

William Mitchell Law Review

Volume 37 Issue 5 *Journal of the National Security Forum* 

Article 27

2011

## Not Reading Means Losing: The National Security Cost of Ignoring Osama Bin Laden's Words

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Scheuer, Michael (2011) "Not Reading Means Losing: The National Security Cost of Ignoring Osama Bin Laden's Words," *William Mitchell Law Review*: Vol. 37: Iss. 5, Article 27. Available at: http://open.mitchellhamline.edu/wmlr/vol37/iss5/27

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## NOT READING MEANS LOSING: THE NATIONAL SECURITY COST OF IGNORING OSAMA BIN LADEN'S WORDS

## Michael Scheuer<sup>†</sup>

When asked to write an essay for the Journal of the National Security Forum, it seemed appropriate to look at Osama bin Laden and the far-from-fully-recognized threat he posed to the United States by doing what a lawyer does in preparing a case: read all the materials related to it. A lawyer, after all, presumably would not enter a courtroom to argue a case without such thorough preparation. And yet, I would argue the United States has been waging a war against Osama bin Laden, al Qaeda, and its allies without bothering to study his words in an effort to absorb what the U.S. military calls the commander's intent.

As a result, come August 27, 2011, Osama bin Laden, al Qaeda, and their allies will have been waging war on the United States for fifteen years, and they will still be a basically unknown quantity to U.S. policymakers, generals, intelligence officers, and even socalled al Qaeda experts. That this is the case is purely the result of sloth or negligence, because since formally declaring war—on August 27, 1996<sup>1</sup>—bin Laden has, at least in one way, followed the model of America's victorious North Vietnamese enemies, Ho Chi Minh and General Giap. Like our North Vietnamese vanquishers, bin Laden has made sure the U.S. Government and its people have no credible excuse for failing to understand what motivates the war being waged against them by al Qaeda and other Islamists.

Through numerous statements, speeches, and interviews, bin Laden has explicitly explained the Islamists' grievances, religious motivation, war aims, metrics for measuring progress, and terms for ending the war. Bin Laden's words have been plentiful and are

<sup>†</sup> I explore this issue more fully in MICHAEL SCHEUER, OSAMA BIN LADEN (2011).

<sup>1.</sup> Osama bin Laden, Declaration of War against the Americans Occupying the Land of the Two Holy Places, PBS NEWSHOUR, Aug. 27, 1996, available at http://www.pbs.org/newshour/terrorism/international/fatwa\_1996.html.

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increasingly accessible in English. My own archive, for example, contains over 175 primary-source documents, numbering more than 800 pages. This is a significant amount of material, and yet the only reasonable claim to make about my archive is that I hold only the primary documents I found, not all that exist.

Given this body of primary-source documents, it is odd that so few of them have been exploited by the Western political leaders, writers, and analysts who have spoken on the issue or produced books meant to explain who bin Laden was and what he was up to. To date, works on bin Laden—with a few notable exceptions, especially Peter Bergen's splendid and indispensable, *The Osama bin Laden I Know*—have been based, in the main, on what others have said about him, not what he himself has said.

These "others" come in two batches. The first tends to be such enemies of bin Laden and al Qaeda as former Saudi intelligence chief Prince Turki al-Faisal; the long- and still-imprisoned but nowreformed Egyptian Takfiri<sup>2</sup> scholar Sayyid Imam al-Sharif (a.k.a. Dr. Fadl); and the former Islamist firebrand but now al-Saud apologist/scholar, Shaykh Salman al-Awdah. The second batch is found among former or current mujahedin who have fallen out with bin Laden, men such as Mustafa bin Abd al-Qadi Setmariam Nasar (a.k.a. Abu Musab al-Suri and Umar Abd al-Hakim); Boudejema Bounoua (a.k.a. Abdullah Anas); Hashim al-Makki (a.k.a. Abu Walid al-Masri and Mustafa Hamid); and Nasser al-Bahri (a.k.a. Abu Jandal). It is worth noting that the men in this latter group broke with bin Laden over strategy, tactics, timing, targeting, or concern for the Taleban regime's survival, but did not become his enemies. They still view him as an important, accomplished, and inspirational Islamist leader. They differ with bin Laden over tactics and targets but their ultimate goals for the jihad are comparable to bin Laden's.

