Burn a Koran Day.” President Barack Obama, U.S. military leadership, and U.S. State Department officials all condemned his plans, and the fire department in Gainesville, Florida, refused to give him a permit for the event. While his plans for 2010 were eventually called off, Jones again advocated for a worldwide “burning of Korans” in 2012 and proceeded to organize events in various cities around the country. One of these instances, which concluded with a burning ceremony involving the Qur’an and an image of Prophet Muhammad, was captured on video and uploaded to YouTube.

The video has been viewed over 69,000 times and has nearly 1,200 comments, including “Muslims should not be allowed in America, they are terrorist,” “muslim mudafuckas should carry a terrorist prevention bracelet with a GPS on it everytime you enter the civilized west,” “burn them and burn them all!” and “Its high time we end them before they end us.”

Muslims believe that the holy book of Islam, the Qur’an, contains the word of God, so any attempt to desecrate it is viewed as extremely offensive and threatening to Muslims all over the world. In fact, many Muslims believe that desecrating any holy book is offensive.

In the film, which dramatizes the life of Prophet Muhammad, he is portrayed “as a child of uncertain parentage, a buffoon, a womanizer, a homosexual, a child molester and a greedy, bloodthirsty thug.” Depictions, portraits, or images of the Prophet Muhammad are considered disrespectful and traditionally prohibited in Islam.
Examples of Facebook pages that have been created to spread anti-Muslim bigotry.

**Allah Sucks**
9,516 Likes | 2,603 Talking about

**Anti-Islam Alliance**
21,137 Likes | 892 Talking about

**Ban Islam and Sharia Law Worldwide**
10,412 Likes | 33 Talking about

**Islam is Scum 2**
5,887 Likes | 48,349 Talking about
Online Hate by Individuals

Individuals are often inspired to spread hate after engaging or interacting with anti-Muslim activists and groups online.

Erik Rush

In the immediate aftermath of the Boston Marathon bombings in 2013, before the perpetrators had been identified, frequent Fox News contributor Erik Rush posted tweets blaming Muslims for the attacks and declared, “Let’s kill them all.” Within seconds the tweets reached his 12,000-plus Twitter followers, though Rush later tweeted that his remarks were sarcastic.50

Even if these statements have little effect when uttered as the opinion of a private individual, statements coming from a TV media correspondent undoubtedly have greater impact and can encourage others to act on a hateful message.

Pat Dollard

Immediately after a deadly shooting at Fort Hood, Texas, on April 2, 2014, a conservative documentary filmmaker and former Breitbart News contributor, Pat Dollard, called for Americans to “start slaughtering Muslims in the streets” on Twitter.51

Despite pressure from fellow Twitter users, Dollard’s tweet has not since been removed.
Threats to mosques and holy sites have also appeared online. For example, in response to a photo posted on a Facebook user’s page depicting the distribution of mosques in America, one individual wrote “let them put one in upstate south carolina an we wil [sic] burn it down.”

The photo below was posted on a Facebook page and depicted a violent attack in Mecca, Saudi Arabia, where millions of Muslims travel every year to perform Hajj, or pilgrimage—one of the five core acts of faith for adherents of Islam. Comments such as “One of the best solutions to solve a worse threat,” “I wish,” and “shoulda been a nuke” were left in response.
ATTACKS ON MUSLIMS, MOSQUES, AND ISLAMIC INSTITUTIONS

According to the latest FBI hate crimes statistics, the number of attacks on Muslims, mosques, and Islamic institutions throughout the country has spiked to alarming levels since 9/11. Twenty-eight hate crimes targeting American Muslims were reported in 2000, and just one year later that number increased to 481.52

While the number of hate crimes reported declined after 2001, they began to rise again in 2010, increasing by 50% in the past few years.53 Hate crime rates are now 5 times greater than before 9/11.

