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Positive Rhetoric, Prejudiced Policy:
The Contradiction of Islamophobia in American Government after 9/11

By
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and
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Abstract

Following the tragic terrorist attacks on September 11, 2001, local and national leaders responded to the security crisis by uniting the country under the American ideals of freedom and democracy while condemning the Islamic terrorist group responsible. With beliefs rooted in historical American and European prejudice, Western scholarship promoted a “clash of civilizations” between Islam and the West wherein the cultures’ supposed irreconcilable differences would inevitably lead to warfare. Simultaneously, many Americans grew suspicious of Muslims after the attacks, including government officials. As hate crimes against Muslim and Middle Eastern Americans soared in the U.S., government leaders used positive rhetoric to discourage violence and further unite the country’s citizens. At the same time, however, these leaders implemented discriminatory policy and law enforcement practices like the U.S. Patriot Act that disproportionately targeted Muslim immigrants and citizens from Muslim-majority countries in the name of counterterrorism. These Islamophobic sentiments and policies have only continued to grow under the Bush, Obama, and Trump administrations, with hate crimes and anti-Muslim sentiment once again skyrocketing in 2016. This powerful disconnect between governmental rhetoric and policy has allowed for decades-long discrimination against Muslim and Middle Eastern citizens to continue to this day.

Lay Summary

This thesis explores the contradiction within the American government between rhetoric and policy regarding Muslim and Middle Eastern communities as well as people perceived to be a member of either group. After the tragic terrorist attacks on 9/11, Islamophobic hate crimes soared across the U.S. To discourage this trend, Presidents Bush and Obama as well as local leaders like Mayors Giuliani and Bloomberg established positive, inclusive rhetoric about the religion of Islam. However, these same leaders instituted or oversaw discriminatory policy that specifically targeted the Muslim and Middle Eastern community for surveillance, tracking, and detention. With recent instability in the Middle East and renewed suspicion of Islam and its relation to terrorism, President Trump established cohesive and Islamophobic rhetoric and policy which continues to influence public opinion and widespread discrimination against Muslim people in the United States.

Background

On September 11, 2001, nearly three thousand people lost their lives in the deadliest terrorist attack on American soil. Perpetrated by the Islamic extremist group al-Qaeda based in Afghanistan, four commercial airplanes were hijacked. Two were flown into the North and South Towers of the World Trade Center in New York City, instantly killing hundreds, setting the towers on fire, and causing the buildings to eventually collapse on trapped employees as well as police, fire, and rescue first responders. The third plane flew into the headquarters of the United States Department of Defense at the Pentagon, killing one hundred eighty-four people. The fourth plane, intended for the White House, was overtaken by passengers who crashed the aircraft in Pennsylvania, resulting in the death of all forty passengers.¹ This attack was unlike anything the United States had ever experienced. Using civilians as targets, the 9/11 attacks saw more lives lost than the bombing of Pearl Harbor in 1941. The smoldering rubble of the towers and posters for missing people buried in the debris remained in the heart of the country's most populated city for months after the attacks and served as a daily reminder of the tragedy. Beyond the residents of New York City and Washington D.C. who witnessed the events firsthand, millions of people worldwide watched the attacks through television footage and news coverage. People across the country and around the world felt the overwhelming grief and terror that now plagued the United States.

¹ There are many sources detailing the tragic terrorist attacks on September 11, 2001 including: Noam Chomsky, *9/11: Was there an alternative?* (Crawley, W.A.: University of Western Australia, 2011).

Marc Redfield, *The Rhetoric of Terror: Reflections on 9/11 and the War on Terror* (New York, NY: Fordham University Press, 2009).

David Holloway, *9/11 and the War on Terror* (Edinburgh: Edinburgh University Press, 2008).

Thomas H. Kean and Lee Hamilton, *The 9/11 Commission Report* (Washington D.C.: National Commission on Terrorist Attacks upon the United States, 2004).

In response to this national tragedy, American patriotism soared as millions rallied in support of New York City and Washington D.C., donating blood for those who were injured and sending relief packages to the cities most affected. President George W. Bush's approval rating skyrocketed from 55% to 90% in the days following 9/11, the highest figure ever recorded for a U.S. president. Likewise, Congress held the highest approval rating ever recorded at 84%, shattering the previous record of 57%.² The victims of the attacks were viewed as martyrs for the American ideals of democracy and freedom, as many paid tribute to those lost with the haunting phrase, "Never Forget." In President Bush's Address to the Nation on September 11, 2001, the President asserted, "America was targeted for attack because we're the brightest beacon for freedom and opportunity in the world. And no one will keep that light from shining. Today, our nation saw evil – the very worst of human nature – and we responded with the best of America."³ When the United States government declared that al-Qaeda was responsible for the attacks, Americans responded by preparing themselves to fight the War on Terror against Islamic extremists.

However, many people suffered from the ensuing widespread targeting of the Middle Eastern and Muslim communities in response to the terrorist attacks. Although political leaders like President George W. Bush, Attorney General John Ashcroft, the members of Congress, and New York Mayors Rudy Giuliani and Michael Bloomberg initially crafted positive rhetoric that distinguished Muslim citizens from terrorists, they simultaneously instituted discriminatory policy against Muslim and Arab civilians. Adhering to long held, dangerous Western

² David W. Moore, "Terrorism Most Important Problem, But Americans Remain Upbeat," Gallup.com (Gallup, October 18, 2001), <https://news.gallup.com/poll/4996/terrorism-most-important-problem-americans-remain-upbeat.aspx>.

³ George W. Bush, "Statement by the President in His Address to the Nation," The White House: President George W. Bush (National Archives and Records Administration, September 11, 2001), <https://georgewBush-whitehouse.archives.gov/news/releases/2001/09/20010911-16.html>.

misconceptions about the Islamic theology and Middle East region, both local and national leaders enforced discriminatory surveillance and policing practices with the intent to specifically monitor Muslim citizens. Under tremendous pressure, fear, and grief, American leaders sought to protect the country by any means necessary, at the expense of Muslim, Arab, Southeast Asian, and Sikh civilians. Thus, the unique historical Western perception of Islam paired with the socio-political context of fear cultivated a contradiction of governmental rhetoric condemning Islamophobia and the simultaneous institution of discriminatory policy against Arabs and Muslims. Although these prejudiced laws remain largely unchanged, presidential and local rhetoric today have transformed from peaceful and respectful to overwhelmingly negative and hateful. This transition has only aided in the steady rise of hate crimes against American Muslims since 9/11. Ultimately, the impending security crisis superseded the American government's initial positive rhetoric and led to the implementation of Islamophobic policy which continues to negatively impact the American view of Islam today.

Subsequently, as the country came together in an unprecedented display of national unity after 9/11, Muslim Americans became victims of widespread racial and religious profiling, government surveillance, and Islamophobic hate crimes. While still grappling with the devastating loss of the 9/11 attacks and the looming threat to U.S. security, all eyes were fixed on Islam. Hate crimes against Muslims, Arabs, and people perceived to be in either group skyrocketed in the U.S. as suspicion permeated throughout the country.⁴ While many government officials were careful to distinguish between extreme Muslim terrorist groups and the peaceful religion of Islam in their rhetoric, these same officials oversaw the implementation

⁴ Ryan D. Byers; James A. Jones, "The Impact of the Terrorist Attacks of 9/11 on Anti-Islamic Hate Crime," *Journal of Ethnicity in Criminal Justice* 5, no. 1 (2007): 43-56, 44.

of policy that disproportionately affected Muslim and Arab citizens and dismantled their civil liberties. This rising animosity and distrust for the Muslim faith, called Islamophobia, has only continued to rise beyond the immediate aftermath of 9/11. Now, almost twenty years later, Islamophobic rhetoric and hate crimes have surpassed the 2001 level.⁵

According to Mark Bleich, “Islamophobia can best be understood as indiscriminate negative attitudes or emotions directed at Islam or Muslims.”⁶ Unfortunately, many of the Islamophobic policies and hate crimes following 9/11 also targeted Middle Eastern people, specifically Arabs, because of the region’s association with Islam. Although the territory referred to in the term “Middle East” is often generalized and disputed, for the purpose of this essay, the definition of Middle East outlined by geopolitical scholar Karen Culcasi is used to reference the geographical areas of Afghanistan, Algeria, Cyprus, Egypt, Iran, Iraq, Jordan, Lebanon, Libya, Sudan, Syria, Turkey, the West Bank and Gaza Strip and the various territories in Arabia including Saudi Arabia, Kuwait, Yemen, Oman, Bahrain, Qatar, and United Arab Emirates.⁷ Because the American perspective groups Arab people and Muslim theology together, many Middle Eastern Christians, people of South Asian descent, Sikhs, and others that outwardly displayed racial or cultural similarities to the Americanized stereotype of Arabic Muslims became targets of Islamophobic discrimination and hate crimes despite not being members of the religion. For example, many cases of Islamophobic discrimination and harassment targeted women in hijabs and men in turbans, presumably because of the association between the

⁵ Katayoun Kishi, “Assaults against Muslims in U.S. Surpass 2001 Level,” Pew Research Center (Pew Research Center, November 15, 2017), <https://www.pewresearch.org/fact-tank/2017/11/15/assaults-against-Muslims-in-u-s-surpass-2001-level/>.

⁶ Erik Bleich, “Defining and Researching Islamophobia,” *Review of Middle East Studies* 46, no. ii (2012): pp. 180-189, <https://www.jstor.org/stable/41940895>, 182.

⁷ Karen Culcasi, “Constructing and Naturalizing the Middle East,” *Geographical Review* 100, no. 4 (October 2010): pp. 583-597, <https://www.jstor.org/stable/25741178>.

religious and regional garments with Islam and Arabia respectively.⁸ According to Ryan D. Byers and James A. Jones, there was a 1,600% surge in anti-Islamic hate crimes following 9/11 when compared to the 2000 FBI data.⁹ Furthermore, 27.2% of all hate crimes in 2001 targeted Muslims, compared to only 0.035% in 2000.¹⁰ While this alarming trend diminished after the first eight weeks post-9/11, the frequency of hate crime perpetrated against Muslims never returned to its previous low level.¹¹ It is important to note that these statistics only reflect FBI and police data when many Islamophobic crimes went and still go unreported. Moreover, these crimes range from vandalism, workplace discrimination, and harassment to violent assaults. In an extreme case, on September 15, 2001 in Mesa, Arizona, a Sikh man named Balbir Singh Sodhi was shot and killed by a man who had earlier told friends he was “going to go out and shoot some towel-heads.”¹² Obviously a premeditated hate crime, the perpetrator had misidentified Sodhi as a Muslim because he was wearing a turban in accordance with his Sikh beliefs. It was also reported that the killer had shot at the home of an Afghan family and a store owned by a Lebanese man.¹³ In New York City, many taxi drivers were harassed and assaulted because of their ethnicity; numerous reports indicated that bystanders and law enforcement officials did not intervene or try to stop the incidents.¹⁴

As these bias-induced crimes continue twenty years later, it is important to understand where the American, and by extension European, fear and distrust of Islam originates. Looking

⁸ Human Rights Watch, “‘WE ARE NOT THE ENEMY’: Hate Crimes Against Arabs, Muslims, and Those Perceived to be Arab or Muslim after September 11,” 14, no. 6 (G) (November 2002), 15.

⁹ Byers and Jones, “The Impact of the Terrorist Attacks of 9/11,” 44.

¹⁰ *Ibid.*, 48.

¹¹ *Ibid.*, 53.

¹² Anita Snow, “Correction: Sikh Killed-Anniversary Story,” AP News (Associated Press, September 15, 2019), <https://apnews.com/article/f1fd15e5440c478d99472f18cc0e00a6>.

¹³ *Ibid.*

¹⁴ “Civil Rights Implications of Post-September 11 Law Enforcement Practices in New York,” New York Advisory Committee to the U.S. Commission on Civil Rights, New York, 2004, 8.

at modern scholarly work that predates 9/11, much of the discourse surrounding Islamic history as well as Middle Eastern political relations with the United States demonstrates a simplistic view of Islam. Several scholars go so far as to pit ‘Western’ ideology against the Muslim religion to predict a “clash of civilizations” in which the seemingly incompatible views of Middle Eastern Muslims would violently oppose the U.S., thereby creating an “us” vs. “them” narrative within the United States and Western Europe.¹⁵ This concept of a “clash of civilizations” subscribes to the idea that war and conflict between Muslims and Americans is inevitable because of the irreconcilable differences in ideology, culture, and religion between the two groups. Of course, one obvious problem with this idea is that millions of Muslims currently reside in the United States, and millions more around the world support freedom, democracy, and the other ideals Americans hold sacred. Still, scholars like Bernard Lewis and Samuel P. Huntington describe Islam in direct opposition with the United States as innately separate and deeply divided entities.

Specifically, in Bernard Lewis’s article “The Roots of Muslim Rage” first published in *The Atlantic* in 1990, the prominent scholar of Islam created a clear dichotomy between the United States and Islam as he speculated on the reason for longstanding U.S. tensions with the Middle East.¹⁶ He wrote, “But Islam, like other religions, has also known periods when it inspired in some of its followers a mood of hatred and violence. It is our misfortune that part, though by no means all or even most, of the Muslim world is now going through such a period, and that much, though again not all, of that hatred is directed against us.”¹⁷ Here, Lewis invoked a division between the United States and the Muslim world, even using “us” to refer to the United States. Although he was careful to not overly generalize about Muslims around the world,

¹⁵ Samuel P. Huntington, *The Clash of Civilizations and the Remaking of World Order* (New York, NY: Touchstone, 1996).

¹⁶ Bernard Lewis, “The Roots of Muslim Rage,” *Policy* 17, no. 4 (2001): pp. 17-26.

¹⁷ *Ibid*, 17.

Lewis still used strong language and indicated a one-sided hatred directed at the U.S. from Muslims. He went on to say, “At times this hatred goes beyond hostility to specific interests or actions or policies or even countries and becomes a rejection of Western civilizations as such, not only what it does but what it is, and the principles and values that it practices and professes. These are indeed seen as innately evil, and those who promote or accept them as the ‘enemies of God.’”¹⁸ In this excerpt, Lewis set Western values against Muslim theology, making them seem inherently incompatible. More specifically, in discussing the U.S.’s relationship with Middle Eastern countries, Lewis stated that since the U.S. represented power, wealth, freedom, justice, opportunity, and success, “America had become the archenemy, the incarnation of evil, the diabolic opponent of all that is good, and specifically, for Muslims, of Islam.”¹⁹ Finally, Lewis coined the infamous phrase saying, “This is no less than a clash of civilizations – perhaps irrational but surely historic reaction of an ancient rival against our Judeo-Christian heritage . . .”²⁰ As the predominant framework for viewing Middle Eastern and U.S. relations before 9/11, this divisive and reductive understanding of the Muslim belief system only fueled Islamophobic sentiment in the United States and divided the country against its Muslim citizens who eventually were perceived as outside enemies. Lewis was influential not only in theory but in policy as well; he served as an adviser on foreign policy and Middle Eastern relations to President Bush, Vice President Cheney, and Defense Secretary Rumsfeld.²¹

Of course, Lewis was not alone in this ideology. Famed political scientist Samuel P. Huntington posited similar ideas in his *The Clash of Civilization and the Remaking of World*

¹⁸ Lewis, “Roots of Muslim Rage,” 18.

¹⁹ Ibid, 19.

²⁰ Ibid, 26.

²¹ Douglas Martin, “Bernard Lewis, Influential Scholar of Islam, Is Dead at 101,” *The New York Times* (*The New York Times*, May 21, 2018), <https://www.nytimes.com/2018/05/21/obituaries/bernard-lewis-islam-scholar-dies.html>.

Order. Meant to be a framework for viewing global relations and safeguarding against world war, Huntington separated the modern world into distinct civilizations with the West on one extreme end and Islam on the other.²² Like Lewis, Huntington placed Western beliefs in direct contrast to Islamic theology. In discussing the Islamic Resurgence in the Middle East beginning in the 1970s, Huntington stated, “The general failure of liberal democracy to take hold in Muslim societies is a continuing and repeated phenomenon for an entire century beginning in the late 1800s. This failure has its source at least in part in the inhospitable nature of Islamic culture and society to Western liberal concepts.”²³ Here, Huntington suggested that Muslim rejection of Western ideals like democracy is due to an inherent and irreconcilable difference between the two entities. Huntington argued this idea further saying, “Some Westerners, including President Bill Clinton, have argued that the West does not have problems with Islam but only with violent Islamist extremists. Fourteen hundred years of history demonstrate otherwise. The relations between Islam and Christianity, both Orthodox and Western, have often been stormy. Each has been the other’s Other.”²⁴ Citing historic conflict between Muslims and Christians dating back to the Crusades, Huntington brings up a significant idea of “other.” With the clear dichotomy between West and East, Christian and Muslim drawn in Western scholarship, a contentious division of “us” vs. “them” emerges. Following 9/11, this idea of a stark and uncompromising division between Islam and the United States led to the “othering” of Muslim citizens and contributed to the resulting prejudiced policy and Islamophobic discrimination faced by millions of Muslim Americans. Huntington’s words also made a direct enemy of Islam as a religion, rather than the individuals that subscribe to fringe extreme interpretations of Islam who were

²² Huntington, *The Clash of Civilizations*.

