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## Muslims in the Media

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## MUSLIMS IN THE MEDIA

# Considering Ethnic Group Tensions: The Symptomatic Case of French Comedian Dieudonné

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This article examines the 2014 case of French comedian Dieudonné and his purported incitement to hatred through his comedy act at the time, which hit national headlines and danced along the line of acceptable speech and making fun of the Holocaust. At the same time, Dieudonné's comedy appealed to a faction of French society that felt relegated and ignored by the French elite, a sentiment that was furthered by a clash between one religious group that has legal protections in place to protect it from Holocaust denial, versus another group that does not have similar protections in place for Islamophobic acts. This case study demonstrates how Dieudonné tapped into these sensitive areas of cultural life by engaging the communicative genres of humour and satire to draw attention to and toy with making fun of the Holocaust, though his comedy act, *Le Mur* (The Wall), a silly song about the Holocaust, and an arm gesture called the '*quenelle*'. Using a textual thematic analysis of online newspaper articles collected at the time from *Le Figaro* and *Le Monde*, as well as transcripts from ten in-person, semi-structured interviews conducted in Paris with activists, journalists, politicians, a lawyer, and a comedian, what the findings point to is that while Dieudonné appealed to a disenfranchised audience as a 'provocateur', he also highlighted how key factions of French society are struggling with inclusivity and a lack of social cohesion in a political context where *laïcité*, the separation of religious life and political life, is sacrosanct.

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## Introduction

France has often been cited as being a hotbed for a rise of anti-Semitism, with recent political moves to put measures in place to tackle this (BBC, 2019). At the same time, the denial of the Holocaust is prohibited by the 1990 Gayssot Act (Légifrance, 1990), yet there are no legal protections against Islamophobic acts. Furthermore, *laïcité* has an almost sacred position in French culture (Barras, 2013: 276), yet Taylor et al. (1994: 38) describe how identities are shaped through a process of recognising one another with equal value and respect. With this view, there is then a context where one religious and ethnic group has, for very important and historical reasons, protections in place to preserve its dignity (the French Jewish community), whereas another does not (the French Muslim community). In a religiously diverse society like France, this presents a context where frustrations over rights to recognition will arise, and a schism between a political reality that separates church and state is created with a cultural reality where religious communities and ethnic identity form an important part of daily life.

In late 2013 and early 2014, French comedian Dieudonné hit headlines for his comedic act, *Le Mur* (The Wall), which was touring at the time. His arm gesture, known as the '*quenelle*', was a part of the act and it gained notoriety after footballer Nicholas Anelka performed it at a match in the UK (Ervine, 2017: 236). It was construed as a sign of protest against the French establishment (ibid.: 242), yet it was also interpreted as an inverse-Nazi salute (Weissbrod, 2015). Paired with a silly song, '*Shoahnanas*' (Holocaust Pineapples), which made allusions to the Holocaust, as well as various provocative jokes, Dieudonné's comedy crossed the legal lines of permissible speech, and he was fined (Beardsley, 2014). Dieudonné, however, was already familiar with being fined for incitement to hatred of Jews and for anti-Semitic speech (Mazel, 2014). He was further fined when he made headlines again in early 2015 for tweeting '*Je me sens Charlie Coulibaly*' (I feel like Charlie Coulibaly), after the January attacks at the Charlie Hebdo office and a Jewish shop in Paris (ibid.), an act that took place in a national context that was still coming to terms with the effects of the attack (Tittley et al., 2017). What makes the Dieudonné case so interesting is not an overt denial of an event such as the Holocaust, but the systematic process of making fun

of the topic and the humourous treatment of it, and the dangers that this presents. This article focuses on how, and in what ways, the communicative role of humour and satire facilitated the journey of Dieudonné's comedy by not only undermining the Holocaust, but also as exploiting larger societal and cultural fractures in the French context. The Dieudonné case shows how a comedian, incentivised perhaps for financial reasons, tapped into the cultural frustrations of a group that felt marginalised and undermined, and was propelled by a form of inflammatory speech that was sure to receive attention.

So, on the one hand, the issue then not only becomes one of challenging sensitive cultural mores about the remembrance of the Holocaust, but on the other hand requires us to acknowledge that a portion of the French population has not lived a similar history as those linked to the Holocaust. This presents unique challenges to how the cultural memory of an event like the Holocaust is preserved. In a national context where the lived memories of those generations that experienced World War II are being committed to time and history, the question of how events like the Holocaust will be remembered is an important one (Gorrara, 2018: 111). This is also taking into consideration what is sometimes described as a 'cultural obsession', which must acknowledge the tensions between individual memory, collective memory, and representation, because 'memories are constructed and mediated via specific culturally constructed frames' (Best and Robson, 2005: 1). Taking a lens from communication theory, the Dieudonné case exemplifies how, within the context of humour and satire, different communicative genres act in shaping collective memory in diversifying cultural contexts, particularly in instances such as provocative speech acts and the nuanced relationship that these have with offence, transgression, the general public reacting to an event, and alternative audiences, in the form of counter-publics, responding to an event.

This article is based on findings from my doctoral thesis, which consists of a textual thematic analysis of 50 (out of 516) online newspaper articles about the Dieudonné case from *Le Figaro* and *Le Monde*, collected from 2013 to 2014, and ten interview transcripts from semi-structured, in-person interviews conducted in Paris in 2015 with free speech stakeholders that consisted of activists, journalists,

politicians, a lawyer, and a comedian, with interviewees discussing the Dieudonné case, freedom of speech, creative expression, tolerance, offence, human dignity, and collective life in France (Elliott-Harvey, 2018). Starting with a brief discussion on free speech legislation from the French context, this paper addresses legal prohibitions for contesting historical events, as well as how satire, as a form of performative speech, tests the parameters of acceptable speech. The discussion continues with the Dieudonné case and how his humour inflamed national ethnic and religious tensions by addressing a disenfranchised audience, and explores notions of civic duty, nationhood, and counter-publics. What then follows is a discussion of the research design and the case study model as a 'free speech event'. The findings are split into two sections, first discussing how Dieudonné, through his comedy, acted as a socially divisive 'provocateur' appealing to an alternative audience. The second section elaborates on tensions with diversity by exploring the notions of marginalisation, inclusivity, and representation. The conclusion brings the themes of the paper together and offers considerations for future research on the topic of communicative genres and challenges with diversity and integration.