In addition, since 2010, opposition to mosques has also grown, often resulting in vandalism or arson. In 2012 alone, during the month of Ramadan, when Muslims all over the world refrain from food and drink until after sunset, a man vandalized a sign in front of a mosque in North Smithfield, Rhode Island, and a suspected arson attack burned the Islamic Society of Joplin in Missouri to the ground. Just one month later, a fire was deliberately set in the prayer area of the Islamic Center of Toledo in Ohio, the third largest mosque in the U.S. These incidents came on the heels of a tragic shooting in Oak Creek, Wisconsin, where a white supremacist opened fire on worshippers at a Sikh gurdwara, killing six people and injuring many others.

The photo below was posted on a Facebook page entitled, “Ban Islam,” and solicited input from followers about a young Muslim woman wearing a headscarf with the American flag printed on it to celebrate Independence Day. In response, Facebook users threatened violent attacks on the young woman for wearing the headscarf. For example, one user said: “I’d be in the news for snatchin it off her head.” Two users commented that they would choke the young woman with the scarf she was wearing.

HIJAB (HEADSCARF)

Some Muslim women wear the hijab, or headscarf, as a form of modesty and refrain from exposing their hair in public. Therefore, asking a Muslim woman who wears the hijab to remove it would be considered disrespectful. Furthermore, purposefully removing a woman’s headscarf or threatening to remove it would be an offensive, intimidating, and violent act.
facebook.

In response to a post on the Facebook page “Islam is Scum 2” regarding the Islamic holiday known as Eid al-Adha, which traditionally involves slaughtering animals for meat to be shared with family, friends, and those in need, one user wrote the following comment: “The only blood I wanna see is that of a Muslims pouring from there black necks.”

facebook.

In Texas, a local news channel posted on its Facebook page that a haboob, or severe duststorm, was approaching Lubbock. The word haboob is derived from an Arabic term that means “wind.” The announcement was met with a number of bigoted comments including: “Since when do we need to apply a Muslim vocabulary to a good ole AMERICAN dirt storm??” and “It’s called a dust storm . . . Texas is not a rag head country.”

YouTube

OSA at Islamic Mosque Little Rock

On September 14, 2012, a group of 20-30 individuals protested outside a mosque in Little Rock, Arkansas during the congregation’s Friday prayer. A video of their meeting after visiting the mosque can be found on YouTube. The video included statements describing Islam as a “slavish” and “bondage” religion, as well as a declaration that the group has “got to nail this” religion and show Muslims that Christianity is special.

VIRTUAL BECOMES REAL: BULLYING OF MUSLIM STUDENTS

There are real-life consequences to propagating hate on the Internet. When school children use social media websites to bully their classmates online, a phenomenon referred to as cyberbullying, it can aggravate tensions on school campuses and in classrooms. For example, Muslim high school students of Somali descent in Minnesota were targeted by another student who created a Facebook group called “I hate the Somalis (sic) at Tech High.” Unfortunately, this came as no surprise to some of the students since it was not uncommon for students to make disparaging remarks about their Muslim classmates.

In another instance, a Muslim high school student was subjected to repeated bullying by classmates, including threats of violence on Facebook. Neither police nor school staff took action when she reported the harassing activity, and she was later attacked by the same students, suffering a concussion and bruising. One of her attackers later bragged about the incident on Facebook.
“Congress shall make no law ... abridging the freedom of speech, or of the press ... ”

First Amendment to the U.S. Constitution

The starting point for understanding how online hate can be addressed is the First Amendment to the U.S. Constitution; however, it applies only to actions and restrictions imposed by government entities. The First Amendment prohibits Congress from making any law that interferes with freedom of speech and it has been interpreted to apply to all levels of government. Even when speech is offensive or disfavored, it will most likely be protected by the Constitution. Since the First Amendment was enacted in 1791, courts have generally been reluctant to create exceptions that chip away at its protections, particularly with regard to hate speech. For example, in 1977 the U.S. Supreme Court ruled that Skokie, Illinois, home to the highest per capita number of Holocaust survivors outside of Israel at the time, could not stop a “Nazi parade” from marching through the streets simply because of the content of its message. In a later case, the Court noted that it cannot permit the government to impose special prohibitions on those who express disfavored views.
While most forms of public expression are afforded robust protection, the right to free speech is not absolute. Narrowly defined exceptions to First Amendment protections include: false statements of fact in limited circumstances (e.g., libel), obscenity, child pornography, and commercial speech. The exceptions most relevant to hate speech are highlighted below:

**Incitement**

The First Amendment protects speech that abstractly advocates for the use of force or violence, unless that speech is “directed to inciting or producing imminent lawless action” and is “likely to incite or produce such action.” For example, speech that advocates for evading a mandatory military draft that results in people actually breaking the law is not protected by the First Amendment.

Not all cases, however, are this clear. Take, for instance, *The Innocence of Muslims*, a short video maligning the Prophet Muhammad that went viral. A court has not considered whether the film constitutes incitement under First Amendment law, but some argue that the film’s production and dissemination suggest “the aim was not just to air offensive views, but to do so in such a way as to ignite precisely the violence that in fact ensued.”

**“Fighting Words”**

Another exception to the First Amendment, which is related to but distinct from incitement, applies to “fighting words,” which the Supreme Court has defined as speech that “tend[s] to incite an immediate breach of the peace” by provoking a violent reaction. The subtle distinction between inciting speech and fighting words lies in the speaker’s intent: inciting speech causes others to perform unlawful acts while fighting words are intended to cause one who hears the words to react to the speaker. For example, speech that contains deeply abusive language, is exchanged face-to-face, and is likely to provoke a violent reaction will generally be considered unprotected speech under the “fighting words” exception.

**Threats**

First Amendment protections are not afforded to true threats, or declarations of “intention to inflict punishment, loss, or pain on another, or to injure another by the commission of some unlawful act.” The Supreme Court, however, has stated that threats cannot be punished if a reasonable person would understand them as obvious hyperbole. With this exception, threatening messages sent online or via social media platforms can be prosecuted under the law if the recipient reasonably believes that the sender intends to put him or her at risk of harm.

In sum, when speech falls under one of the specific exceptions listed above, it may be actionable.

**WHAT IS HATE SPEECH?**

Hate speech is difficult to define, both within and outside of the law. Some define it broadly as speech that marginalizes an individual or a group of people. Others define it more specifically as speech that incites harm or prejudicial action against someone because of his or her race, religion, ethnicity, national origin, sexual orientation, or disability. However, even without a clear, universally accepted definition, hate speech is easily identifiable in many instances. The challenge with hate speech is often not how to define it but rather how it is treated under the law and by the social media platforms that some users employ to promote hate.
WHAT INTERNET COMPANIES SAY ABOUT HATEFUL CONTENT

For a few reasons, online hate speech falls outside the First Amendment exceptions described in the previous section. For one, although the First Amendment prohibits certain government action that curtails speech, it does not stop private entities or companies from restricting speech. As a result, virtually all social media companies have created terms of service agreements or user policies that address hateful or abusive speech. They have also developed ways to monitor and remove content that violates their policies. These companies strongly believe in the free marketplace of ideas inspired by First Amendment principles, but they are also committed to user safety.

Internet companies have differing user policies. For example, as shown on the following page, Facebook is committed to creating a safe and respectful community online and has an explicit policy prohibiting hate speech. Its policy does “not permit individuals or groups to attack others based on race, ethnicity, national origin, religion, sex, gender, sexual orientation, disability or medical condition.”76 Similarly, YouTube does not permit hate speech.77 In addition, Twitter currently maintains a more permissive policy that prohibits users from publishing “direct, specific threats of violence against others.”78
Hate speech

We encourage free speech and try to defend your right to express unpopular points of view, but we don’t permit hate speech.