²³ *Ibid*, 114.

²⁴ *Ibid*, 209.

responsible for terrorist attacks and other violent interactions with the U.S. This dangerous concept only aided in American resentment and misunderstanding of Islam. Reinforcing this idea, Huntington outright said, “The underlying problem for the West is not Islamic fundamentalism. It is Islam, a different civilization whose people are convinced of the superiority of their culture and are obsessed with the inferiority of their power.”²⁵ Despite the innate similarities between Islam and Christianity as monotheistic religions that recognize the sanctity of Old Testament scripture and teachings, Huntington insisted that the Christian West was incompatible with Muslim countries in the East.

These ideas of division expressed by Lewis and Huntington were reflected in the American public’s view of Islam in the years following 9/11. First, the majority of Americans agreed with the scholars’ proposed dichotomy of Muslim and Christian religious beliefs. For example, Princeton Survey Review Associates found that 60% of Americans in June 2003 believed their religion was “very different” from Islam.²⁶ Additionally, around 40% of Americans believed that the 9/11 terrorist attacks reflected the “true teachings of Islam” “to a great degree” or “to some degree” between September 2001 and June 2002, despite numerous Islamic associations and mosques condemning the attacks and terrorism altogether.²⁷ Moreover, Lewis and Huntington’s statements regarding the perceived Islamic threat to Western civilization were echoed by the American public in various polls. The Chicago Council on Foreign Relations reported that since 1994, over 33% of Americans viewed Islamic fundamentalism as a “critical threat” to U.S. interests with a significant spike to 61% in 2002.²⁸ When asked if the Muslim

²⁵ Huntington, *The Clash of Civilizations*, 217.

²⁶ Costas Panagopoulos, “Trends: Arab and Muslim Americans and Islam in the Aftermath of 9/11,” *Public Opinion Quarterly* 70, no. 4 (2006): pp. 608-624, 618.

²⁷ *Ibid.*

²⁸ *Ibid.*, 619.

world considers itself at war with the U.S., 71% of Americans answered “yes” in March 2002.²⁹ Finally over 70% of Americans polled by CBS believed it was likely that the war in Afghanistan would lead to a larger conflict between Western and Muslim countries.³⁰ Clearly, Lewis and Huntington’s ideas about Western and Islamic division and inherent conflict was not limited to the academic sphere as a majority of Americans subscribed to the same belief system following 9/11.

While some Islamic scholars like Lewis and Huntington and the general American public focused on what they viewed as incompatible belief systems between Islam and the U.S., several academics criticized this argument for its simplicity and reduction of Islam into a monolith. Instead, many chose to follow Edward Said’s argument in his work *Orientalism* against the predominant ideas in Western scholarship of Islam. Said defined the field of “Orientalism” as the study of the East by Western scholars who base their understanding on European ideas, preconceived notions, and the West’s relation to the East. More specifically he wrote, “The Orient is not only adjacent to Europe; it is also the place of Europe’s greatest and richest and oldest colonies, the source of its civilizations and languages, its cultural contestant, and one of its deepest and most recurring images of the other. In addition, the Orient has helped to define Europe (or the West) as its contrasting image, idea, personality, experience.”³¹ Here, Said flipped Lewis and Huntington’s argument, saying that Europe has always set itself in contrast with Eastern society. Said went on to recognize how the prevailing, simplistic, and European-based ideas about the East have been spread saying:

Orientalism, therefore, is not an airy European fantasy about the Orient but a created body of theory and practice in which, for many generations, there has been a considerable material investment. Continued investment made Orientalism, as a system of knowledge

²⁹ Panagopoulos, “Trends: Arab and Muslim Americans,” 620.

³⁰ Ibid, 621.

³¹ Edward Said, *Orientalism* (London: Routledge & Kegan Paul Ltd., 1978), 9-10.

about the Orient, an acceptable grid for filtering through the Orient into Western consciousness, just as the same investment multiplied – indeed made truly productive – the statements proliferating out from Orientalism into the general culture.³²

Prominent scholars, thinkers, and writers have perpetuated the idea of the Orient, therefore policy, behavior, and public opinion is rooted in the same ideology and rarely questioned. Again, Said reversed Huntington’s troubling argument that the Islamic world’s perceived animosity toward the U.S. stems from their feelings of superiority by writing the opposite, “Orientalism is never far from what Denys Hay has called the idea of Europe, a collective notion identifying ‘us’ Europeans as against all ‘those’ non-Europeans, and indeed it can be argued that the major component in European culture is precisely what made that culture hegemonic both in and outside Europe: the idea of European identity as a superior one in comparison with all the non-European peoples and cultures.”³³ In this excerpt Said identified the European othering of the East and the resulting tension of European perceived superiority. Finally, Said recognized and worked to dispel the monolith of Islam that Lewis and Huntington readily engaged in saying, “Thus the history of Orientalism has both an internal consistency and a highly articulated set of relationships to the dominant culture surrounding it . . . there has never been such a thing as a pure, or unconditional, Orient.”³⁴ In this way, Said criticized the simplistic, unitary Western view of Islam and acknowledged the complex and diverse reality of the “Orient.”

Furthermore, Edward Said wrote a scathing response to both Lewis and Huntington’s clash of civilizations model shortly after 9/11 in his article entitled, “The Clash of Ignorance.”³⁵ He criticizes, “Certainly neither Huntington nor Lewis has much time to spare for the internal dynamics and plurality of every civilization, or for the fact that the major contest in most modern

³² Said, *Orientalism*, 14.

³³ *Ibid*, 15.

³⁴ *Ibid*, 30-1.

³⁵ Edward Said, “The Clash of Ignorance,” *The Nation*, October 4, 2001, <https://www.thenation.com/article/archive/clash-ignorance/>.

cultures concerns the definition or interpretation of each culture, or for the unattractive possibility that a great deal of demagoguery and downright ignorance is involved in presuming to speak for a whole religion or civilization.”³⁶ Taking issue with the oversimplification and generalizations that both scholars assert about the West and Islamic world as monolithic civilizations, Said points out the authors’ oversight of the plurality of both the West and Islam.

Most contemporary data support Said’s nuanced interpretation of Islam and disprove the stance of Lewis, Huntington, and the American public in their singular view of a complicated religion with diverse membership. For example, the prevailing Western association of Muslims with the Middle East region, specifically Arab people, is inaccurate. In fact, according to the Pew Research Center, only 20% of the world’s Muslims live in the Middle East or North Africa, while 62% live in Asia or the Pacific Islands.³⁷ Furthermore, Muslims around the world, like Christians and other religious groups, do not necessarily share the same religious interpretation or practices. For example, within Islam, there is a 1,400 year-old divide between Sunni and Shi’ite Muslims dating back to a dispute over Muslim leadership following the death of the prophet Muhammad.³⁸ While practically all Muslims adhere to a belief in one God, the teachings of the prophet Muhammad, and the importance of religious rituals, e.g. fasting during the holy month of Ramadan, the global population is divided on the public adoption of sharia law, an Islamic legal code which will be discussed in further detail later.³⁹ In relation to terrorism in the name of Islam, however, a vast majority of Muslims around the world denounce violence against civilians.⁴⁰ For example, Pew Research Center characterized Muslim views of the terrorist group

³⁶ Said, “The Clash of Ignorance.”

³⁷ Michael Lipka, “Muslims and Islam: Key Findings in the U.S. and around the World,” Pew Research Center (Pew Research Center, August 9, 2017), <https://www.pewresearch.org/fact-tank/2017/08/09/Muslims-and-islam-key-findings-in-the-u-s-and-around-the-world/>.

³⁸ Ibid.

³⁹ Ibid.

⁴⁰ Ibid.

ISIS as “overwhelmingly negative.”⁴¹ Although the United States and Europe have perpetuated the idea of a singular Islamic belief system focused on hatred of the West and have narrowed the regional scope of Islam to the wide and diverse Middle East, Muslims around the world present differing beliefs and generally disagree with the terrorist acts committed by Islamic extremists.

Moreover, within the United States specifically, the Muslim population is racially and ethnically diverse with varied commitment to the religion. Of Muslim immigrants living in the U.S. in 2017, 35% are South Asian, 25% are Middle Eastern or North African, and 23% are from the Asia-Pacific.⁴² While 41% of all U.S. Muslims are white (including people of Middle Eastern descent), 28% are Asian and 20% are Black.⁴³ As for religious identification, 55% of U.S. Muslims are Sunni and 16% are Shi’ite, while the remaining 29% identify with neither group.⁴⁴ Pew also found that “Muslims in the U.S. are roughly as religious as U.S. Christians,”⁴⁵ with varying degrees of devotion across the population. 82% of Muslims in the United States are American citizens, and 75% believe there is significant discrimination against Muslims in the United States, with 48% having experienced at least one incident of discrimination in the year 2016.⁴⁶ Still, despite the pervading stereotypes and disproportional number of hate crimes directed at members of the Islamic faith that have persisted since 9/11, 92% of U.S. Muslims answered that they are proud to be American.⁴⁷

⁴¹ Lipka, “Muslims and Islam.”

⁴² “Demographic Portrait of Muslim Americans,” Pew Research Center’s Religion & Public Life Project (Pew Research Center, July 26, 2017), <https://www.pewforum.org/2017/07/26/demographic-portrait-of-Muslim-americans/>.

⁴³ Ibid.

⁴⁴ Lipka, “Muslims and Islam.”

⁴⁵ Ibid.

⁴⁶ “Demographic Portrait of Muslim Americans.”

⁴⁷ Ibid.

Although the Westernized monolith of Islam and its association with the Middle East is unfounded in data, both the American public and government adhered to these ideas following 9/11. Even though many government officials like President Bush and members of the U.S. Congress attempted to alleviate tension between the American public and Muslim citizens with calls for religious tolerance, the United States government simultaneously enacted law enforcement policy and created legislation throughout the past two decades that target Muslim and Arab Americans. Imbued with this skewed Westernized perception of Islam, the American public as well as government officials succumbed to prejudice and discrimination against a religion and region the nation has struggled to understand for centuries.

Local

On a local level, the New York City governmental response to the September 11 terrorist attacks balanced antidiscrimination remarks with inflammatory policy. Mayor Rudy Giuliani simultaneously praised New York's Muslim and Arab communities at public events while allowing the New York Police Department (NYPD) to establish a covert intelligence unit that promoted spying on Muslim neighborhoods and mosques.⁴⁸ Similarly, Mayor Michael Bloomberg touted diversity initiatives and his relationships with prominent Muslims in the community during his time as mayor and even signed an NYPD antidiscrimination bill, all the while establishing and overseeing the police department's domestic surveillance units that racially and religiously targeted Arabs and Muslims.⁴⁹

⁴⁸ Matt Apuzzo and Adam Goldman, "With CIA Help, NYPD Moves Covertly in Muslim Areas," NBC New York (Associated Press, August 24, 2011), <https://www.nbcnewyork.com/news/local/with-cia-help-nypd-moves-covertly-in-muslim-areas/1926933/>.

⁴⁹ Eileen Sullivan, "AP IMPACT: NYPD Spied on City's Muslim Anti-Terror Partners and Allies of Mayor Bloomberg," Associated Press, October 5, 2011, https://www.pulitzer.org/files/2012/investigative_reporting/ap/nypd5.pdf.

On October 1, 2001, just a few weeks after the World Trade Center collapsed, Mayor Giuliani addressed the United Nations General Assembly Special Session on Terrorism. In his speech, Giuliani spoke to the strength and resilience of New York while urging for UN action against the terrorist group responsible for the attack. He was also careful to acknowledge the large population of Muslims and Arabs living in New York. He stated, “We have very strong and vibrant Muslim and Arab communities in New York City. They are an equally important part of the life of our city. We respect their religious beliefs.”⁵⁰ Here, Giuliani recognized the contribution of Muslims to the city, distinguishing between the radical religion practiced by al-Qaeda and the traditionally peaceful Islamic faith practiced by millions of Muslims in the United States and abroad. Furthermore, Mayor Giuliani referred to the racial and religious discrimination Muslim and Arab citizens faced in the immediate aftermath of 9/11 by saying, “I’ve urged New Yorkers not to engage in any form of group blame or group hatred.”⁵¹ Again Giuliani distinguishes between Muslims as a religious group, Arabs as people descending from a region in the Middle East, and the Muslim Arab terrorists. In his words, the mayor does not put blame on Arab or Muslim communities simply because of their vague group associations. Finally, in the conclusion of his speech, Rudy Giuliani dispels the idea of inevitable violence between conflicting Eastern and Western belief systems by saying, “Surrounded by friends of every faith, we know this is not a clash of civilizations.”⁵² Significantly, Giuliani used the phrase first put forth by Bernard Lewis in “The Roots of Muslim Rage” at the same time it was gaining traction around the world as reasoning behind the terrorist attacks. As Giuliani addressed 189

⁵⁰ Rudolph W. Giuliani, “Address to the United Nations General Assembly on Combatting Terrorism,” Archives of Rudolph Giuliani, 107th Mayor - Major Addresses, accessed November 16, 2020, http://www.nyc.gov/html/records/rwg/html/2001b/un_remarks.html.

⁵¹ Ibid.

⁵² Ibid.

countries in the General Assembly of the United Nations, including 56 member nations in the Organisation of Islamic Cooperation,⁵³ and 21 member nations in the League of Arab States,⁵⁴ which together contain 46 Muslim majority countries, he emphasized that cultural differences do not necessarily constitute warfare between Islamic and Christian societies or Western and Eastern regions. Giuliani's address to the UN contained careful, precise language to ensure that blame not be placed on peaceful Muslims and Arabs for the terrorist attacks and to maintain goodwill among the members of the General Assembly.

After Mayor Giuliani's term ended, Michael Bloomberg was inaugurated New York City's 108th mayor on January 1, 2002, just three and a half months after 9/11.⁵⁵ Like his predecessor, Mayor Bloomberg constructed a careful public image as an ally of the Muslim community. For example, in July 2004, Bloomberg signed a law prohibiting the NYPD from engaging in racial profiling. In his public address at the signing ceremony, Mayor Bloomberg stated, "Racial profiling will not be tolerated in our city . . . New York City is home to eight million people of every race, ethnicity, and religion from all over the world."⁵⁶ Here, Bloomberg attempted to go beyond former Mayor Giuliani's rhetoric and instituted policy to protect not only Muslims and Arabs, but all minority citizens in New York. However, legal experts have criticized the law, citing vague, unenforceable language. The law provides the definition of police racial profiling as follows: "an act of a member of the force of the police department or other law enforcement officer that relies on race, ethnicity, religion or national origin as the

⁵³ "Member States," Organisation of Islamic Cooperation: The Collective Voice of the Muslim World (Organisation of Islamic Cooperation), accessed November 16, 2020, <https://www.oic-oci.org/states/?lan=en>.

⁵⁴ "Arab League," Encyclopedia Britannica (Encyclopedia Britannica, inc.), accessed November 16, 2020, <https://www.britannica.com/topic/Arab-League>.

⁵⁵ "Inauguration Ceremony of the 108th Mayor, Michael R. Bloomberg," Inauguration Speech by Michael Bloomberg, January 1, 2002, <http://www.nyc.gov/html/om/html/inaug02.html>.

⁵⁶ Justin Elliott, "NYC's Anti-Profiling Law: 'Not Worth Paper It's Written On'," ProPublica, March 2, 2012, <https://www.propublica.org/article/nycs-anti-profiling-law-not-worth-paper-its-written-on>.

determinative factor in initiating law enforcement action against an individual, rather than an individual's behavior or other information or circumstances that links a person or persons of a particular race, ethnicity, religion or national origin to suspected unlawful activity.”⁵⁷ Critics of this definition say it is too vague and accuse the policy of not establishing consequences for violations of the law. However, on the surface, the law appears to correct unjust and discriminatory policing in New York City. Like Giuliani before him, Mayor Bloomberg reached out to Arab and Muslim communities in New York City and tried to unify the city against the backdrop of hate crimes targeting Muslims across the country.

Although Mayor Rudy Giuliani and his successor Mayor Michael Bloomberg made positive remarks about the diversity of New York and the value of Muslim and Arab contributions to the city through their respective public addresses to the community, the two mayors oversaw the implementation of specialized NYPD intelligence units that specifically targeted Muslim and Arab New Yorkers. The NYPD discrimination story was broken by the Associated Press with a series of articles written from August through December of 2011 which earned authors Matt Apuzzo, Adam Goldman, Eileen Sullivan, and Chris Hawley the 2012 Pulitzer Prize in Investigative Reporting.⁵⁸ In their second article published August 24, 2011, Apuzzo and Goldman state, “A months-long investigation by The Associated Press has revealed that the NYPD operates far outside its borders and targets ethnic communities in ways that would run afoul of civil liberties rules if practiced by the federal government. And it does so with unprecedented help from the CIA in a partnership that has blurred the bright line between foreign and domestic spying.”⁵⁹ This accusation is grounded in investigative work and interviews with

⁵⁷ Elliot, “NYC’s Anti-Profiling Law.”