### **Freedom of Expression, Satire and the French Context**

Freedom of expression in the French context has a legacy that is both foundational as well as contentious. Freedoms that were put into place during the Enlightenment resonate to the present day (Belavusau, 2010: 181), but they exist as freedoms under responsibility, both in legislation and in interpretation; Article 10 of the *European Convention for Human Rights* cites freedom of expression as a freedom under responsibility (Council of Europe, 1950: 5). Articles 19 from the *International Covenant on Civil and Political Rights*, and the *Universal Declaration of Human Rights* (OHCHR, 1976; UN, 1948), also assert the individual's right to free expression. The former, however, is binding for 173 signatory nations (OHCHR, 2020; George, 2016: 27), while the latter is non-binding (Mchangama, 2015: 76). In the French context, Article 11 of the *Declaration of the Rights of Man and of the Citizen from 1789* states: 'The free communication of thoughts and opinions is one of the most precious rights of Man: every Citizen can therefore speak, write, freely print, except to answer to the abuse of this liberty in cases determined by

the Law' (Légifrance, 1789).<sup>1</sup> Yet the two documents that are most often cited in legal discussions on freedom of speech in the French context are the *Gayssot Act of 1990* on Holocaust denial, and the *Pleven Law of 1972* on racism (Légifrance, 1990; Légifrance, 1972), the former of which is relevant to the Dieudonné case. In 1990, the Gayssot Act made the denial of the Holocaust illegal (Bird, 2000: 411), as well as racist, anti-Semitic or xenophobic acts (Légifrance, 1990). As a society built on the ideals of a republic (Bird, 2000: 400), the protections put into place by this law show how 'the French law against racist speech represents a shift toward the recognition of group-based equal rights and has set in motion important transformations in public race conscious' (ibid.: 407). The discrepancies here between individual rights and group-based rights then present a paradox over whose rights take precedence, especially with sensitive topics like the denial of the Holocaust.

One of the most notorious cases of Holocaust denial is historian Robert Faurisson and statements that he made in the mid-1990s (Bleich, 2011b: 922). The United Nations Human Rights Committee case of *Faurisson v. France* ruled against Faurisson by upholding the Gayssot Act over rights to free expression set by Article 19 of the *International Covenant on Civil and Political Rights* (Bleich, 2011a: 58; OHCHR, 1993). The Committee stated that 'while [Faurisson] does not contest the use of gas for purposes of disinfection, he doubts the existence of gas chambers for extermination purposes ("chambres à gaz homicides") at Auschwitz and in other Nazi concentration camps' (OHCHR, 1993: 3). The Committee also addressed Faurisson's claim that the Gayssot Act personally impinged on his right to free expression, and 'that the incriminated provision constitutes unacceptable censorship, obstructing and penalizing historical research' (ibid.: 5). What makes the *Faurisson v. France* case so interesting in relation to a discussion on freedom of speech is addressing the line between self-expression and the contestation of documented historical events. Laws like the Gayssot Act fit into what would be called 'memory laws', which prevent the negation and denial of significant events like the Holocaust (Gutman, 2016: 576).

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<sup>1</sup> 'Art. 11. La libre communication des pensées et des opinions est un des droits les plus précieux de l'Homme : tout Citoyen peut donc parler, écrire, imprimer librement, sauf à répondre de l'abus de cette liberté dans les cas déterminés par la Loi' (author's translation).

These can in turn be interpreted as a legal precedent to the prevention of individual freedom of expression, regardless of whether or not that opinion is based on truth or fact (ibid.: 577).

The values of pluralism, from a communicative standpoint, rest with a responsibility to think about the impact of language. Austin (1962: 94) states that we must 'consider from the ground up how many senses there are in which to say something *is* to do something, or *in* saying something we do something, and even *by* saying something we do something' (emphasis original). In performative genres like comedy and satire, there is still the relevance of how 'language mediates' (Livingstone, 2009: 5), and in what ways 'free speech events' influence how that communication and meaning-generation is established and transferred (Kreider, 2015: 80). Satire, as a genre, occupies communicative spaces in 'literature, film, and other media which is used to deflate, ridicule, and censure the perceived folly or immorality of what is represented', where 'tools include irony, sarcasm, wit, caricature, exaggeration, distortion, and parody', and 'invites the audience's moral indignation' (Daniel and Rod, 2016). Satire can also be used as a tool to address a political elite and challenge power (Corner, 2000: 32–33). 'Humour scandals' (Kuipers, 2011: 76), like the Dieudonné case which will be discussed next, allow audiences to act as 'co-authors and co-owners of the meanings produced' in creative messages (Goltz, 2015: 266).

In summary, freedom of speech can never be completely separate from legislative oversight, because these aspects will constantly be juxtaposed against interpretation and what the ethical limits might be (Maussen and Grillo, 2014: 174). Placing these elements against social responsibility, especially in instances where tragic historical events like the Holocaust are lessened or denied, is particularly interesting in the European context, because 'social peace in an increasingly multiculturalist Europe requires certain restrictions on expressions aimed at racial, ethnic, and religious (and recently also sexual) minorities' (Mchangama, 2015: 77). Here there is then the need to consider the 'moral injuries' (Veninga, 2016: 28), of both individuals and groups, in navigating contentious and provocative topics that enter into the public domain



through expressive genres like comedy and satire, but also to acknowledge what sorts of counter-discourse and counter-publics that might arise as a result.

### **Tackling Issues in Diversity: The 2014 Case of French Comedian Dieudonné and the '*quenelle*'**

French-Cameroonian comedian Dieudonné is a well-established comedian in the Francophone context. Earlier in his career, he performed as a duo with Jewish comedian Elie Semoun (Moore, 2014), but in more recent years has been going solo (Dieudosphere.com, 2020). In 2014, Dieudonné was receiving negative media exposure with accusations of anti-Semitic humour and hate speech (BBC, 2014), as well as being known to have ties with the extreme-right essayist Alain Soral, and the founder of the *Front National*, Jean-Marie Le Pen (E&R, 2020; Moore, 2014). At the time, Dieudonné claimed that his work 'is anti-Zionist and anti-establishment, but not anti-Semitic' (Douet, 2014). Yet an infamous arm gesture that he created managed to perform two functions, where 'critics say the comic's trademark straight-arm gesture is a Nazi salute in reverse' (ibid.), by performing 'the amazing double of denying the Holocaust while suggesting that the Jews deserved their fate' (Moore, 2014). The '*quenelle*' originally refers to a local French dish (Le Figaro, 2014), but is known as a modernised Nazi salute (Weissbrod, 2015). Having semantic ties to the original Nazi salute, the '*quenelle*' is performed by straightening one lowered arm, palm flat, with the other arm folded over the chest, also with a flat palm. What made this gesture particularly troubling, however, is not only the gesture itself, but how it was appropriated. Malik (2014) elaborated on this at the time:

The popularity of Dieudonné rests on his ability to play on and to fuse many of the themes that have become so corrosive of contemporary politics, and not just in France: a contempt for mainstream politics and politicians, a sense of voiclessness [sic] and abandonment, particularly in France in the *banlieues* [suburbs/estates], a perception of a world out of control and driven by malign forces, victimhood as a defining feature of social identity, a willingness to believe in conspiracy theories, and the growth of new

forms of anti-Semitism, particularly on the left and among youth of North African origin. The reason that the “quenelle” has become so popular is that it embodies in a single gesture many of these contemporary themes. It has become for many an expression of hatred for the system (Malik, 2014).

