

Journal of Civil Rights and Economic Development

Volume 25
Issue 4 *Volume 25, Summer 2011, Issue 4*

Article 2

June 2011

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Recommended Citation

Bryan Adamson (2011) "The Muslim Manchurian Candidate: Barack Obama, Rumors, and Quotidian Hermeneutics," *Journal of Civil Rights and Economic Development*: Vol. 25 : Iss. 4 , Article 2.
Available at: <https://scholarship.law.stjohns.edu/jcred/vol25/iss4/2>

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ARTICLES

THE MUSLIM MANCHURIAN CANDIDATE: BARACK OBAMA, RUMORS, AND QUOTIDIAN HERMENEUTICS

BRYAN ADAMSON*

Backdrop: In a March, 2008, 60 Minutes segment, Steve Kroft interviewed Kenny Schoenholtz, an Ohio resident. He appeared to be working-class, white and middle-aged. The subject of the interview was the upcoming Democratic presidential primary. Steve Kroft asked which candidate Mr. Schoenholtz favored. Mr. Schoenholtz mused: “I’m leaning towards Obama...but I heard he doesn’t even know the national anthem. . .wouldn’t use the Holy Bible. He’s got his own beliefs, with the Muslim beliefs.” Kroft, almost interrupting, fired back, “You know that’s not true.” With his eyes fixed, chin quivering, and mouth trying to form a response, Mr. Schoenholtz finally said, “No? I’m just—this is what I’ve been told.”¹

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¹ *60 Minutes: All Eyes on Ohio* (CBS television broadcast Mar. 2, 2008) (transcript available at http://www.cbsnews.com/stories/2008/02/29/60minutes/main3894659_page3.shtml?tag=contentMain;contentBody) (video available at http://www.cbsnews.com/video/watch?id=3897988n%3fsource=search_video).

Rumor had it that Obama was an unpatriotic, Islamic terrorist sympathizer. The rumor originated with ideological opponents, and was propagated by journalists, pundits and politicians alike. Ideologues Jerome Corsi and Andy Martin wrote about Obama's "extensive Muslim ties" as early as 2004.² Broadcast commentators such as Juan Williams, Glenn Beck and Rush Limbaugh churned false assertions about Obama's "radical" ties, and his Madrassa education.³ Others sardonically mocked his middle name—Hussein,⁴ and his surname and image were transposed with Osama bin Laden's.⁵

Obama's political opponents piled on. In the 60 Minutes segment, Steve Kroft asked Democratic Presidential Candidate Senator Hillary Rodham Clinton whether she believed that Obama is a Muslim. Her reply? "No. No. Why would I? No, there is nothing to base that on. (Pause) *As far as I know.*"⁶ Early in his campaign, when asked about the possibility of a Muslim running for president, Republican Presidential nominee John McCain subtly embedded the rumors' subtext: "Since this nation was founded primarily on Christian principles. . . I prefer someone who I know

² See *infra* at Section IA.

³ *Id.*

⁴ Katharine Mieszkowski, What's In A Name? *SALON*, Dec. 20, 2007, http://www.salon.com/politics/war_room/2006/12/20/obama/ (mocking Obama's middle name); *Special Report Roundtable - January 16* (FOX News broadcast Jan. 16, 2007) (transcript available at http://www.realclearpolitics.com/articles/2007/01/special_report_roundtable_janu_9.html) (showing Brit Hume, host of Fox News' Special Report, "correct[ing]" himself: "Barack Obama -- Barack Hussein Obama"); *CNN's Situation Room* (CNN broadcast Dec. 11, 2006) (transcript available at <http://transcripts.cnn.com/TRANSCRIPTS/061211/sitroom.03.html>) (revealing the comments of CNN correspondent Jeanne Moos, who said of Obama: "how about sharing the name of a former dictator? You know his middle name? Hussein").

⁵ *CNN's Situation Room*, *supra* note 4 (broadcasting further comments by Jeanne Moos of CNN, "[o]nly one little consonant differentiates [Obama and Osama]"); *Hardball* (MSNBC broadcast Feb. 18, 2008) (video available at <http://mediamatters.org/items/200802190002>) (displaying a picture of Osama bin Laden while touting an upcoming story on Obama). Lee Glendinning, Osama? Obama? CNN Puts The Whole Thing On Air, *GUARDIAN*, Jan. 4, 2007, <http://www.guardian.co.uk/media/2007/jan/04/broadcasting.tvnews/> (pointing out a similar error made by CNN); Don Frederick & Andrew Malcolm, *Osama, Obama - Romney Trips Over His Tongue*, L.A. TIMES, Oct. 28, 2007, available at <http://articles.latimes.com/print/2007/oct/28/nation/na-ticket28> (quoting Mitt Romney "just look at what Osam — Barack Obama—said yesterday. Barack Obama calling on radicals, jihadists of all different types, to come together in Iraq").

⁶ *60 Minutes*, *supra* note 1 ("Pause," and emphasis added). Equivocal at best, Senator Clinton was widely criticized for propagating the rumor. A sound argument can be made that her response was inadvertent and/or not given its proper context in later recapitulations. At two points in the interview, Senator Clinton makes clear she doesn't believe Obama is a Muslim. Steve Kroft first asked Clinton, "You don't believe that Senator Obama's a Muslim?" Clinton replied, "Of course not. I mean, that, you know, there is no basis for that. I take him on the basis of what he says. And, you know, there isn't any reason to doubt that." *Id.* A minute later, Kroft asked, "[you] said you'd take Senator Obama at his word that he's not . . . a Muslim." *Id.* Clinton replied, "Look, I have been the target of so many ridiculous rumors, that I have a great deal of sympathy for anybody who gets, you know, smeared with the kind of rumors that go on all the time." *Id.*

has a solid grounding in my faith[.]”⁷ Last fall, he and his Vice-Presidential nominee Sarah Palin became unyielding in their desire to entrench the rumor with their constituents, and in the process surfaced its most deadly consequence. Persistently asking their rally audiences “Who is the real Barack Obama?” they abided responses such as “Terrorist!” or “Kill him!”⁸

The exhortation to kill Obama most disturbingly illustrates what happens when rumors are adopted as fact. The “Muslim = Terrorist” meme is, sadly, not new. In the aftermath of the 9/11 attacks, however, the meme has become particularly noxious. The equation has resulted in American Muslims being vilified, racially profiled, assaulted, and even murdered.⁹ Given that disquieting aspect of the post-9/11 climate, to be labeled a Muslim and thus a “terrorist sympathizer” potentially exposed Obama to physical harm.

The rumor could exact political costs as well. A Newsweek survey conducted in July 2008 revealed deep-seeded Islamophobia: 48% of the respondents said they would not vote for a Muslim presidential candidate.¹⁰ So it was not entirely unexpected—although disappointing—that Obama’s political opponents were more than happy to let the rumor fester.¹¹ Those opponents hoped voters would view Obama as the sum of all Americans’ fears: If Obama becomes President he will fulfill the Islamist terrorists’ desire to bring America down “from the inside.” He was the Muslim Manchurian Candidate.¹²

Though the underlying facts to the Obama rumor were patently, provably

⁷ William Fisher, *Muslim American Voters Left Out in the Cold*, INT’L PRESS SERVICE NEWS AGENCY, Jan. 17, 2008, <http://www.ipsnews.net/news.asp?idnews=40825>.

⁸ Foon Rhee, *Biden Calls Latest Attacks On Obama Dangerous: Says McCain Campaign Is Inciting Anger*, BOSTON GLOBE, Oct. 9, 2008, available at http://www.boston.com/news/politics/2008/articles/2008/10/09/biden_calls_latest_attacks_on_obama_dangerous/.

⁹ See, e.g., CIVIL RIGHTS IN PERIL: THE TARGETING OF ARABS AND MUSLIMS (Elaine C. Hagopian ed., 2004) (discussing American hatred towards Arabs); See also Tariq A. Shah, *Islam, Muslims and Terrorism: Secret Evidence and Guilt by Association*, 10 M.S.U.-D.C.L. J. INT’L L. 589, 589 (2001) (chronicling murders and assaults of Muslim-Americans, and harassment and profiling of Muslim-Americans—including those who “looked” Muslim).

¹⁰ Mary Gilbert & Amy Harder, *Religion and The Race: White Evangelicals & Catholics Favor McCain; Plus: Americans are Warming up to Immigration*, NAT’L J., July 14, 2008, http://nationaljournal.com/njonline/religion-and-the-race-20080714?mrefid=site_search (“Respondents were more wary of Muslims and atheists, with 48 percent saying they would not vote for a Muslim candidate and 51 percent majority rejecting candidates who do not believe in God.”).

¹¹ DANIEL SOLOVE, THE FUTURE OF REPUTATION: GOSSIP, RUMOR, AND PRIVACY ON THE INTERNET 61 (2007) (noting “Sticky” is a term used to describe a rumor when it gains momentum).

¹² See e.g., Op-Ed., *The Internet Helps Fuel the Ugly Insinuation that Obama is a Stealth Muslim, Reviving An Ancient Hate*, L.A. TIMES, Dec. 3, 2007, available at <http://articles.latimes.com/2007/dec/03/opinion/ed-obama3>. This description of Obama first emerged in 2006. *Id.* See also Michael Dobbs, *Fact-Checking the Campaigns*, WASH. POST Dec. 19, 2007, available at <http://www.washingtonpost.com/wp-dyn/content/discussion/2007/12/17/DC2007121701244.html>.

false, the number of voters believing them was extraordinary. Polls conducted between February 2008 and Election Day revealed that as many as 18% and no fewer than 10% of likely or actual voters believed that Obama is a Muslim.¹³ Mr. Schoenholtz was obviously one of millions of likely voters wrestling with the rumor. That he was willing to believe the various rumors about Obama because it was “what [he had] been told” begs a question: Who so utterly influenced Mr. Schoenholtz that he could adopt the rumors as truth? This Article posits that his friends did in face exert such influence, and explains how.

This Article does not attempt to examine the Obama rumors from a legal perspective. It does not prescribe remedies for rumors against politicians. It does not examine libel, slander,¹⁴ or the equal time rule.¹⁵ It does not argue for re-consideration of the now-defunct personal attack rule, the political editorial rule,¹⁶ nor the Fairness Doctrine¹⁷ in light of our present political landscape. What this Article does instead is examine that seemingly simple exchange between Mr. Schoenholtz and Steve Kroft to mine the media’s role in rumor-mongering, and the influence peer groups engaged in quotidian discourse have in re-framing, mediating, and reinforcing (or debunking) rumors.

This communication theory perspective turns on quotidian hermeneutics—a method which analyzes commonplace conversations that take place within social groups.¹⁸ From a political perspective, examining

¹³ Michael Saul, *15% Voters Wrong, Bam’s Not Muslim*, N.Y. DAILY NEWS, Apr. 19, 2008 (noting 15% of voters believe Obama is a Muslim); *Race, the Race and Relatability*, NEWSWEEK, May 5, 2008 (discussing a Newsweek poll that found 13% of Democrats believe Obama is a Muslim); Michael Dimock, *Belief that Obama is Muslim is Durable, Bipartisan – But Most Likely to Sway Democratic Votes*, PEW RES. CENTER FOR PEOPLE & PRESS, July 15, 2008, available at <http://pewresearch.org/pubs/898/belief-that-obama-is-muslim-is-bipartisan-but-most-likely-to-sway-democrats> (finding that 12% of Democrats and 12% of Republicans believe Obama is a Muslim); Safdar Khwaja, Editorial, *We Are Muslims. So What?*, PITTSBURGH POST-GAZETTE, Nov. 9, 2008 (stating that 10% of voters on Election Day believed Obama was a Muslim).

¹⁴ See generally *N.Y. Times v. Sullivan*, 376 U.S. 254 (1964) (supporting the proposition that any examination of the Obama rumors through a libel or slander lens must begin with this Supreme Court case). See also *Monitor Patriot Co. v. Roy*, 401 U.S. 265, 271 (1971); *Ocala Star-Banner Co. v. Damron*, 401 U.S. 295, 299 (1971); *Time, Inc. v. Pape*, 401 U.S. 279, 284 (1971).

¹⁵ 47 U.S.C. § 315(a) (2010) (prescribing, with exceptions, that “[i]f any licensee shall permit any person who is a legally qualified candidate for any public office to use a broadcasting station, he shall afford equal opportunities to all other such candidates for that office in the use of such broadcasting station . . .”).

¹⁶ *Radio-Television News Directors Ass’n v. FCC*, 229 F.3d 269 (D.C. Cir. 2000) (ordering the FCC to repeal the personal attack and political editorial rules).

¹⁷ See *Syracuse Peace Council v. FCC*, 867 F. 2d 654 (D.C. Cir.1989) (approving the FCC’s decision not to enforce the Fairness Doctrine). The Fairness Doctrine was abandoned in 1987. *Id.*

¹⁸ Debbie Schlusel, *Barack Hussein Obama: Once a Muslim, Always a Muslim*, Dec. 18, 2006, http://www.debbieschlusel.com/archives/2006/12/barack_hussein.html. Schlusel is a political pundit who makes frequent appearances on mainstream media outlets such as MSNBC and FOX. Debbie Schlusel, *About Debbie Schlusel*, <http://www.debbieschlusel.com/bio/> (last visited Mar. 18, 2011).

in-group conversations about media stories is of no small consequence. First, the rumors of Obama's Muslim allegiances were believed in numbers sufficient to tip the election.¹⁹ Second, in a broader sense, with regards to issue-based decision making, "interpersonal communication represents a significant source of political information and voter influence."²⁰ Thus, what voters discuss in everyday conversation, and *how* they discuss rumors are worthy topics to explore.

This Article proceeds in five parts. Part I mines the sources of the Obama rumors, and examines how those rumors were amplified in the media. Part II applies a few basic semiotic principles to emphasize how the Obama rumors were embedded in voters like Mr. Schoenholtz by playing upon themes of patriotism and "American-ness." Part III sets forth rumor traits, including the distinct phenomena that emerge as rumors are passed along. Part IV describes in-group traits to posit what happened to the Obama rumors as Mr. Schoenholtz's in-group members engaged in quotidian discourse. Before concluding, Part V explains why rumors are hard to quell, especially in light of the influence in-group members have on mediating rumor belief.

I. THE MUSLIM MANCHURIAN CANDIDATE RUMORS—GENESIS²¹

Rumors are unverified, but are relevant information statements that arise in contexts of ambiguity, passed on from person to person, which allow people to make sense of events.²² Rumors represent a unique dynamic of interpersonal and small group communication—distinct from myths, urban legends, and even gossip.²³ Being an important form of social discourse,

¹⁹ Obama won by just over a 7% margin of the popular vote: 69,456,897 votes to 59,934,814 votes. Presidents of the United States of America, *Barack Hussein Obama*, <http://www.potus.com/bhobama.html> (last visited Mar. 18, 2011).

²⁰ Bruce E. Pinkleton, *Individual Motivations and Information Source Relevance in Political Decision Making*, 2 MASS COMM. & SOC. 65, 70 (1999).

²¹ I use this word intentionally, fully aware of the irony.

²² NICHOLAS DIFONZO & PRASHANT BORDIA, RUMOR PSYCHOLOGY: SOCIAL AND ORGANIZATIONAL APPROACHES 13, 15 (2007) (hereinafter RUMOR PSYCHOLOGY) (noting that rumors manage risk, but also entertain, build alliances, and fulfill wishes.).