⁵⁸ “The 2012 Pulitzer Prize Winner in Investigative Reporting,” The Pulitzer Prizes, accessed November 16, 2020, <https://www.pulitzer.org/winners/matt-apuzzo-adam-goldman-eileen-sullivan-and-chris-hawley>.

⁵⁹ Apuzzo and Goldman, “With CIA Help.”

over forty current and former NYPD and federal officials, many of whom were directly involved in establishing and performing the surveillance. The reports uncovered decade-long NYPD procedure that included sending undercover officers into Muslim and Arab communities without indication of criminal behavior and writing detailed surveillance logs of Muslims and Arabs living in New York, all of which began under the mayoral tenure of Rudy Giuliani even before the World Trade Center fell on September 11, 2001.⁶⁰

The NYPD's official surveillance operation began with the hiring of the department's first civilian intelligence chief David Cohen in January 2002.⁶¹ Cohen had previously served in the Central Intelligence Agency (CIA) for thirty-five years.⁶² Since a 1985 lawsuit ruled that the NYPD must have "specific information" of criminal activity to warrant surveillance, the department was limited in how they could legally monitor citizens in order to prevent terrorism. In September 2002, Cohen asked the court to amend the regulation saying it made detecting terrorist plots "virtually impossible" and argued that the Federal Bureau of Investigation (FBI) had changed its procedure in response to the 9/11 attacks and the NYPD should be granted the same leniency.⁶³ He wrote, "In the case of terrorism, to wait for an indication of crime before investigating is to wait far too long."⁶⁴ U.S. District Judge Charles S. Haight Jr. agreed, citing a new judiciary context and public safety concern. In turn, Cohen committed the department to following FBI investigative guidelines.

With these looser regulations, Cohen transformed the NYPD's intelligence unit. Using census data, undercover officers called "rakers" were employed in ethnic neighborhoods and told

⁶⁰ Apuzzo and Goldman, "With CIA Help."

⁶¹ Ibid.

⁶² Ibid.

⁶³ Ibid.

⁶⁴ Ibid.

to observe the people, businesses, and area around them. Known as the Demographic Unit, this operation was undisclosed by the NYPD and only became public knowledge upon the release of the Associated Press series in 2012. “Rakers” monitored different areas in predominantly Muslim and Arab communities for indicators of radicalization or terrorism. They focused on a list of twenty-eight countries as “ancestries of interest” – almost all of which have strong ties to Islam.⁶⁵ When pressed for comment by the Associated Press, the NYPD spokesman Paul Browne denied the existence of the unit and instead referred to the Zone Assessment Unit assigned to areas deemed susceptible to terrorist sympathies, but Browne insisted the police department only followed leads and did not spy on the neighborhoods without specific cause.⁶⁶ However, testimony from a Bangladeshi New York police officer in a 2006 trial that convicted a man for plotting a terrorist attack revealed that officers were instructed to “act like a civilian – hang out in the neighborhood, gather information.”⁶⁷ Following police protocol after 9/11, NYPD officers mapped out ethnic neighborhoods and collected information on people based solely on their perceived race, ethnicity, and religion. It is worth noting that similar surveillance programs targeting Muslim communities have been enacted in the United Kingdom since the creation of the CONTEST counter-terrorism program in early 2003.⁶⁸ For example, in the Prevent phase of the strategy, U.K. policing and military authorities continue to infiltrate Muslim communities, obtain information, and analyze susceptibility to terrorist sympathies through publicly funded events and organizations targeting mosques and youth groups.⁶⁹ These examples of domestic

⁶⁵ Adam Goldman and Matt Apuzzo, “Inside the Spy Unit That NYPD Says Doesn't Exist,” NBC New York (Associated Press, August 31, 2011), <https://www.nbcnewyork.com/news/local/nypd-spy-terrorism-Muslim-cia/1927513/>.

⁶⁶ Apuzzo and Goldman, “With CIA Help.”

⁶⁷ Ibid.

⁶⁸ Parliamentary reports for the year included counter-terrorism strategy (Parliament. House of Commons, 2009).

⁶⁹ Fahid Qurashi, “The Prevent Strategy and the UK 'War on Terror': Embedding Infrastructures of Surveillance in Muslim Communities,” *Palgrave Communications* 4, no. 17 (2018), <https://doi.org/10.1057/s41599-017-0061-9>.

surveillance of Muslim and Arab communities perpetrated by the United States and the United Kingdom demonstrate a broad Western suspicion of Islam after 9/11.

In addition, the NYPD developed a Terrorist Interdiction Unit to find and handle informants. Interviews with officers and police documents showed that Cohen stationed a disproportionate number of officers in a Pakistani neighborhood and instructed them to find a reason to stop cars, i.e. speeding, running stop signs, broken tail lights, etc. to give the officers the opportunity to search for outstanding warrants or suspicious behavior. Once in police custody, the officers would then leverage the arrest to obtain new informants in Muslim neighborhoods. In other instances, informants were recruited from Muslim prisoners who were promised better conditions and money upon release if they provided information to the police. One extreme example of informant recruitment occurred when the NYPD asked the city's taxi commission to run a report on all Pakistani cab drivers for fraudulent license to pressure them to become informants. Called "mosque crawlers" in interviews, these civilian informants attended services at mosques across the city and reported church activity including information about imams and attendees to police. Again, the NYPD spokesman denied using mosque crawlers, despite testimony from a police informant in court saying that "he attended hundreds of prayer services and collected information even on people who showed no signs of radicalization."⁷⁰ Despite protection from the first amendment, Muslims were monitored in their place of worship by the NYPD through heavily recruited mosque crawlers.

Apuzzo and Goldman also reported on NYPD activity outside of New York City. Some officers were appointed as federal marshals so they could work outside of city limits. An undercover squad of NYPD officers known as the Special Services Unit operated in New Jersey,

⁷⁰ Apuzzo and Goldman, "With CIA Help."

Pennsylvania, and Massachusetts although they could not make arrests outside New York jurisdiction.⁷¹ Other NYPD officers had been stationed in eleven foreign cities.⁷² Moreover, in August 2003, local police were given permission by the federal government to enforce immigration law, which had previously been treated as civil rather than criminal law.⁷³ Many of members of the NYPD were granted federal privileges and security clearance, effectively blurring the line between federal and local law enforcement.⁷⁴

With help from informants as well as undercover officers in New York and elsewhere, analysts within the department compiled a report on every mosque within one hundred miles of New York City to determine the likelihood of terrorist infiltration of a particular community. In total, the NYPD collected information on over two hundred fifty mosques, thirty-one Muslim student associations, and numerous community bookstores, restaurants, and other local businesses. Many were under surveillance for criminal activity, but others were monitored for little more than religious discrimination. For example, a Bangladeshi restaurant was identified as an area of interest because of its “devout crowd.”⁷⁵ Observing customer religious affiliation and identifying a high level of devotion as a reason for suspicion was just one instance of the NYPD profiling Muslim citizens. Of the Islamic establishments monitored by officers, seven Muslim student associations were marked “MSAs of concern”⁷⁶ while fifty-three mosques were labeled as “mosques of concern” for reasons varying from money laundering and radical teachings of

⁷¹ Apuzzo and Goldman, “With CIA Help.”

⁷² Ibid.

⁷³ “Civil Rights Implications,” New York Advisory Committee, 4.

⁷⁴ Ibid.

⁷⁵ Apuzzo, Matt, and Adam Goldman. “Documents: NYPD Gathered Intelligence on 250-plus Mosques, Student Groups in Terrorist Hunt.” Associated Press. Associated Press, September 6, 2011.

https://www.pulitzer.org/files/2012/investigative_reporting/ap/nypd3.pdf.

⁷⁶ Chris Hawley and Matt Apuzzo, “AP Enterprise: Schools Raise Privacy Concerns over NYPD Spying on Muslim Students,” Associated Press, October 11, 2011,

https://www.pulitzer.org/files/2012/investigative_reporting/ap/nypd6.pdf.

extreme Salafism to more vague concerns like “rhetoric.”⁷⁷ For example, two mosques were identified for ties to a one-thousand-year-old Egyptian mosque called Al-Azhar, a prominent establishment among Sunni Muslims around the world and one of the first religious institutions to condemn the 9/11 terrorist attacks.⁷⁸ In fact, President George W. Bush’s advisor Karen Hughes met with the head of the institution in 2005 during her tour of the Middle East which aimed to align the region with the United States against extremism.⁷⁹ Al-Azhar also hosted President Obama in 2009 for his address uniting the Muslim world with the U.S.⁸⁰ Despite its long established friendly relationship with the United States, mosques with ties to Al-Azhar were marked as potential terrorist threats to the nation for vague and unclear reasons.

Furthermore, the diversity and friendship with Muslim leaders that Mayor Bloomberg emphasized in his mayoral tenure did not give the Islamic figures exemption from NYPD surveillance. The Associated Press reported that two mosques in Queens that had previously been monitored by the NYPD were promoted as “destination options” to emphasize the city’s diversity in a 2009 city planning brochure for a bike tour route.⁸¹ Although the NYPD under Bloomberg had been collecting information on these mosques, they were later deemed safe enough to tout as a political tokenization of New York’s “celebration” of diversity. Moreover, the mosques included in the undercover operations of the NYPD had been publicly visited by Mayor Bloomberg where he met with leaders he deemed allies in the fight against terrorism.⁸² As summarized by Eileen Sullivan of the Associated Press, “The dichotomy between simultaneously

⁷⁷ Apuzzo and Goldman, “Documents: NYPD Gathered Intelligence.”

⁷⁸ Ibid.

⁷⁹ Parvez Ahmed, “Karen Hughes Gets an Earful, but Is Her Boss Listening?,” Media Monitors Network (MMN), October 5, 2005, <https://www.mediamonitors.net/karen-hughes-gets-an-earful-but-is-her-boss-listening/>.

⁸⁰ Barack Obama, “President Obama Speaks to the Muslim World from Cairo, Egypt,” National Archives and Records Administration (National Archives and Records Administration, June 4, 2009), <https://obamawhitehouse.archives.gov/issues/foreign-policy/presidents-speech-cairo-a-new-beginning>.

⁸¹ Eileen Sullivan, “AP IMPACT: NYPD Spied:”

⁸² Apuzzo and Goldman, “Documents: NYPD Gathered Intelligence.”

being partner and suspect is common among some of New York's Muslims."⁸³ Despite Mayor Bloomberg's public allyship with Muslim leaders, he allowed NYPD officers to monitor their mosques without cause and infiltrate their communities with informants.

Additionally, the NYPD monitored Muslims in the New York City area by tracking name changes. In 2008 the department requested official information regarding name changes from state court officials who claimed it was all public information and that they were unaware of how the police were using it.⁸⁴ Despite a federal court order restricting background checks unless police had information suggesting criminal activity, the NYPD selected names to undergo background checks. Associated Press reporters found from police records that over 65% of the people investigated for name changes had Arabic sounding names, even though officers were allegedly told to include American sounding names so that the department could not be accused of profiling.⁸⁵ All of the names were catalogued by NYPD for future use, even if the background checks were clear.⁸⁶ This act is especially troubling, since in the aftermath of 9/11, many Muslim and Arab citizens decided to change their names to avoid the widespread discrimination and hate crimes being perpetrated against those perceived to be from either group. However, those Muslim and Arab citizens seeking refuge from discrimination were then investigated and logged by NYPD for having ethnic-sounding names in the first place.

Although Mayors Giuliani and Bloomberg included positive and inclusive rhetoric about Arab and Muslim New Yorkers while simultaneously overseeing the New York Police Department institute discriminatory investigative and surveillance policies in the years

⁸³ Sullivan, "AP IMPACT: NYPD Spied."

⁸⁴ Matt Apuzzo and Adam Goldman, "NYPD Keeps Secret Files on Muslims Who Change Their Names to Sound More American: Report," [nydailynews.com](https://www.nydailynews.com/new-york/nypd-secret-files-Muslims-change-names-sound-american-report-article-1.968327) (Associated Press, October 26, 2011), <https://www.nydailynews.com/new-york/nypd-secret-files-Muslims-change-names-sound-american-report-article-1.968327>.

⁸⁵ Ibid.

⁸⁶ Ibid.

immediately following 9/11, they have both defended their policies as well as the actions of the NYPD in more recent years in a continued showing of hypocrisy. For example, at the Republican National Convention on July 18, 2016, Rudy Giuliani spoke carefully about 2016 terrorist attacks linked to Islamic extremism stating, “It is Islamic extremist terrorism. I did not say all of Islam. I said Islamic extremist terrorism. Failing to identify them properly maligns decent Muslims around the world.”⁸⁷ Rhetorically speaking, Giuliani maintained a polished and thoughtful outlook on terrorism as it relates to Islam even fifteen years after the 9/11 attacks. However, Giuliani directly contrasted his rhetorical position the next night in an interview with the Intercept on July 19, 2016, where he claimed responsibility without remorse for overseeing the NYPD’s expanded discriminatory practices, going so far as to take credit for dismantling first amendment protections even earlier than the Associated Press initially reported. He said, “I was the mayor who put police officers in mosques, in New York and New Jersey. We did it for the eight years I was mayor. After the 1993 bombing of the World Trade Center by Islamic extremist terrorists from New Jersey, I did it in early January of 1994.”⁸⁸ Despite his remarks in 2001 asserting that he “respected their religious beliefs,” Giuliani demonstrated little reverence for Muslims or first amendment protections in the Constitution as practicing Muslims worshipped alongside undercover police officers citywide during his tenure as mayor.

Similarly, former Mayor Bloomberg has defended the NYPD’s surveillance techniques following 9/11 under his administration. In an interview on John Gambling’s radio show on WOR radio in 2012, Bloomberg said, “Everything the NYPD has done is legal, it is appropriate, it is constitutional. They are permitted to travel beyond the border of New York City to

⁸⁷ Alex Emmons, “Rudy Giuliani Brags About Treating All Muslims Like Criminal Suspects,” The Intercept, July 20, 2016, <https://theintercept.com/2016/07/20/rudy-giuliani-brags-about-treating-all-Muslims-like-criminal-suspects/>.

⁸⁸ Ibid.

investigate cases . . . We don't target individuals based on race or religion. We follow leads.”⁸⁹

Like the NYPD spokesman, Bloomberg stuck to the argument that NYPD “followed leads” and did not “target individuals based on race or religion” despite overwhelming evidence that the department aggressively monitored Muslim and Arab neighborhoods and investigated several mosques solely for their religious affiliations. Once again Mayor Bloomberg defended his and the NYPD’s response to 9/11 during his 2020 presidential campaign. In an interview with PBS NewsHour on February 13, 2020, Bloomberg explained:

We sent some officers into some mosques to listen to the sermon that the imam gave. We were very careful. And the authorities that looked at us said, yes you complied with the law. But we had every intention of going every place we could legally to get as much information to protect this country. We had just lost 3,000 people at 9/11. Of course we're supposed to do that. There were some imams who publicly at that time were urging terrorism. And so of course that's where you gonna [sic] go. That does not, incidentally mean that all Muslims are terrorists or all terrorists are Muslims. But the people who flew those airplanes came from the Middle East.⁹⁰

Here, like Giuliani, Bloomberg is careful to distinguish between Muslims and terrorists despite the NYPD policies that did not grant the same distinctions. Additionally, since the city of New York has settled several lawsuits over NYPD surveillance of Muslim and Arab citizens resulting in the removal of certain information gathered by the intelligence unit,⁹¹ the legality of NYPD policy remains murky at best although the city and its police department have never admitted to violating any law or any wrongdoing as it pertains to their intelligence unit.

⁸⁹ Tina Moore, Rocco Parascandola, and Corky Siemaszko, “Mayor Bloomberg Defends NYPD Spying on Muslims Calling It Legal, Appropriate and Constitutional,” *nydailynews.com* (New York Daily News, January 10, 2019), <https://www.nydailynews.com/news/mayor-bloomberg-defends-nypd-spying-Muslims-calling-legal-constitutional-article-1.1028022>.

⁹⁰ Bobby Allyn, “‘We're Supposed To Do That': Bloomberg Defends NYPD's Spying Of Muslims After 9/11,” NPR (NPR, February 28, 2020), <https://www.npr.org/2020/02/27/810181314/we-re-supposed-to-do-that-bloomberg-defends-nypd-s-spying-of-Muslims-after-9-11>.

⁹¹ Syed Farhaj Hassan, The Council of Imams in New Jersey, Muslim Students Association of the U.S. and Canada, Inc., All Body Shop Inside and Outside, Unity Beef Sausage Company, Muslim Foundation Inc., Moiz Mohammed, Jane Doe, Zaimah Abdur-Rahim, and Abdul-Hakim Abdullah v. The City of New York, 2:12-CV-3401 (WJM)(MF), 7 (United States District Court District of New Jersey).