How this appealed to certain demographics within audiences, such as French-Maghreb youths, is particularly relevant here. This is because this was an audience that some argue does not share mainstream French culture's taboos on the Holocaust, because ‘they don't necessarily have the same cultural references about what happened in Europe during the Second World War’ (Jean-Yves Camus, quoted in Beardsley, 2014). This was an audience that is ‘so furious with “the system” that they are beyond the reach of even populist politicians’ (Lichfield, 2014). Dieudonné's comedy, the ‘*quenelle*’, and a silly song that was a part of his *Le Mur* (The Wall) tour in 2014, all worked together to create a potentially toxic cocktail of incitement. The silly song ‘Shoahnanas’ is something to note here. The word ‘Shoah’ refers to a Jewish word for ‘apocalypse’ (Hietalahti, 2016: 23), and also refers to the Holocaust. Some cite the ‘Shoahnanas’ song as referring to ‘Holocaust floozies’ (Lichfield, 2014), but it is more commonly known as a song called ‘Holocaust Pineapples’ (Rose, 2014). Dieudonné received fines for it and it was also removed from online video platform YouTube (Beardsley, 2014). At the time, then-Prime Minister Manuel Valls attempted to stop the tour of *Le Mur*, but was only able to appeal to the local governments at the Prefecture level, who had legislative powers to stop the shows (ibid.). Even after the scandal of the tour died down, Dieudonné was in the media again after the January 2015 terrorist attacks in Paris, for tweeting, ‘*Je me sens Charlie Coulibaly* [I feel like Charlie Coulibaly]’ (Wendling, 2015). Reactions to the tweet are a study within itself; however, research points to how framing of the media in instances like these can persuade audience emotions, as was seen in the ‘Je Suis Charlie’ movement (Walter et al., 2016: 3956), and within French civic culture. ‘Civic culture’ in the sense used here refers to the combination of cultural and political life in a given society. Originating with Almond and Verba (1989, 1963), one definition of ‘civic culture’ is a ‘dispersed idea, ranging from the perspectives surrounding types of committed civic action to

the less self-conscious, intermittent and partial sense of the “civic self” that informs everyday life for many people’ (Richardson et al., 2013: 5). This notion of civic culture is important when considering the Dieudonné case, and how different ethnic and religious groups see their own position, as well as that of others, in diverse contexts. With French society being highly diverse and rich in multicultural heritage, there is still an idea of a ‘brutal bargain’ (Podhoretz, [1967] 2017: 15), when it concerns groups assimilating into mainstream culture. Here immigrant groups must ‘accept that aspects of their old lives are lost forever, and that this is the price to be paid for the advantages of migration’ (van Krieken, 2012: 468), in order to be a part of a nation and an ‘everyday’ civic life (Billig, 2017). *Laïcité*, in an effort to separate church and state, in turn forces a spotlight on ethnic groups whose identities are very much tied with their everyday religious and cultural life, yet at the same time, *laïcité* ‘has increasingly become a sacred – non-negotiable – element of collective life’ (Barras, 2013: 276).

This raises questions as to ‘the ways nations are discursively narrated and reproduced’ (Skey and Antonsich, 2017: 2). Society is constantly reinventing the ‘imagined community’ (Anderson, B., [1983] 2006), and a sense of a national ‘we’ (Antonsich, 2016: 40). Yet for a faction of French society, immigration and social isolation has led to an ‘ethnicisation of poverty’ (Wihtol de Wenden, 2007: 56), and a marginalised ‘other’ in the *cités* (projects) of large French cities (Higbee, 2001: 197). Young people in these *banlieues* (suburbs/estates) are the sites of ‘anger of populations—for the most part postcolonial minorities—doomed to abandonment and marginalization, and with no mechanism for voicing their concerns’ (Bancel, 2013: 215), until cataclysmic events like the 2005 Parisian riots broke out, in protest of the deaths of two young men who had been killed while evading police (Thomas, 2013: 63), where young people were able to vent their frustrations towards what they perceived to be the establishment and the authority. Occurrences like these can be described as a ‘*fracture sociale* [social fracture]’, which shows a ‘perceived disintegration of community and civic responsibility that accompanies exclusion, violence and delinquency but also to the growing divide between rich and poor in French society’ (Higbee, 2005: 123). This is often positioned as a Christian French

identity, versus a Muslim immigrant identity. This Muslim 'other' has received further negative attention in recent years (Brubaker, 2017: 1199), through State-sanctioned actions such as the 2011 banning of the *niqab* (BBC, 2018), or the 2016 burkini ban in certain parts of France (Brubaker, 2017: 1202). Challenges such as these have led to discussions of a 'secular imagined community' (Sommier, 2016: 243), or a 'new contemporary sociological imagination' (Wieviorka, 2014: 633), where French culture is reinventing itself in the face of challenges by divisive influences in politics, society, and even culture: such as in the Dieudonné case.