²³ See *id.* at 18. Urban legends and myths have narrative structures more like storytelling. Rumors are distinctive in that they are non-narrative in structure, constituting statements about which people are unsure. *Id.* (stating that "[r]umors tend to relate to information that pertains to an ambiguous situation or event of which people are already apprised and in which they are involved in ferreting out the facts"). See also Zsuzsanna Szvetelszky & Balázs Székfü, *Three Degrees Of Inclusion: The Emergence Of Self-Organizing Social Beliefs: Modeling Cooperative Behavior in the Social Sciences*, 779 API CONF. PROC. 185, 187 (2005). "Gossip is not an opinion and not a story, but a special mixture of the special stories and special opinions (about the stories)" about a person not present, discussed within a discrete social network. See also DIFONZO & BORDIA, *supra* note 22, at 19; DiFonzo and Bordia view gossip as "evaluative social talk about individuals, usually not present that arises in the context of social network

rumors, even false ones, have far-reaching effects on human behavior. As a result, rumors have been extensively studied for their psychological, economic, social, and political consequences.²⁴ As they spring from various facts or events, it is important to review some of the facts which provided the basis for the Obama rumors Mr. Schoenholtz articulated, and how media sources propelled them.²⁵

A. Obama has “Got His Own Beliefs, With the Muslim Beliefs . . .”

Rumors emerging about Obama’s Muslim identity began shortly after his 2004 address at the Democratic National Convention. In mid-August, Andy Martin alleged that Obama was concealing his Islamic faith. Martin’s writing was first broadcast in cyberspace—on the Free Republic website.²⁶ In December 2006, Ted Sampley, of the United States Veteran

formation, change, and maintenance—that is, in the context of building group solidarity.” See also Alla V. Tovares, *Public Medium, Private Talk: Gossip About A TV Show as ‘Quotidian Hermeneutics,’* 26 TEXT & TALK 463, 467 (2006) (analyzing gossip as a “dialogic evaluative talk with an element of surprise about an absent third party whose words, actions, or appearance are in violation of social norms or expectations”).

²⁴ DIFONZO & BORDIA, *supra* note 22, at 15 (documenting how rumors manage threat with examples of rumors that emerged in catastrophic events such as the 1934 Indian earthquake, the 1986 Chernobyl nuclear accident and the “Eleanor [Roosevelt] Club”). See GORDON W. ALLPORT & LEO POSTMAN, THE PSYCHOLOGY OF RUMOR (1947) (analyzing rumors during World War II, and discussing the impact of rumors on armed forces and citizen morale); Michael A. Kamins et al., *Consumer Responses to Rumors: Good News, Bad News*, 6 J. CONSUMER PSYCHOL. 165, 167 (1997) (evaluating word of mouth conversations and impact on consumers’ choice of products); Amy Reynolds & Brooke Barnett, *This Just In . . . How National TV News Handled the Breaking “Live” Coverage of September 11*, 80 JOURNALISM & MASS COMM. Q. 689 (2003) (discussing media news, audiences, and rumors about the terrorists attacks).

²⁵ To ground the discussion of how people take their rumors from media sources, it is helpful to set forth a few examples of the audience reached by the media discussing the Obama rumors. In the spring of 2007, Rush Limbaugh averaged 13.5 million listeners per week, and 20 million in 2008. See Project for Excellence in Journalism, *The State of the News Media 2008: Talk Radio*, <http://stateofthemediamedia.org/2008/radio-intro/talk-radio/> (last visited Mar. 18, 2011) (“According to data from Talkers Magazine, [Limbaugh] commanded an estimated 13.5 million weekly listeners in 2007.”); Premiere Radio Networks, *Rush Limbaugh: Biography*, <http://www.premiereradio.com/vfile/2009/03/1617.doc?k=6f1548a4570ff1fa607862e0d90e3e99> (last visited Mar. 18, 2011) (explaining that in 2008 Limbaugh’s show was broadcast on nearly 600 stations, reaching approximately 20 million listeners). *Hannity & Colmes* averaged 1.5 million viewers in November 2007. See Project for Excellence in Journalism, *The State of the News Media 2008: Audience*, <http://stateofthemediamedia.org/2008/cable-tv-intro/audience/> (last visited Mar. 18, 2011). MSNBC’s *Hardball with Chris Matthews* averaged 459,000 viewers per night in 2006 and 420,000 in 2007. *Id.* CNN’s *Headline News* prime time audience averaged 353,000 viewers. *Id.* In the third quarter of 2007, FOX News’ median prime time audience was 1.4 million. *Id.* As for newspapers, *The New York Post* averaged 625,421 daily circulations, *The New York Times*, 1,000,665, and *The Washington Post*, 622,714. See Carpe Diem, <http://mjperry.blogspot.com/2008/10/newspaper-circulation-continues-to-drop.html> (Oct. 28, 2008, 3:44 EST).

²⁶ Press Release, Andy Martin, YAHOO NEWS, *Columnist Says Barack Obama ‘Lied To The American People’; Asks Publisher to Withdraw Obama’s Book* (Aug. 11, 2004) (available at <http://www.freerepublic.com/focus/f-news/1189687/posts>). Andy Martin, a political gadfly, recently filed suit in Hawaii petitioning the release of Obama’s birth certificate to pursue his allegation that Obama is not a natural-born United States citizen.

Dispatch, amplified Martin's allegation.²⁷ Quoting liberally from Martin's work, Sampley further claimed that Obama had attended "Jakarta's Muslim Wahhabi schools," and declared that such schools were training grounds for Muslim terrorists.²⁸

Shortly after Obama announced his presidential candidacy, Insight Magazine churned the rumor mill.²⁹ Published on its website in January 2007, the article was titled "Hillary's Team has Questions About Obama's Muslim Background."³⁰ It opened with this salvo: "Are the American people ready for an elected president who was educated in a Madrassa as a young boy and has not been forthcoming about his Muslim heritage?"³¹ Crediting an "unreleased background check" being conducted by Clinton's campaign, the article's most incendiary charge was that Obama "spent at least four years in a so-called Madrassa, or Muslim seminary, in Indonesia."³² The Insight piece also declared that "Obama's education began a life-long relationship with Islam as a faith and Muslims as a community . . ."³³ The article did not carry a byline. Equally remarkable was the fact that every quoted statement was from an unnamed source.³⁴ The story's intent was to characterize the recently-announced presidential candidate as a Muslim weaned on anti-American Islamic extremism.

Quickly after it was posted, the Insight story migrated out of cyberspace. Over the course of two weeks, at least 200 news outlets reported the story.³⁵ The New York Post led off with this headline: "OSAMA MUD FLIES AT OBAMA."³⁶ Rush Limbaugh reported the Insight story without questioning its dubious veracity, let alone the story's wholesale absence of

²⁷ Ted Sampley, *Barak Hussein Obama - Who is he?*, U.S. VETERAN DISPATCH, Dec. 29, 2006, http://www.usvetdsp.com/dec06/obama_muslim.htm.

²⁸ *Id.* (stating that Obama was enrolled "in one of Jakarta's Muslim Wahhabi schools, and describing Wahabbism as "the radical teaching that created the Muslim terrorists who are now waging Jihad on the rest of the world").

²⁹ *Hillary's Team has Questions About Obama's Muslim Background*, INSIGHT MAG., Jan. 17, 2007, <http://www.freerepublic.com/focus/f-news/1770215/posts>.

³⁰ *Id.*

³¹ *Id.*

³² *Id.*

³³ *Id.*

³⁴ *Id.*

³⁵ A LEXIS/NEXIS transcript search also revealed that 76 broadcast, cable, or radio outlets discussed the story. Furthermore, from the time the Obama/Madrassa story "broke" on January 17, 2007 until the end of the month, over 120 news outlets were reporting the rumor.

³⁶ Howard Kurtz, *Campaign Allegation a Source of Vexation*, WASH. POST, Jan. 22, 2007, available at <http://www.washingtonpost.com/wp-dyn/content/article/2007/01/21/AR2007012101161.html>; See also *Right-Wing Media Figures Claim Clinton Behind Obama/Muslim Smears*, MEDIA MATTERS FOR AM., Jan. 19, 2007, <http://mediamatters.org/items/200701200003>.

investigative rigor.³⁷ Similarly, FOX News (which has common ownership with the New York Post) also presented, *as fact*, that Obama “spent the *first decade* of his life, raised by his Muslim *father*, as a Muslim and was educated in a Madrassa.”³⁸ Further into the story, the news reader repeated the false attribution of the story to “Hillary Clinton’s camp,” and perniciously described Madrassas as schools “financed by Saudi’s, [where] they teach this Wahhabism which pretty much hates us.”³⁹ In the same show, a caller questioned whether Obama’s schooling meant that “he doesn’t consider terrorists the enemy.”⁴⁰ FOX anchor, Brian Kilmeade, responded, “Well, we’ll see about that.”⁴¹

The Sunday after the story broke, Juan Williams connected the dots for those buying the rumor and its Muslim = Terrorist meme:

In terms of Obama and race, I still think that there’s—and don’t forget the idea that, you know, he comes from a father who was a Muslim and all that. I mean, I think that, given that we’re at war with Muslim extremists, that presents a problem.⁴²

Days later, the Insight article allegations were dismissed as absolutely false.⁴³ However, its “Obama-is-a-secret Muslim” refrain reverberated

³⁷ Editorial, *Sticks, Stones and Mr. Obama: Misleading Aspersions About The Senator’s Background Only Make The Perpetrators Look Bad*, WASH. POST, Jan. 28, 2007, at B06; Joe Conason, *Ghosts Of Dirty Tricks Past*, SALON.COM, Jan. 26, 2007, <http://www.salon.com/opinion/conason/2007/01/26/obama/print.html>.

³⁸ *Obama Smeared As Former ‘Madrassa’ Student, Possible Covert Muslim Extremist*, THINK PROGRESS, Jan. 19, 2007, <http://thinkprogress.org/2007/01/19/fox-obama-madrassa/> (emphasis added).

³⁹ *Id.*; Merriam-Webster Dictionary, (defining a “madrassa” as a “Muslim school, college or university that is often part of a mosque”) available at <http://www.merriamwebster.com/dictionary/madrassa>; See also Peter Bergen & Swati Pandey, *The Madrassa Scapgoat*, 29 WASH. Q. 117, 117 (2006), available at http://www.twq.com/06spring/docs/06spring_bergen.pdf (evaluating the truth behind the evolution of madrassas into a “potent symbol [of] terrorist factories”).

⁴⁰ THINK PROGRESS, *supra* note 38.

⁴¹ *Id.*

⁴² *FOX News Sunday Roundtable: Chris Wallace*, (FOX News television broadcast Jan. 21, 2007) (transcript available at http://www.realclearpolitics.com/articles/2007/01/joe_biden_carl_levin_newt_ging.html).

⁴³ *The Situation Room: Possible Smear Campaign Against Senator Obama* (CNN television broadcast Jan. 22, 2007) (transcript available at <http://edition.cnn.com/TRANSCRIPTS/2007.01.22.html>) (explaining how CNN broke the story). See, e.g., Bill Carter, *Rivals CNN and Fox News Spar Over Obama Report*, N.Y. TIMES, Jan. 24, 2007, at A5 (commenting on the pointed exchange between the rival news networks as a result of Insight’s allegations regarding then Senator Obama’s childhood); Nedra Pickler & Robin McDowell, *Obama Denies Education as Radical Muslim: Official at the Indonesian School in Question Insist It’s Public, Secular*, THE HOUS. CHRON., Jan. 25, 2007, at 12, available at <http://www.chron.com/disp/story.mpl/headline/nation/4497076.html> (proposing that the allegations against then Senator Obama were groundless); *Does Partisanship Have Its Place in Politics?* (NPR radio broadcast Jan. 25, 2007) (transcript available at <http://www.npr.org/templates/story/story.php?storyId=7020213>) (analyzing the implications of certain partnerships in politics); *The Early Show: Senator Barack Obama Discusses The State Of The Union Address*, (CBS television broadcast Jan. 24, 2007) (asking Senator Obama about the rumors regarding his madrassa schooling, to which then Senator Obama dismissed as “scurrilous attacks”); *NewsHour with Jim Lehrer: Fighting in*

throughout 2007.⁴⁴ In fact, the accusations continued through 2008.

In August, 2008, Jerome Corsi put the rumors on full blast in his book *The Obama Nation: Leftist Politics and the Cult of Personality*.⁴⁵ The publisher Simon & Schuster promoted Corsi's text as "[s]crupulously sourced with more than 600 footnotes [.]"⁴⁶ The "stunning" and "comprehensive" book discussed "Obama's extensive connections with Islam and radical politics. . .and his communist and socialist mentors in Hawaii and Chicago."⁴⁷ Corsi documented "Obama's continuing connections with Kenya, the homeland of his father, through his support for the candidacy of Raila Odinga, the radical socialist presidential contender who came to power amid Islamist violence and church burnings."⁴⁸ Finally, the publisher hyped a claim that Obama had a "20-year-long religious affiliation with the black-liberation theology of former Trinity United Church of Christ Reverend Jeremiah Wright. Reverend Wright's sermons have always been steeped in a rage first expressed by Franz Fanon, Stokely Carmichael and Malcolm X, a rage that Corsi shows has deep meaning for Obama."⁴⁹

In the book itself, Corsi asserted that Obama's campaign staff was chock-full of communists, and Obama himself had "extensive connections to Islam."⁵⁰ Corsi wrote of an interview with a self-described "childhood friend" of Obama, Zulfan Adi. Adi "knew" Obama was raised as a Muslim, and offered as proof a recollection that when the "muezzin

Najaf, Iraq, Intensifies (PBS television broadcast Jan. 29, 2007) (transcript available at http://www.accessmylibrary.com/coms2/summary_0286-29513690_ITM) (discussing "a Media Unit report on the struggle to separate fact from fiction in the news").

⁴⁴ See *infra* at Section I, B (discussing the rumor that Obama does not even know the national anthem); Section I, C (commenting on the alleged statement "that Obama was sworn into the Senate on the Q'uran, and would not use the Bible if he were to be sworn in as President"); Section I, D (noting "the factual touchstones which built upon the rumors' primary narratives," including the photograph taken in Kenya, the flag lapel pin, and his associations with William Ayers and Reverend Jeremiah Wright); Section I, E (explaining how the internet was used as a way of "disseminating, discussing, or echoing the Obama rumors").

⁴⁵ See generally JEROME R. CORSI, *THE OBAMA NATION: LEFTIST POLITICS AND THE CULT OF PERSONALITY* (2008) (portraying President Obama as maintaining an extreme leftist ideology and extensive connections with Islam and radical politics). Jerome R. Corsi also co-wrote the widely discredited, but politically devastating book that "swift-boated" John Kerry during the 2004 elections. E.g., JOHN E. O'NEILL & JEROME R. CORSI, *UNFIT FOR COMMAND: SWIFT BOAT VETERANS SPEAK OUT AGAINST JOHN KERRY* (2004).

⁴⁶ Amazon.com, *The Obama Nation Book Summary*, <http://www.amazon.com/Obama-Nation-Leftist-Politics-Personality/dp/1416598065> (providing a review of the book from the publisher, Simon & Schuster).

⁴⁷ *Id.*

⁴⁸ *Id.*

⁴⁹ *Id.*

⁵⁰ Jim Rutenberg & Julie Bosman, *Book Attacking Obama Hopes To Repeat '04 Anti-Kerry Feat*, N.Y. TIMES, Aug. 13, 2008 (reiterating many of the worst misrepresentations).

sounded the call to prayer,” he saw “Lolo [Obama’s stepfather] and Barry [Barack] walk together to the makeshift mosque.”⁵¹ Evidence of Corsi’s bias and dubious research behind his claims was overwhelming.⁵² Nonetheless, *Obama Nation* was hugely popular, and reached number one on the New York Times bestseller list.⁵³

Time and again, Obama refuted the rumor that he is not a Christian.⁵⁴ Even before he ran for president his two autobiographies, *The Audacity of Hope*⁵⁵ and *Dreams From My Father*⁵⁶, had been published and widely read. In both books, Obama discussed his upbringing and his faith.