Hate speech refers to content that promotes violence or hatred against individuals or groups based on certain attributes, such as:

- race or ethnic origin
- religion
- disability
- gender
- age
- veteran status
- sexual orientation/gender identity

There is a fine line between what is and what is not considered to be hate speech. For instance, it is generally okay to criticize a nation-state, but not okay to post malicious hateful comments about a group of people solely based on their race.79

In addition, even if First Amendment protections governed online speech, most instances of hate speech would not fall under the narrow exceptions described above. Some online speech may be extremely offensive, but only rarely is it likely to incite unlawfulness or tend to cause a reader to respond with violence. Arguably, such speech is threatening but does not rise to the level of a “true threat” that will cause someone to reasonably believe he or she is in danger. Furthermore, the anonymity of many Internet users presents a practical limitation: if we don’t know who the speakers are, we cannot hold them accountable.

PROTECTING MINORS: “ERASER LAW”

Some states have passed legislation that address very limited circumstances surrounding online speech. For example, California recently passed a law that would require Internet companies to take down something a minor has posted online if that minor requests it. This “eraser law” is set to go into effect in 2015.82
WHAT USERS CAN DO

Although the law provides few remedies to victims of hate speech, there are important steps they and others who reject bigotry can take to address online hate. The two most effective responses are reporting hateful content to the social media companies on whose platforms the hate speech appears and engaging in counterspeech.
Report Hateful Content

At any given minute, there are millions of people all over the world using the Internet and social media, sharing billions of pieces of content. Internet companies are not able to review all content before it is uploaded or posted. Instead, they rely on their users to report content to them if they believe it violates the companies’ policies. Even if a user is not certain that a piece of content violates a policy, the user is encouraged to report it anyway, and many of the large Internet companies have designated teams to review the reported content and determine if it complies with their policies. Although reported content will not always be removed from social media platforms, user reporting helps inform companies about offensive content online and also holds Internet companies accountable to their policies.

Facebook, YouTube, and Twitter have their own reporting mechanisms, some of which are described, step-by-step, on the following pages.

facebook.

If users see something they believe to be offensive or in violation of Facebook’s Community Guidelines, the company suggests users report it and provides resources on how to do so.

1. The first step is to click on the arrow on the top right corner of the post and select the “Report/Mark as Spam” option.

2. Once that option is selected, users have the option to “Undo” or “Report” the content as abusive to Facebook.

3. When “Report” is selected, users have the option to explain why they are reporting the content to Facebook: “Is this post about you or a friend?” Users may select “Hate Speech” as the reason for why the post is being reported.
Users also have the option to further explain what type of hate speech the post includes.

The final step is to select “Report to Facebook”.

Facebook has produced an infographic that lays out the process for reporting, and displays a wide variety of content that may be reported. This infographic is available on Facebook’s website.³³

FACEBOOK TAKES A CLOSER LOOK

Facebook has recently taken a closer look at how people use reporting to resolve concerns with problematic posts. It has created and tested new user experiences that are designed to meet people’s concerns about the content they see and empower them to engage with those creating the content. Facebook reports that with these new experiences, people are ten times more likely to send a message to someone posting status updates they do not like. Furthermore, people who say their needs are met by Facebook’s reporting tools are significantly more likely to send a message (42%) than report the status update to Facebook (17.7%). According to their own research, Facebook is helping 3.9 million people resolve disputes every week with social resolution tools that allow people to engage others about a piece of content that bothers them. For example, when one person confronts another about an embarrassing photo, the photo is removed or a conversation is started about 85% of the time. In addition, 90% of the people contacted by these messages feel positive or neutral about the person who sent the message. While this data focuses heavily on content that people see in their News Feed, and not on content that exists outside of their networks, it demonstrates Facebook’s commitment to understanding and addressing hate online without extraneously limiting content.³⁴
To report a video on YouTube, users should click on the flag icon in the bottom right corner of a video.

Users can select from a list of options to describe why the video is being reported.

After selecting “Hateful or abusive content,” users have the opportunity to further explain how the content is hateful.

Finally, users are asked to provide the timestamp and any additional details about the video to complete the report. This is an opportunity to explain in further detail why the content is offensive and a violation of YouTube’s policy.
To report abusive content on Twitter, users should go to the Help page and locate the section entitled, “Policies & Violations,” and then select the option for “How to report violations.”