The Dieudonné case highlights how, in a country context where there is a diversification of the national makeup, there is at the same time parts of the national audience that are not represented and do not see themselves as fitting into the mainstream. In the literature, these audiences are positioned as a part of a counter-public, the subaltern, or subaltern counter-publics. Positioned in theories of the public sphere by Habermas (1992, 1989), counter-publics are sites of discourse (Waisanen, 2012: 240), that are a part of 'a social process' (Wimmer, 2005: 97), where 'emergent collectives fit less comfortably in a conception based on essential group identity' (Asen, 2000: 438). Fenton and Downey (2003: 16,24) argue that counter-publics therefore create 'the best prospects for encouraging democratisation at local, national and international level', as an 'alternative to the dominant public sphere', because they instigate discourse and change. The subaltern is a term that exists in the literature under different terminologies. Durham (2020: 163) describes the subaltern as a term that relates to how power is challenged in a given society, where it 'refers in its most basic sense to a subordinated class of people, marginalized through dominant ideologies and social formations, yet harboring the potential for resistance to power structures'. When applied to a group or community, these are 'raced, classed, gendered subjectivities that are systematically erased through the norms of civility and participation that constitute the dominant development ideology', that 'emerge through culture-centered processes as decisionmakers in articulating a development agenda and in carrying it out' (Dutta, 2018: 88). The next iteration is the notion of a subaltern counter-public, which Fraser (1990: 67) describes as 'parallel discursive arenas where members of subordinated social groups invent and

circulate counterdiscourses, which in turn permit them to formulate oppositional interpretations of their identities, interest and needs'. Subaltern counter-publics in this way 'empower the agency and intellectual autonomy of marginalised voices' (Chikonzo et al., 2019: 78). The concepts of counter-publics, the subaltern, and subaltern counter-publics link back to the Dieudonné case through the idea that his comedy appealed to an alternative public that does not identify with a socially and politically-formulated national civic identity, which in turn challenges common values of social unity and national cohesion.

## Research Design

The findings from this article are from my doctoral research project, which is a comparative study between France and Denmark, with one case study from each context on free speech controversies from a creative context (Elliott-Harvey, 2018). This article focuses on the French case study, comedian Dieudonné M'bala M'bala, and selected elements from his 2014 comedy tour, *Le Mur* (The Wall). Online articles about the case study were collected from *Le Figaro* and *Le Monde* from the beginning of 2013 to the end of 2014, and ten in-person, semi-structured interviews were conducted in Paris in 2015 with free speech stakeholders that consisted of activists, politicians, journalists, a lawyer, and a comedian.

The selection of a case study allows for the examination of how communication works in a given context and at a given time (Flyvbjerg, 2007: 391; see also: Gerring, 2004; Stake, 1995; Ragin and Becker, 1992). The Dieudonné case is recent and there is a small pool of English-language research about it, from different angles such as studies on religion (Ben-Moshe, 2015), anti-Semitism (Grigat et al., 2016; Mazel, 2014; Clavane, 2014), law and hate speech (Tsesis, 2017; Lepoutre, 2017; Keck, 2016; Mchangama, 2015), social media (Leone, 2015), colonial studies (Alzouma, 2011), humour (Hietalahti, 2016), cultural studies (Boudana, 2015), and European studies (Camus, 2006). The selection of the Dieudonné case also provided an opportunity to examine different genres within communications studies as well as from other disciplines, such as the broader social sciences, philosophy, and the arts. Finally, the case study complements a communication angle by being a 'media controversy' at

the time of research. 'Media controversies' are events that occur in the media, but then are also circulated in society and culture, as defined here:

Media controversies are communication conflicts that take place in the mass media. However, mass media are not only the "place" of such controversies, but also constitute them. First of all, media decide if the conflict will be "broadcast", that is, put on the agenda. As public agendas in modern societies are decisively co-determined by media, such "broadcasting" also determines the chances of a conflict becoming an issue, that is, the subject of public concerns (Sponholz, 2016: 504).

Stanyer (2013: 104–105) would describe these events as 'critical moments', ones that focus attention on particular issues, because there are surrounding mediated discourses that further and progress that attention. Terminologies like these are more subtle than those on a more global scale, like what Dayan and Katz (1992) would describe as 'media events'. As a case study, the Dieudonné case inhabits an 'in-between' or *liminal* communicative space (Turner, [1969] 2008: 95), as a media controversy that challenges cultural notions of propriety and impropriety (Sponholz, 2016: 505), where from a methodological perspective it presents itself as a 'key incident' that offers something interesting to examine from a research point of view (Emerson, 2007: 439). The research questions of this article are: how do provocative speech acts in the creative realm test the boundaries of freedom of speech, and how do notions of nationhood, identity and diversity impact public debates about these provocative speech acts?

The data collected to approach these research questions consists of online articles and interview transcripts. Online articles about the Dieudonné case were collected from centre-right newspaper *Le Figaro* (315 articles), and centre-left newspaper *Le Monde* (201 articles), for 2013 and 2014. As quality press, these titles can be seen as a 'cultural authority', setting the stage for how events are examined and understood (Anderson, C.W., 2013: 166; 2008: 249), and as a 'moral arbitrator' (Dewey, 1927), based on their respective editorial decisions and approaches (Firmstone, 2008:

218–222). The selected newspapers also ‘have the high visibility of national organs that represent established, characteristic, political stances’ (Barnes and Larrivee, 2011: 2502), and they ‘are known to reflect the views of the French national elite on foreign and security policy issues’ (Hellman, 2011: 58). The sampling strategy involved randomising a numbered, chronological master list of the articles from each newspaper, and then selecting the first 25 that met three criteria: they had to be over eight sentences in length, they could not be news pieces but needed to be more developed articles, and Dieudonné needed to be mentioned at least three times. Interview transcripts were produced from ten in-person, semi-structured interviews conducted in Paris in 2015 with free speech stakeholders that consisted of activists, politicians, journalists, a lawyer, and a comedian. Interviews, as a qualitative method, allow for insight into how individuals perceive events and how they articulate these in a research context (Aberbach and Rockman, 2002: 673). The approach used here was through an ‘episodic interview’, where ‘everyday knowledge’ about the case study was shared (Bauer et al., 2000: 85). All interviews took place in Paris and seven core questions were asked in the interview schedule, covering broad opinions on freedom of speech, the Dieudonné case and creative boundaries, and how controversial topics are negotiated in a diverse context. Both English and French were spoken, and transcripts were directly translated into English for the French-language interviews. Participants were selected through a purposive sampling method (see **Table 1** for the participant overview).