While what bin Laden's enemies and former close associates have said about him is a major resource when analyzing his thought, talents, weaknesses, intellect, successes, and failures, it is not a sufficient base of data on which to develop a well-rounded

<sup>2.</sup> Takfirism is "the pronouncement of unbelief" against another Muslim individual, group, or state. Once this judgment is made, the property and life of the designated unbeliever can be taken. See Ibrahim A. Karawan, Takfir, OXFORD ISLAMIC STUDIES ONLINE, http://www.oxfordislamicstudies.com. In the Muslim world, Takfiris are universally hated for their murderous behavior, and even more so for their arrogance in usurping God's authority by making his judgment of who is and is not a good Muslim.

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assessment of the man. It is, quite simply, less than half of the story. To accomplish the task of accurate understanding, what others say must be assessed alongside the primary-source bin Laden documents. And yet, Western politicians, generals, policymakers, and writers have largely failed to do so, often referring to the primary bin Laden documents as rants, diatribes, and ravings, as if they really emanated from the imaginary madman so often described by U.S. Presidents, British and other European prime ministers, and Arab tyrants. It must be said that leading Muslim writers and journalists—especially Rahimullah Yusufzai, Abdel Bari Atwan, and Ahmad Zaydan—have paid much closer attention to bin Laden's words and use of Islamic history and, by and large, have produced more sophisticated and accurate portraits of him.

Since 9/11, then, a score or more books have been written by Western and Muslim authors about bin Laden and al Qaeda. In regard to bin Laden, these books have focused on his character, intelligence, leadership talent, public-speaking ability, skill at exploiting Islam and its history in his rhetoric, international influence, organizational skills, and modern management style. I believe the best of these books are by Peter Bergen, Abdel Bari Atwan, Steve Coll, and Brynjar Lia.<sup>3</sup>

Among the rest, I have listed below books by Western and non-Muslim authors that have come to be categorized as essential works on bin Laden and al Qaeda. In each case, the author and title are followed by the number of citations of bin Laden's works speeches, interviews, statements, and so on—contained in that author's endnotes.<sup>4</sup> I have also noted where a large number of

<sup>3.</sup> PETER L. BERGEN, THE OSAMA BIN LADEN I KNOW: AN ORAL HISTORY OF AL QAEDA'S LEADER (2006); ABDEL BARI ATWAN, THE SECRET HISTORY OF AL QAEDA (2006); STEVE COLL, THE BIN LADENS: AN ARABIAN FAMILY IN THE AMERICAN CENTURY (2008); BRYNJAR LIA, ARCHITECT OF GLOBAL JIHAD: THE LIFE OF AL-QAIDA STRATEGIST ABU MUS'AB AL-SURI (2008).

<sup>4.</sup> Since 1996, no senior U.S. political leader or civil servant—save for Rep. Ron Paul (R-TX)—has tried to explain to Americans what bin Laden has said, what motivates him and those he inspires, or what they intend to accomplish. Presidents Clinton, George W. Bush, and Obama have educated Americans about bin Laden with scare words like thug, gangster, un-Islamic, and monster. They and their senior civil servants—like Obama terrorism czar John Brennan—have lied to Americans about the religious-motivated war bin Laden and his allies are waging against the United States. Indeed, Brennan lied directly to all Americans when he said the word jihad means self improvement and has nothing to do with martial activity. Either from ignorance or a desire not to anger the administration, no journalist cited this blatant bit of dishonesty; almost all mentions of jihad in the Qur-an and Sunnah are martial in nature. See John O. Brennan, Assistant to the

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citations pertain to relatively few primary documents. I did not, of course, have access to electronic versions of these books. My count is derived from a line-by-line reading of each book's notes, keeping score as I went. I do not claim the counts are exact, but they are quite close to the mark, and give a clear idea of the degree to which each author exploited primary sources. The books are listed by date of publication and, naturally, the more recent the publication date the greater the number of primary documents were available to the author. Except as noted above, I make no judgment regarding the quality of each; some are fine works, others are listed because so little quality work is available on bin Laden.