Next, users should find the section relating to abusive behavior and violent threats. When reporting abusive behavior and violent threats, users have the option to report content, or learn more about Twitter’s policies and procedures.

**Abusive behavior and violent threats**

When reporting abusive behavior on Twitter, please provide the following:

- Description of problem, including length of time the abusive behavior has been happening
- Tweet URLs (to find the exact link of a Tweet, please review this article)
- Tweet text (copy and paste the text of the Tweet into the form)
- Your email address

**Please note:** If you believe you may be in danger, please contact your local law enforcement authority in addition to reporting the content to Twitter so that the situation can also be addressed offline.

To report abusive behavior on Twitter, [click here](#).

For more information about Twitter’s abusive behavior policy, [click here](#).

For more information about reporting abusive behavior on Twitter, [click here](#).
After clicking the link provided to report content, users are directed to a form that asks for information pertaining to the offensive content, including when the problem began, the frequency of occurrences, and a link to the content being reported.

**I'm reporting an abusive user**

Please fill out all the fields below so we can review your report.

For more information and resources on dealing with abusive users both on the internet and on Twitter, please review this article.

- **How can we help?**
  - Someone on Twitter is posting my private information.
  - Someone on Twitter is being abusive.
  - Someone on Twitter is sending me violent threats.

- **What username is causing the issue?**
  - [e.g. Display name]

  Please provide links to the Tweets you are reporting as evidence so that we can investigate. To find the exact link of a Tweet, please review this article. You'll need to provide at least one direct link to the content you're reporting; more links are helpful to establish patterns.

  **Tweet I am reporting**

  [Link to Tweet]

- **Report another Tweet**

- **What are you reporting?**
  - I think the user has multiple accounts they are using to directly @reply me and others.
  - This user keeps sending me @replies and I don’t want to receive them.
  - This user is saying really offensive things, but is not sending me @replies.

- **Have you already blocked the person(s) involved?**
  - Yes
  - No

- **How long ago did this begin?**
  - 24 hours ago
  - Few days ago
  - About a week ago
  - About a month ago
  - More than a month ago

- **How many times has this happened?**

- **Further description of problem**

  Please provide as much detail as possible surrounding your issue. We are unable to accept attachments or screenshots related to your report. Please only provide links to exact Tweets or Twitter accounts.

- **Your full name**

- **I understand that Twitter may provide third parties, for example the reported user, with details of this report, such as the reported Tweet. Your contact information, like your email address, will not be disclosed.**

- **Twitter Username**

Once the reporting process on Facebook, YouTube, or Twitter is complete, users will receive a response indicating the content they reported was either removed or not removed because it did not violate the company’s policies. If you have reported content and it was not removed, contact Muslim Advocates and let us know about it.
Engage in Counterspeech

“If there be time to expose through discussion the falsehood and fallacies, to avert the evil by the processes of education, the remedy to be applied is more speech, not enforced silence.”

United States Supreme Court case Whitney v. California

Both legally and culturally, the country favors free expression. Bad speech should be countered with good speech, and false speech with truthful speech. The courts and civil society have long encouraged more speech as a response to offensive speech. When offensive, hateful content appears on a website or social media platform, a common and effective response is counterspeech.

The following are examples of effective counterspeech campaigns in response to bigotry online.

#myNYPDfile

In February 2012, the Associated Press published online the documents supporting its prior reporting that the New York Police Department (NYPD) has been spying on Muslims in New York and throughout the Northeast.

On Twitter, users responded with humor, mocking the ill-advised, blanket surveillance program.
#MuslimRage

Shortly after protests broke out all over the world in response to The Innocence of Muslims, the American news media questioned why the film sparked such a violent response. Newsweek published a cover story written by a Dutch-Somali critic of Islam, Ayaan Hirsi Ali, titled “Muslim Rage” with a photo depicting a group of angry Muslim men. The magazine also invited its Twitter followers to discuss the cover using the Twitter hashtag “#MuslimRage.”