The method of analysis for both the interview transcripts as well as the online articles is a qualitative method called Thematic Analysis, using NVivo as the software tool for textual analysis coding. Thematic Analysis (TA) offers an organic method of looking for emerging themes in a set of data, ones that are driven by the research context and literature. In other words, TA offers ‘a form of pattern recognition within the data, where emerging themes become the categories for analysis’ (Fereday and Muir-Cochrane, 2006: 82). As a qualitative method, TA offers the researcher the flexibility to adapt and revisit data through an iterative process of textual analysis that is driven by concepts (Braun and Clarke, 2006: 97, 740). The following findings examine first the media content, which encompasses a brief textual analysis of

**Table 1:** Participant Overview.

<b>Code</b>	<b>Gender</b>	<b>Organisation</b>	<b>Role</b>	<b>Type</b>	<b>Language</b>	<b>Duration</b>
F.01	F	Ligue des droits de l'Homme [ <i>Human Rights League</i> ]	Lawyer	Elite	French	00:30:12
F.02	F	Coordination contre le Racisme et l'Islamophobie [ <i>Coordination Against Racism and Islamophobia</i> ]	Activism	Civilian	French	01:11:15
F.03	M	Parti des indigènes de la République [ <i>The Party of the Indigenous of the Republic</i> ]	Activism	Civilian	French	00:35:52
F.04	F	Foundation for Ethnic Understanding	Activism	Civilian	French	00:37:46
F.05	M	l'Alliance Générale contre le Racisme [ <i>The General Alliance Against Racism</i> ]	Activism	Civilian	French	00:52:26
F.06	M	Front National [ <i>National Front</i> ]	Politics	Elite	French	01:10:12
F.07	F	Parti Socialiste [ <i>Socialist Party</i> ]	Politics	Elite	French	01:11:36
F.08	M	<i>The Guardian</i>	Journalist	Elite	English	00:31:12
F.09	M	<i>Le Monde</i>	Journalist	Civilian	French	01:09:14
F.10	F	Comedian	Artist	Elite	French	00:47:54



central themes and trends from within the sample, followed by the interview material, which encompasses a more in-depth textual analysis of the transcripts. The findings were categorised under two central themes, which are the topics of freedom of speech and its relationship with diversity, and exploring notions of inclusivity in relation to 'free speech events'. Selected extracts of the study of the media content are addressed in the first section, and selected extracts of the interview material are addressed throughout both sections.

### **Findings: Dieudonné Appealing as a Socially Divisive 'provocateur'**

The sample size for the media content consisted of 50 online newspaper articles, split between *Le Figaro* and *Le Monde*. In terms of authorship, 18 articles were written by journalists in the former, and 17 in the latter. The remaining authors were expert contributors from the academy or from key organisations. In a first phase of analysis, the central appeal and arguments of each were identified and grouped together. These included core areas such as the legal contentions and purported anti-Semitic nature of Dieudonné's comedic work, and the role of government getting involved in a 'free speech event'. The arguments of the articles were more nuanced, and were split between Dieudonné's comedic work and how this work related to wider social and cultural issues. The editorial line of each newspaper, based on the categories for analysis, was slightly in favour of discussions on then-Prime Minister Manuel Valls' involvement in the issue for *Le Figaro*, and wider cultural issues to do with Holocaust denial and social problems for *Le Monde*.

The focus in this article is on Dieudonné and his role as a 'provocateur', and how comedic play on social taboos played a role in appealing to an audience that is disillusioned with society. The coding for this showed strongly with the *Le Monde* articles, with 14 out of 25 articles coded here, and less strongly for the *Le Figaro* articles, with eight out of 25 articles coded here. What the articles showed is that Dieudonné used his web platform, the *dieudosphère*, to reach his audience [LM-099], as well as through his work and comedic acts at his venue at the time, *Le Théâtre de la Main d'or* in Paris, which was described as 'a little museum of provocations' [LM-028], where 'anything can be laughed at and talked about with everyone' [LM-057].

Through this work, Dieudonné was cited to create the setting for a present-day form of racism [LM-031], by 'becoming a professional of anti-Semitism', and appropriating his 'reputation as a humourist to create anti-Semitism and propagating it' [LF-015]. The performance of the '*quenelle*' was also discussed in the articles, particularly its spread through social media with photos of people performing it, sometimes at sites of remembrance and of worship. It was described as a 'rallying gesture' [LF-010], and its notoriety online demonstrated that as a notion, it 'was moving in France', with the 'discontent from people who think that they are not being listened to' [LF-121], and who were ignored by the polity [LM-022]. The way that Dieudonné's humour also played with anti-Zionism and a 'Palestinian cause' showed how it might appeal to 'young people from Arabo-Muslim culture' [LM-041], but that this could be a destructive force and 'a symptom of a nation on the path of disintegration' [LF-169], because of a 'revived anti-Semitism' [LM-024] and a 'post-colonial anti-Semitism' [LM-025]. Certainly, humour-making about the Holocaust was also a concern, in terms of how this might affect how young people think about it [LM-049], and a type 'indifference' and 'relativism' about the Holocaust in French classrooms at the time, as well as the broader dangers that this might pose to society, as seen here:

Holocaust denial falsifies all historical truth and it is totally delusional. No democratic political formation, whether from the left or the right, gives it any credence at the moment. Yet, Holocaust denial cannot be reduced to the level of an ideological aberration defended by a very small group: one must combat its toxicity because of its growing influence in society.<sup>2</sup> [LM-113]

Questions between a 'hard' Holocaust denial and a 'soft' Holocaust denial were posed, since the latter describes a 'minimisation, an under-estimation of the severity of genocides and the triumphal affirmation of racist opinions' [LM-032]. There was

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<sup>2</sup> 'Totalemment délirant, le négationnisme falsifie toute vérité historique. Aucune formation politique démocratique, qu'elle soit de gauche ou de droite, ne lui accorde aujourd'hui le moindre crédit. Pourtant, le négationnisme ne peut être réduit au rang d'une aberration idéologique défendue par un tout petit groupe : il faut en combattre la toxicité en raison de son influence croissante dans la société' (author's translation).

a time when discourses like these were associated with the extreme-right, and the likes of politician Jean-Marie Le Pen describing the Holocaust as a 'detail' in 1989 (Chrisafis, 2016), but in more recent times Dieudonné's humour reached different areas of society, with the controversy being described as being symptomatic of a 'period of social crisis and intellectual confusion' [LM-069]. Challenges to social cohesion were discussed [LF-298], and how Dieudonné's humour might serve as a reminder of a 'Republican heritage', but with the exercise of free speech, there is a need to 'distinguish between legitimate questioning from vehemence' [LF-260]. Here we segue to the interviews. Dieudonné was described in these as a 'provocateur' in various ways, from a journalist with the idea that he is 'promulgating defiance' of protective laws like the Gaysot Act [F.08], or from an activist who said he was an 'enemy of the State', who utilises 'intellectually vulnerable people in the Muslim community' to make money, but that politicians were also making him a scapegoat on the limits of free speech [F.04]. In this instance, however, another activist described how politicians were forgetting their audience and constituents, as well as the people who feel like they are being represented by Dieudonné [F.02]. This public was described by a journalist as an 'alternative public', which 'is not the same public that watches the news', and is 'another composite, misbegotten public that feels liberated by this speech', one which is 'not at all represented by the system', and one that harbours a particular rhetoric:

Dieudonné reveals both necessary things and unnecessary things in society. When he attacks taboos, he pulls people towards hateful speech that becomes a part of a cannon that then gets re-canonised into something that's a bit troublesome, a bit nauseating. That's why he's a little disturbing, since he has a fairly strong influence on a lot of people. He makes himself out to be a Robin Hood of freedom of expression with people in the *banlieues* [projects/estates]. [F.09]

As well as uniting people, Dieudonné's comedy was also seen to act as a divisive tool. A human rights lawyer thought that Dieudonné's work 'undermines living together', by tapping into an idea of a 'competitive victimhood' that places one group against

another [F.01]. One activist spoke about how Dieudonné 'de-integrates' people and compromises 'French values' by positioning different ethnic groups against one another [F.05]. Another activist thought that the French elite was out of touch about what was going on in society because:

They aren't capable of hearing that there are people who aren't exactly anti-Semitic when they listen to Dieudonné, but they like Dieudonné because he tells them: You see you don't have the voice, you're frustrated, you're like me, they don't let you speak, come to me, they don't look like you. [F.04]

Having an elite, of academics, politicians, and other forms of an establishment that do not represent the current makeup and demographics of French society meant that Dieudonné was able to use his platform to address an audience that felt misrepresented. A left-leaning politician spoke about a 'subculture', where:

One sees that he can fill stadiums in a way that's extremely— it shows that there is a type of subculture. There is an audience of people who do not believe anymore in the official discourse. Who are conspirers, who do not believe anymore the mainstream media and who are in a sort of underground sphere, which is very difficult to control. [F.07]

An aspect of this lack of control or contact with a given population was underscored by a radical activist, with the idea that society is changing:

There is an emergence of groups that take charge, who take public responsibility, who refuse integration *à la française*, who refuse assimilation and who are in the process of transforming France. France is in the process of transforming and this is a cultural reality. [F.03]

This resistance of having an alternative discourse of what it means to be a part of French society is where the issue of Dieudonné's comedic play of the Holocaust is situated, but it can also be twisted to provide a positive influence. An activist thought that the topic of the Holocaust must not remain taboo, because one should be able

to laugh at anything, and that with laughter, healing can take place [F.02]. Another participant, who is a comedian, described how humour can help diffuse tension when it concerns combative topics:

Humour de-dramatises and it de-sacralises. There are certain situations where one is so oppressed, that the only way to get out of it and to not go crazy, is with laughter. It's the only way to decompress, to make some distance in relation to a painful situation. [F.10]

Humour in this sense provides a strong communicative message. A right-leaning politician described how the use of satire and caricature is in many ways more 'efficient than a long political discourse' when it concerns certain topics, but that it also serves this positive function since:

There is a mania in France on individual thoughts, on the media, on the press, where we know there are some ideas that are hard to transmit, and humour and satire allow the debate to be lifted or opened when it's sometimes a little too closed in on itself. [F.06]

In this way, humour and satire break down barriers between people. An activist described how humour can serve as a way to bridge people and make topics more accessible by challenging social and cultural norms and taboos [F.04]. However, when it concerns areas that are more sensitive, a journalist thought that satire helps gives those a voice when they otherwise might not have it [F.08], but the play on taboo is also what makes humour and satire challenging and able to push the boundaries of what might be acceptable speech, as another journalist put it:

The only thing that's really corrosive and funny is what no one dares saying. That's what releases laughter, laughter is liberating, and one is not liberated by words one hears every day. [F.09]

Alternative discourses, however, must be offered in these instances, just as an activist highlighted:

If someone wants to say that the Shoah is a joke and that it didn't exist, he has the right to say it. If he wants to say that Islam is the most rotten religion of the world, he has the right to say it; but I have the right to give an alternative discourse. [F.04]

Alternative discourses in the sense used here then means that speech that incites a reaction, however extreme it might be, must be met with counter-speech that offers a different perspective on the issue. In this dialogue, a right-leaning politician thought that free speech must never be limited [F.06], however a left-leaning politician positioned this by thinking about the speaker, and their position in society, where 'who says what is important' and depending on the speaker, the dignity of the individual might be attacked [F.07]. Yet where does this leave us in a discussion on inclusivity and national cohesion?

### **Findings: Understanding Inclusivity and 'free speech events'**

In thinking about establishing the parameters of what might be acceptable speech when it concerns a perceived attack on a particular ethnic or religious group, we must also think about how and in what ways inclusivity, in 'free speech events' like the Dieudonné case, is negotiated when it concerns identity and what it means to belong. Here we continue with the interview material. A comedian spoke about how immigrants in the French context are always asked about their origins. She spoke about how, being from North Africa, she would always mention her country first, as opposed to answering that she was French, because then she would be asked about where she is 'originally from' [F.10]. This aspect of 'box-ticking' or placing people into their identities leads to what a journalist described as a 'fragmented identity' [F.08], where people have hybrid heritages. Making space for hybrid identities was what an activist described when she spoke about being a dual national with France and a North African country, but she stressed that she would not choose which came first nor would she want to be asked to choose [F.02]. This was something that a left-leaning politician thought was to the detriment of society, because this prevents

people from becoming true French citizens, rather than 'carriers of an identity or as representations of their communities':

I think we need to liberate people from their identity. They need to try to be nothing else in public life, nothing else other than French citizens. One arrives. One is here, and one becomes a citizen. One pays taxes and one participates in the public political life of the country. [F.07]

In being a 'carrier of an identity', there is the merging of an idea of culture with religion, and marginalisation takes place because of the need to separate political (and public) life with cultural (and private) life. A journalist thought that even with this, there is a legacy in France that French Jews, as a group, have often served as a scapegoat in society [F.08], which legitimises others' feelings of relegation. Here, a human rights lawyer stated that:

There is in France an old background of anti-Semitism that we are not able to extinguish. It affects what certain people call French *de souche*, French people who are French for an extremely long time, and there is an anti-Semitism which affects populations with immigrant origins, if they are from Maghreb origins or, to a lesser degree, the populations of African origin. [F.01]

This form of historical resentment was what a journalist described as historical 'culpabilities' [F.09], and an activist stressed how in this process of culpabilities, special protections are offered to one group but not offered to the other [F.04]. The lines are drawn between the powerful and the powerless, who are not offered these same protections:

The line between freedom of expression and defamation or insult or propagation of racist ideas is very thin. And who sets the line? Well power. And power is not necessarily neutral. It is never neutral. [F.04]