Barack Obama was born in 1961 to an American mother and Kenyan father.⁵⁷ His father was not a practicing Muslim by the time he met and married Ann Dunham, Obama’s mother.⁵⁸ Obama’s mother and father separated when Obama was two years old. Between the ages of 6 and 10, Obama lived in Indonesia and was raised in a secular household by his mother and stepfather Lolo Soetoro.⁵⁹

Between 1969 and 1971, Obama attended a public school in Jakarta.⁶⁰ The state-run school was Muslim only in the sense that the majority of the students were Muslim. It did not base its curriculum on any particular religion, and was not found to remotely resemble a “training ground for

⁵¹ *Unfit for Publication: Corsi’s The Obama Nation Filled With Falsehoods*, MEDIA MATTERS FOR AM., Aug. 4, 2008, <http://mediamatters.org/items/200808040005> (refuting dozens of Corsi’s contentions through counter-investigation).

⁵² *See id.*; *see also* Max Blumenthal, *Obama Nation Author Jerome Corsi’s Racist History Exposed*, THE NATION, Aug. 20, 2008, <http://www.thenation.com/doc/20080901/blumenthal> (Obama Nation “was larded with crackpot smears cobbled together from assorted right-wing blog posts.”); Posting of Joe Klein to Swampland, <http://swampland.blogs.time.com/2008/08/13/scholarship/> (Aug. 13, 2008, 14:57 EST). Factcheck.com assessed the book as “a mishmash of unsupported conjecture, half-truths, logical fallacies and outright falsehoods.” Joe Miller, *Corsi’s Dull Hatchet*, Factcheck.com, Sept. 15, 2008, http://www.factcheck.org/elections-2008/corsi_dull_hatchet.html.

⁵³ Rutenberg & Bosman, *supra* note 50.

⁵⁴ In August, 2008, his campaign launched a website specifically to address the rumors. Fight The Smears, <http://www.fightthesmears.com> (last visited Mar. 18, 2011). *See, e.g., All Eyes On Ohio*, *supra* note 1; *see also* MSNBC.com, Jan. 15 Democratic Debate Transcript, Jan. 16, 2008, <http://www.msnbc.msn.com/id/22682821/page/8/> (“Let’s make clear what the facts are: I am a Christian. I have been sworn in with a Bible. I pledge allegiance [to the American flag] and lead the Pledge of Allegiance sometimes in the United States Senate when I’m presiding”).

⁵⁵ *See generally* BARACK OBAMA, *THE AUDACITY OF HOPE* (2006).

⁵⁶ BARACK OBAMA, *DREAMS FROM MY FATHER: A STORY OF RACE AND INHERITANCE* (2004).

⁵⁷ *Id.* at 9 (discussing how his parents met).

⁵⁸ OBAMA, *supra* note 55, at 204 (mentioning that “although my father had been raised a Muslim, by the time he met my mother he was a confirmed atheist”).

⁵⁹ *Id.* at 202 (stating that his secular mother and his stepfather raised him in a non-religious household). *See also* Kim Barker, *History Of Schooling Distorted*, CHI. TRIB., Mar. 25, 2007, at 28) explaining that his stepfather, Lolo, was raised as a Muslim, but by adulthood was a non-practitioner).

⁶⁰ OBAMA, *supra* note 55 at 274. According to Obama, this was because his family could not afford private schooling. “Without the money to go to the international school that most expatriate children attended, I went to local Indonesian schools and ran the streets with the children of farmers, servants, tailors, and clerks.”

future terrorists.”⁶¹ Moreover, the school was not attached to a mosque, and it was therefore incorrect to describe it as a “Madrasa.” Furthermore, Corsi’s “eyewitness” backtracked on the mosque allegation. In a subsequent interview, when asked for details, Adi admitted that he was uncertain, and also stated that he had known Obama for only a few months.⁶² From 1988 until recently, Obama was a member of the Chicago’s Trinity United Church of Christ.⁶³ Yet, despite the Obama rumors having been proved false, scrutinizers continued to look for Muslim cues.

B. Obama “Doesn’t Even Know the National Anthem . . .”

In October 2007, a picture was taken as the national anthem played. It was taken in Iowa, where Obama was attending an event hosted by Senator Tom Harkin. Obama, along with Hillary Clinton and New Mexico Governor Bill Richardson, stood outside, on a platform stage, in front of a large American flag. Both Clinton and Richardson had their hands over their heart. Barack had his arms downward, and his hands clasped together in front of him. The fact that the national anthem was being played when the photograph was taken was easily omitted. This image became anchored as a referent to the rumor that Obama “refused to put his hand over his heart during the Pledge of Allegiance.”⁶⁴ Further down the rumor stream, the image came to signify that Obama “refused to recite the Pledge of Allegiance at all.”⁶⁵

⁶¹ *The Situation Room* (CNN television broadcast Jan. 22, 2007) (transcript available at <http://edition.cnn.com/TRANSCRIPTS/0702/07/sitroom.02.html>). Hardi Priyono, deputy headmaster of the school, stated “This is a public school. We don’t focus on religion.” The Indonesian Embassy released a statement via E-Mail: “Sekolah Dasar Negeri 04 Besuki in Menteng, Jakarta, Indonesia has always been a public school. It has never been an Islamic madrasah type of school.” *Debunked Insight Magazine And Fox News Smear Campaign*, U.S. FED. NEWS, Jan. 23, 2007.

⁶² Barker, *supra* note 59 (stating that Adi “only knew Obama for a few months, during 1970, when his family moved to the neighborhood”).

⁶³ Jason George, *Candidates Come Marching in With Religion*, CHI. TRIB., Dec. 31, 2007, at 1 (mentioning that “Obama was baptized at the age of 26 at Chicago’s Trinity United Church of Christ”).

⁶⁴ Bill Adair, *E-Mail Assailing Obama’s Patriotism Misses Mark*, ST. PETERSBURG TIMES, Nov. 9, 2007, at 1A.

⁶⁵ *Id.* (emphasis added). Before those misrepresentations, much was already being made about the whether the image was proof that Obama was unpatriotic. On the October 23, 2007 broadcast of Fox and Friends, the host, Steve Doocy led in his story by asserting that “Barack Obama has a new round of patriotism problems.” Note exchange Doocy had with his co-host Gretchen Carlson:

CARLSON: [there is a statute] that talks about what your stance and hand-over-heart action should be --

DOOCY: Are you talking about United States Code, Title 36, Chapter 10, Sec. 171?

CARLSON: I am, and you are so good with numbers so early in the morning, Steve.

DOOCY: Yeah. During the singing of the national anthem, you’ve got to have your hand over

In early 2008, political columnist John Semmens wrote a short piece in Obama's "voice." Obama stated: "There are a lot of people in the world to whom the American flag is a symbol of oppression. And the anthem itself conveys a war-like message. You know, the bombs bursting in air and all. It should be swapped for something less parochial and less bellicose."⁶⁶ Though clearly intended as satire, that passage was integrated into viral e-mails as authentic Obama statements.⁶⁷

C. Obama "Wouldn't Use The Holy Bible . . ."

Another alleged statement declared that Obama was sworn into the Senate on the Q'uran, and would not use the Bible if he were to be sworn in as President. The rumor started sometime in early 2007, likely from an anonymous e-mail.⁶⁸ It was never substantiated because it was never true as to Obama. In January 2007, Keith Ellison, D-Minnesota, was in fact sworn into the United States House of Representatives on the Q'uran—the one belonging to Abraham Lincoln.⁶⁹ The assertion that Obama would be sworn in on a Q'uran instead of a Bible should he become President was pure embellishment.

D. The Muslim Manchurian Candidate Rumors—Force Multipliers

Various news articles, Corsi's book, the viral e-mails, and broadcast media stories provided ample fodder for the Obama rumors. However, other significant events along the presidential campaign provided more fuel to the rumors' text and subtext. While not rumors in themselves, the

your heart. (emphasis added).

Fox & Friends' *Doocy* Reported Obama's "Patriotism Problems," MEDIA MATTERS FOR AM., Oct. 23, 2007, available at http://mediamatters.org/items/200710230004?f=h_latest (quoting Fox & Friends (Fox News Channel broadcast Oct. 23, 2007)).

For clarity's sake, national anthem protocol is set forth in 36 U.S.C. § 301(b)(1). "During a rendition of the national anthem when the flag is displayed, all present except those in uniform *should* stand at attention facing the flag with the right hand over the heart" (emphasis added). 36 U.S.C. § 301(b)(1) (2008). Subsection (b)(2) provides: "When the flag is not displayed, those present *should* face toward the music and act in the same manner they would if the flag were displayed there." *Id.* (emphasis added). Nowhere does it *require* placing the right hand over the heart—which clearly would be unconstitutional. *Id.*

⁶⁶ Richard Ruelas, *Obama Rumor Spreads Like Cyber Wildfire*, ARIZ. REPUBLIC, Oct. 18, 2008.

⁶⁷ *Radio Host Bob Grant Repeats Discredited Email Smears On Obama*, MEDIA MATTERS FOR AM., Oct. 27, 2008, <http://mediamatters.org/items/200810270010>.

⁶⁸ *Obama Sworn In On His Bible* ST. PETERSBURG TIMES, Dec. 20, 2007, available at <http://www.politifact.com/truth-o-meter/statements/238/> (discussing a chain e-mail from December 19, 2007).

⁶⁹ Ellison to Take Oath on Thomas Jefferson's Quran, NATIONAL PUBLIC RADIO, Jan. 3, 2007, <http://www.npr.org/templates/story/story.php?storyId=6718662>.

following events served as factual touchstones which built upon the rumors' primary narratives.

a. The Photograph Taken in Kenya

On February 4, 2008, a photograph of Obama in Somali attire was accompanied by the headline "Obama's Shocking Al Qaeda Link" in the National Examiner.⁷⁰ The photograph caption read "Barack Obama is dressed in *Muslim* attire [.]"⁷¹ The photograph was taken when Obama went to Kenya in August, 2006 in his capacity as a member of the Senate Foreign Relations Committee panel on African Affairs.⁷² The National Examiner re-purposed the image to visually fortify Obama's alleged ties with Raila Odinga, who purportedly had "shady ties" with "al Qaeda cells."⁷³ The photograph quickly surfaced on the Drudge Report website.⁷⁴ The Tennessee Republican Party, in an early February press statement questioning Obama's support of Israel, circulated the photograph with the caption "Muslim Attire."⁷⁵

The photograph's caption was plain wrong; Obama's attire was actually that of a *Somali elder*. Yusuf Garaad Omar, head of the BBC's Somali Service, offered an accurate refutation: there is "no religious significance to [the clothing] whatsoever."⁷⁶ The attire was like that normally worn by nomads, and the turban was an item worn by the elderly as a sign of respect. As custom, whenever there were visiting delegates the region's Council for Peace and Development would dress them in nomadic clothes.⁷⁷ Neither the National Examiner nor The Drudge Report sought to

⁷⁰ *Obama's Shocking Al Qaeda Link*, NAT'L EXAMINER, February 4, 2008, at 36. The National Examiner has an average weekly circulation of 313,000 copies, including subscriptions. Total readership is estimated at 1.3 million. *Securities and Exchange Commission 8K Filing*, AMERICAN MEDIA OPERATIONS, available at <http://sec.edgar-online.com/american-media-operations-inc/8-k-current-report->

⁷¹ *Obama's Shocking Al Qaeda Link*, *supra* note 70 (emphasis added).

⁷² Lynn Sweet, *Obama Trip To Highlight U.S. Interests In Africa*, CHI. SUN-TIMES, July 10, 2006, at 34.

⁷³ *Obama's Shocking Al Qaeda Link*, *supra* note 70.

⁷⁴ Matt Drudge, *Clinton Staffers Circulate 'Dressed' Obama*, DRUDGE REPORT, Feb. 25, 2008, http://www.drudgereportarchives.com/data/2008/02/25/20080225_115348_flashoa.htm. The Drudge Report is one of the most popular online news sites, with 2.1 million unique visitors in September 2008 alone. Nat Ives, *After The Election, Will Huffpo And Co. Be Old News?: Traffic To Pundit Sites Nose-Dived After '04 Race, But Arianna Isn't Worried*, ADAGE MEDIWORKS, Oct. 27, 2008, <http://adage.com/article/mediaworks/election-huffpo-news/132031/>.

⁷⁵ Alexander Mooney, *Michelle Obama Takes Heat From Tennessee GOP*, CNN, May 15, 2008, <http://www.cnn.com/2008/POLITICS/05/15/michelle.tennessee/index.html> (discussing the tensions between the Tennessee Republican Party and the Obamas during the 2008 Presidential Election).

⁷⁶ *The Meaning Of Obama's Robes*, BBC NEWS, Feb. 26, 2008, <http://news.bbc.co.uk/2/hi/technology/7265115.stm> (quoting Yusuf Garaad Omar, head of the BBC's Somali Service).

⁷⁷ *Id.*; see also, Katharine Houreld, *Obama's Kenya Garb Not Religious, Says Elder*, CHI. SUN-

correct the image's descriptive anchor.⁷⁸

b. The Flag Lapel Pin

The flag pin controversy arose for Obama while campaigning in Iowa in October 2007. A reporter noticed that Obama was not wearing one on his lapel. The American flag lapel pin had become a symbol of solidarity after 9/11—worn by politicians, citizens, journalists, news anchors and talk show hosts.⁷⁹ In the post 9/11 swell of patriotic fervor, not wearing a flag pin carried great risk—especially for politicians.

When asked why he did not wear one at the Iowa event, Obama responded that the pin “had become a substitute for I think true patriotism, which is speaking out on issues that are of importance to our national security[.]”⁸⁰ Instead, he stated “tell the American people what I believe will make this country great, and hopefully that will be a testimony to my patriotism.”⁸¹

Arguably the nadir of the rumor-mongering, the Associated Press headline read “Obama Ditches American Flag Pin: Has Become a Substitute for ‘True Patriotism.’”⁸² The Drudge Report picked the story up on October 4, 2007, and recast it as “Obama Stops Wearing Flag Pin.”⁸³ On the October 4th edition of *Hannity and Colmes*, Kate Obenshain, the former head of Virginia's Republican Party, criticized Obama for not wearing the pin, admonishing that “[s]omebody [who] wants to be commander-in-chief should have pride in our country enough to wear the lapel, continue to wear the lapel pin on their jacket during this campaign.”⁸⁴

TIMES, Mar. 9, 2008. As Mohammed Hassan Mumin, the Kenyan who presented Obama the gift later said, if George W. Bush had come to visit, he “could have dressed him the same as Barack Obama.”

⁷⁸ Chadwick Matlin, *Obama Gets Dressed*, SLATE, Feb. 25, 2008, <http://slate.com/blogs/blogs/trailhead/archive/2008/02/25/obama-gets-dressed> (discussing the use of the image as a divisive tactic in the 2008 Democratic Primary).

⁷⁹ The fact that news readers and journalists began to wear the flag lapel pins has been a topic of much professional and scholarly discussion. The discussion centered on whether news readers wearing the flag pin undermined journalist integrity by inferring allegiance to subjects (government, war, politics) that journalists are bound to cover critically. See generally Elizabeth Birge & June Nicholson, *Journalism after 9/11*, 92 QUILL 17 (2004); Amy Reynolds & Brooke Barnett, *CNN's Framing of September 11: Suggesting an Appropriate Response to Terrorism*, in MEDIA REPRESENTATIONS OF SEPTEMBER 11TH (Steven Chermak et al. eds., 2003); JOURNALISM AFTER SEPTEMBER 11 (Barbie Zelizer & Stuart Allan eds., 2002).

⁸⁰ David Wright & Sunlen Miller, *Obama Dropped Flag Pin in War Statement*, ABC NEWS, Oct. 4, 2007, <http://abcnews.go.com/Politics/Story?id=3690000&page=1>.