While the poorly chosen cover and hashtag perpetuated the stereotype of the angry, violent Muslim man, it became the subject of ridicule for many Twitter users. Soon users responded en masse by poking fun at the hashtag:
Miss America Twitterstorm

When the winner of the Miss America 2014 pageant, Indian-American Nina Davaluri, was announced, Twitter users inundated the network with hateful tweets associating her with terrorism and al-Qaeda:

Other Twitter users quickly began engaging in counterspeech, causing some to apologize for their statements, as displayed below:
Twitter Digs Deeper

Based on a quick scan of tweets related to Miss America shortly after her win was announced, Twitter noted that out of a small sample of 573 responses, 73% exhibited counterspeech, 24% were neutral, and 3% were positively reaffirming the offensive tweet. While none of Twitter’s research is conclusive, it provides anecdotal evidence of the power in counterspeech. An example of this is described below in more detail.

@DallasRobinson8 tweeted the following:

However, due to reactions by people all over the world to his tweet, @DallasRobinson8 finally began to realize the hurtful nature of his tweet:

After being publicly shamed in international media, @DallasRobinson8 celebrated the coverage:

The examples above demonstrate the power in counterspeech and how it can be used on social media platforms to change the course of dialogue.
CONCLUSION & RECOMMENDATIONS

Our country’s Founding Fathers could not have contemplated a nation where the speech of a single individual could be amplified throughout the country instantaneously, and echoed by others within seconds. But even though the speech of our time may be different from theirs, there is no doubt that free speech remains a bedrock principle of our society. Given today’s widespread use of the Internet, all Americans should remain actively engaged and vigilant to prevent our freedom of speech from being abused.
To address hate online, Muslim Advocates encourages and recommends that you do the following:

1) **Learn About User Policies:**
   Review the terms of service agreements or user policies for sites and platforms that you are using or about which you are concerned;

2) **Know & Use the Reporting Tools:**
   Familiarize yourself with the tools that sites have put in place for reporting hateful content and use them if you believe something violates a company’s guidelines;

3) **Respond to Hate with Effective Counterspeech:**
   Consider opportunities to engage in counterspeech, using the examples highlighted above as a model for what you can do when you encounter hate speech online; and,

4) **Report Threats to Law Enforcement:**
   If you have been the target of threats, report them to law enforcement immediately.

**Additional recommendations:**

**Parents and Students:**

- Engage school administrators about your concerns with the use of the Internet and social media platforms and the impact on your child at school;
- Immediately inform school administrators about bullying in school;
- Learn about the school’s policies on cyberbullying or Internet use at school or during school hours in the event that a threatening or harmful situation involving other students arises; and,

**Leaders of Organizations:**

- If your organization has been a target of threats, inform law enforcement immediately;
- Share this report and engage your colleagues and members about the issues of hate online using the resources provided in this report; and,
- Create opportunities to engage with interfaith partners in your community and educate them and others about these issues.

**Internet Companies:**

- Develop and maintain an understanding of sensitivities that relate to American Muslims and other communities targeted by hate groups;
- Track and record the frequency at which reports are based on hateful content, particularly as it relates to a person’s faith;
- Affirmatively state company policy on hate speech and threatening speech;
- Continue to enhance tools designed for reporting content;
- Review all content reported by users to determine whether content violates company policies; and
- Promptly notify users who have reported content violations of the outcome of the company’s review and provide a clear explanation of the evaluation process used by the company.

**Policy Makers:**

- The White House should convene a national-level dialogue on hate against religious communities and invite Internet companies to participate in discussions addressing online hate.

**SHARE YOUR STORIES WITH US**

Let us know about examples of online hate so we can continue to monitor hate directed at the Muslim community. We also want to hear about your successes in reporting content or using counterspeech as a response to online hate.
ENDNOTES


5 Abraham H. Foxman & Christopher Wolf, Viral Hate 59 (Palgrave Macmillan 2013).


12 Nick Wing, Barry West, Tennessee County Commissioner, Draws Backlash For ‘How To Wink At A Muslim’ Post, Huffington Post, (May 1, 2013, 12:28 p.m.), http://www.huffingtonpost.com/2013/05/01/barry-west-tennessee-muslims_n_3193600.html.