This lack of neutrality described what a human rights lawyer thought was the practice of a double standard between those with a voice, and those without:

Double standards here mean that we, when we are Arab or black, when we express ourselves, we are reprimanded, when the Jews are not. So, I say these things very simply, it's very violent to hear, that's what double standards mean, which is an enormous problem, because furthermore anti-Semitic acts have not stopped increasing. All this creates a very bad climate between people of different origins and of different religions, and all of this attacks how we go about living together. [F.01]

How members of society are meant to live together is also dependent on how historical narratives such as the Holocaust are taught and remembered. Participants described these realities as not being understood by young people, such as how the events of World War II are taught in high schools [F.07]. Given how important the Holocaust is, there is then the idea that there is a type of over-saturation of remembrance, and a lack of personal connection with the material being taught because:

It's not their history. They weren't there. They have another history which is colonisation, slavery, and they think too much about that. Every week there is coverage on the Shoah, it's too much. It nourishes a frustration that could transform into anti-Semitism. [F.09]

This frustration also feeds into negative coverage of Muslims and Islam in the media. An activist thought that because of these perceived discriminations and the way in which the media 'forges a public opinion', mainstream society reinforces certain prejudices:

The "little Frenchman" at home says: My God another Muslim, they are all the same. Where no, it's not true. And, for example, the attacks at *Charlie Hebdo*, the two boys who did the attack, they are boys of Arab origin but they grew up in the foster system because their parents were dead. When we said: Yes, it's them, they are of Arab origin— well it's not important that



they are of Arab origin, they are French and so it was the French system that failed them. [F.02]

This aspect of failure is counteracted with what another participant described as a frustration towards a perceived threat of immigrants, and a 'cultural insecurity', a term introduced by French academic Laurent Bouvet (2015), that is tied to certain frustrations with national conditions. A left-leaning politician elaborated:

There are people who have a feeling of relegation, and at the same time concern about the preservation of their way of life. They have strong claims of community and identity along with an economic insecurity and fragility. That's to say: I live in Seine-et-Marne, because I can't live in Paris. I have two children, I don't have financial means, I am then going to exile myself to the outer zone. I can't travel without a car, because public transport doesn't go to my place. My children take the train to school, it's far. My car will get stolen. I will find myself relegated. On top of that I'm a victim of delinquency and criminality. There is a crisis of passion, and in this crisis of passion one can have the feeling that it's the immigrant who's responsible, because he will, without doing anything, receive financial support where I pay taxes, and I don't have a library, I don't have a cinema next to my place, and on top of that the transport is a hassle, the RER doesn't work. So, these people can have a feeling at some point that the other person is a threat, and they go for the extreme vote, because they are fed up. It's a feeling of relation to a world that is changing. [F.07]

The solution, the participant stressed, was the need to re-examine how progressive integration might take place:

These communities need to integrate and assimilate into the national community, and they have at each time re-interrogated our way of living, re-interrogated the framework in which the national community is evolving. [F.07]

Yet she also acknowledged the particular challenges that certain religious communities might face, and needed to be 'responded to collectively':

It's true that today, there are challenges with Islam. I firmly think that Muslims need to be helped to organise a French Islam, which can adapt Islam's practices, adapt its calendars, to life in France, for the very large majority of Muslims who will be inspired to be French citizens. And to be inspired to be French citizens entirely. Without being stigmatised, without flipping the finger all the time. For us the challenge is the integration and assimilation of these populations. I think that everyone can live in an equal way but in return there are improvements to be made. [F.07]

The social and political model that is set by *laïcité* needed to be reassessed, without so much focus on religion and religious symbols, because, as a comedian put it, '*laïcité* is about respecting other people's religions' [F.10]. A right-leaning politician thought, however, that the 'French model', which he described as 'a French history, a French tradition that is on unity and cohesion of a free people' needed to steer clear of a hybridised, cosmopolitan composition because:

Multiple cultures are not made for collective life. Before the idea of living together there is the idea of knowing how to live, from only one and the same culture, and not from several. We can have an opening to the world but if we mix everything, if all the cultures are together, then we lose an individual identity and an individual culture. [F.06]

A left-leaning politician thought that there is a sort of 'glorification' of diversity, which needs to be responded to politically [F.07]. So, in terms of the discussion here, there is the merging of a type of pluralism, in the form of multiple ethnicities and religions, that is paired with a pluralism of voices, opinions, and a fundamental right to express opinions that might offend others when it concerns cases like the Dieudonné case, which together address a sensitive national dialogue on French culture, history, and national cohesion.

## Conclusion

What the Dieudonné case study shows is that communicative contexts in the cultural realm are continuously able to challenge the boundaries of acceptable speech, as well as provide a space for the negotiation and re-examination of which social and cultural values are important, not only to inclusivity and the sharing of national values, but also to free expression and pluralistic debate about what those limits might be. Dieudonné's comedy act called *Le Mur* (The Wall), as well as his fun-making and allusions to the Holocaust, showed how 'free speech events' and 'media controversies' inform and shape discourses of free expression, cultural memory and offensive content, but also how controversies like the Dieudonné case discursively shape concepts like nationhood, inclusivity, and representation. Yet, at the same time, it also created a counter-discourse within a demographic that does not share the same senses of outrage, as demonstrated by a national context where there are portions of the population that do not share the same national history and heritage, and where moral infractions of the Jewish community as a group with legal protections, are countered by the lack of representation and acknowledgement of the Muslim community as a group which, to date, does not have legal protections. The Dieudonné case, and the conversations that arose out of the controversy, therefore showed to what extent there are discrepancies between a political reality that separates religious identity with civic identity, and a cultural reality where ethnic and religious identity are a part of everyday life.

Perspectives on the issue, through thematic findings, were articulated in this paper based on a textual thematic analysis of 50 online newspaper articles from centre-right *Le Figaro* and centre-left *Le Monde*, and transcripts from ten in-person, semi-structured interviews conducted in Paris in 2015 with free speech stakeholders that consisted of activists, politicians, journalists, a lawyer, and a comedian. The textual thematic analysis of the online articles showed that Dieudonné appealed to his audience as a socially divisive 'provocateur', who successfully tapped into the frustrations of an audience through his comedy about the Holocaust, but in turn re-ignited the national dialogue about historical memory and the ramifications of Holocaust denial. The textual thematic analysis of the interview transcripts

elaborated on the 'provocateur' aspect of Dieudonné's comedy, through discussions on how his comedy threatened integration and acted as catalyst for further social divisions. While this was sometimes seen by participants in a negative light, in the form of themes of relegation and disillusionment, this was also seen in a positive light, where through the act of counter-discourse, specific minority groups were able to articulate their positions and affirm their places in a society that is changing. The analysis suggests the importance of sites of counter-publics and how these might help to develop a more in-depth understanding of controversies like the Dieudonné case, when 'free speech events' test what we think is acceptable speech, in relation to the society in which we live, but also in relation to giving voice to those who are sometimes not heard.