ROHAN GUNARATNA, INSIDE AL QAEDA: GLOBAL NETWORK OF TERROR (2002)—20 citations to 8 documents

JASON BURKE, AL QAEDA: CASTING A SHADOW OF TERROR (2004)—5 citations

JONATHAN RANDAL, OSAMA: THE MAKING OF A TERRORIST (2004)-2 citations

MARC SAGEMAN, UNDERSTANDING TERROR NETWORKS (2004)—2 citations

STEVE COLL, GHOST WARS: THE SECRET HISTORY OF THE CIA, AFGHANISTAN, AND BIN LADEN, FROM THE SOVIET INVASION TO SEPTEMBER 10, 2001 (2004)—2 citations

FAWAZ A. GERGES, THE FAR ENEMY: WHY JIHAD WENT GLOBAL(2d ed. 2009) (2006)—15 citations to 5 documents

MARY HABECK, KNOWING THE ENEMY: JIHADIST IDEOLOGY AND THE WAR ON TERROR (2006)—52 citations to 14 documents

President for Homeland Sec. and Counterterrorism, Securing the Homeland by Renewing America's Strengths, Resilience, and Values (May 26, 2010), *available at* http://csis.org/files/attachments/100526\_csis-brennan.pdf).

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LAWRENCE WRIGHT, THE LOOMING TOWER: AL QAEDA AND THE ROAD TO 9/11 (2006)—28 citations, 22 of which refer to 4 documents

STEVE COLL, THE BIN LADENS: AN ARABIAN FAMILY IN THE AMERICAN CENTURY (2008)—17 citations to 10 documents

BRUCE RIEDEL, THE SEARCH FOR AL QAEDA: ITS LEADERSHIP, IDEOLOGY, AND FUTURE (2008)—12 citations

ROY GUTMAN, HOW WE MISSED THE STORY: OSAMA BIN LADEN, THE TALIBAN, AND THE HIJACKING OF AFGHANISTAN (2008)—11 citations

This list shows that despite the large body of primary-source documents at hand, few of them have been exploited by Western writers and analysts who have produced books meant to explain bin Laden and what he is up to. The reason for this failure is not entirely clear, but it seems to pivot off the reluctance of some authors and most politicians to accept that in the early twenty-first century, the Islamic religion can possibly be the driving force behind bin Laden, al Qaeda, and their allies. They seem even more reluctant to face—or at least publicly state—the fact that in the eyes of most Muslims, Western policies and actions in the Islamic world are not benign and humanitarian, but anti-Muslim and lethal.

The bulk of bin Laden scholarship is extraordinarily presentist. When Western authors encounter thinking or mores they consider anachronisms in the modern world, they default to asserting that ideas running counter to the tenets of secularism, diversity, multiculturalism, and globalization are held by only limited numbers of medieval, violence-prone, pseudo-Islamic thugs. The predominantly secular authors, for example, hate the absence of Western-style women's rights in much of the Muslim world, and so Islamists are always archmisogynists. They detest the motivational power of the Islamic faith across the Muslim world, which instructs that violence can be needed to defend faith, and so the Islamists are described as distorters of their religion. Most of all, they fear any threat to progress toward a secular world, and so-notwithstanding much heart-on-sleeve prose-they prefer to combat the Islamists with status quo policies featuring the West's

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defense of Arab tyrannies, efforts to impose secular democracy on Muslims to negate Islam's overwhelmingly martial doctrine of jihad, and claims that proliferating Islamist violence is due to such bizarre, clearly wrong factors as nihilism, a lack of gender mixing, illiteracy, and the hijacking of the Qur-an. A close reading of bin Laden's words would offend the presentists' optimistic view of a secular world triumphing over superstitious religion, and so they have ignored the appeal of these words to tens, even hundreds of millions of Muslims, much to the detriment of Western security, economic vitality, and prospects for peace.

Because many of the essential bin Laden-related books lack a thorough assessment of primary bin Laden sources, it is worth looking at a few of the pieces of "common wisdom"—marked below in italics—that have emanated from these books; conclusions that a comprehensive assessment of primary sources would call into question.

The Central Importance of Sayyed Qutb: The theorist of jihad as Hobbes's war of all against all, Qutb is seen in the West as a principal shaper of bin Laden's thought and actions." But in the corpus of bin Laden's work there is not a single quotation from Qutb's work, nor does bin Laden ever mention his name. That bin Laden accepts some of what Qutb said is clear. As long as Qutb does not stray from the Salfist-jihadi view of the Qur-an and the Sunnah (the sayings and traditions of the Prophet Muhammad), bin Laden concurs with him. But this is really no more than saying the Qur-an and Sunnah are central to the thought of bin Laden and most Muslims. When Qutb diverges from these sources, bin Laden clearly has no use for his recommendations and does not deign to even refer to The idea that a direct line can be drawn from him. Qutb's rather odd interpretation of Islam and bin Laden's traditional Salafism simply cannot be substantiated. <sup>6</sup> By

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<sup>5.</sup> See, e.g., Robert Siegel, Sayyid Qutb's America: Al Qaeda Inspiration Denounced U.S. Greed, Sexuality, NPR, May 6, 2003, http://www.npr.org/templates/story/story.php?storyId=1253796&from=mobile.