While the ethics and constitutionality of NYPD procedure post-9/11 has proven controversial, Mayor Bloomberg spoke to an essential point in this interview. New York City lost three thousand people in a single morning. The 9/11 terrorist attacks left a brutal scar on the country, particularly in New York City. According to the University of Connecticut Center for Survey Research and Analysis, around 40% of Americans in 2002 and 2003 believed that the government should have the power to monitor Muslims.⁹² Like the NYPD, many Americans agreed with police departments' policies of sweeping, targeted surveillance of Muslims in response to the attacks on September 11, 2001. Although by 2012 NYPD officers and community members could acknowledge the hypocrisy and discrimination taking place in public institutions in New York City, they were still a grieving and terrified city for over a decade after the attacks. Demonstrated through the actions of their mayors, New York, and by extension the rest of the United States, was overwhelmingly in support of protection and security from terrorism even at the cost of civil liberties. Although they superficially praised the diversity of their city, New Yorkers embraced any policy to counter terrorism, even those that threatened the freedom of their community. On a local level and at the heart of the devastating loss on 9/11, New York responded to the 9/11 attacks with positive rhetoric through its mayoral addresses but prejudiced policy under its police department.

National

The hypocrisy of local government establishing Islamophobic policy with positive language toward Muslims post-9/11 is also reflected on the national level. In 2001, members of Congress, the President, and the Attorney General of the United States condemned hate crimes and discrimination against Muslim and Middle Eastern Americans within the very legislation

⁹² Panagopoulos, "Trends: Arab and Muslim Americans," 622.

that targeted the groups. From the controversial Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism Act of 2001 (U.S.A Patriot Act) to FBI training and counterterrorism procedure, federal officials created, approved, and enacted harmful, discriminatory policy under the guise of national security while publicly denouncing Islamophobia after the 9/11 terrorist attacks.

First, one of the most egregious and widely criticized policies instituted after 9/11, the Patriot Act allowed federal law enforcement less restrictions on conducting surveillance, obtaining warrants, and detaining suspects of terrorist activity.⁹³ Hastily passed by the Senate and House of Representatives and signed by President Bush just forty-five days after 9/11, the act received overwhelming support in both chambers of Congress with a single vote against it in the Senate.⁹⁴ Although the Patriot Act resulted in largescale discrimination against U.S. Muslims, the law ironically begins with a broad condemnation of prejudice against Arab and Muslim Americans.⁹⁵ Section 102 of the law reiterates the Constitutional rights of “Arab Americans, Muslim Americans, and Americans from South Asia,” praises many Muslims as national heroes in the midst of the terrorist attacks, and unequivocally denounces the acts of violence targeting these groups and “those who are, or perceived to be, of Arab or Muslim decent” in the wake of 9/11.⁹⁶ The section concludes that the “civil rights and civil liberties of all Americans, including Arab Americans, Muslim Americans, and Americans from South Asia, must be protected and that every effort must be taken to preserve their safety.”⁹⁷ Despite the efforts of the bill authors to

⁹³ U.S. Congress, *Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism (U.S.A Patriot Act) Act of 2001*, H.R. 3162, 107th Cong., 1st sess., signed into law October 26, 2001, <https://www.congress.gov/107/plaws/publ56/PLAW-107publ56.pdf>.

⁹⁴ “Roll Call Vote 107th Congress - 1st Session,” (United States Senate, October 25, 2001), https://www.senate.gov/legislative/LIS/roll_call_lists/roll_call_vote_cfm.cfm?congress=107&session=1&vote=00313.

⁹⁵ *Ibid.*

⁹⁶ *Ibid.*

⁹⁷ *Ibid.*

invoke a sense of inclusion with Muslim citizens, the passing of the Patriot Act has led to heightened suspicion of Islamic religious practices and the widespread violation of Muslim and Middle Eastern Americans' civil liberties.⁹⁸ As stated by Islamic scholar Geneive Abdo, "The act, written in response to the September 11 attacks, in theory applies to all citizens, but it was written with Muslims in mind and in practice denies them their civil liberties by empowering law enforcement authorities to raid their homes, offices, and mosques in the name of the war on terrorism."⁹⁹ Organizations like Amnesty International, Human Rights Watch, the Americans Civil Liberties Union (ACLU), and the Council on American-Islamic Relations (CAIR) as well as Middle East and legal scholars have criticized the Patriot Act for the broad authority granted to federal law enforcement in preventing terrorism and its disproportionate effect on those perceived to be Muslim or Middle Eastern.¹⁰⁰ According to CAIR, 42% of complaints filed to the organization by Muslims after 9/11 were the result of profiling at the hands of federal law enforcement like the FBI and various agents with the Department of Homeland Security (DHS) as well as Transportation Security Administration (TSA) officials at airports.¹⁰¹ Before the passing of the Patriot Act, the organization received few complaints from Muslims regarding mistreatment based on ethnic or religious profiling.¹⁰² Moreover, the complaints filed in wake of the Patriot Act included "not only security-centered scrutiny but also public humiliation, raids by government agents on Muslim homes and businesses, detention and interrogation of Muslims, as

⁹⁸ Kam C. Wong, "The U.S.A Patriot Act: A Policy of Alienation," *Michigan Journal of Race and Law* 12 (2006): pp. 161-202.

⁹⁹ Geneive Abdo, "Islam in America: Separate but Unequal," *The Washington Quarterly* 28, no. 4 (2005): pp. 7-17, 12.

¹⁰⁰"The U.S.A Patriot Act: Impact on the Arab and Muslim American Community," Institute for Social Policy and Understanding, 2004, <https://www.ispu.org/the-usa-patriot-act-impact-on-the-arab-and-muslim-american-community/>.

¹⁰¹ Ibid.

¹⁰² Ibid.

well as closure of several Muslim charities.”¹⁰³ One instance of religious discrimination occurred in New Jersey’s Bernards Township when the Planning Board blocked the construction of a mosque citing zoning issues that applied to mosques but not synagogues or Christian churches since Muslim services were predominantly on Fridays.¹⁰⁴ The Department of Justice later uncovered emails between board members filled with Islamophobic ideas.¹⁰⁵ For instance, one member wrote, “As a religion, Islam owes its size and influence to a tradition from Day 1 of forced conversions through violent means.”¹⁰⁶ Subscribing to an unfounded and outdated view of Islam’s largely peaceful spread, this New Jersey township showcased the worst of backward Western ideology and the manipulation of policy to discriminate against Muslim communities. In the end, since terrorist threats were associated with the Middle East and Islamic religion, many innocent Muslims became suspects of terror to law enforcement and the American public at large, which in turn made Muslims the main victims of the Patriot Act’s suspension of civil liberties.

Like Congress, the U.S. Department of Justice issued statements denouncing Islamophobia and racial profiling while also instituting federal regulations that targeted nonimmigrants from predominantly Muslim countries. Published in 2003 after decades of “stop and frisk” and other racially motivated policies, the Department of Justice (DOJ) issued a “Fact Sheet” on racial profiling claiming to ban and abolish racial profiling in the American justice system.¹⁰⁷ As stated by Attorney General John Ashcroft on February 28, 2002, “This

¹⁰³ “The U.S.A Patriot Act,” Institute for Social Policy and Understanding.

¹⁰⁴ Jim Dwyer, “New Jersey Town Used Zoning to Discriminate Against Islam,” *The New York Times* (*The New York Times*, May 23, 2017), <https://www.nytimes.com/2017/05/23/nyregion/new-jersey-town-zoning-discriminate-islam.html>.

¹⁰⁵ *Ibid.*

¹⁰⁶ *Ibid.*

¹⁰⁷ “Fact Sheet: Racial Profiling,” Department of Justice (Department of Justice, June 17, 2003), https://www.justice.gov/archive/opa/pr/2003/June/racial_profiling_fact_sheet.pdf.

administration . . . has been opposed to racial profiling and has done more to indicate its opposition than ever in history. The President said it's wrong and we'll end it in America, and I subscribe to that. Using race . . . as a proxy for potential criminal behavior is unconstitutional, and it undermines law enforcement by undermining the confidence that people can have in law enforcement."¹⁰⁸ The DOJ also received guidance from the Civil Rights Division to effectively ban racial profiling in law enforcement activities, like during traffic stops and routine patrols.¹⁰⁹ However, the DOJ gives exception to terrorism cases saying, "Given the incalculably high stakes involved in such investigations, federal law enforcement officers who are protecting national security or preventing catastrophic events (as well as airport security screeners) may consider race, ethnicity, alienage, and other relevant factors."¹¹⁰ Here, the DOJ strictly prohibits racial profiling while still leaving room for its officials to discriminate against Muslims in the context of terrorism and national security.

The hypocrisy continued into the Attorney General's implementation of the National Security Entry/Exit Registration System (NSEERS).¹¹¹ This program initiated exactly one year after the 9/11 attacks tracked nonimmigrants like students, temporary workers, and temporary residents living in the U.S. and required individuals from certain countries to be fingerprinted, photographed, and interviewed under oath at U.S. ports of entry.¹¹² In conjunction with NSEERS, male nonimmigrants over 16 years old already living in the United States from countries determined by the Attorney General to be threats to national security were legally compelled to complete Call-In Special Registration at the Bureau of Citizenship and Immigration

¹⁰⁸ "Civil Rights Implications," New York Advisory Committee, 1.

¹⁰⁹ Ibid, 2.

¹¹⁰ Ibid, 5.

¹¹¹ Ibid, 10.

¹¹² Ibid, 2.

Services (BCIS) under DHS.¹¹³ The countries included were Iran, Iraq, Libya, Sudan, Syria, Afghanistan, Algeria, Bahrain, Eritrea, Lebanon, Morocco, North Korea, Oman, Qatar, Somalia, Tunisia, United Arab Emirates, Yemen, Pakistan, Saudi Arabia, Bangladesh, Egypt, Indonesia, Jordan, and Kuwait.¹¹⁴ With the exception of North Korea, Attorney General Ashcroft's list specifically targeted Muslim majority countries predominantly in the Middle East.

Moreover, the Call-In registration system was riddled with problems. First, nonimmigrants from the selected countries were only informed of the requirement through the Federal Register and later on the BCIS website,¹¹⁵ which meant this information was only available to people with internet access and the ability to read English.¹¹⁶ There was also a general lack of training and oversight, as many registrants faced inconsistent policy, procedure, and paperwork.¹¹⁷ Furthermore, BCIS did not provide interpreters as the director had previously promised, so many registrants relied on family members, friends, or strangers in the crowd to translate for them as they testified under oath; some were denied interpreters altogether if their English was deemed "good enough" by immigration officials.¹¹⁸ In addition, attorneys were not allowed to be with clients unless they were making a sworn statement, so many mistakenly waived their rights.¹¹⁹ Finally, many nonimmigrants were mistreated by BCIS officials. Some registrants were held in a cell and handcuffed for up to thirty-six hours.¹²⁰ Through the registration process, officials learned of expired visas or immigration violations and detained many men for deportation, even though immigration services, appeals, and extensions were on

¹¹³ "Civil Rights Implications," New York Advisory Committee, 2.

¹¹⁴ *Ibid.*

¹¹⁵ *Ibid.*, 16.

¹¹⁶ *Ibid.*

¹¹⁷ *Ibid.*, 17.

¹¹⁸ *Ibid.*

¹¹⁹ *Ibid.*

¹²⁰ *Ibid.*

delay because of the NSEERS program taking up time and resources.¹²¹ For example, in Los Angeles, four hundred mostly Iranian men were detained for deportation even though many had already applied to live in the U.S. as permanent residents.¹²² As a result, many registrants feared deportation upon arrival at BCIS, but if they did not register, they still faced deportation for breaking the law.¹²³

Facing criticism for discriminatory practices, the DOJ defended NSEERS and Call-In Registration in the Federal Register. When presented with the argument that the rule was discriminatory, the DOJ responded, “contrary to what some commenters may believe, this method is not new.”¹²⁴ They also published a section dedicated to recognizing the broad discrimination Muslim Americans were experiencing at the hand of the public but denied any wrongdoing or complicity.¹²⁵ The section concludes, “The Department remains firmly committed to protecting the civil rights of all individuals in the United States while seeking to prevent acts of terrorism. The Department unequivocally rejects the notion that the requirements of the final rule, or the criteria for application of the final rule, to nonimmigrant aliens subject to special registration are, or are intended to be, invidiously discriminatory.”¹²⁶ Despite this abject denial of guilt, the DOJ suspended special registration at the end of 2003 once all Call-In groups had already registered and their data had been collected.¹²⁷ Ultimately, only 11 out of 85,000

¹²¹ “Civil Rights Implications,” New York Advisory Committee, 3.

¹²² *Ibid.*

¹²³ *Ibid.*

¹²⁴ Department of Justice, Immigration and Naturalization Service, 8 CFR Parts 214 and 264 “Registration and Monitoring of Certain Nonimmigrants,” *Federal Register* 67, no. 155 (August 12, 2002): 52584-52593, 52585, <https://www.govinfo.gov/content/pkg/FR-2002-08-12/pdf/02-20642.pdf>.

¹²⁵ *Ibid.*

¹²⁶ *Ibid.*

¹²⁷ Muzaffar Chishti and Claire Bergeron, “DHS Announces End to Controversial Post-9/11 Immigrant Registration and Tracking Program,” (Migration Policy Institute, May 17, 2011), <https://www.migrationpolicy.org/article/dhs-announces-end-controversial-post-911-immigrant-registration-and-tracking-program>.

registrants through NSEERS had ties to terrorism.¹²⁸ From the special registration program nationwide, 13,799 nonimmigrants were placed in removal proceedings.¹²⁹ While claiming to prohibit racial profiling in federal law enforcement and denying Islamophobic bias, the Department of Justice used ethnicity to monitor Muslims as suspects of terrorist activity throughout the country.

In addition to immigration services targeting Muslims under the direction of the DOJ, federal law enforcement officers in the FBI implemented discriminatory surveillance practices and issued Islamophobic training materials.¹³⁰ Like the NYPD, FBI Director Robert Mueller ordered fifty-six field offices to develop “demographic” profiles of their region which would be used to “set specific numerical goals for counter terrorism investigations and secret national security wiretaps in each region.”¹³¹ These profiles included the number of mosques in the area categorized under a section marked “Vulnerability.”¹³² Furthermore, a 2006 FBI intelligence report described Islamic converts as “Homegrown Islamic Extremists” if they were “wearing traditional Muslim attire,” “growing facial hair,” “frequently attended mosque or prayer group,” “travelling to a Muslim country,” or had “increased activity in a pro-Muslim social group or political cause.”¹³³ In labeling these religious institutions and practices as areas of suspicion for terrorist activities, the FBI employed blatant religious profiling against Muslims.

¹²⁸ Chishti and Bergeron, “DHS Announces End.”

¹²⁹ Ibid.

¹³⁰ “Losing Liberty: The State of Freedom 10 Years after the Patriot Act,” Muslim Advocates, October 2011, <https://Muslimadvocates.org/advocacy/report-losing-liberty-the-state-of-freedom-10-years-after-the-patriot-act/>.

¹³¹ Michael Isikoff, “Investigators: The FBI Says, Count The Mosques,” Newsweek (Newsweek, February 2, 2003), <https://www.newsweek.com/investigators-fbi-says-count-mosques-140311>.

¹³² Ibid.

¹³³ Muslim, Arab, and South Asian organizations, “Muslim Advocates,” Muslim Advocates (Muslim Advocates, October 27, 2011), <https://Muslimadvocates.org/2011/10/letter-to-dhs-john-brennan-on-fbis-us.e-of-biased-experts-and-training-materials/>.

Similarly, the FBI provided optional briefings for its agents on the tenets and belief system of Islam that contained a slew of Quranic misinterpretations and stereotypes with the purpose of “identifying the elements of verbal deception in Islam and their impacts on law enforcement.”¹³⁴ Here, the FBI does not distinguish between Islam, Islamic extremism, or terrorism. In training, agents are seemingly taught the terms are synonymous. Many of these briefings on Islam were written by FBI intelligence analyst William Gawthrop, who was quoted in 2006 prior to his position in the Bureau saying, “Muhammad’s mindset is a source for terror.”¹³⁵ In one presentation entitled “Militancy Considerations,” Gawthrop graphed Christianity, Judaism, and Islam from 1400 B.C. to 2010 over a range of “violent” to “nonviolent.”¹³⁶ According to the graph, Christians and Jews became increasingly nonviolent over time, while Muslims flatlined at a violent level around 620 A.D. continuing until 2010.¹³⁷ In another briefing on Islamic Law, the presentation described the prophet “Mohammad” as a “Cult Leader for small inner circle,”¹³⁸ and defined the Islamic practice of almsgiving, zakat, as a “warfare funding mechanism,” going so far to say that for Muslims, “expenditure of zakat on warfighting is not only permissible but obligatory.”¹³⁹ These presentations also exhibited ideology that subscribed to the inevitable “clash of civilizations” that Orientalist scholars and policy advisors predicted in the late 1990s. For example, one briefing stated, “There can be no peace between the two [Islam and nonbelievers] until dar al Islam conquers and assimilates its

¹³⁴ William Gawthrop, “Strategic Themes and Drivers in Islamic Law,” *FBI Briefings on Islam*, (March 21, 2011), <https://www.wired.com/2011/09/fbi-Muslims-radical/>.