⁸¹ *Id.*

⁸² *Following Drudge, Media Outlets Seize On Obama Decision — Years Ago — To Stop Wearing Flag Pin*, MEDIA MATTERS FOR AM., Oct. 5, 2007, <http://mediamatters.org/items/200710060001>.

⁸³ *Id.*

⁸⁴ *Hannity & Colmes: Was Barack Obama Shunning The American Flag?*, (FOX News broadcast

Mark Williams, a Sacramento-based radio host and journalist, appeared on FOX News and deduced:

Obama says he took his flag pin off after 9-11, and he felt, apparently, some sort of an affinity or some sort of a connection, because at that point he felt it OK to come out of the closet as the domestic insurgent he is.⁸⁵

c. William Ayers

“Domestic terrorist” William Ayers would serve as grounds for one of two attempts to radicalize Obama by association. Ayers is a Professor of Education at University of Illinois-Chicago. In 1970, he co-founded the Weather Underground, an anti-war organization.⁸⁶ Most infamously, the organization planted small bombs at the Pentagon and the U.S. Capitol.⁸⁷ Ayers and his wife Bernadine Dorhn were charged with crimes, but charges were dropped in 1974.⁸⁸ Regardless, Ayers had repudiated his role in, and the tactics of, the Weather Underground.⁸⁹

In 1995, former Illinois Senator Alice Palmer introduced Obama to Bill Ayers over coffee at Ayers’ home.⁹⁰ In 2001, Ayers contributed \$200.00 to Obama’s Illinois senate re-election campaign. Beginning in 1995, Ayers and Obama sat on the Chicago Annenberg Challenge (CAC) board.⁹¹ For two years they served simultaneously on a second charitable foundation board—the Woods Fund. Both organizations’ missions focused on youth scholarships and education reform. They also both lived in the Hyde Park area of Chicago.⁹² A review of the CAC project records found nothing to suggest anything inappropriate in these volunteer projects.⁹³ Moreover,

Oct. 4, 2007) (transcript available at <http://www.foxnews.com/story/0,2933,299580,00.html>).

⁸⁵ Mark Williams Says On Fox News: After 9-11, Obama Came “Out Of The Closet As The Domestic Insurgent That He Is, MEDIA MATTERS FOR AM., Oct. 5, 2007, <http://mediamatters.org/items/printable/200710050005>.

⁸⁶ Katha Pollitt, *Bill Ayers Whitewashes History, Again*, THE NATION, Dec. 11, 2008, available at <http://www.thenation.com/blogs/anotherthing/388681/print> (responding to the outrage of Vietnam).

⁸⁷ William Ayers, Op.-Ed., *The Real Bill Ayers*, N.Y. TIMES, Dec. 6, 2008, at 21 (discussing the group’s responsibility for placing several small bombs in empty offices).

⁸⁸ Abdon M. Pallasch & Chris Fusco, *10 Things To Know About Bill Ayers*, CHI. SUN-TIMES, Oct. 12, 2008, at A2 (noting why the crimes were dropped); Scott Shane, *Obama and ‘60s Bomber: A Look Into Crossed Paths*, N.Y. TIMES, Oct. 4, 2008, at 1, available at <http://www.nytimes.com/2008/10/04/us/politics/04ayers.html?pagewanted=print> (mentioning the charges were dropped because of illegal wiretap, break-ins and mail interceptions by authorities).

⁸⁹ Ayers, *supra* note 87 (stating his regrets about the risks posed to others because of the group’s actions).

⁹⁰ Pallasch & Fusco, *supra* note 88 (noting how Obama and Ayers met).

⁹¹ *Id.* (explaining how both Obama and Ayers became involved in the charity).

⁹² *Id.* (noting they have bumped into each other on the street in their neighborhood).

⁹³ *Id.* (stating their relationship did not reach more than professional relations in regards to the

evidence never surfaced that the two were particularly close, socialized together, or knew each other very well, in contrast to reports that Ayers served as Obama's policy advisor or mentor.⁹⁴

Though no proof was ever given that their "relationship" went any further, the Obama/Ayers connection was raised insistently. A McCain internet ad made much of the connection, stating that Ayers and Obama "ran a radical 'education' foundation."⁹⁵ Accusations flew that Obama "launched his political career" in Ayers's living room.⁹⁶ The William Ayers controversy provided more fuel to the Obama rumors' "Muslim = Terrorist" stereotype by providing detractors with a loaded adjective, i.e., "domestic." On the campaign stump, Ayers was pluralized as Palin accused Obama of "palling around with terrorists."⁹⁷

d. Reverend Jeremiah Wright

While the rumors regarding Obama's heritage and schooling played on anti-Muslim sentiments, the Reverend Wright controversy injected the kind of racial politics that has become all-too-familiar over the past few decades.⁹⁸ Reverend Wright was Obama's Pastor at Trinity United Church

charity).

⁹⁴ *Id.*

⁹⁵ Andy Barr, *McCain Launches Ayers Ad*, POLITICO, Oct. 9, 2008, <http://www.politico.com/news/stories/1008/14419.html> (discussing McCain's new campaign web advertisement, which stated "Barack Obama. Too Risky For America.").

⁹⁶ *Id.*

⁹⁷ David Grann, *The Fall: John McCain's Choices*, NEW YORKER, Nov. 17, 2008, at 37.

⁹⁸ Michelle Obama was also the target of criticisms regarding her patriotism and her so-called "anti-White" sentiments. The consequence, of course, was to fortify the Obama = Muslim rumors. The firestorm first began in February 2008, when she was excoriated for stating that as an adult she had "never really been proud of America" until she saw enthusiastic voters "hopeful" and "hungry for change." Michael Graham, Editorial, *Michelle, No Belle!*, BOSTON HERALD, Feb. 21, 2008, at 19; see also Charles Krauthammer, *Too Late to the Duck Hunt; A Farewell to Hillary*, WASH. POST, May 9, 2008, at A27. *The National Review* featured a full-face close up photograph of Michelle Obama, with a scolding expression. Mark Steyn, *Mrs. Obama's America*, NAT'L REV., Apr. 21, 2008, available at <http://nrd.nationalreview.com/?q=MjAwODA0MjE=>.

She was ridiculed again on June 3, 2008, the day on which Barack sealed the Democratic nomination. After she introduced Obama, he approached her; they kissed, hugged, and bumped their fists. The fist bump came to be interpreted as a conspiratorial gesture, signifying some secret allegiance with Islam. Privileging the absurd over the serious, the "terrorist fist bump" was endlessly discussed under the guise of news, and parodied on a much-criticized *New Yorker* magazine cover. NEW YORKER, July 21, 2008, http://www.newyorker.com/magazine/toc/2008/07/21/toc_20080714. During the June 6, 2008 edition of FOX News' *America's Pulse*, host E.D. Hill teased the upcoming segment with this line: "A fist bump? A pound? A terrorist fist jab? The gesture everyone seems to interpret differently." *America's Pulse* (FOX News broadcast June 6, 2008 (transcript available at <http://mediamatters.org/items/200806060007>). The ensuing discussion with Janine Driver—whom Hill introduced as a "body language expert"—sought to deconstruct the gesture. At no point during the discussion did Hill explain the necessity to call it "a terrorist fist jab." Anyone who has watched any sporting event in the last 20 years would understand fully that the gesture signifies "great job!" The fist bump is also common in casual social contacts between youth, as a signifier for "what's up?" The act emerged out of African-

of Christ in Chicago, where Obama had been a member for 20 years. In spring 2008, ABC news presented a story on Reverend Wright's sermons. The most infamous snippet was from a 2003 sermon.

The government gives them the drugs, builds bigger prisons, passes a three strike law and then wants us to sing God Bless America. Naw, naw, naw. Not God Bless America. God Damn America! That's in the Bible. For killing innocent people. God Damn America for treating us citizens as less than human. God Damn America as long as she tries to act like she is God and she is Supreme.⁹⁹

A 40 minute sermon was edited into a 15 second incendiary indictment of America.¹⁰⁰ Sound-bit, stripped of context, and misinterpreted, video of Reverend Wright declaring "God damn America!" caused apoplectic rage.¹⁰¹ The excerpt was looped endlessly on radio and television. It spread like wildfire in cyberspace.¹⁰² Obama's "relationship with an angry pastor who expressed anti-American sentiments"¹⁰³ became another plot in the narrative to frame him as not only as anti-American, but one better: Anti-White.

On his radio broadcast, Glenn Beck put it like this:

We now have evidence that Barack Obama has been in a radicalized church that is based on black liberation where the theory is if God's not against white people, then we have to kill God because got's (sic) not really God. The only God that is really truly God would be against white people. And we

American culture (a "dap"), and has long become mainstream.

⁹⁹ Reverend Jeremiah Wright, Sermon, available at <http://www.youtube.com/watch?v=ycWgFCEnprs&feature=related>.

¹⁰⁰ Brian Ross & Rehab el-Buri, *Obama's Pastor: God Damn America, U.S. to Blame for 9/11*, ABC News, Mar. 13, 2008, available at <http://abcnews.go.com/Blotter/DemocraticDebate/story?id=4443788&page=1>.

¹⁰¹ Reverend Wright's sermon was about the human rights casualties America itself had wrought over the decades, and civil rights injustices done to African-Americans. Far from implying what *should* happen to America, he was reminding his audience of what the Bible and other religious texts state what happens to perpetrators of harms against innocents. To give Reverend Wright's sermon the justice it deserves would fill a book. I do not address it extensively here. For an insightful and incisive response to the Reverend Wright criticism, see Tim Wise, *Jeremiah Wright, Barack Obama and the Unacceptability of Truth: Of National Lies and Racial America*, COUNTERPUNCH, Mar. 18, 2008, <http://www.counterpunch.org/wise03182008.html>.

¹⁰² The excerpts of Reverend Wright's sermons (notably, not the *full* sermon) and reactions were viewed millions of times on YouTube.

¹⁰³ Karl Rove, *Was It Ever Going To Be Easy?*, NEWSWEEK, May 5, 2008, at 35 (stating that Obama should answer questions about "being 'friendly' (as [his] chief strategist, David Axelrod, put it) with a violent, unrepentant 60's radical and having a close relationship with an angry pastor who expressed anti-American sentiments.").

have any and all means to destroy the white enemy.¹⁰⁴

The Wright controversy became so virulent that Obama held a press conference in Philadelphia where, in the process of delivering a speech on America's tortured history of race and racism,¹⁰⁵ Obama distanced himself from Reverend Wright's comments, and later officially left the church.

The Reverend Wright stories attempted to "other-ize" Obama in a different, but equally important way. For many, Reverend Wright's words and demeanor¹⁰⁶ summoned the racial grievance trope. More deeply, however, Reverend Wright conjured not just emblems of 60's African-American *activism*, but *anti-white radicalism*. Not coincidentally, detractors invoked Reverend Wright's name in the same breath as Malcolm X, Louis Farrakhan, and Stokely Carmichael. For his critics, Wright's "rage" extended towards Israel, further embedding allegations of Obama's Islamic allegiance.

Before the Reverend Wright imbroglio, Obama had largely avoided being tethered to the 1960's civil rights activism and its participants. Obama is bi-racial; he is a "cusper" (someone born near the end of the baby

¹⁰⁴ *The Glenn Beck Program* (MSNBC radio broadcast Mar. 21, 2008) (transcript available at <http://www.glennbeck.com/content/articles/article/198/7636/>).

¹⁰⁵ Barack Obama, U.S. Senator, Speech on Race (Mar. 18, 2008) (transcript available at <http://www.nytimes.com/2008/03/18/us/politics/18text-obama.html?ex=1363579200&en=01c3df099739ddd0&ei=5124&partner=permalink&expprod=permalink>) (explaining that he, President Obama (then a United States Senator), has condemned Reverend Wright's statements as wrong and divisive and further that he never personally heard Reverend Wright make derogatory comments towards whites).

¹⁰⁶ Reverend Wright's delivery also contributed to the critique. Some understand the impassioned tone, cadence, pitch, movement and gestures used by preachers like Reverend Wright as a known sermon style with its own historicity. See, e.g., Ashon T. Crawley, "Let's Get It On!" *Performance Theory and Black Pentecostalism*, 6 *BLACK THEOLOGY* 308 (2008); HENRY H. MITCHELL, *BLACK CHURCH BEGINNINGS: THE LONG-HIDDEN REALITIES OF THE FIRST YEARS* 59 (2004). The authors note that preachers in black churches often use powerful, dramatic, image-laden, and tonal preaching styles. Others less familiar with sermon delivery styles of African-American preachers may perceive it as scary, unfamiliar, or even frightening. See, e.g., *Meet The Press* (NBC television broadcast Mar. 16, 2008) (transcript available at http://www.msnbc.msn.com/id/23658548/ns/meet_the_press). In discussing Barack Obama, Tim Russert states that African-Americans are concerned that Reverend Wright's church's "climate, comments and hyperbole...will frighten white Americans and create difficulty for Obama in uniting the country." *Id.* See *Hardball With Chris Matthews* (MSNBC television broadcast Mar. 17, 2008). Chris Matthews asked Nancy Giles, "Let me ask you Nancy Giles, what do you make when you hear someone like Jeremiah Wright give a fire and brimstone social speech[?]" Nancy Giles responded "My biggest problem with what he said was the tone was really awful, and then [some of] the stuff . . . [was] totally inappropriate." *Id.* See also Joe Fitzgerald, *Did His Mentor Share Hatred With Barack?*, *BOSTON HERALD*, Mar. 15, 2008, at 4. "If you've listened to your radio over the past two days you've probably heard the recording of these venomous words, delivered in that breathless, thunderous style some preachers like to employ while turning up the heat in their deliveries[.]" See Tim Ritten, *With Friends Like These*, *L.A. TIMES*, Mar. 15, 2008, at A23 "[Wright] [p]reached in a style that leaves little room for understatement, it's alarming stuff when you hear it for the first time. And because the U.S. news media don't [sic] take anybody's religion very seriously or report on it in much depth, this will be many white Americans' first exposure to this inflammatory -- albeit tiny -- tendency within black churches."

boom era, viz., 1964); he was a young boy when the modern African-American civil rights battles were waged by the likes of Jesse Jackson and Malcolm X; he was raised by a white mother from Kansas and grandmother in Hawaii. Detractors could not even extrapolate civil rights era struggles through his Kenyan father, who lived in the United States only six years, and died in 1982.¹⁰⁷ In short, Obama did not fit neatly into the “racial grievant” construct persistently imposed upon African-Americans as a way to dismiss calls for civil rights remedies such as desegregation, criminal or economic justice, or affirmative action.¹⁰⁸

To be sure, Obama consciously resisted the casting.¹⁰⁹ As one observer put it, Obama appealed to whites in part because he was an African-American politician “who [did not] flaunt his scars.”¹¹⁰ As Gwen Ifill opined, “[w]hen given the chance to talk about race in the ways most expected to hear, he resisted. Race was worth talking about, he thought, but only in the context of broader issues. You would never catch this black man with his fist in the air.”¹¹¹ In other words, Obama was not an “angry black man.”

The desired political goal of exploiting Obama’s relationship with Reverend Wright was precisely to draw Obama as just that- an angry black man. Through his association with Wright, critics sought to cast Obama as a secret black radical, spoiling to vindicate racial wounds. If successful, a wedge would be drawn between Obama and his substantial support from Whites. With the Wright controversy still swirling, former campaign strategist Dick Morris fairly summed up the questions Obama opponents hoped would be asked: “[T]he question that plagues Obama is not issues or his record or positions, it’s . . . [i]s he pro-American? How does he feel about white people?”¹¹²

¹⁰⁷ Juan Williams, Op.-Ed., *Obama’s Color Line*, N.Y. TIMES, Nov. 30, 2007, at 23.

¹⁰⁸ *Id.* (stating that half of black Americans feel that President Obama only has some or nothing in common with the values of black Americans and that he acts like he is white).