<sup>6.</sup> Two leading Western scholars of Salifi-jihadists, Quintan Wiktorowicz and Joas Wagemakers, define those men as Salafists who do not believe that quiet advice or public agitation against Muslim rulers, with the goal of persuading them to govern strictly in accord with the Qur-an and the Sunnah, will succeed. Rather, they believe that to purify Islam and bring Muslims back under God's rule, a defensive jihad must be waged on Islam's foes. In essence, they seek to make jihad

studying and analyzing Qutb, we learn much about the militant milieu in which bin Laden's generation was reared but almost nothing about the mature bin Laden's thought and motivation.

Ayman al-Zawahiri, the Éminence Grise: Western politicians and writers often refer to al-Zawahiri-former Egyptian Islamic jihad chief and now al Qaeda's deputy leader-as bin Laden's brain. An examination of bin Laden's work, however, reveals no significant impact by the Egyptian on his thought or rhetoric. Indeed, such an assessment clearly delineates how far bin Laden has drawn al-Zawahiri away from his original positions and strategy. As with Qutb, bin Laden does not quote al-Zawahiri in his own statements, but stands with him as long as the Egyptian sticks to the above-mentioned foundational documents of Salafi-jihadism. It is worth noting that bin Laden appears to have little use for self-taught Islamist scholars like the English-major Qutb, the surgeon al-Zawahiri, or the Egyptian Islamic Jihad's electrical-engineer-turned-Islamic theorist, Muhammad al-Faraj. His respect is reserved for those scholars who have received a traditional and formal Salafist education via university educations or private study with Salafi scholars, men such as Abdullah Azzam and Safar al-Hawali. Ironically, bin Laden usually does not even refer to the views of the Salafi-jihadi scholars he most respects. There is no need to directly quote them. By simply quoting the Qur-an and the Sunnah he is, in essence, quoting those scholars but putting credit where it belongs-in the hands of Allah and the Prophet Muhammad.

Al Qaeda-ism is Takfirism: In bin Laden's works there is nothing but a thorough and unequivocal denunciation of Takfiri doctrine.<sup>7</sup> He repeatedly and effectively attacks those—especially Saudi-regime spokesmen—who identify

a form of worship and Islam's sixth pillar, what bin Laden calls "the peak of true Islam." See Joas Wagemakers, A Purist Jihadi-Salafi: The Ideology of Abu Muhammad Al-Maqdisi, 36 BRIT. J. MIDDLE E. STUD. 281 (2009); Quintan Wiktorowicz, Anatomy of the Salafi Movement, 29 STUD. CONFLICT & TERRORISM 207 (2006), available at http://www.cerium.ca/IMG/pdf/WIKTOROWICZ\_2006\_Anatomy\_of\_the\_Salafi\_ Movement.pdf; Quintan Wiktorowicz & John Kaltner, Killing in the Name of Islam: Al-Qaeda's Justification for September 11, 10 MIDDLE E. POL'Y 76, 78 (2003).

<sup>7.</sup> See supra text accompanying note 2.

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him or al Qaeda as Takfiri. That said, bin Laden clearly recognizes and respects the massively negative impact on al Qaeda if the Saudis or others succeed in making the Takfiri label stick. Bin Laden and his lieutenants seldom deign to respond to criticism or accusations from Western states or Arab tyrannies, but when accused of Takfirism, he, al-Zawahiri, the late Abu Mustafa Abu al-Yazid, Abu Yaha al-Libi, and other senior al Qaeda lieutenants have been quick to rebut the accusations. Bin Laden clearlyand accurately-foresees oblivion for al Qaeda and its allies if the Muslim masses come to believe they are Takfiris. His concern is evident in that he twice used public statements to implicitly apologize to Muslims for Abu Musab al-Zarqawi's Takfiri actions in Iraq, to assure them they would not occur again, and to publicly and explicitly urge al Qaeda to avoid Takfiri behavior. In late 2007, bin Laden apologized for al-Zarqawi's actions, saying:

I assure Muslims in general and our people in the neighboring states [to Iraq] in particular that they will see nothing from the mujahedin [in Iraq] but all that is good, God willing. We are your sons. The Muslim victims who fall in operations against the infidel Crusaders or their usurper [Iraqi] agents are not the intended targets. God knows that we are deeply saddened when some Muslims fall victim. Yet we hold ourselves responsible and seek God's forgiveness for that. We beseech God to have mercy on them and let paradise be their final abode and to compensate their families and relatives.<sup>8</sup>

Al Qaeda Has No Central Command and Control: Abu Musab al-Zarqawi's murderously Takfiri behavior in Iraq has been the only potentially fatal strategic threat al Qaeda has faced since 9/11. Indeed, if the U.S. military did not kill him, al Qaeda would have found a way to dispose of him, either by promoting him to a position where he would not command fighters or by killing him. Indeed, the relative ease with which U.S. interrogators claim to

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<sup>8.</sup> Osama bin Laden, The Way to Frustrate the Conspiracies (Dec. 27, 2007), NEFA FOUND., http://wwwl.nefafoundation.org/miscellaneous/nefabinladen 1207.pdf.

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have elicited al-Zargawi's location from a captured, close associate is astounding and raises the possibility that al Qaeda directed the man to allow himself to be captured and then provide targeting data.<sup>9</sup> Aside from the substantial but temporary damage al-Zarqawi did to al Qaeda's position in Iraq and to the group's Muslim-world standing, bin Laden's handling of what can be called the al-Zarqawi problem demonstrated his indirect managerial style-avoiding public disputes with lieutenants and allies is always his priority—and the continuing hierarchical nature of al Qaeda. Bin Laden did not take on al-Zargawi in public, but assigned al-Zawahiri and another senior al Qaeda figure-a North African named Atyiah-to bring al-Zarqawi back on al Qaeda's non-Takfiri reservation. Al-Zawahiri did so in a measured but clearly pointed manner. He stressed al Qaeda's respect for al-Zargawi's success in killing Americans and their allies, but told al-Zarqawi that he was part of a bigger whole that had an international agenda that was being damaged by his Takfiri actions, especially televised beheadings and the bombing of mosques and shrines. When al-Zarqawi took minimal remedial action, Atyiah followed with a much harsher letter. It opens by saluting al-Zarqawi's lethal accomplishments against U.S.-led forces but then harshly chastises him for ignoring the fact that he is subordinate to bin Laden and other al Qaeda leaders, demanding that complement not retard al his actions Oaeda's international goals, and pledging that he would be removed from commanding al Qaeda in Iraq if he did not quickly fall into line behind the directions of al Qaeda's central leadership. The content of both lettersespecially Atyiah's-as well as al Qaeda's ongoing rebound in Iraq ought to give pause to the authors who have identified al Oaeda as either a noncentralized organization now isolated from its independent affiliates or as a doctrinally takifiri organization. These authors are largely mistaken and have skewed the now-losing U.S. military's understanding of its Islamist foes, as well as the doctrine it has shaped to defeat them.<sup>10</sup>

<sup>9.</sup> For the supposedly simple (magical?) process of getting targeting data for al-Zarqawi from a captured mujahid, see MATTHEW ALEXANDER & JOHN BRUNING, HOW TO BREAK A TERRORIST: THE U.S. INTERROGATORS WHO USED BRAINS, NOT BRUTALITY, TO TAKE DOWN THE DEADLIEST MAN IN IRAQ (2008).

<sup>10.</sup> The former Australian soldier David Kilcullen has published a book in

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Al Qaeda Has Failed: After reviewing bin Laden's words, it is irrefutably clear that he always has intended al Qaeda's primary role to be that of inciting and instigating Muslims to jihad, not as a military machine meant to defeat Islam's enemies by itself or in alliance with a few other groups. Thus, the whole concept hawked by self-serving Western politicians that they have made Western populations safer because there has not been another 9/11 attack reflects not only wishful thinking, but a singular ignorance of al Qaeda's goals and the expanding power of its media operations. At the time of 9/11, for example, al Qaeda's main planning, training, and operational platform was in Afghanistan. As 2011 begins, the group retains parts of that platform and has added viable and growing bases in Yemen, Pakistan, Iraq, Somalia, and North Africa. In addition, the example al Qaeda set by hurting the United States and then not only surviving but growing in numbers and expanding geographically has been an inspiration for continued or increased organizational activity and violence by Islamist fighters in the North Caucasus, southern Thailand, Europe, across the Far East, Kashmir, the Arabian Peninsula, India, Nigeria and other places in west and east Africa, and the United States. In short, al Qaeda not only retains substantial military capabilities for a group of its limited size, but it has a developed an outsized media and geographical reach. In terms of inspiration and instigation capabilities, al Qaeda is today exactly what bin Laden intended it to be: an unqualified success in inspiring Muslims to wage jihad across the Islamic world. Today, al Qaeda probably is about where bin Laden expected it to be, given his clear expectation of a multigenerational struggle and his frequent frustrated and chiding remarks to the many Muslims males still to join the jihad.