14 Wing, supra, note 12.

15 CAIR LA, Hate Comes to Orange County, YouTube (Mar. 2, 2011), https://www.youtube.com/watch?v=NutFkykjbM.

16 Muslims customarily wish “peace and blessings” upon the mention of the name of the Prophet Muhammad.


20 SIOA is also known as the American Freedom Defense Initiative and it was founded as the U.S. branch of Stop Islamisation of Europe. Nathan Lean, Expose the Islamophobia Industry, N.Y. DAILY NEWS, July 9, 2012, http://www.nydailynews.com/opinion/expose-islamophobia-industry-article-1.1109263.
26 Note that WordPress.org is different from WordPress.com. WordPress.com has terms of service and allows people to report abusive content, however it does not have control over sites powered by WordPress.org as indicated on their website. Dispute Resolution & Reporting, WORDPRESS.COM, http://en.support.wordpress.com/disputes/ (last visited Apr. 23, 2014).
27 This number is based on the figure reported on the website. BARE NAKED ISLAM, http://www.barenakedislam.com (last visited Apr. 23, 2014).
31 Id. at 70.
32 SOUTHERN POVERTY LAW CENTER, supra note 21.
37 Id.
40 ALI ET AL., supra note 30, at 67.
41 Id. at 67–68.
43 Note that the generally accepted spelling for Islam’s holy book is “Qur’an,” and not “Koran,” which is used in Pastor Terry Jones’ materials.
46 Waddell, supra note 44.
47 StandUpAmericaNow, Worldwide Burning of Korans and Muhammad by Dr. Terry Jones, YOUTUBE (Apr. 28, 2012), https://www.youtube.com/watch?v=tZk8do68JwE.
54 Apuritan, OSA at Islamic Mosque Little Rock, YOUTUBE (Sept. 16, 2012), https://www.youtube.com/watch?v=YgxUHD0qXSo.
57 Obeidallah, supra note 55.
64 “There are certain well-defined and narrowly limited classes of speech, the prevention and punishment of which have never been thought to raise any Constitutional problem. These include the lewd and obscene, the profane, the libelous, and the insulting or ‘fighting’ words—those which by their very utterance inflict injury or tend to incite an immediate breach of the peace. It has been well observed that such utterances are no essential part of any exposition of ideas, and are of such slight social value as a step to truth that any benefit that may be derived from them is clearly outweighed by the social interest in order and morality.” *Chaplinsky v. New Hampshire*, 315 U.S. 568, 571–72 (1942).
66 *N.Y. Times v. Sullivan*, 376 U.S. 254 (1964). Note that courts have also held that libel directed against religious or racial groups does not create an actionable offense—“group libel” is different from libel directed toward a particular person or entity, which is actionable under the law. FOXMAN & WOLF, supra note 5, at 62; *Who Can Sue For Defamation*, DIGITAL MEDIA LAW PROJECT, http://www.dmlp.org/legal-guide/who-can-sue-defamation (last visited Apr. 24, 2014).
71 On February 26, 2014, Google removed *The Innocence of Muslims* from YouTube pursuant to a court order by the U.S. Court of Appeals for the Ninth Circuit in *Garcia v. Google, Inc.*, No. 12-57302, 2014 U.S. App. LEXIS 3694, at *24 n.9 (9th Cir. 2014), appeal docketed, No. 12-57302 (9th Cir. Mar. 13, 2014). In *Garcia*, Cindy Lee Garcia alleged copyright infringement of her performance in the film because it had been partially dubbed over with anti-Muslim statements. The page for the former video indicates that Google disagrees with the Court’s copyright ruling and will appeal the decision. StandUpAmericaNow, *Innocence of Muslims Movie Trailer*, YOUTUBE, https://www.youtube.com/watch?v=mjoa3QazVy8 (last visited Apr. 24, 2014).
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