¹⁰⁹ Jeff Chang, *The Ongoing Evolution of Obama’s ‘Post-Racial’ Politics*, HUFFINGTON POST, Feb. 12, 2008, http://www.huffingtonpost.com/jeff-chang/the-ongoing-evolution-of-_b_86312.html?page=2 (discussing how the Obama campaign decided to create a “tone of a campaign they were determined not to define him by the color of his skin.”). Williams, *supra* note 107 (quoting Obama as saying “‘In the history of African-American politics in this country there has always been some tension between speaking in universal terms and speaking in very race-specific terms about the plight of the African-American community. By virtue of my background, you know, I am more likely to speak in universal terms.’”).

¹¹⁰ Raina Kelly, *An Unfamiliar Narrative*, NEWSWEEK, May 5, 2008, at 38; Marjorie Valbrun, *Color, Character, Content: At Play In the New ‘Post-Racial’ Politics*, THEROOT.COM, Apr. 2, 2008, <http://theroot.com/views/color-character-content-play-new-post-racial-politics> (“Whites criticized Sen. Obama for being aligned with an unapologetic ‘race man.’”).

¹¹¹ GWEN IFILL, *THE BREAKTHROUGH: POLITICS AND RACE IN THE AGE OF OBAMA* 53 (2009).

¹¹² Dick Morris: “[T]he question that plagues Obama is . . . Is he Pro-American?”, MEDIA

E. The Muslim Manchurian Candidate Rumors—Gone Viral

Collectively, the mainstream media sources disseminating, discussing, or echoing the Obama rumors possessed broad audience reach. However, the medium most responsible for the pervasive spread of the Obama rumors was electronic mail. In early 2007, the Q'uran rumor, Sampley's article, and excerpts from the Insight Magazine article were circulated on the internet, and eventually found their way into various e-mail messages. There, the rumors gained their most pernicious and widespread impact. One e-mail disseminated in January 2008 fully captured what Mr. Schoenholtz "heard."¹¹³

Subject: Who Is Barack Obama?

If you do not ever forward anything else, please forward this to all your contacts. . .this is very scary to think of what lies ahead of us here in our own United States. . .better heed this

MATTERS FOR AM., June 11, 2008, <http://mediamatters.org/research/200806110001> (discussing a June 10, 2008 episode of FOX News' *The Big Story With John Gibson*).

¹¹³ Snopes.com, *Who is Barack Obama?*, <http://www.snopes.com/politics/obama/muslim.asp> (last visited Mar. 18, 2011). The e-mail reads, in full:

Subject: Who is Barack Obama?

If you do not ever forward anything else, please forward this to all your contacts. . .this is very scary to think of what lies ahead of us here in our own United States. . .better heed this and pray about it and share it.

Who is Barack Obama?

Probable U.S. presidential candidate, Barack Hussein Obama was born in Honolulu, Hawaii, to Barack Hussein Obama, Sr., a black MUSLIM from Nyangoma-Kogel, Kenya and Ann Dunham, a white ATHEIST from Wichita, Kansas. Obama's parents met at the University of Hawaii. When Obama was two years old, his parents divorced. His father returned to Kenya. His mother then married Lolo Soetoro, a RADICAL Muslim from Indonesia. When Obama was 6 years old, the family relocated to Indonesia. Obama attended a MUSLIM school in Jakarta. He also spent two years in a Catholic school. Obama takes great care to conceal the fact that he is a Muslim. He is quick to point out that, "He was once a Muslim, but that he also attended Catholic school." Obama's political handlers are attempting to make it appear that he is not a radical. Obama's introduction to Islam came via his father, and his influence was temporary at best. In reality, the senior Obama returned to Kenya soon after the divorce, and never again had any direct influence over his son's education. Lolo Soetoro, the second husband of Obama's mother, Ann Dunham, introduced his stepson to Islam. Obama was enrolled in a Wahabi school in Jakarta. Wahabism is the RADICAL teaching that is followed by the Muslim terrorists who are now waging Jihad against the western world. Since it is politically expedient to be a CHRISTIAN when seeking major public office in the United States, Barack Hussein Obama has joined the United Church of Christ in an attempt to downplay his Muslim background. ALSO, keep in mind that when he was sworn into office he DID NOT use the Holy Bible, but instead the Koran.

Barack Hussein Obama will NOT recite the Pledge of Allegiance nor will he show any reverence for our flag. While others place their hands over their hearts, Obama turns his back to the flag and slouches.

Let us all remain alert concerning Obama's expected presidential candidacy.

The Muslims have said they plan on destroying the US from the inside out, what better way to start than at the highest level – through the President of the United States, one of their own!!!

and pray about it and share it.

Who is Barack Obama?

Probable U.S. presidential candidate, Barack Hussein Obama was born in Honolulu, Hawaii, to Barack Hussein Obama, Sr., a black MUSLIM from Nyangoma-Kogel, Kenya and Ann Dunham, a white ATHEIST from Wichita, Kansas.*** When Obama was two years old, his parents divorced. His father returned to Kenya. His mother then married Lolo Soetoro, a RADICAL Muslim from Indonesia. ***Obama attended a MUSLIM school in Jakarta. *** Obama takes great care to conceal the fact that he is a Muslim. ***Obama was enrolled in a Wahabi school in Jakarta. Wahabism is the RADICAL teaching that is followed by the Muslim terrorists who are now waging Jihad against the western world.*** Since it is politically expedient to be a CHRISTIAN when seeking major public office in the United States, Barack Hussein Obama has joined the United Church of Christ in an attempt to downplay his Muslim background. ALSO, keep in mind that when he was sworn into office he DID NOT use the Holy Bible, but instead the Koran. ***Barack Hussein Obama will NOT recite the Pledge of Allegiance nor will he show any reverence for our flag. While others place their hands over their hearts, Obama turns his back to the flag and slouches.***The Muslims have said they plan on destroying the US from the inside out, what better way to start than at the highest level – through the President of the United States, one of their own!!!¹¹⁴

This was just one of several viral e-mails questioning Obama's Muslim ties.¹¹⁵ During the most recent presidential campaign, Americans engaged in the political conversation by using e-mail, the internet, and text messaging to an extraordinary degree.¹¹⁶ The Obama viral e-mails are prime examples of how e-mail is used to transmit political "information." According to a survey conducted during the previous election cycle, 15% of e-mail users sent e-mails to their family or friends at least once a week,

¹¹⁴ *Id.*

¹¹⁵ See Snopes.com, *Barack Obama*, <http://snopes.com/politics/obama/obama.asp> (last visited Feb. 21, 2011) (compiling e-mails circulated about Obama during the campaign).

¹¹⁶ Aaron Smith & Lee Rainie, *The Internet and the 2008 Election*, PEW RES. CENTER, June 15, 2008, at 4-5, http://www.pewinternet.org/~media/Files/Reports/2008/PIP_2008_election.pdf.pdf (finding that 27% of internet users went online once a week to do something campaign-related, and 35% of those using email said they received campaign-related emails at least once a week, 14% on a daily basis. Also, 8% of those using text messaging sent or received text messages about the campaign or other political issues at least once a week.)

urging them to support a candidate or to discuss their campaigns.¹¹⁷

In his interview, Mr. Schoenholtz cites two examples to support his claim that Obama has “Muslim beliefs.” Though he correctly references the e-mail when he says Obama will not use the “Holy Bible,” he mischaracterizes the e-mail’s reference to Obama and the national anthem. If we can assume that Mr. Schoenholtz saw this e-mail, or was told about it, any misquoting on his part can be seen as an example of what happens to rumors as they spread. Explicitly, this e-mail highlights the themes its author hoped to embed.

II. THE OBAMA RUMORS HITTING THEIR MARK(ER): “OTHERNESS”

That the Obama rumors refused to abate, even in the face of truth and facts, is a testament to the power of the underlying misrepresentations. The rumors’ intent was to exploit Islamophobia and reinforce anti-Muslim stereotypes. The news stories, images, and e-mails created and built on narratives themed upon patriotism and “American-ness.” Semiotic conventions of opposition and metonymy worked to ground the motif. Opposition is a process by which the meaning of a thing is derived, in part, by reference to what it is not.¹¹⁸ For example, a red light’s meaning is understood, primarily, by what a green light signifies. Oppositional domains can be binary, such as “alive/dead” subsumed under a “state of being” paradigm, or anagoric domains, where the lines between the two are not as clear.¹¹⁹ The paradigm under construction with the Obama rumors is “patriotism,” and its anagoric counterpart, “un-patriotic.”¹²⁰

¹¹⁷ *Id.* at 5 (discussing use of e-mail during the 2008 Presidential election).

¹¹⁸ Stephen R. Barley, *The Codes Of The Dead: The Semiotics Of Funeral Work*, 12 J. OF CONTEMP. ETHNOGRAPHY, 3, 9 (1983); ARTHUR ASA BERGER, MEDIA ANALYSIS TECHNIQUES 9 (2004).

¹¹⁹ Barley, *supra* note 118, at 9 (discussing binary oppositional domains).

¹²⁰ This is a type of analog opposition, where there is no strict demarcation between being patriotic or “unpatriotic”.

PARADIGM = PATRIOTISM	
SYMBOL OR EXPRESSION PRESENT	SYMBOL OR EXPRESSION ABSENT
FLAG PIN	NO PIN
SINGING NATIONAL ANTHEM	NOT SINGING
HAND OVER HEART	HANDS IN FRONT
DOMAIN = PATRIOTIC	DOMAIN = UN-PATRIOTIC

Symbols and expressions are then marked and categorized as signifiers of being patriotic or un-patriotic. A flag pin is a symbol worn as an expression of patriotism. It is not a sign because it no way resembles nor denotes America (or patriotism), but is a learned cultural association.¹²¹ Similarly, speech-acts and gestures can be symbolic. Singing the national anthem, and placing one's hand over their heart are also markers of national allegiance. The absence of those aggregated expressive acts labeled Obama by opposition, *viz.*, unpatriotic.

Similar principles worked to infer Obama's "Muslim-ness." Again, the oppositional domains are anagogic, but the markers employed acted as metonymic signs. Metonymy is a substitution by which a term, symbol, or sign stands in for another term, yet is connected by a material or logical relationship.¹²² That metonymical relationship can be made by juxtaposition. For example, using a crown image to sell butter takes the image out of its paradigmatic domain (monarchical regalia), and places it another. The connotation, however, stays the same, *i.e.*, quality. The relationship can also be made by substitution with adjuncts. Adjunctive metonymies use an attribute or associate of the signified to stand for it—for example, when using an image of a crown to denote "king." The Q'uran and the image of Obama in the Somali robe and turban act as adjunctive metonymies to signify "Muslim-ness."

¹²¹ Barley, *supra* note 118, at 9; BERGER, *supra* note 118, at 9 (discussing learned cultural associations in the realm of oppositional domains).

¹²² Barley, *supra* note 118, at 8; BERGER, *supra* note 118, at 22 (defining metonymy).

EXPRESSION=HERITAGE		
AMERICAN		MUSLIM
SIGN	M E T O N Y M Y	SIGN
BIBLE		Q'URAN
"BLUE JEANS"		WRAP AND TURBAN
"MR. SMITH"		BARACK HUSSEIN OBAMA

The Obama rumors employed metonymical markers to signify his Muslim "being." The Q'uran (as a physical object), the name "Hussein," and the image of Obama in a robe and turban each denote being Muslim. The text below the image of Obama in Somali attire ("Muslim attire") served as anchorage for the image's preferred interpretation. Those adjuncts were read in comparison to the Bible (or "*Holy Bible*" as Mr. Schoenholtz said), and for example, wearing blue jeans, or having the name "John Smith" as signifying "American-ness." From a semiotic perspective, while absent signs and symbols were used to identify Obama as unpatriotic, present signifiers identified Obama as Muslim.

III. RUMOR CHARACTERISTICS

Rumors are studied primarily as social communications mediated orally. As sociologist Tamotsu Shibutani noted in his groundbreaking research, rumors are like a behavioral contagion.¹²³ The similarity between epidemic analytical models and rumor models is obvious, and long-recognized in both social science and epidemiology literature.¹²⁴ Rumors are "viral;" they "infect" social systems; rumors "mutate;" individuals

¹²³ TAMOTSU SHIBUTANI, *IMPROVISED NEWS: A SOCIOLOGICAL STUDY OF RUMOR* 95 (1966).

¹²⁴ See, e.g., Violet R. Cane, *A Note on the Size of Epidemics and the Number of People Hearing a Rumour*, 28 J. ROYAL STAT. SOC'Y, SERIES B 3, 487, 487 (1966) ("The model commonly used for discussing the spread of infection in a population has certain features in common with the model...for the spread of a rumour."); Klaus Dietz, *Epidemics and Rumours: A Survey*, 130 J. ROYAL STAT. SOC'Y, SERIES A 4, 505, 505 (1967) (applying "deterministic and stochastic models for the spread of some 'infectious' or 'contagious' phenomenon through a population . . . [such as] propagation of ideas, rumours and consumers' goods").

along the chain might be “spreaders,” “resistants,” or “stiflers.”¹²⁵ Rumors have distinct properties, worth highlighting before describing how they—literally and figuratively—take on epidemic proportions.

A. Rumor Types

Rumors fall into two classes. “Wish” or “pipe dream” rumors are those that represent hopeful thinking and pleasant consequences. Pipe dream rumors provide an affective benefit by addressing uncertainty in a positive way, and reinforcing peoples’ general preference to perceive positive outlooks.¹²⁶ “Bogey” or “dread” rumors—typically spread more often—describe feared consequences.¹²⁷ “Wedge” rumors are a specific type of bogey rumor, as they communicate divisive information, highlighting differences along social, cultural, political, religious, racial or ethnic lines.¹²⁸ The stories about Obama are quintessential wedge rumors.

Whether pipe dream or bogey, rumors have four basic characteristics. Rumors provide a) information that offers some b) affective benefit; that information is c) plausible, but d) invariably vulnerable to distortion. The former three qualities ensure that a rumor will be passed on. The latter quality emerges out of the quotidian processes of peer groups. That idea will be addressed in Section IV.

First, a rumor provides substantive information. That information can be of a personal, social, political, and/or economic nature. The Obama rumors provided a story of his background, his education, his religion, and his relationships. Without regards to the truthfulness of their substance, the rumors communicated messages about Obama.

Second, rumors have an affective benefit on the recipient. Rumor information might reinforce positive outlooks, quell anxieties, or reduce ambiguity in the context of uncertainty.¹²⁹ Once again, regardless of the absence of truth, the Obama rumors served an affective need. To the extent that there were those uncertain about his biography, the rumors sought to influence feelings about Obama. However, the Obama rumors did more than fill the affective need for certainty. By casting him as the sum of all

¹²⁵ D.J. Daley & D.G.Kendall, *Epidemics and Rumors*, 204 NATURE 1118, 1118 (1964) (explaining that the spreading process evolves by directed contacts of the spreaders with others in the population).

¹²⁶ Kamins, et al., *supra* note 24, at 168.

¹²⁷ *Id.*

¹²⁸ *Id.* at 169.

¹²⁹ Robert Knapp, *A Psychology of Rumor*, 8 PUB. OPINION Q. 22, 23 (1944); DIFONZO & BORDIA, *supra* note 22, at 13.

American fears, the rumors not only reduced uncertainty, but, as bogey rumors do, induced new anxieties.

A presumption underlying a rumor's affective benefit is that its substance is consonant with the recipient's attitude, belief, or value system.¹³⁰ The Obama rumors portrayed him as presumptively antithetical to the recipient's systems. At the most irresponsible level, the rumors induced intolerant predispositions based on religious, ethnic, and/or racial biases. By resonating with the recipient's attitudes (e.g., xenophobia), beliefs (e.g., Muslims are terrorists), or values (e.g., it is un-American not to recite the Pledge of Allegiance), the Obama rumors' impact was to stimulate core emotions about patriotism (at best) and bigotry (at worst).