¹³⁵ Muslim, Arab, and South Asian organizations, “Muslim Advocates.”

¹³⁶ William Gawthrop, “Militancy Considerations,” *FBI Briefings on Islam*, (August 24, 2011), <https://www.wired.com/2011/09/fbi-Muslims-radical/>.

¹³⁷ Ibid.

¹³⁸ Gawthrop, “Strategic Themes.”

¹³⁹ William Gawthrop, “Doctrinal Basis for Jihad,” *FBI Briefings on Islam*, <https://www.wired.com/2011/09/fbi-Muslims-radical/>.

adversary.”¹⁴⁰ Again, Gawthrop reiterates, “Accommodation and compromise are impermissible and fighting is obligatory . . . War is the rule and peace is only temporary.”¹⁴¹ Gawthrop’s understanding of Islam is similar to that of Huntington and Lewis as he agrees that Islam and Western culture are inherently opposed, incompatible, and perpetually engaged in conflict with one another. Perhaps most troubling about these briefings, Gawthrop intentionally groups mainstream Islam with Islamic extremism and terrorism saying, “There may not be a radical threat as much as it is simply a normal assertion of the orthodox ideology . . . The strategic themes animating these Islamic values are not fringe; they are main stream [sic].”¹⁴² Implying that Islam mandates warfare with the West and that all practicing Muslims support terrorist ideology, these FBI briefings display an uninformed, biased, and discriminatory mindset that wrongfully placed an air of suspicion and distrust on the Muslim community from law enforcement officials. Although the briefings each begin with the disclaimer that the beliefs expressed in the presentations may not be that of the government or FBI, these materials were still presented at Quantico to agents in the field combating terrorism across the country.¹⁴³

Despite appointing an Attorney General that oversaw these discriminatory practices, President George W. Bush used positive rhetoric to try to dispel the Islamophobia sweeping over the nation. Following the 9/11 attacks, most of the country looked to the President to lead and protect the country at the cusp of the greatest and most tangible threat to national security the country had seen since War World II. Just nine months into his first term, President Bush faced critical decisions that would affect domestic and foreign relations for decades to come. In practice, President Bush started two foreign wars with Muslim countries in response to 9/11

¹⁴⁰ Gawthrop, “Strategic Themes.”

¹⁴¹ Gawthrop, “Doctrinal Basis for Jihad.”

¹⁴² Ibid.

¹⁴³ Ibid.

while enacting domestic security measures that disproportionately affected members of the Islamic faith and people of Arab descent by signing the Patriot Act. However, while speaking authoritatively and aggressively to the terrorist group responsible, President Bush maintained a positive view of Islam in his speeches, encouraging compassion and peace among panicked American citizens.

Notably, President Bush worked to dispel misconceptions and stereotypes about the Muslim faith in most of his speeches following 9/11. With the largest platform in American government, he used his rhetorical influence to promote understanding and unity among all faiths and nationalities while actively combatting Islamophobia within the United States. In several speeches to the American people and governmental entities, President George W. Bush distinguished Muslims from terrorists by emphasizing the peaceful foundation of the Islamic faith, included Muslims and Arabs in the national context of grief and healing, and condemned Islamophobic hate crimes.

First, President Bush separated Islam from the faith practiced by radical terrorists. In a speech to Congress on September 20, 2001, President Bush said of al-Qaida's relationship to Islam, "The terrorists practice a fringe form of Islamic extremism that has been rejected by Muslim scholars and the vast majority of Muslim clerics; a fringe movement that perverts the peaceful teachings of Islam."¹⁴⁴ Later in the same speech, President Bush addressed Muslims and acknowledged that their faith was being corrupted and misinterpreted by terrorist groups. He stated:

I also want to speak tonight directly to Muslims throughout the world. We respect your faith. It's practiced freely by many millions of Americans and by millions more in

¹⁴⁴ George W. Bush, "Address to the Joint Session of the 107th Congress," Selected Speeches of President George W. Bush: 2001-2008, September 20, 2001, https://georgewbush-whitehouse.archives.gov/infocus/Bushrecord/documents/Selected_Speeches_George_W_Bush.pdf, 66-7.

countries that America counts as friends. Its teachings are good and peaceful, and those who commit evil in the name of Allah blaspheme the name of Allah. The terrorists are traitors to their own faith, trying, in effect, to hijack Islam itself. The enemy of America is not our many Muslim friends. It is not our many Arab friends. Our enemy is a radical network of terrorists and every government that supports them.¹⁴⁵

At a time when hate crimes against Muslims were spiking to unprecedented levels in the United States, President Bush recognized the peaceful tenets of Islam as well as the United States' Muslim and Arab allies in fighting against terrorism. Again the president separated the two entities in his remarks at the Department of Defense Service of Remembrance at the Pentagon on October 11, 2001. To a domestic audience, he asserted, "For us too, in the year 2001, an enemy has emerged that rejects every limit of law, morality, and religion. The terrorists have no true home in any country, or culture, or faith."¹⁴⁶ In denying the terrorists a home in the Middle East and foundations in the Islamic faith, President Bush made a key distinction to discourage hatred and blame on all Muslim and Arab people. He restated this idea on an international stage at the UN General Assembly saying, "The terrorists are increasingly isolated by their own hatred and extremism. They cannot hide behind Islam. The authors of mass murder and their allies have no place in any culture, and no home in any faith."¹⁴⁷ The president then emphasized the specific disconnect between Muslim teachings and the religion practiced by terrorists adding:

Last week, the Sheikh of Al-Azhar University, the world's oldest Islamic institution of higher learning, declared that terrorism is a disease, and that Islam prohibits killing innocent civilians. The terrorists call their cause holy, yet, they fund it with drug dealing; they encourage murder and suicide in the name of a great faith that forbids both. They dare to ask God's blessing as they set out to kill innocent men, women and children. But

¹⁴⁵ Bush, "Address to the Joint Session," 68.

¹⁴⁶ George W. Bush, "Department of Defense Service of Remembrance at the Pentagon," Selected Speeches of President George W. Bush: 2001-2008, October 11, 2001, https://georgewbush-whitehouse.archives.gov/infocus/Bushrecord/documents/Selected_Speeches_George_W_Bush.pdf, 80.

¹⁴⁷ George W. Bush, "Address to the United Nations General Assembly," Selected Speeches of President George W. Bush: 2001-2008, November 10, 2001, https://georgewbush-whitehouse.archives.gov/infocus/Bushrecord/documents/Selected_Speeches_George_W_Bush.pdf, 85.

the God of Isaac and Ishmael would never answer such a prayer. And a murderer is not a martyr; he is just a murderer.¹⁴⁸

In using Islamic scholarship and teaching, President Bush worked consistently and carefully to dispel false association of peaceful practicing Muslims worldwide with the extremism of terrorists. In fact, numerous Muslim scholars, leaders, and organizations outright condemned the 9/11 terrorist attacks, including but not limited to the League of Arab States, the Secretary General of the Organization of the Islamic Conference, and various Islamic leaders and politicians from Egypt, Pakistan, Bangladesh, Palestine, and Tunisia.¹⁴⁹

Moreover, President Bush included Muslims and Arabs in his rhetoric as American heroes, sympathizers, and grieving family members instead of solely associating them in the context of terrorism. Here, he worked to dispel the monolith that has followed Islam for centuries and provide a place in the nation for grieving Muslims, sharing the same fears and devastation of every American citizen following the attacks. For example, he spoke of good deeds in response to the terrorist attacks and international showing of support declaring, “We’ve seen the unfurling of flags, the lighting of candles, the giving of blood, the saying of prayers in English, Hebrew, and Arabic . . . We will not forget South Korean children gathering to pray outside our embassy in Seoul, or the prayers of sympathy offered at a mosque in Cairo.”¹⁵⁰ Including mentions of Arabic and Muslim support, President Bush displayed Muslims and Arabs in the context of global allyship. Furthermore, the president acknowledged that Muslim and Arab people had been victims of the terrorist attacks on 9/11 and had also acted heroically like thousands of other Americans. In his Address to the United Nations, he said of the list of lives lost, “Those names

¹⁴⁸ Bush, “Address to the United Nations,” 84.

¹⁴⁹ Charles Kurzman, “Islamic Statements Against Terrorism,” Islamic Statements Against Terrorism (The University of North Carolina at Chapel Hill, September 21, 2020), <https://kurzman.unc.edu/islamic-statements-against-terrorism/>.

¹⁵⁰ Bush, “Address to the Joint Session,” 65-6.

include a young Pakistani who prayed toward Mecca five times a day, and died that day trying to save others . . . All of the victims, including Muslims, were killed with equal indifference and equal satisfaction by the terrorist leaders. The terrorists are violating the tenets of every religion, including the one they invoke.”¹⁵¹ Here, President Bush worked to connect Muslims and Arabs to the unity and heroic patriotism many felt in the wake of 9/11 from which Muslims and Arabs had been previously excluded.

Finally, in these speeches given within the first few months of 9/11, President Bush unequivocally condemned the surging hate crimes against Muslims across the country. In the address to Congress, President Bush asserted, “We’re in a fight for our principles, and our first responsibility is to live by them. No one should be singled out for unfair treatment or unkind words because of their ethnic background or religious faith.”¹⁵² Later, at the UN he stated, “To inflame ethnic hatred is to advance the cause of terror . . . The war against terror must not serve as an excuse to persecute ethnic and religious minorities in any country. Innocent people must be allowed to live their own lives, by their own customs, under their own religion.”¹⁵³ With these words, President Bush made an international statement with pressing domestic implications that religious and racial discrimination is unethical and wrongfully placed on these groups.

Of course, President Bush’s most famous address on Islam at the Islamic Center of Washington D.C. on September 17, 2001 combined each of the previously outlined rhetorical elements with the aim to create a safer, more positive space for Muslims and Arabs in the U.S. Delivered less than a week after the terrorist attacks, the speech included verses from the Quran encouraging peace, an emphasis on Muslim allyship against terrorism, and a clear condemnation

¹⁵¹ Bush, “Address to the United Nations,” 83-4.

¹⁵² Bush, “Address to the Joint Session,” 71.

¹⁵³ Bush, “Address to the United Nations,” 88.

of Islamophobic hate crimes by the President of the United States. Immediately, he separated terrorism from the Muslim faith saying, “These acts of violence against innocents violate the fundamental tenets of the Islamic faith. And it’s important for my fellow Americans to understand that.”¹⁵⁴ To further demonstrate this point, President Bush asserted, “The face of terror is not the true faith of Islam. That’s not what Islam is all about. Islam is peace. These terrorists don’t represent peace.”¹⁵⁵ Finally, the president condemned Islamophobic hate crimes stating, “Those who feel like they can intimidate our fellow citizens to take out their anger don’t represent the best of America, they represent the worst of humankind, and they should be ashamed of that kind of behavior.”¹⁵⁶ In a significant gesture, President Bush delivered this tolerant speech encouraging compassion and quoting the Muslim holy book on the steps of the Islamic Center in Washington D.C. just six days after the terrorist attacks, providing a key rhetorical example to all American citizens.

President Bush and Mayors Giuliani and Bloomberg ultimately inspired religious tolerance in the American people in the immediate aftermath of 9/11 through their careful, inclusive rhetoric. Surprisingly, public opinion polls conducted in the first few months following 9/11 showed Americans’ attitudes toward Islam were mostly positive.¹⁵⁷ These more favorable views were perhaps the result of increasingly positive rhetoric from government officials encouraging religious tolerance, such as President Bush’s speech at the Islamic Center of Washington D.C.¹⁵⁸ For example, a poll conducted by Princeton Survey Research Associates

¹⁵⁴ George W. Bush, “‘Islam Is Peace’ Says President: Remarks by the President at Islamic Center of Washington D.C.,” The White House: President George W. Bush (National Archives and Records Administration, September 17, 2001), <https://georgewBush-whitehouse.archives.gov/news/releases/2001/09/20010917-11.html>.

¹⁵⁵ Ibid.

¹⁵⁶ Ibid.

¹⁵⁷ Panagopoulos, “Trends: Arab and Muslim Americans.”

¹⁵⁸ Bush, “‘Islam Is Peace.’”

found that from March to November 2001, the proportion of Americans with a “very favorable” or “mostly favorable” view of Islam increased from 45% to 59%, with “very favorable” numbers more than doubling.¹⁵⁹ Additionally, the Council on American-Islamic Relations (CAIR) reported in July 2002 that 79% of Muslim Americans said they had experienced “an act of kindness or support from friends or colleagues of other faiths” after 9/11.¹⁶⁰ Following the lead of President Bush, Americans reported higher tolerance and understanding of Islam in the first weeks and months after the attacks. But while Americans reported having more favorable views of Islam in the immediate wake of 9/11, the hate crime statistics show the inverse to be true. Most Islamophobic incidents were reported within the first few weeks of the attacks, yet public opinion surveys recorded positive attitudes toward Muslims. Again following the example of President Bush, Americans appeared more tolerant in their rhetoric regarding Muslims and Arabs, but the spiking hate crimes in the first weeks following 9/11 suggest their actions were not so tolerant. Just as the President appeared more tolerant in his rhetoric while simultaneously approving discriminatory legislation, the American public instigated hate crimes while reporting more favorable views of Islam.

Moreover, this reported positive view of Islam was quickly replaced by negative views in the later months and years following 9/11. When asked if “mainstream Islam encourages violence against non-Muslims,” the percentage of Americans who agreed more than doubled between January 2002 and September 2003 from 14% to 34%, while the proportion who believed Islam to be a “peaceful religion” decreased from 57% to 46% over the same time period.¹⁶¹ Of course, some of these findings can be attributed to the war in Afghanistan and the

¹⁵⁹ Panagopoulos, “Trends: Arab and Muslim Americans,” 614.

¹⁶⁰ Human Rights Watch, “‘WE ARE NOT THE ENEMY’: Hate Crimes Against Arabs, Muslims, and Those Perceived to be Arab or Muslim after September 11,” 14, no. 6 (G) (November 2002), 16.

¹⁶¹ *Ibid.*, 619.

American invasion of Iraq by 2003. By associating terrorism with these wars and connecting terrorism with Islam, American Islamophobia grew steadily in the years after 9/11. Analyzing the trends of several published public opinion polls, Castro Panagopoulos concluded, “Americans were more informed about, tolerant of, and sensitive to Muslims and the religion of Islam directly after the September 11 attacks. Over time, though, as people became removed from the events, the data indicate that Americans appear less informed about and more cautious toward Arab and Muslim Americans.”¹⁶² Perhaps a result of increased positive rhetoric and interest in Islam immediately after the 9/11 attacks, Americans were more knowledgeable and accepting of the Muslim religion, but with U.S. invasions of Muslim majority countries and the return of wounded and deceased American soldiers in the following years, Americans displayed a renewed suspicion and contempt for Islam.

The contradiction of Islamophobia in the United States did not end with the Bush administration in 2008. Careful rhetoric paired with discriminatory policy continued with bipartisan consistency throughout the administration of President Obama. Although he took office over eight and a half years after 9/11, President Obama’s administration was both a target and proponent of Islamophobic sentiment within the U.S.

Although further removed from the 9/11 terrorist attacks than his predecessor, President Obama was placed in a unique position regarding Islam from the onset of his campaign. Just before announcing his presidential candidacy in February 2007, *Insight Magazine* printed an article falsely claiming that then-Senator Obama was raised and educated as a Muslim.¹⁶³ Fox News picked up the story, and the rumor quickly spread around the country, following President

¹⁶² Panagopoulos, “Trends: Arab and Muslim Americans,” 609.

¹⁶³ Michael D. Giardina, “Barack Obama, Islamophobia, and the 2008 U.S. Presidential Election Media Spectacle,” *Counterpoints* 346 (2010): pp. 135-157, <https://www.jstor.org/stable/42980515>, 141.

Obama for the duration of his campaign and subsequent presidency.¹⁶⁴ Even after a year and a half of repeated denial from both the Obama campaign and fact-checking media outlets, it was reported in September 2008 that around one third of likely voters believed Obama was or could be Muslim.¹⁶⁵ It is unsurprising given the West's historical suspicion of Islam that these false claims painted President Obama as an un-American, unpatriotic candidate. During the 2008 election, most Americans remained wary of the possibility of a Muslim president, so linking President Obama to Islam proved an effective strategy for his opponents. As a result of the negative American perception of Muslims, the Obama administration separated itself from the Islamic community. Despite these efforts, *Time* magazine and the Pew Research Center found that over a year into President Obama's first term, 25% of Americans still believed he was secretly a Muslim with around half the population doubting his Christianity.¹⁶⁶ Perhaps this complicated entanglement with Islam compelled President Obama to maintain the Islamophobic status quo during his administration.