which he describes as Takfiris virtually all of the Afghan and non-Afghan mujahedin fighting the U.S.-led coalition in Afghanistan. The book has repeatedly been cited in the media as the basis for current U.S. military strategy in Afghanistan. This is too bad. A realistic analysis of the mujahedin fighting in Afghanistan would find almost no Takfiris among them. It also would find that those that are in Afghanistan are being hunted down and killed by the other mujahedin. See DAVID KILCULLEN, THE ACCIDENTAL GUERRILLA: FIGHTING SMALL WARS IN THE MIDST OF A BIG ONE (2009).

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**Polling Shows al Qaeda is Irrelevant:** Not surprisingly, many non-Muslim authors place high value on the results of polling by reputable Western pollsters in the Muslim world, and some of it is indeed very valuable. But the personality-based polls' celebrity-measuring or questions-such as "Do you approve of Osama bin Laden?" or "Would you want to live under a bin Laden government?"-are virtually worthless. They disguise reality and give hope where there should be little or none. Today's low positive responses to such questions would skyrocket tomorrow if al Qaeda attacks successfully in the United States or Israel. The key polling questions are the ones that mesh with what bin Laden identifies as the motivation for jihad and with what he wants to achieve. Questions such as, "What do you think of U.S. foreign policy?"; "Do you want to be governed with a large measure of Sharia law?"; and "Do you believe your current government is un-Islamic, has failed, and/or is oppressive?" elicit the most informing responses. Polling shows virtual unanimous hatred among Muslims for U.S. foreign policy and current Muslim governments, and a large majority favoring a substantial measure of Sharia law in governance. These results, moreover, are nearly the same among key cohorts: young and old, male and female, and militant and moderate.<sup>11</sup> As long as these results remain consistently high for protracted periods in these cohorts-as they have for a decade-bin Laden is on the right track for his purposes. Indeed, his refusal to use public words to build his own celebrity, and his use of them instead to focus unrelentingly on al Qaeda's three war aims-driving the United States from the Muslim world, destroying Israel and Arab tyrannies, and returning to the "true" Islam-and on inciting Muslims to join the jihad to attain these aims, is nothing short of genius.

As noted above, none of this means that Osama bin Laden, al Qaeda, and their Islamist allies are ten-foot tall enemies; indeed, with any kind of manly Western response, both could have been eliminated at almost anytime between bin Laden's 1996 declaration of war and mid-1999. That, of course, did not happen, mostly because of the inferior and timid quality of Western political and

<sup>11.</sup> See JOHN L. ESPOSITO & DALIA MOGAHED, WHO SPEAKS FOR ISLAM? WHAT A BILLION MUSLIMS REALLY THINK (2008).

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military leadership. What a reading of the primary bin Laden documents does suggest, however, is that fifteen years into the war bin Laden has waged, the West's understanding of its Islamist enemies' former leader and his goals is at best marginal because of its political leaders' failure to read what he has said, accept that his motivation is what he says it is, and recognize that he intends to do what he has said he will do. This reality is troubling as there is no doubt that the U.S., British, and other Western intelligence services have provided their elected and civil-servant superiors with detailed analyses of bin Laden's words ever since he declared war in 1996, and that these analyses surely contradict the popular they-hate-usfor-our-freedom mantra often stated by political leaders.

Thinking back nearly ninety years, the West last made this kind of deliberate error when it failed to read but readily scorned and ridiculed the published words of a jailed, former corporal in the Kaiser's army. Now, as then, it would be wise to take the guidance of another man who intended and came closest to destroying the United States. "The better rule," Robert E. Lee said, "is to judge our adversaries from their standpoint, not from our own."<sup>12</sup>

<sup>12.</sup> Peter G. Tsouras, Civil War Quotations: In the Words of the Commanders 90 (1998).

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# EDITORIAL CARTOON COMPETITION WINNER: RUNNER UP, JOEL BUSTAMANTE<sup>†</sup>



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## PART IV: STUDENT NOTE

The following article was prepared by a student at William Mitchell College of Law.

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