All rumors possess a third characteristic: plausibility.¹³¹ There are two components to rumor plausibility. One is the *appearance* of verifiability. A method by which to imbue a rumor with the appearance of verifiability is to give it details such as source citation, research description, or personal accounts by known, credible individuals. In doing so, the rumor's verisimilitude is enhanced.¹³²

For example, despite its many, many flaws, Corsi's book provided the Obama rumors with verisimilitude. With its "600 footnotes" and interviews with self-described Obama "friends," *Obama Nation* gave the Obama-as-a-radical Islamist rumor the imprimatur of truth. A statement woven into in a rumor purporting to have first-hand information is another method by which rumors are claimed as verified. A viral e-mail that tied Obama to the Kenya elections and Odinga opened with "Thanks for sending out the alert about Obama. We are living and working in Kenya for almost twelve years now, and know his family (tribe) well."¹³³ Note that a rumor need not be verifiable *in fact*. As there is a tendency to communicate rumors without verifying their accuracy (as is commonplace with viral e-mails), any apparent verifiability of the rumor is sufficient to strengthen its plausibility.

Source credibility is the second component of rumor plausibility.¹³⁴

¹³⁰ DIFONZO AND BORDIA, *supra* note 22, at 92-110 (citing descriptive and correlation research that "points toward belief in rumors that are consistent with the hearer's currently held attitudes.").

¹³¹ Chris Frost, *Tales on the Internet: Making It Up As You Go Along*, 52 ASLIB PROC. 5, 9 (2000).

¹³² *See id.* (explaining that information in print—whether a newspaper, blog entry, or e-mail—carries greater verisimilitude, and that by producing the rumor on high quality pages, the tendency is to equate high production value with high credibility).

¹³³ *Kenya Connection*, SNOPE.COM, available at <http://snopes.com/politics/Obama/Kenya.asp>.

¹³⁴ DIFONZO & BORDIA, *supra* note 22, at 100. "[R]umors heard from more credible, authoritative, or well-positioned sources ... would tend to be more strongly believed than would rumors heard from less credible, authoritative, or well-positioned sources." *Id.* However, even rumors transmitted by non-

Source credibility emerges out of a symbiotic relationship between a media source and the individual who initiates the rumor. Consequently, choices surrounding media exposure are determinants of rumor source, and by extension, rumor credibility.

As a general proposition, people seek out media that align with their personally relevant beliefs. Congenial media sources are those whose topics, more often than not, elicit affective responses consonant with those beliefs.¹³⁵ In particular, selective media exposure is especially marked where a news topic goes to the core of one's self-identity or self-concept, such as political ideology.¹³⁶ For individuals with strong political predispositions, "political topics may be particularly likely to inspire selective exposure."¹³⁷

Whether rumors are retold orally or communicated electronically, the media has a critical impact on rumor strength. Most individuals selectively expose themselves to more than one media source for news. News redundancy of those select media can make a rumor seem more plausible. Consequently, the more media sources discussing the rumor, the more likely the rumor recipient will give the rumor credence. For example, if NBC, ABC, CNN, FOX, a local newspaper, a blog, a book, and a radio station are providing the echo chamber for the same rumor, the mere reportage gives the rumor legitimacy.

Sources other than broadcast media also provide rumor echo chambers. More than ever before, people have moved away from television as source of information and towards the internet.¹³⁸ Given the sheer amount and

credible sources can become sticky, because once a rumor goes far down the chain, one may forget who precisely originated it. Thus even rumors spread by non-credible sources may be embraced over time.

¹³⁵ Natalie Jomini Stroud, *Media Use and Political Predispositions: Revisiting the Concept of Selective Exposure*, 30 POL. BEHAV. 341-66, 342 (2008). For example, one study showed that those viewing FOX News were more likely to believe the link between Iraq and Saddam link, and the existence of WMD, than those who watched PBS, or listened to NPR. Steven Kull, et al., *Misperceptions, The Media, and the Iraq War*, 118 POL. SCI. QUARTERLY 4, 569-98, 585 (2003-04).

¹³⁶ Stroud, *supra* note 135, at 345.

¹³⁷ *Id.* Stroud's research supported other findings demonstrating that political predispositions predict selection of political talk, radio, cable news, and internet websites. *Id.* at 359. In her study of the 2004 presidential campaign, she found that of the media types evaluated (newspapers, NPR, cable news (FOX, CNN, MSNBC), and political websites), 64% of self-identified conservative Republicans consumed at least one conservative media outlet versus 26% of liberal Democrats. In contrast, 43% of conservative Republicans consumed at least one liberal outlet while 76% of liberal Democrats consume at least one liberal outlet. *Id.* One conclusion drawn is that liberal Democrats were more likely to engage in selective exposure. Finally, this finding indicates that people may adjust their exposure to political information in order to maintain a desired emotional state or as a response to a distinct emotion. *Id.*

¹³⁸ For example, a Pew Research Center survey conducted in the midst of the 2008 political campaign found that 40% of all adults used the Internet to obtain political information. More telling, 17% of those adults did so on any typical day. Aaron Smith, *Politics Goes Viral Online*, PEW RES. CENTER FOR PEOPLE & PRESS, July 15, 2008, at 1 (at <http://pewresearch.org/pubs/869/politics-goes> -

breadth of information available, the internet provides greater chances that people will encounter information that compliments their political predispositions.¹³⁹ The fact that congenial media sources have expanded means that there is greater rumor redundancy, and more media acting as veracity cues for those so exposed.¹⁴⁰

Plausible information serving an affective need ensures that an initiate will pass the rumor on to his peer group members. A rumor's injection marks the beginning of the quotidian process. As the rumor infects the peer group, its fourth characteristic emerges—distortion.

B. Rumor Distortion: Leveling, Sharpening, Adding, and Assimilation

Rumors that spread naturally through social networks show a compounding pattern.¹⁴¹ As they travel from individual to individual, or group to group, rumors mutate by picking up new pieces, or dropping older ones. As rumors spread, “the central details survive as they are told and retold, [but] the overall configuration of information changes by growing more elaborate.”¹⁴² Speculative and interpretive propositions are often added as rumors move along. As rumors spread through social groups, four distinct patterns emerge: leveling, sharpening, adding, and assimilation.¹⁴³ Collectively, these patterns make up the rumor's “embedding” process.

a. Leveling, Sharpening, Adding, and Assimilation

Leveling occurs when the rumor message grows shorter and more concise as it is passed along.¹⁴⁴ Details are lost and fewer words are used in successive versions. For example, a rumor story may contain twenty detailed statements in its original description, but as it is passed on, only five details may remain. If we can assume that the viral e-mail was Mr.

viral-online).

¹³⁹ Stroud, *supra* note 135, at 346. Furthermore, voters increase their use of mass media to fill informational voids and increase their use of their self-identified most “beneficial” sources. Pinkleton, *supra* note 20, at 76.

¹⁴⁰ However, one study found that people tend to more readily adopt information from sources in this order: Expert Oral Advice, Nonfiction Books, and to a significantly lesser extent, Internet, Print News, and Radio/TV News. Joette Steff-Mabry, *A Social Judgment Analysis of Information Source Preference Profiles: An Exploratory Study to Empirically Represent Media Selection Patterns*, 54 J. AM. SOC'Y FOR INFO. SCI. & TECH. 9, 879-904, 890-91 (2003).

¹⁴¹ Melvin L. DeFleur & Mary M. Cronin, *Completeness and Accuracy of Recall in the Diffusion of the News From a Newspaper vs. a Television Source*, 61 SOC. INQUIRY 2, 148-66, 152 (1991).

¹⁴² *Id.*

¹⁴³ DiFONZO & BORDIA, *supra* note 22, at 134-136.

¹⁴⁴ DeFleur & Cronin, *supra* note 141, at 152.

Schoenholtz's rumor source, we see how he leveled the rumor by omitting a great deal of e-mail information. For example, Mr. Schoenholtz does not mention Obama's father, mother, or stepfather, that Obama lived in Indonesia, nor that Obama does not know the Pledge of Allegiance.

Sharpening occurs when prominent details remain in the story and come to constitute the dominant theme.¹⁴⁵ Sharpening occurs necessarily as a result of leveling.¹⁴⁶ It involves the "selective perception, retention, and reporting of a limited number of details from a larger context."¹⁴⁷ Mr. Schoenholtz's response accentuates select rumor statements: Obama has "Muslim beliefs," he would not be sworn in on the Holy Bible, he "doesn't even know the national anthem." With sharpening, the full rumor is stripped, and what remains are the rumor's thematic markers.

Adding occurs as rumors are passed along and the communicator incorporates new material or details. This phenomenon is referred to as the compounding, or snowballing effect of rumors. Added information can be a hybrid of remembered rumor statements and false recollections that, from the rumor's thematic standpoint, are nonetheless plausible.¹⁴⁸ Mr. Schoenholtz does this when he states that Obama "doesn't even know the national anthem"—a statement not in the viral e-mail, but a plausible extension of the rumor's gist.

The added information can also be sheer fabrication. The more capricious rumor mongers will inject statements to enhance a rumor's plausibility. For example, one line that appeared in a later version of the Obama rumor "Can Muslims Be Good Americans?" e-mail began with "I checked this out on Snopes, and it's true."¹⁴⁹ That preface gave what followed increased credibility by suggesting that the rumors had been verified by an objective source. In fact, Snopes.com had not verified the Obama rumors at all, but had discredited them at every turn.

When a rumor is retold, individuals eventually incorporate their own linguistic conventions, cognitive habits, and biases.¹⁵⁰ This *assimilation*

¹⁴⁵ *Id.*

¹⁴⁶ DIFONZO & BORDIA, *supra* note 22, at 136. Sharpening can occur out of changes such as exaggeration. *Id.* DiFonzo and Bordia cite as an example Allport and Postman's 1947 findings that the rumor that black servants were using Eleanor Roosevelt's combs evolved from "one Negro" to "four Negroes." *Id.*

¹⁴⁷ See ALLPORT & POSTMAN, *supra* note 24, at 46. In serial retelling situations, news stories undergo leveling and their content will conform to sharpening patterns; see DIFONZO & BORDIA, *supra* note 22, at 137.

¹⁴⁸ DIFONZO & BORDIA, *supra* note 22, at 135.

¹⁴⁹ Farhad Manjoo, *Rumor's Reasons*, N. Y. TIMES MAG., (Mar. 16, 2008) (discussing how Obama has handled the rumors concerning religious orientation).

¹⁵⁰ Bernard Guerin & Yoshihiko Miyazaki, *Analyzing Rumors, Gossip, And Urban Legends*

process manifests itself in a variety of ways.¹⁵¹ For example, rumors may be communicated in a manner to make them thematically coherent and plausible. They may be passed on in a manner which adds incomplete information, or simplifies complex stimuli.¹⁵² Ultimately, rumors are assimilated in a way to align with personal interests or prejudices.¹⁵³

It is within the assimilation process that the rumors are integrated into an adopter's belief systems. For example, for adopters already having racial, religious, or ethnic biases, the Obama rumors were cognitively framed within those biases. That framework can be distilled into three syllogisms:

Syllogism 1: All Muslims are Anti-American. Barack Obama is a Muslim. Therefore, Barack Obama is Anti-American.

Syllogism 2: The terrorists who attacked American were Muslim. Barack Obama is a Muslim. Therefore, Barack Obama is aligned with the terrorists.

Syllogism 3: Muslims are adherents to Islam, not Christian faiths. Barack Obama is Muslim. Therefore, Barack Obama is not a Christian.

Once adopted, the rumors are articulated in evaluative statements like "A Muslim cannot be President of the United States because Muslims hate America," or "Obama will be soft on terrorists because he's Muslim." Mr. Schoenholtz stated he might vote for Obama, but noted, "there are some things that trouble meFalse" His response does not suggest that he believed the rumors; however, his response indicates he had weighed the rumors against his value systems as they regard patriotism, ethnicity, and religion.

b. Viral E-mail Rumors

While oral transmission plays a part in the general flow of rumors,¹⁵⁴ they also flow amongst individuals via text, e-mail links, and the like. Because rumors can be disseminated hundreds of times via e-mail with each successive transmission, e-mailed rumors undergo a "cascading effect" that cannot be replicated by oral transmission.¹⁵⁵ Consequently, e-

Through Their Conversational Properties, 56 THE PSYCHOL. REC. 23, 24 (2006) (summarizing the traditional theories of rumors and other stories in terms of their sociological and psychological effects).

¹⁵¹ DeFleur & Cronin, *supra* note 141, at 152.

¹⁵² DiFONZO & BORDIA, *supra* note 22, at 137.

¹⁵³ *Id.* at 136.

¹⁵⁴ DeFleur & Cronin, *supra* note 141, at 163.

¹⁵⁵ As e-mail groups move in a common direction regarding their beliefs and values, Internet

mailed rumors are more pernicious than those passed on orally.

Moreover, text rumors undergo distortions in ways different than orally transmitted rumors. Generally speaking, rumors transmitted by e-mail do not suffer from lack of accuracy. Because the e-mail information is (relatively) fixed and people usually forward e-mails without editing the text, rumors so communicated do not go through the leveling and sharpening patterns. As a result, there is a significantly less chance of distortion than in oral repetition.¹⁵⁶

This is by no means to say that e-mail rumors are not vulnerable to leveling, sharpening, or adding. A viral e-mail can be leveled by selecting only a portion to forward. Words may be blocked, bolded, or underscored prior to later transmission. The “Who Is Barack Obama?” author places “MUSLIM” “RADICAL” “ATHEIST” and “CHRISTIAN” in all cap type, utilizing textual sharpening techniques in e-mail rumors. Finally, the “I checked this out on Snopes.com. . .” tag adds a fabrication to the rumor as it cascades down the rumor network. Nonetheless, while “[r]eliability diminishes exponentially as the information is passed from user to user and e-mail list to e-mail list,” the rumor information gains legitimacy by the simple virtue of repetition.¹⁵⁷

It is important to note that leveling, sharpening, adding and assimilation are social properties of conversation, not properties of the rumor itself. But because of the social properties of conversations, rumors—compared to other modes of information transmission—are more subject to inaccuracy and capricious distortion.¹⁵⁸ This fact leads to a discussion of quotidian processes in small groups, and how rumors are introduced and mediated amongst group members.

rumors are described as “social cascades.” CASS R. SUNSTEIN, *REPUBLIC.COM 2.0* 80 (2002); *see also*, Sushil Bikhchandani, et. al., *A Theory of Fads, Fashion, Custom and Cultural Change as Informational Cascades*, 100 J. POL. ECON. 992-1026 (1992).

¹⁵⁶ *See* Frost, *supra* note 131, at 9 (differentiating rumor by word of mouth from rumor by electronic transmission where in the former only the relevant details will be transmitted while in the latter the whole message will be forwarded in the same format).

¹⁵⁷ RICHARD DAVIS, *THE WEB OF POLITICS: THE INTERNET’S IMPACT ON THE AMERICAN POLITICAL SYSTEM* 44 (1999).

¹⁵⁸ The degree of leveling, sharpening, and assimilation of orally transmitted rumors is contingent on the rumor’s initial length, mode of dissemination, and medium. Though the literature examining specific media forms diverge on the degree of story recall, researchers agree on this point: people recall relatively little of what they see, hear or read. DeFleur & Cronin, *supra* note 141, at 153. First, the length of the initial story impacts rumor accuracy. *Id.* at 163. That is, the shorter the story, the less the distortion. Second, the medium of the rumor source also impacts the quality of rumors transmitted orally. *Id.* Observing a serial retelling of a 307 word story with 54 details, DeFleur and Cronin found that the subjects in the newspaper-story retelling chain passed on more details more accurately than those in the television chains. *Id.*

IV. QUOTIDIAN PROCESSES

Communication scholars have examined rumor transmission using two distinct methodologies. One methodology employs controlled experiments based on serial retellings of an initial, complex story. In these studies, the research provides a starter subject, which is then removed. Next, much like the game of telephone, the story is retold and retold by word of mouth.¹⁵⁹ The other methodology involves a post-facto study of naturally-generated rumors that flow through various populations.