Like President Bush, President Obama crafted his speeches carefully and worked to include Muslim Americans in the national framework. For instance, just a few months after taking office, President Obama stated at the Turkish Parliament, "The United States is not, and will never be, at war with Islam."¹⁶⁷ In doing so, he distinguished terrorism from the religion of Islam and attempted to restore international relationships with Muslim majority countries. Going beyond his predecessor, President Obama renamed the enemy of the U.S. as "violent extremism" instead of what President Bush had called "radical Islam" from 2001-2006, separating the two

¹⁶⁴ Giardina, "Barack Obama," 141.

¹⁶⁵ Ibid, 42.

¹⁶⁶ Todd K. Hartman and Adam J. Newmark, "Motivated Reasoning, Political Sophistication, and Associations between President Obama and Islam," *PS: Political Science and Politics* 45, no. 3 (July 2012): pp. 449-455, <https://www.jstor.org/stable/41691360>, 449.

¹⁶⁷ Marc Lynch, *Rhetoric and Reality: Countering Terrorism in the Age of Obama* (Washington D.C.: Center for a New American Security, 2010) 5.

entities even further.¹⁶⁸ Looking to isolate al-Qaeda and prevent the terrorist organization from using Islam as a recruiting mechanism, President Obama sought support from Muslim communities abroad in fighting the War on Terror. Additionally, President Obama paralleled President Bush's speech at the Washington D.C. Islamic Center with similar remarks at the Islamic Society of Baltimore in 2016.¹⁶⁹ Using the same language as Bush, President Obama emphasized Islam's peaceful foundation saying, "For more than a thousand years, people have been drawn to Islam's message of peace. And the very word itself, Islam, comes from salam – peace . . . And like so many faiths, Islam is rooted in a commitment to compassion and mercy and justice and charity . . . For Christians like myself, I'm assuming that sounds familiar."¹⁷⁰ In this speech, President Obama continued President Bush's positive language to provide a clearer, more favorable image of Islam to the American people. From a rhetorical perspective, President Obama continued and expanded President Bush's outreach to the Islamic world, reinforcing the faith's dedication to peaceful ideals.

However, President Obama also maintained President Bush's discriminatory policy toward Arab and Muslim Americans during his administration. For example, President Obama supported the utilization and extension of the Patriot Act to prevent terrorism.¹⁷¹ His administration frequently used the law enforcement tools allowed by controversial sections of the Patriot Act like wiretapping without warrants and the seizure of "tangible things" during investigations.¹⁷² Furthermore, the Director of the Institute for Middle East Studies at George Washington University concluded that, "Despite the ranging controversies over civilian trials and

¹⁶⁸ Lynch, *Rhetoric and Reality*, 13.

¹⁶⁹ Barack Obama, "Remarks by the President at Islamic Society of Baltimore," The White House: President Barack Obama (National Archives and Records Administration, February 3, 2016), <https://obamawhitehouse.archives.gov/the-press-office/2016/02/03/remarks-president-islamic-society-baltimore>.

¹⁷⁰ *Ibid.*

¹⁷¹ Lynch, *Rhetoric and Reality*, 13.

¹⁷² *Ibid.*, 24.

Miranda rights for alleged terrorists, the Obama administration has largely worked within the Bush administration's legal framework on a range of issues, including domestic surveillance, state secrets, extraordinary rendition and targeted assassination abroad."¹⁷³ Likewise, many of the previously mentioned Islamophobic FBI training materials were distributed under the Obama administration, and law enforcement around the country continued to target Muslim and Middle Eastern citizens in the name of counterterrorism throughout his presidency. Ultimately, President Obama continued the Bush administration's disconnect between positive rhetoric and Islamophobic policy by maintaining peaceful language while simultaneously extending discriminatory legislation.

Unfortunately, this Islamophobic trend in policy has persisted in the United States and is now coupled with hateful governmental rhetoric. Unlike Presidents Bush and Obama who masked discriminatory antiterrorism initiatives with inclusive dialogue and public appearances with Islamic leaders, President Trump has held a consistent, Islamophobic position for the duration of his presidential campaign and four-year term in both rhetoric and policy.

To understand President Trump's Islamophobic platform and general appeal, it is important to recognize the context in which he was elected. By the start of President Trump's campaign, widespread Islamophobic sentiment in the United States had resurfaced. With the instability in the Middle East caused by violent demonstrations during the Arab Spring in 2011, the ensuing Syrian refugee crisis, and the rise of ISIS in 2014, a heightened sense of apprehension toward Middle Eastern and Muslim people returned within the U.S. and Europe.

In response to decades of political repression and economic hardship, several countries in the Middle East and North Africa revolted against their longstanding authoritative governments,

¹⁷³ Lynch, *Rhetoric and Reality*, 14.

and many successfully deposed their leaders between January and April of 2011, now called the Arab Spring.¹⁷⁴ Beginning in December in Tunisia after a vegetable seller set himself on fire in protest of government abuse and economic turmoil, the Tunisian people demonstrated in the streets until the leading family of Ben Ali fled to Saudi Arabia on January 14, 2011.¹⁷⁵

Demanding the permanent removal of Ben Ali and his entire administration, the Tunisian people launched the rallying cry of the Arab Spring, “The people want the fall of the regime.”¹⁷⁶ Within the following months, the leaders of Egypt, Libya, and Yemen had been deposed or killed, and large-scale protests were sustained throughout the Middle East and North Africa, specifically in Bahrain, Morocco, and Iraq.¹⁷⁷ Furthermore, emboldened protestors in Syria were met with violence from Bashar al-Assad’s regime in March 2011, instigating a brutal civil war that has displaced millions of Syrian people from 2011 through today as the fighting continues.¹⁷⁸ By April 2016, 11.5% of Syria’s population had been killed or injured, and 4.8 million Syrians were living as refugees outside the country with 6.6 million others displaced internally.¹⁷⁹ This regional instability alarmed the U.S. and Europe as several Islamist groups that were perceived to have terrorist sympathies, including the Islamic State in Iraq and al-Sham (ISIS), vied for power in the Middle East, specifically in Syria.¹⁸⁰

Having captured significant territory in Iraq and pushing into Syria, the militant Islamist extremist group ISIS rose to prominence in 2014 through an alliance with al-Qaeda.¹⁸¹ In the summer of 2014, President Obama launched airstrikes against ISIS, who retaliated by beheading

¹⁷⁴ Lin Noueihed and Alex Warren, *The Battle for the Arab Spring: Revolution, Counter-Revolution and the Making of a New Era* (New Haven, CT: Yale University Press, 2012).

¹⁷⁵ *Ibid.*, 64.

¹⁷⁶ *Ibid.*, 77.

¹⁷⁷ *Ibid.*, 97-226.

¹⁷⁸ *Ibid.*, 231.

¹⁷⁹ Shahram Akbarzadeh and Dara Conduit, “The Syrian Refugee Crisis,” *Ethos* 24, no. 2 (2016): pp. 8-10, 8.

¹⁸⁰ *Ibid.*, 9.

¹⁸¹ Gregory D. Johnsen, “The Rise of ISIS,” *Great Decisions* (2016): pp. 13-24, 14.

Western hostages.¹⁸² The group gained traction internationally through online recruiting, capitalizing on “self-radicalization” in the West with “homegrown” terror attacks in Germany, the UK, and France.¹⁸³ By 2016, ISIS had “either inspired or directed attacks in 11 Western countries.”¹⁸⁴ At the same time, Americans and Europeans became fearful of ISIS members hiding among Syrian refugees and being allowed entry abroad. With a renewed fear of Islamic extremism and terrorism in the U.S., suspicion of Muslims mounted in the U.S. and Europe.

Therefore, President Trump capitalized on already-present Islamophobic sentiment in the U.S. by campaigning on tighter immigration restrictions in the name of national security and invoking misplaced fear and distrust in the nation’s Muslim and Middle Eastern communities. Once elected, President Trump instituted some of the most blatantly discriminatory policy since the Civil Rights Movement.

During his presidential campaign beginning in 2015, President Trump disseminated hateful and baseless rhetoric against Islam at campaign rallies, in media interviews, and on Twitter, relying on America’s historic distrust of Muslims and exploiting the fear and grief still felt from the 9/11 attacks. For example, at a rally held in Birmingham, Alabama in November 2015, President Trump claimed that he personally witnessed “thousands” of Muslims celebrating in New Jersey on 9/11.¹⁸⁵ Although not verified by any media sources or videos taken on September 11, President Trump stood by his claims on ABC’s “This Week,” saying “There were people that were cheering on the other side of New Jersey, where you have large Arab populations. They were cheering as the World Trade Center came down. I know it might not be

¹⁸² Johnsen, “The Rise of ISIS,” 20.

¹⁸³ Ibid, 19.

¹⁸⁴ Ibid, 22.

¹⁸⁵ Maxwell Tani, “Trump: I Saw 'Thousands and Thousands' of People in New Jersey Cheer the 9/11 Attacks,” Yahoo! Finance (Yahoo!, November 22, 2015), <https://finance.yahoo.com/news/trump-saw-thousands-thousands-people-164537580.html?guccounter=1>.

politically correct for you to talk about it, but there were people cheering as that building came down – as those buildings came down. And that tells you something.”¹⁸⁶ Even though this statement was widely disputed by New Jersey police and local government officials, President Trump reiterated this harmful lie on Twitter, linking a video to “credible sources” allegedly showing Muslims celebrating on 9/11.¹⁸⁷ These statements and subsequent tweets not only spread false information to the American public but also led to more needless suspicion of peaceful Muslims in the United States while contributing to the idea of mutual exclusivity between the Islamic belief system and American ideals. Furthermore, President Trump diametrically opposed President Bush’s rhetorical approach after 9/11. While President Trump disseminated fear and distrust by claiming widespread Arab celebrations fourteen years after the attacks, President Bush dispelled this idea immediately following 9/11 in his “Islam is Peace” speech, saying “Like the good folks standing with me, the American people were appalled and outraged at last Tuesday’s attacks. And so were Muslims all across the world. Both Americans and Muslim friends and citizens, tax-paying citizens, and Muslims in nations were just appalled and could not believe what we saw on our TV screens.”¹⁸⁸ Despite President Bush and Islamic leaders’ assurances of Muslim loyalty to the United States, President Trump reignited suspicion and mistrust of Islam with his continued baseless accusations against Muslims following 9/11.

Besides exploiting the grief and heightened sensitivity surrounding 9/11, President Trump employed hateful, Islamophobic rhetoric throughout the campaign trail. For example, he issued the following statement on December 7, 2015: “Donald J. Trump is calling for a total and complete shutdown of Muslims entering the United States until our country’s representatives can

¹⁸⁶ Tani, “Trump: I Saw 'Thousands and Thousands'.”

¹⁸⁷ Brendan Brown, “Trump Twitter Archive,” Trump Twitter Archive, accessed January 15, 2021, <https://www.thetrumparchive.com/>.

¹⁸⁸ Bush, “Islam is Peace.”

figure out what is going on.”¹⁸⁹ This position encourages the illegal use of religious profiling in immigration policy and wrongfully blames all Muslims for the actions of extremist terrorists. Later, when asked if Islam was at war with the West on CNN in March 2016, President Trump replied, “I think Islam hates us . . . there’s a tremendous hatred there. We have to get to the bottom of it. There’s an unbelievable hatred of us.”¹⁹⁰ When pressed on if it was a war with radical Islam or Islam itself, Mr. Trump answered, “It’s radical, but it’s very hard to define. It’s very hard to separate because you don’t know who’s who.”¹⁹¹ Feeding into the Huntington and Lewis “clash of civilizations” narrative, President Trump unequivocally stated that the religion of Islam “hates” the United States. Again, this statement is a stark contrast to President Bush’s speech in which he referred to the Muslim leaders at the Islamic Center of Washington D.C. saying, “They love America just as much as I do.”¹⁹² Again, President Trump cast suspicion on the entire religion of Islam when discussing suicide bombings in Brussels stating, “We’re having problems with the Muslims, and we’re having problems with the Muslims coming into the country . . . This all happened because, frankly, there’s no assimilation. They are not assimilating . . . They want to go by sharia law. They want sharia law. They don’t want the laws that we have. They want sharia law.”¹⁹³ Wildly generalizing about a diverse community of people, President Trump placed a target on Muslims across the country. Unlike the continued efforts of Presidents Bush and Obama, President Trump made no attempt to separate peaceful Muslims from

¹⁸⁹ Christine Wang, “Trump Website Takes down Muslim Ban Statement after Reporter Grills Spicer in Briefing,” CNBC (CNBC, May 8, 2017), <https://www.cnbc.com/2017/05/08/trump-website-takes-down-Muslim-ban-statement-after-reporter-grills-spicer-in-briefing.html>.

¹⁹⁰ Theodore Schleifer, “Donald Trump: ‘I Think Islam Hates Us,’” CNN (Cable News Network, March 10, 2016), <https://www.cnn.com/2016/03/09/politics/donald-trump-islam-hates-us/index.html>.

¹⁹¹ Ibid.

¹⁹² Bush, “Islam is Peace.”

¹⁹³ Abigail Hauslohner and Jenna Johnson, “‘I Think Islam Hates Us’: A Timeline of Trump’s Comments about Islam and Muslims,” The Washington Post (WP Company, April 28, 2019), <https://www.washingtonpost.com/news/post-politics/wp/2017/05/20/i-think-islam-hates-us-a-timeline-of-trumps-comments-about-islam-and-Muslims/>.

extremist terrorists in his statements during his presidential campaign, further perpetuating the myth that Islam is incompatible with the United States.

Specifically, President Trump's quote on Muslims wanting sharia law represents a broader theme of Western fixation on and misunderstanding of the Islamic legal code. Describing the contention surrounding sharia law as a "modern phenomenon," legal scholars emphasize the connection between Islamic law and English common law saying, "Even within the scholarly community, there is still too little understanding of, or interest in, the Islamic legal tradition. Thus, few are aware of the extent to which the English common law borrowed from the Islamic legal tradition, the impact of Europe's encounter with Islamic law on the development of international law, or the prominent role of Islamic law in global finance and commerce, both historically and in the present."¹⁹⁴ Additionally, Islamic law is founded on pluralism and rooted in the different Islamic schools of thought interpreting the Quran and Sunnah.¹⁹⁵ In fact, Islamic tradition links sharia with "God's way" and fiqh as the different interpretations of sharia.¹⁹⁶ Although not always practiced historically, the Islamic community valued and encouraged diverse understandings of religious law.¹⁹⁷ Thus, even though there is no consensus among the global Muslim community on the correct interpretation or structure of sharia law nor a unanimous desire among Muslims for it to become adopted into public law, many Americans view sharia law as a great threat to the U.S. Constitution. For example, since 2010, seventy-eight anti-Muslim bills or constitutional amendments have been introduced in thirty-one states and U.S. Congress with the intent to prohibit the adoption of sharia law.¹⁹⁸ A Tennessee bill from

¹⁹⁴ Tamir Moustafa and Jeffrey Adam Sachs, "Law and Society Review Special Issue Introduction: Islamic Law, Society, and the State," *Law and Society Review* 52, no. 3 (2018): pp. 560-73, 561.

¹⁹⁵ *Ibid*, 562.

¹⁹⁶ *Ibid*, 563.

¹⁹⁷ *Ibid*.

¹⁹⁸ Gadeir Abbas, "Anti-Muslim Legislation and Its Hopeful Demise," *Human Rights* 39, no. 2 (January 2013): pp. 9-10, <https://www.jstor.org/stable/24630058>.

March 2011 states, “knowing adherence to sharia . . . is prima facie evidence of an act in support of the overthrow of the United States government.”¹⁹⁹ Even though most Muslims in the United States do not favor sharia law and no major groups advocate for its adoption in the U.S., thirty-one states believe that it is an imminent threat to public policy.²⁰⁰ Most of the bills have been struck down or revised so as to not obviously target Muslim populations, but they represent the continued American mistrust and suspicion of Muslims as well as the fundamental misunderstanding of Muslim beliefs and practices.²⁰¹

Moreover, President Trump praised Mayor Giuliani for his surveillance of mosques and inaccurately criticized Mayor Bloomberg for allegedly ending the NYPD’s discriminatory counterterrorism protocol, encouraging renewed suspicion of the Islamic religion within the United States.²⁰² When asked how he would protect U.S. citizens from ISIS, President Trump ignored the rights of millions of Muslim citizens and responded, “You’re going to have to watch and study the mosques because a lot of talk is going on at the mosques. And from what I’ve heard in the old days, meaning a while ago, we had great surveillance going on in and around mosques in New York City, and I understand our mayor totally cut that out.”²⁰³ While he incorrectly stated that Mayor Bloomberg ended mosque surveillance when it persisted under his tenure, President Trump issued his support for spying on Muslim places of worship. In the same interview, when told that French leadership was discussing shutting down mosques with radical teachings, President Trump answered, “I would hate to do it, but it’s something that you’re gonna [sic] have to strongly consider. Because some of the ideas and some of the hatred, the

¹⁹⁹ Abbas, “Anti-Muslim Legislation,” 9.

²⁰⁰ Ibid.