In summary, the findings illustrate to what degree the Dieudonné case acted as a national provocation, but also to what degree the case showed tensions and frustrations as communities situate themselves in a national context that is diversifying and reconciling with a heritage that includes the trauma of World War II, as well as a heritage that includes a postcolonial legacy. Future investigations on similar media controversies that address tensions about race, religion, and ethnicity, through creative and communicative forms like comedy, will help to shed light on how diversifying nations address challenges with integration, as their cultural, racial, and ethnic demographics engage in discourses and counter-discourses on the parameters of free expression, integration, and mutual rights to recognition.

### **Ethics and Consent**

Application form number PVAR 14-003 was submitted for ethical review in August 2014 to the University of Leeds Faculty Research Ethics Committee for the Faculty of Arts, Humanities and Cultures, and was approved in September 2014. This was in keeping with appropriate protocol on informed consent for interview participants.

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## Competing Interests

The author has no competing interests to declare.

## Primary Sources

### *Analysis Sample List*

Le Figaro (LF)

1. [LF-010]  
Jarrassé, J. 2013. L'armée va sanctionner deux militaires pour un geste réputé antisémite [The army will sanction two soldiers for a reputed anti-Semitic gesture]. 10 September 2013 at 20:56. *Le Figaro (Société)*. [Online]. [Accessed 9 January 2015]. Available from: <http://www.lefigaro.fr/actualite-france/2013/09/10/01016-20130910ARTFIG00810-l-armee-va-sanctionner-deux-militaires-pour-un-geste-repute-antisemite.php>
2. [LF-015]  
Joseph, M. 2013. La viralité de la «quenelle» de Dieudonné continue d'inquiéter [The virality of the Dieudonné's 'quenelle' continues to worry]. 16 December 2013 at 17:52. *Le Figaro (Société)*. [Online]. [Accessed 9 January 2015]. Available from: <http://www.lefigaro.fr/actualite-france/2013/12/16/01016-20131216ARTFIG00533-la-viralite-de-la-quenelle-de-dieudonne-continue-d-inquieter.php>
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Gonzalès, P. 2013. Dieudonné : le casse-tête de l'interdiction [Dieudonné: the headache of prohibition]. 30 December 2013 at 15:16. *Le Figaro (Société)*. [Online]. [Accessed 10 January 2015]. Available from: <http://www.lefigaro.fr/actualite-france/2013/12/29/01016-20131229ARTFIG00127-dieudonne-le-casse-tete-de-l-interdiction.php>

5. [LF-053]  
Joseph, M. 2013. «Quenelle» : ces personnalités qui font marche arrière [‘Quenelle’:thesepeoplestepbackwards]. 31 December 2013 at 09:39. *Le Figaro (Société)*. [Online]. [Accessed 10 January 2015]. Available from: <http://www.lefigaro.fr/actualite-france/2013/12/31/01016-20131231ARTFIG00225-quenelle-ces-personnalites-qui-font-marche-arriere.php>
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Leclerc, J.-M. 2014. Manuel Valls vise Dieudonné au portefeuille [Manuel Valls aims for Dieudonné’s wallet]. 3 January 2014 at 19:29. *Le Figaro (Société)*. [Online]. [Accessed 10 January 2015]. Available from: <http://www.lefigaro.fr/actualite-france/2014/01/03/01016-20140103ARTFIG00478-manuel-valls-vise-dieudonne-au-portefeuille.php>
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8. [LF-096]  
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9. [LF-110]  
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- lefigaro.fr/actualite-france/2014/01/08/01016-20140108ARTFIG00302-la-meilleure-reponse-a-dieudonne-c-est-le-dedain.php
10. [LF-113]  
Jarrassé, J. 2014. Dieudonné : la méthode Valls ne fait pas l'unanimité au PS [Dieudonné: Valls' method does not create unity at the PS]. 8 January 2014 at 13:04. *Le Figaro (Politique)*. [Online]. [Accessed 10 January 2015]. Available from: <http://www.lefigaro.fr/politique/2014/01/08/01002-20140108ARTFIG00351-dieudonne-la-methode-valls-ne-fait-pas-l-unanimite-au-ps.php>
  11. [LF-121]  
Bellec, M. 2014. Pourquoi les commentaires pro-Dieudonné sont si nombreux [Why there are so many pro-Dieudonné comments]. 8 January 2014 at 19:14. *Le Figaro (Société)*. [Online]. [Accessed 10 January 2015]. Available from: <http://www.lefigaro.fr/actualite-france/2014/01/08/01016-20140108ARTFIG00539-pourquoi-les-commentaires-pro-dieudonne-sont-si-nombreux.php>
  12. [LF-136]  
Boyer, V. and Torossian, S. 2014. Liberté d'expression : qui décide de ce qui peut se dire ? [Freedom of expression: who decides what can be said?]. 9 January 2014 at 15:33. *Le Figaro (Mon Figaro)*. [Online]. [Accessed 3 July 2014]. Available from: <http://www.lefigaro.fr/mon-figaro/2014/01/09/10001-20140109ARTFIG00495-liberte-d-expression-qui-decide-de-ce-qui-peut-se-dire.php>
  13. [LF-142]  
Cukierman, R. 2014. Le difficile mais nécessaire combat contre Dieudonné [The difficult but necessary battle against Dieudonné]. 9 January 2014 at 17:47. *Le Figaro (Mon Figaro)*. [Online]. [Accessed 3 July 2014]. Available from: <http://www.lefigaro.fr/mon-figaro/2014/01/09/10001-20140109ARTFIG00506-le-difficile-mais-necessaire-combat-contre-dieudonne.php>

14. [LF-146]  
Leclerc, J.-M. 2014. Les autres procédures judiciaires de Dieudonné [Dieudonné's other legal proceedings]. 9 January 2014 at 18:18. *Le Figaro (Société)*. [Online]. [Accessed 10 January 2015]. Available from: <http://www.lefigaro.fr/actualite-france/2014/01/09/01016-20140109ARTFIG00574-les-autres-procedures-judiciaires-de-dieudonne.php>
15. [LF-152]  
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