The major shortcoming of the serial retelling approach to rumor study lies in the fact that evaluating the truth of a rumor is not solely an intrapersonal exercise. Rumor evaluation is not a serial or asynchronous process, but a collective group activity.¹⁶⁰ As social constructivists see, knowledge is transactional, constructed in conversation and social practice between persons. Moreover, knowledge is built through progressive discourse, and is connected to, and unfolds in, the activity and cultural practices of in-group members.¹⁶¹ Rumors are premised upon uncertainty and ambiguity. Thus, making sense of the rumor naturally entails a form of collaborative problem-solving.¹⁶² In order to better assess how Mr. Schoenholtz came to incorporate the Obama rumors into his belief systems, it is helpful to understand peer groups and their relevance to rumor mediation.

A. Peer Groups

With rumors, the collaborative problem-solving takes place in the context of social groups. There are several types of social groups, each organized around explicit or implicit principles. Some groups are a product of biology (siblings or family) or institution-belonging (teachers, assemblypersons in a factory, or members of a church). Other social groups are organized by common race or ethnicity; sex, gender, age, religion, education, occupation, or social class. However, essentialist attributes cannot fully explain why people belong to certain groups.¹⁶³

¹⁵⁹ See *Id.* at 152 (describing a “laboratory-like” experiment where parties retell a story they heard and the version of the story is recorded at each stage in the repetition to see how it has evolved).

¹⁶⁰ See Frost, *supra* note 131, at 6 (noting the argument that rumor is a collective group activity).

¹⁶¹ Lily Orland-Barak, *Convergent, Divergent and Parallel Dialogues: Knowledge Construction in Professional Conversations*, 12 *TCHRS. AND TEACHING: THEORY AND PRAC.* 13, 15 (2006).

¹⁶² See DiFONZO & BORDIA, *supra* note 22, at 136-37. With the serial retelling study model, the person only hears the rumor once. Thus, the serial retelling methodology fails to capture the impact of message redundancy that actually occurs with rumors. *Id.*

¹⁶³ See Miller McPherson, et al, *Birds Of A Feather: Homophily in Social Networks*, 27 *ANN.*

Peer groups are a subspecies of social groups. Peer groups are larger than dyads; the social network reach of a peer group can typically be defined by three degrees of inclusion, e.g., “my friend’s friend.”¹⁶⁴ In contrast, the “clique” is the tightest form of peer group.¹⁶⁵ Peer group members maintain their connectivity over time and through various means. Peer members in close physical proximity might engage in day-to-day, face-to-face conversation. However, media technologies such as e-mail, text messaging, instant messaging, and Twitter enhance the ability to build and maintain group ties.

Whether a clique or slightly larger, core peer group members constitute the “in-group.” In-groups naturally occur, i.e., they are not solely a product of biological or institutional circumstances. In-groups are marked by “associative preferences,” where its members demonstrate their affinity through “selective attention and proximity-seeking.”¹⁶⁶ In-group members socialize with one another, share experiences, develop types of humor and common interests, and develop and use rules and codes of behavior.

Importantly, in-group members are value-homophilic in that they are more likely to have similar attitudes, beliefs, and values.¹⁶⁷ Value-homophily is a condition for “the mutual adoption of an innovation (i.e., information or ideas) or for the development of a common consensus.”¹⁶⁸

REV. SOC. 415, 415 (2001) (“These essentialist attributes ignore the vast differences in the social worlds that these people occupy.”).

¹⁶⁴ Zsuzanna Szvetelszky & Balazs Szekfu, *Three Degrees of Inclusion: The Emergence of Self-Organizing Social Beliefs*, in MODELING COOPERATIVE BEHAVIOR IN THE SOCIAL SCIENCES: EIGHTH GRANADA LECTURES 185, 186 (P.L. Garrido, J. Marro & M.A. Munoz eds., 2005).

Small-group behavior was first mapped in the groundbreaking study by Paul Lazarsfeld and Robert Merton in 1954, and their study of friendship. Paul F. Lazarsfeld & Robert K. Merton, *Friendship as Social Process: A Substantive and Methodological Analysis*, in FREEDOM AND CONTROL IN MODERN SOCIETY, 18, 21 (Morroe Berger, et al. eds., 1954). In-category and out-category frequency studies inform an understanding of the size of the social groups and potential contacts, and thus the likelihood of new information. For example, such studies have found that humans spontaneously form groups of preferred sizes organized in a geometrical series approximating 3–5, 9–15, and 30–45. W.-X. Zhou et al., *Discrete Hierarchical Organization of Social Group Sizes*, 272 PROC. OF THE ROYAL SOC’Y B 439, 439 (2005).

¹⁶⁵ Eugenia Roldán Vera & Thomas Schupp, *Network Analysis In Comparative Social Sciences*, 42 COMP. EDUC. 405, 409 (2006). This concept first emerged out of Stanley Milgram’s definitive experiments in the 1960’s on social networks and social groups, from which the famous term “six degrees of separation” evolved; Jon Kleinberg, *Convergence of Social and Technological Networks*, 51 COMM. ACM 66, 68 (2008).

¹⁶⁶ Thomas Kinderman & Nicole Sage, *Overlap Between Peer Networks and Friends and Its Implications*, <http://www.sonet.pdx.edu/PeerNetworks/GroupID/Overlap-Net&Frnds.htm>.

¹⁶⁷ McPherson, et. al., *supra* note 165, at 415-16. Homophily is the notion that “a contact between similar people occurs at a higher rate than dissimilar people.” *Id.* at 416. Causes of homophily could be geography, family ties, or shared affinities such as attitudes, beliefs, abilities, interests, or aspirations *Id.* at 428; Cf Christopher Weare, et. al, *Email Effects on the Structure of Local Associations: A Social Network Analysis*, 88 SOC. SCI Q. 222 (2007) ([T]he availability of new media of communication allow [people] to establish social ties that allow new forms of social organization”).

¹⁶⁸ Jon Kleinberg, *supra* note 163, at 70.

Because of this value-homophily, in-group members have a higher degree of influence over each other than non-members.¹⁶⁹ If group members are convinced about a bit of information, they will pass it on, and “influence their friends’ decisions recursively [.]”¹⁷⁰ It is reasonable to posit that Mr. Schoenholtz mediated the Obama rumors with his peer group members. Whether familial, institutional, or a discrete in-group, his group members likely discussed and evaluated the rumors and did so within the framework of their shared belief systems.

Of course, no individual belongs to just one in-group. In fact, we each inhabit different social groups whose other members may or may not overlap. Furthermore, the homophilic values shared by members of one group may not be the same for members of another social group to which an individual belongs. Critically, each group may be organized around a different set of socialization and discourse rules or norms. Thus, membership in one social group likely “involves different levels of exposure and different ways of sharing information” in comparison to membership in another social.¹⁷¹

Membership in dual or multiple in-groups has distinct implications for rumor transmission. Every in-group has central and peripheral actors. Central actors in groups tend to have the greatest influence towards the adoption or rejection of ideas within the group. “Nodes” and “links” are those actors most important to the social network.¹⁷² In small group communication parlance, these individuals are referred to as liaisons, bridges, or connectors. Such individuals are unique in that they interact with two or more social groups, and carry influence within both. Typically, it is difficult for rumors to jump from one social group to another, primarily because people in one group rarely know what information is salient to a different group.¹⁷³ But liaisons, bridges, and connectors may credibly

¹⁶⁹ McPherson et. al., *supra* note 165 at 428 (“People who are more structurally similar to one another are more likely to have issue-related interpersonal communication and to attend to each other’s issue positions, which, in turn, leads them to have more influence over one another.”).

¹⁷⁰ Kleinberg, *supra* note 165, at 70. Kleinberg notes that “[b]y interacting only with others who are like ourselves, anything that we experience as a result of our position gets reinforced.” *Id.* People adopt new innovations (i.e. rumors) depending upon “the behavior of their neighbors in the social network.” *Id.* See also, Jan Kostka, et. al., *Word of Mouth: Rumor Dissemination in Social Networks*, in *STRUCTURAL INFORMATION AND COMMUNICATION COMPLEXITY* 185, 186 (Alexander Shvartsman & Pascal Felber eds., 2008).

¹⁷¹ SOLOVE, *supra* note 11, at 202.

¹⁷² Vera & Schupp, *supra* note 165, at 408. Social network theory evolved in the 1950’s and 1960s to describe or summarize data on social connections. It has been used in disciplines such as anthropology, psychology, sociology, law, business, and of course, communication. *Id.* See also, SOLOVE, *supra* note 11, at 60.

¹⁷³ SOLOVE, *supra* note 11, at 60.

infect discrete social groups with a new rumor, a rumor “fact,” or a rumor-contradicting fact.¹⁷⁴

B. Collaborative Sense-Making and Communication Postures in Peer Groups

Regardless of the peer group, all discuss rumors. In the quotidian process, the rumor substance is mediated in the context of the group’s shared attitudes, beliefs, and values. Because of the selective attention and proximity-seeking, its members have the greatest influence on each other when it comes to reinforcing or modifying ideas and rumors in those systems. The quotidian engagement of rumors in peer group settings has the most profound impact on a rumor’s strength and longevity.¹⁷⁵ How a peer group makes sense of rumors is instructive to understanding the Obama rumors’ stickiness.

Collaborative sense-making is an invitation to a discussion. As explained, rumors may emanate from a book, a newspaper article, a radio or television broadcast, a blog, or an e-mail. Of course, large numbers of people are not exposed to news on a day to day basis. News information is made public through a two step process. First some member of the public are directly exposed. Second, those directly exposed, then pass on the information to others.¹⁷⁶

As news is introduced into the group, leveling, sharpening, adding and assimilation are just some of the social properties of rumor conversation that occur in the sense-making process. Repetition, reinforcement, rhetorical questions, and shared conversational floor also create the type of talk referred to as quotidian hermeneutics.¹⁷⁷ Importantly, throughout the

¹⁷⁴ *Id.* at 61.

¹⁷⁵ DIFONZO & BORDIA, *supra* note 22, at 137. The determinant of whether a rumor will be passed on, rejected, or embedded depends largely on the discursive engagement that occurs within the peer group setting.

¹⁷⁶ DeFleur & Cronin, *supra* note 141, at 164.

¹⁷⁷ Tovaes, *supra* note 23, at 470. E-mail messaging rumor transmission differs from face-to-face oral rumor transmission in critical ways. Rumors rely upon discursive processes that cannot be readily replicated by electronic communication. Oral communication is synchronous, where people engage in real-time conversation give-and-take. In contrast, e-mail messaging is asynchronous. Conversation does not take place moment to moment, but goes over extended periods of time. Even text messaging is vulnerable to asynchronicity due to the potential of delayed response. Importantly, lost through e-mail and text messaging are important conversational dynamics involving proxemics (physical space and distance), kinesics (body movement), paralinguistics (pitch, tone), listening, interactivity, conversation facilitators (e.g., “go on...” or “I see...”) or inhibitors, gestures, completers, turn-taking signs, pitch, and tone.

However, as mentioned, e-mail communication attempts to approximate oral communication by emphasizing words in bold or block type, inserting emoticons, or through word repetition. In addition, as a rumor is text-ed, a sender may tag it by asking “Can anyone verify this?”, “Is this true?”, or “What

discourse, peer group members take on communication roles or, more accurately, communication postures.

Prudent initiators are those who introduce the rumor into the group. The *curious* is the member who seeks more information or detail about the rumor. The *ignorant* is the one who has not heard the rumor at all. The *skeptic* might not believe the rumor. One *infected* has adopted the rumor. The *stifler* either persuasively rebuts the rumor, or refuses to pass it on to other in-groups. These are communication postures because an individual's stance is not necessarily fixed as a role. An initiate might subsequently become curious over the course of the dialogue; a skeptic may evolve to a believer; one infected might evolve into a skeptic.¹⁷⁸ An individual who initiated the Obama rumor, might be a stifler of another rumor on another subject, and so on.

Postures are taken on for reasons both intra-psychic and interpersonal.¹⁷⁹

A rumor initiate might be motivated by wanting clarification from his in-group. People might also pass on a rumor in the hope that someone else will shed some light on its veracity.¹⁸⁰ In addition, one's level of knowledge or personal stake in the rumor might influence the role taken. For example, a rumor initiator may also be acting on ego, leveling or sharpening the rumor in a way that makes it a good or better story (perhaps consonant with his in-group role).¹⁸¹

As rumors are discussed in groups, a four-part pattern emerges.¹⁸² Phrases such as "Did you see," or "I was watching. . .," like Mr. Schoenholtz's "I heard. . ." and "I was told. . ." are common conversation-openers and bridges used by initiators to introduce the media-sourced rumor into the quotidian group discourse. In face-to-face conversations, a rumor initiate may open by declaring, "I heard that Obama will be sworn in on the Q'uran. . .," or asking, "Did you read that Barack Obama is a Muslim?" Others might have heard the same rumor, reinforcing the compulsion to engage the rumor.¹⁸³

do you think of this?" Thus, rumors are often electronically transmitted in with dialogue-inviting substance. See also Prashant Bordia & Nicholas DiFonzo, *When Social Psychology Became Less Social: Prasad And The History Of Rumor Research*, 5 ASIAN J. SOC. PSYCHOL. 49, 57 (2002).

¹⁷⁸ Prashant Bordia & Nicholas DiFonzo, *Problem Solving in Social Interactions on the Internet: Rumor As Social Cognition*, 67 SOC. PSYCHOL. Q. 33, 36 (2004). These postures would be impossible to detect in the serial chain methodology. *Id.*

¹⁷⁹ DiFONZO & BORDIA, *supra* note 22, at 69-87.

¹⁸⁰ *Id.* at 71.

¹⁸¹ Guerin & Miyazaki, *supra* note 150, at 30 ("Leveling, sharpening, and assimilation make for good story telling, rather than as a mechanical side effect of a cognitive system.").

¹⁸² DiFONZO & BORDIA, *supra* note 22, at 126.

¹⁸³ *Id.* At 101-102. If more than one person in the group has heard the rumor, with varying degrees

After the rumor is initiated, there is explanation-giving and interrogation about the rumor's substance and source. Members speculate and advance theories. Tacit features of peer group dynamics also take hold, with members engaging in impression management, face-saving, or norm conformity. In this second stage, group members pool their tidbits of information, and various interpretations emerge.

*Explanation (rumor) fortifying:*¹⁸⁴ "The New York Times had an article about Obama growing up in Indonesia," or "I read the same thing in the local newspaper." *Explanation verifying:* "I was with a few co-workers last night, and one told me he saw a picture of Obama just standing while others were saying the Pledge of Allegiance,"¹⁸⁵ or "The six o'clock news story the other day said he went to a Muslim school." *Explanation falsifying:* "That was some other politician who took the oath on the Q'uran, not Obama," or "A CNN reporter went to India and found that Obama's school wasn't a Madrassa." *Explanation evaluating:* "If his father was a Muslim, Obama must be a Muslim," or "You're supposed to have your hand over your heart when saying the Pledge of Allegiance."