²⁰¹ Ibid.

²⁰² *Trump: We Must Watch and Study Mosques* (MSNBC, 2015), <https://www.msnbc.com/morning-joe/watch/trump-we-must-watch-and-study-mosques-567563331864/>.

²⁰³ Ibid.

absolute hatred, is coming from these areas.”²⁰⁴ Similarly, when asked about the U.K.’s policy of closing mosques, President Trump praised the idea saying, “I would do that, absolutely. I think it’s great.”²⁰⁵ In threatening to deny Muslim Americans their right to practice religion, President Trump outwardly agreed with the Islamophobic policy Mayors Giuliani and Bloomberg intentionally kept hidden from the American public. Unlike his governmental predecessors, President Trump did not mask his Islamophobic views but instead campaigned on promises of religious and racial profiling.

While making prejudiced assertions about Islam’s relationship to ISIS and mosques breeding hatred within the U.S., President Trump neglected to look at data. According to Pew Research Center in 2017, the global view of ISIS among Muslims is generally unfavorable, even “overwhelmingly negative.”²⁰⁶ In addition, most Muslims said that “suicide bombings and other forms of violence against civilians in the name of Islam are rarely or never justified” with 91% agreement in Iraq, where ISIS was founded.²⁰⁷ As for the claim that all Muslims want sharia law, Pew found different results, with countries like Afghanistan, Iraq, and Pakistan favoring sharia law while others like Turkey, Kazakhstan, and Azerbaijan disagreed.²⁰⁸ Despite the diversity in beliefs of Muslims globally and the broad disapproval of ISIS, President Trump continued to associate all Muslims with extremist terrorists.

Sadly, President Trump’s harmful view of Muslims carried into his presidential rhetoric, particularly on Twitter. For instance, while in office in November 2017, the president retweeted videos captioned “Muslim Destroys a Statue of Virgin Mary” and “Muslim migrant beats up

²⁰⁴ *Trump: We Must Watch and Study Mosques*, MSNBC.

²⁰⁵ “Trump on Closing Mosques: ‘I Would Do That, Absolutely ...,’” CBS News (CBS, October 21, 2015), <https://www.cbsnews.com/video/trump-on-closing-mosques-i-would-do-that-absolutely/>.

²⁰⁶ Lipka, “Muslims and Islam.”

²⁰⁷ *Ibid.*

²⁰⁸ *Ibid.*

Dutch boy on crutches!”²⁰⁹ He later deleted them, but the message of Islamophobia remained clear with the videos suggesting a stereotypical predisposition to violence in Muslims and a rejection of Western Christian beliefs. Later, on March 23, 2019 in a targeted attack on Representative Ilhan Omar of Minnesota, a Somali Muslim immigrant, President Trump tweeted a video of the World Trade Center burning with Omar saying “some people did something” in reference to the attacks.²¹⁰ Representative Omar’s remarks from the video were said at CAIR and taken out of context. She was speaking on discrimination against Muslims after 9/11, and, unlike the president, she was deliberate in not associating Islam with terrorism.²¹¹ By linking Omar, one of just two Muslim representatives in the House at the time, with the terrorist attacks on September 11, President Trump reinforced a negative view of Muslim citizens. Again, President Trump singled out Representative Omar because of her faith in a July 14, 2019 tweet:

So interesting to see ‘Progressive’ Democrat Congresswomen, who originally came from countries whose governments are a complete and total catastrophe, the worst, most corrupt and inept anywhere in the world (if they even have a functioning government at all), now loudly and viciously telling the people of the United States, the greatest and most powerful Nation on earth, how our government is to be run. Why don’t they go back and help fix the totally broken and crime infested places from which they came. Then come back and show us how it is done. These places need your help badly, you can’t leave fast enough.²¹²

At a subsequent rally, President Trump’s supporters chanted, “Send her back!”²¹³ thus encouraging racist and Islamophobic rhetoric among Americans. According to Political Science scholars:

Donald Trump’s hate speech and demonization of non-Whites, mainstream media, and oppositional politicians, and his implicit and explicit praise of violence resulted in many

²⁰⁹ Brown, “Trump Twitter Archive.”

²¹⁰ Christal Hayes, “Rep. Ocasio-Cortez, Others Blast Trump for 9/11 Video Coupled with Rep. Omar's Comments,” U.S.A Today (Gannett Satellite Information Network, April 13, 2019), <https://www.usatoday.com/story/news/politics/2019/04/13/donald-trump-posts-video-ilhan-omar-footage-9-11-attack-twin-towers/3456666002/>.

²¹¹ Hayes, “Rep. Ocasio-Cortez.”

²¹² Ibid.

²¹³ Abdo, “Islam in America,” 7.

verbal and corporal attacks against members of the denigrated groups . . . Trump stirred fear, hate, and anger among his core supporters by warning them of dangerous ‘others’ threatening ‘America as we know it’ in terms of history, culture, values, and racial dominance. Whether by dog whistle or bullhorn, he spread online and off-line a divisive propaganda that in many respects resembled right-extremists’ ideology and glorification of violence.²¹⁴

Although not limited to Muslim and Middle Eastern citizens, President Trump’s negative and racist rhetoric influenced the rest of the country by using the historical us versus them framework reinforcing the American view of Muslims as outsiders.

In addition to President Trump’s hateful language and implications regarding Muslims, he instituted Islamophobic policies more blatantly than his predecessors Presidents Bush and Obama. Most notably, within his first week in office, President Trump signed an executive order prohibiting immigrants from Muslim majority countries from entering the United States.²¹⁵ The order banned all immigrants and nonimmigrants from Iran, Iraq, Libya, Somalia, Sudan, Syria, and Yemen as well as all Syrian refugees.²¹⁶ The only exception to these rules was listed as “when the person is a religious minority in his country of nationality facing religious persecution.”²¹⁷ This stipulation which would grant access to religious minorities in Muslim majority countries allowed for the entrance of specifically Christian refugees and prevented exclusively Muslims from entering the United States. Two days after President Trump signed the order, former Mayor and Presidential advisor Rudy Giuliani spoke about drafting the legislation on Fox News. When asked if the ban was related to religion, Giuliani explained, “When [President Trump] first announced it, he said, ‘Muslim ban.’ He called me up, he said, ‘Put a

²¹⁴ Brigitte L. Nacos, Robert Y. Shapiro, and Yaeli Bloch-Elkon, “Donald Trump,” *Perspectives on Terrorism* 14, no. 5 (October 2020): pp. 2-25, <https://www.jstor.org/stable/10.2307/26940036>, 19.

²¹⁵ Presidential Documents, Executive Order 13769 of January 27, 2017, “Protecting the Nation from Foreign Terrorist Entry into the United States,” *Federal Register* 82, no. 20 (February 1, 2017): 8977-8982, <https://www.govinfo.gov/content/pkg/FR-2017-02-01/pdf/2017-02281.pdf>.

²¹⁶ *Ibid*, 8978-9.

²¹⁷ *Ibid*, 8979.

commission together. Show me the right way to do it legally' . . . We focused on, instead of religion, danger. Areas of the world that create danger for us, which is a factual basis, not a religious basis."²¹⁸ Here, Giuliani showed President Trump's true intention with the executive order, to ban Muslim immigrants from entering the country in an explicit example of religious discrimination from the nation's highest office.

In analyzing this ban on refugees, Margaret Hodson discussed the Islamophobic motivation and implications of ignoring a largely bipartisan approach to U.S. refugee policy.²¹⁹ Outlining the beliefs of various anti-refugee organizations, she argued against the mischaracterized Muslim belief in hijra, or migration, as a political and social tactic to infiltrate Western societies specifically to implement sharia law.²²⁰ Furthermore, she stated that, like the President, these groups falsely claim that refugees have committed terrible crimes against the U.S. but the media fails to report them and the government does not screen them, leaving the opportunity for terrorists to enter the country.²²¹ She concluded:

Overall, both the Center for Security Policy and ACT for America use traditional Islamophobic fears about civilization jihad and terrorism as their justifications for opposing the U.S. Refugee Admissions Program. In their view, Muslim refugees resettling in the United States are undertaking a "hijra"—jihad via migration—in order to undermine the Constitution and/or commit acts of terrorism that will ultimately destroy Western civilizational and lead to the establishment of an Islamic Caliphate in America with Sharia law. This warped understanding of hijra not only ignores the historical record regarding Muhammad's journey from Mecca to Medina, but also overlooks the larger theological significance of the hijra as a peaceful spiritual journey to connect with God.²²²

²¹⁸ *Giuliani: Immigration ban is based on danger, not religion* (Fox News, 2017), <https://video.foxnews.com/v/5301869519001#sp=show-clips>.

²¹⁹ Margaret Hodson, "Modern Day Trojan Horse?" Analyzing the Nexus between Islamophobia and Anti-Refugee Sentiment in the United States," *Islamophobia Studies Journal* 5, no. 2 (2020): pp. 267-282, <https://www.jstor.org/stable/10.13169/islstudj.5.2.0267>.

²²⁰ *Ibid*, 272.

²²¹ *Ibid*, 273.

²²² Hodson, "Modern Day Trojan Horse?" 273.

These ideas can be directly linked as President Trump's motivation to enact the Muslim ban and represent the national Islamophobic fears of terrorism, sharia law, and "civilizational jihad" through Muslim refugees.²²³ In fact, President Trump connected himself with the Center for Security Policy saying they were "a very highly respected group of people who I know, actually."²²⁴ With the President of the United States aligning himself with an extreme, discredited organization, going so far as to cite their widely disputed statistics on American Muslim views, President Trump gave credit to these Islamophobic ideas and lent himself to the passing of unfounded, discriminatory policy.

This transition from President Bush's peaceful rhetoric to President Trump's hate-inspiring speech greatly impacted the American public. In 2016, the year President Trump was elected and ISIS emerged as an international terrorist threat, more assaults against Muslims were reported than within the aftermath of 9/11.²²⁵ Islamophobic hate crimes rose overall by 19% from 2015 to 2016 after a dramatic increase of 67% from 2014 to 2015.²²⁶ For example, the Louisville Islamic Center was vandalized on September 16, 2015 with phrases like "Nazis speak Arabic" and "Moslems – leave the Jews alone" spray painted in red.²²⁷ With rhetoric and policy as hateful as President Trump's combined with the perceived threat to national security, it is unsurprising that the American public has reverted back to the alarming levels of discrimination recorded immediately after 9/11 nearly twenty years ago. Moreover, in 2017, half of American adults believed "Islam is not a part of mainstream American society," and 44% reported "a

²²³Hodson, "Modern Day Trojan Horse?" 274.

²²⁴ Ibid, 275.

²²⁵ Katayoun Kishi, "Assaults against Muslims in U.S. Surpass 2001 Level," Pew Research Center (Pew Research Center, November 15, 2017), <https://www.pewresearch.org/fact-tank/2017/11/15/assaults-against-Muslims-in-u-s-surpass-2001-level/>.

²²⁶ Ibid.

²²⁷ Lexy Gross, "Louisville Islamic Center Defaced with Graffiti," Courier-Journal (The Courier-Journal, September 17, 2015), <https://www.courier-journal.com/story/news/local/2015/09/16/islamic-center-vandalized-members-obviously-hurt/32534857/>.

natural conflict between Islam and democracy.”²²⁸ Pew Research Center also found that President Trump worried 68% of Muslim respondents in the U.S. and that 75% reported “a lot” of Islamophobic discrimination with 48% experiencing at least one incident of discrimination within the year.²²⁹ Furthermore, President Trump’s fearful attitude toward Muslims and his mounting concerns with ISIS reintroduced the clash of civilizations political framework.²³⁰ Unfortunately, these statistics, attitudes, and renewed interest in the monolithic clash of the West with Islam show a continued distrust and prejudice against Muslims, Arabs, and those perceived to be in either group.

While critics of President Bush have often pointed out his flawed approach to the War on Terror specifically citing the invasion of Iraq in 2003, most scholars and political pundits acknowledge that his policies were in immediate response to one of the greatest threats to national security the United States had ever seen. Although many were hurtful and impacted innocent civilians, President Bush’s reactionary Islamophobic policies came from a place of real fear and imminent danger. The same cannot be said of President Trump’s rhetoric and policy fifteen years after the attacks. Although ISIS was emerging as a terrorist threat abroad at the same time as the Syrian refugee crisis, there were few isolated incidents in the U.S. that had any real connection to the extremist group. Therefore, it is clear that President Trump’s Islamophobia was rooted in gross misunderstanding and racism, not the fear he renewed in the hearts and minds of the American people.

²²⁸ Lipka, “Muslims and Islam.”

²²⁹ Ibid.

²³⁰ Minhas Majeed Khan, “Is a Clash between Islam and the West Inevitable?,” *Strategic Studies* 36, no. 2 (2016): pp. 1-23, <https://www.jstor.org/stable/10.2307/48535944>, 14.

Conclusion

The days following September 11, 2001 were marked with patriotic symbols, compassionate gestures, and a heightened sense of fear within the American people. This fear reawakened and emboldened the historic Western suspicion of Islam and those who practice its tenets. Huntington and Lewis's predicted "clash of civilizations" had supposedly come to fruition, and the American people grew wary of Islam.²³¹ As a result, Islamophobic hate crimes skyrocketed, and the persecution of American Muslims began.

The months following September 11, 2001 were marked by peaceful rhetoric from President Bush and Mayor Giuliani, a commitment to end racial profiling by Attorney General Ashcroft and the FBI,²³² and the implementation of decades long policy of religiously and racially motivated surveillance of members of the Middle Eastern and Islamic community in the name of national security. Although government officials were careful to distinguish between Islam and terrorism, the law enforcement initiatives they oversaw allowed for the widespread monitoring of Muslim neighborhoods, mosques, and immigrants from Muslim majority countries.²³³ Although hate crime statistics fell, American views of Islam became less favorable and more suspicious within the first few years after 9/11.²³⁴

The decades following September 11, 2001 were marked by foreign wars in Muslim majority countries, terrorist attacks in the U.S. and Europe by Islamic extremist groups, and a U.S. president with complementary rhetoric and policy against Muslim citizens and immigrants. By 2016, Islamophobic hate crimes were reported at levels only reached in the days immediately

²³¹ Huntington, *Clash of Civilizations*.

²³² "Fact Sheet: 'Racial Profiling,'" Department of Justice.

²³³ Appuzo and Goldman, "Documents: NYPD Gathered Intelligence."

²³⁴ Panagopoulos, "Trends: Arab and Muslim Americans," 614.

after the 9/11 attacks.²³⁵ With President Trump exploiting the historic fear and suspicion of Muslims in the United States, the country has continued to engage in blatant religious discrimination.

While President Bush believed that the response to the 9/11 attacks showed the “best of America,”²³⁶ 9/11 also brought out the worst of the country, manifesting itself in the systemic fear, distrust, and discrimination of American Muslim citizens. Rooted in a faulty understanding of the Middle East and Islamic belief system, U.S. officials targeted the Muslim community in their counterterrorism policies while the American public harassed, vandalized, assaulted, and even killed innocent Muslim civilians. Thinly disguised by positive rhetoric, both local and federal leaders approved and implemented mass discrimination against Muslim and Middle Eastern communities.

Blinded by overwhelming grief and fear, many Americans were willing to sacrifice their own personal freedom for safety in the wake of 9/11. Ever since this tragic day, government leaders have struggled to balance national security concerns with civil rights violations, specifically pertaining to Muslim and Middle Eastern Americans. With the passing of the Patriot Act and the implementation of national counterterrorism policies under the FBI and local police forces, Americans everywhere faced the possibility of surveillance, demographic mapping, and detention with minimal cause. However, most Americans did not truly face the repercussions of these policies. Instead, the unintended consequence of these counterterrorism measures has been the mass discrimination and targeting of Muslim and Middle Eastern people as well as those perceived to be in either group at the hands of the American public as well as law enforcement officials. Ultimately, the United States sacrificed the personal freedom and safety of its Muslim

²³⁵ Kishi, “Assaults against Muslims.”

²³⁶ Bush, “Statement by the President.”

people in the name of national security after 9/11. Now, twenty-one years later, Muslim Americans face less of a contradiction within the policy and rhetoric of the American government but continue to suffer the widespread and consistent burden of Islamophobic mistrust and discrimination.