Third, as group members engage in interrogation, articulations of each member's attitudes, values and beliefs become insinuated into the rumor discussion. In that shared, value-homophilic space, assimilated expressions about what the rumors *mean* are surfaced. *Explanation accepting:* "I don't trust him," "Our country was founded on Christian values and he wants to disrespect that," or "If you're a Muslim, you are a terrorist." Finally, as sense-making subsides, casual participation begins to peak as group members disengage in the rumor discussion.¹⁸⁶

In sum, group members work the rumor out together, each using his specialized knowledge, to attain consensus on the meaning of the rumors.¹⁸⁷ In quotidian discussions, rumors will not be quelled if no group member takes on the curious, skeptic, or stifler posture. Those are the members who will ask probing questions going to the rumors' veracity. Either might also engage in additional information-seeking through media sources. In doing so, the curious, skeptic or stifler member may even attend to non-congenial media sources, especially if he is looking for

of information divergence, that redundancy can have the effect of strengthening the rumor.

¹⁸⁴ *Cf., id.* at 127.

¹⁸⁵ This would be a prime example of a bridge or liaison infecting another in-group with rumor information.

¹⁸⁶ DiFONZO & BORDIA, *supra* note 22, at 126.

¹⁸⁷ Bordia & DiFonzo, *supra* note 177, at 35.

rumor-contradicting information.¹⁸⁸ The curious, skeptic, or stifler member might also seek information from members of a different social group to which he belongs for additional rumor information. Here again, an in-group member, now as a curious, skeptic or stifler, acts as a social group bridge, introducing information into the former social group to critique the rumors.¹⁸⁹

Notably, if consensus has been reached around a particular interpretation of the rumor, group norms will typically act against further critical evaluation.¹⁹⁰ Once the emergent interpretation achieves group value-consonance, the rumor becomes embedded and adopted as fact. Mr. Schoenholtz's in-group members would adopt the Obama rumors if those rumors filled an information need, were plausible, and were not effectively rebutted. Most important, if the rumors' underlying themes (patriotism, ethnicity, religion) resonated with their shared values, they were likely to believe them. If his significant others were willing to believe the rumors, Mr. Schoenholtz was more likely to believe, and less likely to second-guess, what he had been told.

V. RUMOR MANAGEMENT

There are myriad rumor-quelling strategies.¹⁹¹ For example, rumor targets quell rumors by providing information (reducing uncertainty), providing facts (reducing belief), or even filing lawsuits (reducing transmission).¹⁹² In the 60 Minutes segment, Obama refuted the rumors lodged against him by providing facts to reduce rumor belief. Kroft told Obama that he encountered the persistent rumor in southern Ohio, "people talking about it, this idea that you're a Muslim." Obama first responded, "Right. Did you correct them, Steve?"¹⁹³ Obama goes on to state:

¹⁸⁸ See, Nikolau Georg Edmund Jakob, *No Alternatives? The Relationship between Perceived Media Dependency, Use of Alternative Information Sources, and General Trust in Mass Media*, INT'L J. COMM. 4, 589, 590 (2010) (opining that those with access to alternative information sources are less trusting of mainstream media). The internet's pervasive use aids in this search, as individuals may select a variety of sources from which to obtain information of topical salience, whether congenial or not. However, if considering non-congenial media sources, the need for credibility and verifiability is increased. *Id.*

¹⁸⁹ See, ALLAN J. KIMMEL, RUMORS AND RUMOR CONTROL: A MANAGER'S GUIDE TO UNDERSTANDING AND COMBATTING RUMORS 187 (2008) (stating that technology has sped up the means by which falsehoods are transmitted). Of course, the information-seeking may yield data that reinforces the rumor. *Id.*

¹⁹⁰ Prashant Bordia, et. al., *Rumor as Group Problem Solving: Development Patterns in Informal Computer-Mediated Groups*, 30 SMALL GROUP RES. 28, 12 (1999).

¹⁹¹ DiFONZO & BORDIA, *supra* note 22, at 207-209, Table 9.1.

¹⁹² *Id.*

¹⁹³ All Eyes On Ohio, *supra* note 1.

You know, this has been a systematic e-mail smear campaign that's been going on since, actually very early in this campaign. Clearly, it's a deliberate effort by some group or somebody to generate this rumor. I have never been a Muslim, am not a Muslim. These e-mails are obviously not just offensive to me, somebody who's a devout Christian who's been going to the same church for the last 20 years, but it's also offensive to Muslims because it plays into, obviously, a certain fear-mongering there.¹⁹⁴

Despite this and other denials, as well as available evidence to the contrary, a significant percentage of voters continued to believe the rumors. Consequently, one must conclude that something else was making the rumors persist.

A. Why are Rumors Difficult to Quell

The persistence of rumors can be explained in part by confirmation bias, causal inference making, and denial transparency.¹⁹⁵ Confirmation bias is the tendency to discount incoming contradictory information to the extent that it does not challenge existing biases. In other words, “[o]nce formed, impressions become relatively autonomous, that is, independent of the evidence upon which they were founded.”¹⁹⁶ For those who had already formed conclusive impressions about the Obama rumors over time, the belief that Obama is a Muslim became un-tethered from the original source of the information. More than this, the belief would persist despite any new contradictory information.

Causal inference making is the tendency to attribute unwarranted cause-effect relationships to merely contiguous events.¹⁹⁷ Rumors provide ready-made explanations for a behavior or event (e.g., Obama is unpatriotic because he doesn't know the Pledge of Allegiance). Even though such an association is illusory, i.e., one cannot (or at least should not) deduce patriotism from knowing the Pledge of Allegiance, there is nonetheless a cognitive tendency to make such inferences. Finally, denial transparency

¹⁹⁴ *Id.* See also, Perry Bacon, Jr., *Foes Use Obama's Muslim Ties to Fuel Rumors About Him*, WASH. POST, at A01 (November 29, 2007) (describing the Obama's campaign's letter signed by five local Iowa clergy, vouching for Obama's Christian faith).

¹⁹⁵ DIFONZO & BORDIA, *supra* note 22, at 223.

¹⁹⁶ *Id.*; See e.g., Gabrielle F. Principe, et. al., *Rumor Mongering And Remembering: How Rumors Originating In Children's Inferences Can Affect Memory*, 99 J. EXPERIMENTAL CHILD PSYCHOL. 135, 136 (2008).

¹⁹⁷ *Id.* at 136.

causes rebuttals to be ineffective.¹⁹⁸ Rumor propositions stated in the negative become cognitively inverted; the statement that “Obama is not a Muslim” will be recalled as “Obama *is* a Muslim.”¹⁹⁹ These cognitive processes present challenges to rumor management. Yet there are other factors impacting the effectiveness of rumor quelling: denial source status, knowledge-appropriateness of the rebuttal communicator, and rebuttal context.

B. Debunking Rumors—Source and Message Characteristics

Just as a trusted source (whether the media source or the rumor initiator) can impact a rumor’s adoption, a trusted source of information can kill a rumor dead.²⁰⁰ Not surprisingly, those most effective at reducing rumor belief are sources with high credibility and perceived as honest.²⁰¹ In fact, neutral sources tend to have the highest credibility, and thus most effective in reducing rumor belief.²⁰² By comparison, rumor targets are not always the most effective messengers of rumor rebuttals. Being negative stakeholders, i.e., the ones most interested in quelling the rumor, targets have less credibility.

That said, regardless of the source, the rumor denier must also be perceived as one who possesses the appropriate knowledge of truth facts.²⁰³ For the denial to be credible, the messenger must be best positioned to have access to information that will reduce belief or anxiety. For example, undergraduate students hearing rumors of a change in grading policy in their chosen major’s department will not be sufficiently mollified by rebuttals from a lecturer or professor. The head of the department, because of her intimate access to factual information (and hierarchical status), would be the most effective rumor-quelling source.²⁰⁴

Importantly, rebuttal messages must include context. Providing rebuttal context is important to counteract the possibility that someone might hear the rebuttal but know nothing of the rumor that compelled the rebuttal in the first place. One hearing the rebuttal stripped of context immediately asks “what is he denying?” Cognitively, the negative is presumed, i.e., that there must be something to the rumor.

198 DIFONZO & BORDIA, *supra* note 22, at 224.

199 *Id.*

200 Frost, *supra* note 131, at 6.

201 DIFONZO & BORDIA, *supra* note 22, at 216.

202 *Id.* at 213.

203 *Id.* at 216.

204 *Id.*

Placing Obama's 60 Minutes rebuttal under a microscope, we can conclude that it was an effective rumor management statement in some respects, yet failed in other respects. Obama's denial properly referred to the rumor. Repeating the rumor in the denial "provides a context for the denial statement and thereby reduces the uncertainty regarding the reasons for the denial."²⁰⁵

However, Obama is not the best one to rebut the rumors. Though source and status-appropriate, Obama rebuttals take on the air of self-interest. As a neutral source, Kroft was better positioned to stop the rumor, given high credibility ("60 Minutes" as a venerable, trusted news program), his neutral status, and access to truth facts (as an investigative journalist). Finally, rumor management experts would counsel against the phrasing Obama chose to deny the rumors, i.e., "I have never been a Muslim, am not a Muslim." Because recall of negations takes more cognitive effort, his statement is likely to be recalled as "I am a Muslim." Instead of saying "I am not a Muslim," a more effective rebuttal would state "I am a Christian."

C. Debunking Rumors in the Quotidian Discourse

Like the rumor itself, its rebuttal must enter the quotidian discourse. What, if anything, did Mr. Schoenholtz do with Kroft's statement "You know that's not true, don't you?" Whether Mr. Schoenholtz engaged in additional information-seeking, or changed his beliefs about Obama depended, first, on whether he found Steve Kroft a credible source. The second condition for rejecting the Obama rumors required Mr. Schoenholtz to engage in dissonance reduction. Finally, quelling the rumors required Mr. Schoenholtz to re-mediate them with his peers, armed with cognitive resolution and rebuttal evidence from sources credible to his in-group peers.

Mr. Schoenholtz's visual and verbal reactions suggest that he evolved from a rumor believer into a rumor skeptic, open to the possibility that the Obama rumors were baseless. After Kroft informed him that the rumors were not true, Mr. Schoenholtz seemed genuinely surprised, even a little distressed. Kroft, in stating a fact in contradiction with what Mr. Schoenholtz understood, induced visible dissonance. Dissonance, after confrontation with inconsistent information may be reduced in three ways: a) by changing one or more of the elements in the dissonant relation; b) by addition of consonant elements, c) by reducing the importance of the

²⁰⁵ *Id.* at 222.

elements in the dissonant relation.²⁰⁶

The most critical factor in changing one or more the elements of the dissonant relation is the strength (credibility, trustworthiness) of the information source. If Mr. Schoenholtz regarded Kroft as trustworthy and neutral, he was more likely to engage in further information-seeking. From that point, it is possible that he would have taken new information back to his in-group, now as either a skeptic or stifler. Just as when rumors are adopted, in-group members must reach some level of value-consonance with the rebuttal.

If rumor belief only required uncertainty reduction through exposure to counter-facts, Mr. Schoenholtz's task was substantially easier. However, where a rumor goes to a group member's most closely held attitudes, beliefs, or values, that individual must resolve any deeper dissonance created by the new information.²⁰⁷ In the case of the Obama rumors, the extent to which they aligned with group member's racial, ethnic, or religious prejudices, mere information debunking may not have been sufficient. This is because "rumors serve various psychological needs, and people are likely to engage in motivated reasoning to hold on to or legitimize cherished beliefs."²⁰⁸ Any cognitive inconsistency reduction would involve changing the salience of the group members' racial, ethnic, or religious biases that had worked in favor of rumor belief. If Mr. Schoeholtz's group members were motivated to believe the Obama rumors out of such biases, it would be no small task to persuade them to set those biases aside.

CONCLUSION

In defense of journalistic integrity and objectivity, it has been famously said that the media does not tell people what to think, but what to think *about*. Two events illustrate the utter fallacy of that aphorism. In February 2008, FOX News conducted a voter survey which asked, "Who do you

²⁰⁶ See Martin Kumpf & Bettina Goetz-Marchand, *Reduction of Cognitive Dissonance as a Function of Magnitude of Dissonance, Differentiation, and Self-Esteem*, 3 EUR. J. SOC. PSYCHOL. 255 (1973). A dissonance-producing inconsistency exists only where there are two propositions that are regarded as true. See also Bertram Gawronski & Fritz Strack, *On The Propositional Nature Of Cognitive Consistency: Dissonance Changes Explicit, But Not Implicit Attitudes*, 40 J. EXPERIMENTAL PSYCHOL. 535, 536 (2004) ("Inconsistency between two propositions results when both of them are regarded as true, and one follows from the obverse of the other.") According to cognitive consistency theory, there is a tendency for restoration of a consistent cognitive structure, a tendency for "symmetry", "congruity", "balance" or "consonance." *Id.*

²⁰⁷ Dissonance theory asks the core question of how one reacts to new information which is inconsistent with one's cognitions. Gawronski & Strack, *supra* note 206 at 535.

²⁰⁸ DIFONZO & BORDIA, *supra* note 22, at 223.

think terrorist leader Usama (sic) bin Laden wants to win the presidential election?" (Obama won with 30% naming him).²⁰⁹ That same month, CNN conducted an online poll that asked "Does Barack Obama show the proper patriotism for someone who wants to be president of the United States?"²¹⁰ Reminiscent of the famous cross-examination interrogatory "Have you stopped beating your wife?" those survey questions capture the Obama rumors, reconstitute them, and demand that the audience adopt the rumors' premises. Media outlets such as CNN, FOX News, and others exhibited sharp skill at providing an echo chamber for the Obama rumors. Consequently, what Mr. Schoenholtz believed in March 2008 should have hardly come as a surprise.

The media's role in shaping the Obama rumors is complex, but undeniable. On one hand, stories about Obama were newsworthy. Generally speaking, any politician's background, beliefs, and associations can be seen as fair game for news-gatherers; indeed, it is their obligation to mine those subjects. Thus, as a general proposition, reportage about Obama's education, William Ayers, Reverend Wright, or a trip to Kenya could claim the mantle of newsworthiness. And as shown, many of those same news-gatherers played a vital part in debunking the Obama rumors.

On the other hand, a distinction must be made between reporting on verifiable information versus reporting on the unverified information (and outright fabrications) that served as kernels for the Obama rumors. First, the mere reportage of the rumors gave them an aura of credibility. Secondly, how Obama rumor stories were tagged, teased, headlined, framed, supported or dismissed doubtlessly impacted what viewers, readers, or listeners took from the news. By embedding the paradigmatic frameworks to shape perceptions of Obama, i.e., patriotic/unpatriotic, American/Muslim, the media gave legitimacy to the rumors' religious, ethnic, and racial biases. If media agents would not, certainly Obama's ideological and political opponents would never bother to ask "so what?" if Obama is a Muslim?

At the same time, quelling rumors can not be accomplished solely by media agents, and certainly not by the rumor target. The percentage of voters believing Obama to be a practicing Muslim despite the abundant evidence to the contrary, coupled with those who said they would not vote for a Muslim president suggests that something other than available truth

²⁰⁹ Fox News/Opinion Dynamics Poll, February 21, 2008 available at http://www.foxnews.com/projects/pdf/022108_release_web.pdf.

²¹⁰ Jason Linkins, *CNN Re-Legitimizes 'Scurrilous' Obama Email*, HUFFINGTON POST, February 25, 2008, http://www.huffingtonpost.com/2008/02/25/cnn-relegitimizes-scurr_n_88290.html.

facts was influencing voter behavior. As shown, cognitive biases impact rumor belief and recapitulation. Most critically, peer group influence on political decision-making, and the conversational dynamics which attend rumor discussions within such groups, most influenced the Obama rumors belief. The persistent belief of the Obama rumors by so many demonstrates that it is not enough for media agents, politicians, or strangers to rebut rumors; interrogation in quotidian rumor discussions is essential. Hopefully, after being rebuked by Kroft, Mr. Schoenholtz did seek out truth facts, and did “tell a friend” that the Obama-is-a-Muslim rumors were bunk. Even better—hopefully, Mr. Schoenholtz and his peers said “so what?”