Works Cited

- “The 2012 Pulitzer Prize Winner in Investigative Reporting.” The Pulitzer Prizes. Accessed November 16, 2020. <https://www.pulitzer.org/winners/matt-apuzzo-adam-goldman-eileen-sullivan-and-chris-hawley>.
- Abbas, Gadeir. “Anti-Muslim Legislation and Its Hopeful Demise.” *Human Rights, Religious Freedom: At a Crossroads*, 39, no. 2 (January 2013): 9–10. <https://www.jstor.org/stable/24630058>.
- Abdo, Geneive. “Islam in America: Separate but Unequal.” *The Washington Quarterly* 28, no. 4 (2005): 7–17.
- Ahmed, Parvez. “Karen Hughes Gets an Earful, but Is Her Boss Listening?” Media Monitors Network (MMN), October 5, 2005. <https://www.mediamonitors.net/karen-hughes-gets-an-earful-but-is-her-boss-listening/>.
- Akbarzadeh, Shahram, and Dara Conduit. “The Syrian Refugee Crisis.” *Ethos* 24, no. 2 (2016): 8–10.
- Allyn, Bobby. “‘We’re Supposed To Do That’: Bloomberg Defends NYPD’s Spying Of Muslims After 9/11.” NPR. NPR, February 28, 2020. <https://www.npr.org/2020/02/27/810181314/we-re-supposed-to-do-that-bloomberg-defends-nypd-s-spying-of-muslims-after-9-11>.
- Apuzzo, Matt, and Adam Goldman. “Documents: NYPD Gathered Intelligence on 250-plus Mosques, Student Groups in Terrorist Hunt.” Associated Press. Associated Press, September 6, 2011. https://www.pulitzer.org/files/2012/investigative_reporting/ap/nypd3.pdf.
- Apuzzo, Matt, and Adam Goldman. “NYPD Keeps Secret Files on Muslims Who Change Their Names to Sound More American: Report.” *nydailynews.com*. Associated Press, October 26, 2011. <https://www.nydailynews.com/new-york/nypd-secret-files-Muslims-change-names-sound-american-report-article-1.968327>.
- Apuzzo, Matt, and Adam Goldman. “With CIA Help, NYPD Moves Covertly in Muslim Areas.” NBC New York. Associated Press, August 24, 2011. <https://www.nbcnewyork.com/news/local/with-cia-help-nypd-moves-covertly-in-muslim-areas/1926933/>.
- “Arab League.” Encyclopedia Britannica. Encyclopedia Britannica, inc. Accessed November 16, 2020. <https://www.britannica.com/topic/Arab-League>.
- Bleich, Erik. “Defining and Researching Islamophobia.” *Review of Middle East Studies* 46, no. ii

(2012): 180–89. [https://doi.org/ https://www.jstor.org/stable/41940895](https://doi.org/https://www.jstor.org/stable/41940895).

Brown, Brendan. Trump Twitter Archive. Accessed January 15, 2021.

<https://www.thetrumparchive.com/>.

Bush, George W. “Address to the Joint Session of the 107th Congress.” Selected Speeches of President George W. Bush: 2001-2008, September 20, 2001. https://georgewBush-whitehouse.archives.gov/infocus/Bushrecord/documents/Selected_Speeches_George_W_Bush.pdf.

Bush, George W. “Address to the United Nations General Assembly.” Selected Speeches of President George W. Bush: 2001-2008, November 10, 2001. https://georgewBush-whitehouse.archives.gov/infocus/Bushrecord/documents/Selected_Speeches_George_W_Bush.pdf.

Bush, George W. “Department of Defense Service of Remembrance at the Pentagon.” Selected Speeches of President George W. Bush: 2001-2008, October 11, 2001. https://georgewBush-whitehouse.archives.gov/infocus/Bushrecord/documents/Selected_Speeches_George_W_Bush.pdf.

Bush, George W. “‘Islam Is Peace’ Says President: Remarks by the President at Islamic Center of Washington D.C.” The White House: President George W. Bush. National Archives and Records Administration, September 17, 2001. <https://georgewBush-whitehouse.archives.gov/news/releases/2001/09/20010917-11.html>.

Bush, George W. “Statement by the President in His Address to the Nation.” The White House: President George W. Bush. National Archives and Records Administration, September 11, 2001. <https://georgewBush-whitehouse.archives.gov/news/releases/2001/09/20010911-16.html>.

Chishti, Muzaffar, and Claire Bergeron. “DHS Announces End to Controversial Post-9/11 Immigrant Registration and Tracking Program.” migrationpolicy.org. Migration Policy Institute, May 17, 2011. <https://www.migrationpolicy.org/article/dhs-announces-end-controversial-post-911-immigrant-registration-and-tracking-program>.

Chomsky, Noam. *9-11: Was There an Alternative?* Crawley, W.A.: University of Western Australia, 2011.

“Civil Rights Implications of Post-September 11 Law Enforcement Practices in New York.” New York Advisory Committee to the U.S. Commission on Civil Rights, New York, 2004.

Culcasi, Karen. "Constructing and Naturalizing the Middle East." *Geographical Review* 100, no. 4 (October 2010): 583–97. <https://www.jstor.org/stable/25741178>.

"Demographic Portrait of Muslim Americans." Pew Research Center's Religion & Public Life Project. Pew Research Center, July 26, 2017. <https://www.pewforum.org/2017/07/26/demographic-portrait-of-muslim-americans/>.

Department of Justice. Immigration and Naturalization Service. 8 CFR Parts 214 and 264 "Registration and Monitoring of Certain Nonimmigrants." *Federal Register* 67, no. 155 (August 12, 2002): 52584-52593. <https://www.govinfo.gov/content/pkg/FR-2002-08-12/pdf/02-20642.pdf>.

Dwyer, Jim. "New Jersey Town Used Zoning to Discriminate Against Islam." *The New York Times*. The New York Times, May 23, 2017. <https://www.nytimes.com/2017/05/23/nyregion/new-jersey-town-zoning-discriminate-islam.html>.

Elliott, Justin. "NYC's Anti-Profilng Law: 'Not Worth Paper It's Written On'." ProPublica, March 2, 2012. <https://www.propublica.org/article/nycs-anti-profilng-law-not-worth-paper-its-written-on>.

Emmons, Alex. "Rudy Giuliani Brags About Treating All Muslims Like Criminal Suspects." *The Intercept*, July 20, 2016. <https://theintercept.com/2016/07/20/rudy-giuliani-brags-about-treating-all-muslims-like-criminal-suspects/>.

"Fact Sheet: Racial Profiling." Department of Justice. Department of Justice, June 17, 2003. https://www.justice.gov/archive/opa/pr/2003/June/racial_profiling_fact_sheet.pdf.

Gawthrop, William. "Doctrinal Basis for Jihad." *FBI Briefings on Islam*. Lecture presented at Quantico, n.d. <https://www.wired.com/2011/09/fbi-muslims-radical/>.

Gawthrop, William. "Militancy Considerations." *FBI Briefings on Islam*. Lecture presented at Quantico, August 24, 2011. <https://www.wired.com/2011/09/fbi-muslims-radical/>.

Gawthrop, William. "Strategic Themes and Drivers in Islamic Law." *FBI Briefings on Islam*. Lecture presented at Quantico, March 21, 2011. <https://www.wired.com/2011/09/fbi-muslims-radical/>.

Giardina, Michael D. "Barack Obama, Islamophobia, and the 2008 U.S. Presidential Election Media Spectacle." *Counterpoints*, Teaching Against Islamophobia, 346 (2010): 135–57. <https://www.jstor.org/stable/42980515>.

Giuliani, Rudolph W. "Address to the United Nations General Assembly on Combatting

- Terrorism.” Archives of Rudolph Giuliani, 107th Mayor - Major Addresses. Accessed November 16, 2020. http://www.nyc.gov/html/records/rwg/html/2001b/un_remarks.html.
- Goldman, Adam, and Matt Apuzzo. “Inside the Spy Unit That NYPD Says Doesn't Exist.” NBC New York. Associated Press, August 31, 2011. <https://www.nbcnewyork.com/news/local/nypd-spy-terrorism-Muslim-cia/1927513/>.
- Gross, Lexy. “Louisville Islamic Center Defaced with Graffiti.” Courier-Journal. The Courier-Journal, September 17, 2015. <https://www.courier-journal.com/story/news/local/2015/09/16/islamic-center-vandalized-members-obviously-hurt/32534857/>.
- Giuliani: Immigration ban is based on danger, not religion*. United States: Fox News, 2017. <https://video.foxnews.com/v/5301869519001#sp=show-clips>.
- Hartman, Todd K., and Adam J. Newmark. “Motivated Reasoning, Political Sophistication, and Associations between President Obama and Islam.” *PS: Political Science and Politics* 45, no. 3 (July 2012): 449–55. <https://www.jstor.org/stable/41691360>.
- Hauslohner, Abigail, and Jenna Johnson. “I Think Islam Hates US.: A Timeline of Trump's Comments about Islam and Muslims.” The Washington Post. WP Company, April 28, 2019. <https://www.washingtonpost.com/news/post-politics/wp/2017/05/20/i-think-islam-hates-us-a-timeline-of-trumps-comments-about-islam-and-Muslims/>.
- Hawley, Chris, and Matt Apuzzo. “AP Enterprise: Schools Raise Privacy Concerns over NYPD Spying on Muslim Students.” Associated Press, October 11, 2011. https://www.pulitzer.org/files/2012/investigative_reporting/ap/nypd6.pdf.
- Hayes, Christal. “Rep. Ocasio-Cortez, Others Blast Trump for 9/11 Video Coupled with Rep. Omar's Comments.” U.S.A Today. Gannett Satellite Information Network, April 13, 2019. <https://www.usatoday.com/story/news/politics/2019/04/13/donald-trump-posts-video-iihan-omar-footage-9-11-attack-twin-towers/3456666002/>.
- Hodson, Margaret. “Modern Day Trojan Horse? Analyzing the Nexus between Islamophobia and Anti-Refugee Sentiment in the United States.” *Islamophobia Studies Journal* 5, no. 2 (2020): 267–82. <https://www.jstor.org/stable/10.13169/islastudj.5.2.0267>.
- Holloway, David. 2008. *9/11 and the War on Terror*. Representing American Events. Edinburgh: Edinburgh University Press.
- Human Rights Watch. “WE ARE NOT THE ENEMY’: Hate Crimes Against Arabs, Muslims, and Those Perceived to be Arab or Muslim after September 11.” 14, no. 6 (G) (November 2002).

Huntington, Samuel P. *The Clash of Civilizations and the Remaking of World Order*. New York, NY: Touchstone, 1996.

“Inauguration Ceremony of the 108th Mayor, Michael R. Bloomberg.” Inauguration Speech by Michael Bloomberg, January 1, 2002. <http://www.nyc.gov/html/om/html/inaug02.html>.

Isikoff, Michael. “Investigators: The Fbi Says, Count The Mosques.” *Newsweek*. *Newsweek*, February 2, 2003. <https://www.newsweek.com/investigators-fbi-says-count-mosques-140311>.

Johnsen, Gregory D. “The Rise of ISIS.” *Great Decisions* (2016): 13-24.

Kean, Thomas H., and Lee Hamilton. *The 9/11 Commission Report*. Washington D.C.: National Commission on Terrorist Attacks upon the United States, 2004.

Khan, Minhas Majeed. “Is a Clash between Islam and the West Inevitable?” *Strategic Studies* 36, no. 2 (2016): 1–23. <https://www.jstor.org/stable/10.2307/48535944>.

Kishi, Katayoun. “Assaults against Muslims in U.S. Surpass 2001 Level.” Pew Research Center. Pew Research Center, November 15, 2017. <https://www.pewresearch.org/fact-tank/2017/11/15/assaults-against-Muslims-in-u-s-surpass-2001-level/>.

Kurzman, Charles. “Islamic Statements Against Terrorism.” *Islamic Statements Against Terrorism*. The University of North Carolina at Chapel Hill, September 21, 2020. <https://kurzman.unc.edu/islamic-statements-against-terrorism/>.

Lewis, Bernard. “The Roots of Muslim Rage.” *Policy* 17, no. 4 (2001): 17–26.

Lipka, Michael. “Muslims and Islam: Key Findings in the U.S. and around the World.” Pew Research Center. Pew Research Center, August 9, 2017. <https://www.pewresearch.org/fact-tank/2017/08/09/Muslims-and-islam-key-findings-in-the-u-s-and-around-the-world/>.

“Losing Liberty: The State of Freedom 10 Years after the Patriot Act,” Muslim Advocates, October 2011, <https://Muslimadvocates.org/advocacy/report-losing-liberty-the-state-of-freedom-10-years-after-the-patriot-act/>.

Lynch, Marc. *Rhetoric and Reality: Countering Terrorism in the Age of Obama*. Washington D.C.: Center for a New American Security, 2010.

Martin, Douglas. “Bernard Lewis, Influential Scholar of Islam, Is Dead at 101.” *The New York*

- Times. The New York Times, May 21, 2018.
<https://www.nytimes.com/2018/05/21/obituaries/bernard-lewis-islam-scholar-dies.html>.
- “Member States.” Organisation of Islamic Cooperation: The Collective Voice of the Muslim World. Organisation of Islamic Cooperation. Accessed November 16, 2020.
<https://www.oic-oci.org/states/?lan=en>.
- Moore, David W. “Terrorism Most Important Problem, But Americans Remain Upbeat.” Gallup.com. Gallup, October 18, 2001. <https://news.gallup.com/poll/4996/terrorism-most-important-problem-americans-remain-upbeat.aspx>.
- Moore, Tina, Rocco Parascandola, and Corky Siemaszko. “Mayor Bloomberg Defends NYPD Spying on Muslims; Calling It Legal, Appropriate and Constitutional.” nydailynews.com. New York Daily News, January 10, 2019. <https://www.nydailynews.com/news/mayor-bloomberg-defends-nypd-spying-muslims-calling-legal-constitutional-article-1.1028022>.
- Moustafa, Tamir, and Jeffrey Adam Sachs. “Law and Society Review Special Issue Introduction: Islamic Law, Society, and the State.” *Law & Society Review* 52, no. 3 (2018): 560–73.
- Muslim, Arab, and South Asian organizations. Letter to John Brennan. “FBI's Use of Biased Experts and Training Materials.” Muslim Advocates. Muslim Advocates, October 27, 2011. <https://Muslimadvocates.org/2011/10/letter-to-dhs-john-brennan-on-fbis-Use-of-biased-experts-and-training-materials/>.
- Nacos, Brigitte L., Robert Y. Shapiro, and Yaeli Bloch-Elkon. “Donald Trump.” *Perspectives on Terrorism* 14, no. 5 (October 2020): 2–25.
<https://www.jstor.org/stable/10.2307/26940036>.
- Noueihed, Lin and Alex Warren. *The Battle for the Arab Spring: Revolution, Counter-Revolution and the Making of a New Era*. New Haven, CT: Yale University Press, 2012.
- Obama, Barack. “President Obama Speaks to the Muslim World from Cairo, Egypt.” The White House: President Barack Obama. National Archives and Records Administration, June 4, 2009. <https://obamawhitehouse.archives.gov/issues/foreign-policy/presidents-speech-cairo-a-new-beginning>.
- Obama, Barack. “Remarks by the President at Islamic Society of Baltimore.” The White House: President Barack Obama. National Archives and Records Administration, February 3, 2016. <https://obamawhitehouse.archives.gov/the-press-office/2016/02/03/remarks-president-islamic-society-baltimore>.
- Panagopoulos, Costas. “Trends: Arab and Muslim Americans and Islam in the Aftermath of 9/11.” *Public Opinion Quarterly* 70, no. 4 (2006): 608–24.

Parliament. House of Commons (2009). *Project CONTEST: The Government's Counter-Terrorism Strategy*. (HC 2008-2009 9). London: The Stationery Office.

Presidential Documents. Executive Order 13769 of January 27, 2017. "Protecting the Nation from Foreign Terrorist Entry into the United States." *Federal Register* 82, no. 20 (February 1, 2017): 8977-8982. <https://www.govinfo.gov/content/pkg/FR-2017-02-01/pdf/2017-02281.pdf>

Qurashi, Fahid. "The Prevent Strategy and the UK 'War on Terror': Embedding Infrastructures of Surveillance in Muslim Communities." *Palgrave Communications* 4, no. 17 (2018). <https://doi.org/10.1057/s41599-017-0061-9>.

Redfield, Marc. *The Rhetoric of Terror: Reflections on 9/11 and the War on Terror*. New York, NY: Fordham University Press, 2009.

"Roll Call Vote 107th Congress - 1st Session." United States Senate, October 25, 2001. https://www.senate.gov/legislative/LIS/roll_call_lists/roll_call_vote_cfm.cfm?congress=107&session=1&vote=00313.

Said, Edward. "The Clash of Ignorance." *The Nation*, October 4, 2001. <https://www.thenation.com/article/archive/clash-ignorance/>.

Said, Edward. *Orientalism*. London: Routledge & Kegan Paul Ltd., 1978.

Schleifer, Theodore. "Donald Trump: 'I Think Islam Hates Us'." CNN. Cable News Network, March 10, 2016. <https://www.cnn.com/2016/03/09/politics/donald-trump-islam-hates-us/index.html>.

Snow, Anita. "Correction: Sikh Killed-Anniversary Story." AP News. Associated Press, September 15, 2019. <https://apnews.com/article/f1fd15e5440c478d99472f18cc0e00a6>.

Sullivan, Eileen. "AP IMPACT: NYPD Spied on City's Muslim Anti-Terror Partners and Allies of Mayor Bloomberg." Associated Press, October 5, 2011. https://www.pulitzer.org/files/2012/investigative_reporting/ap/nypd5.pdf.

Syed Farhaj Hassan, The Council of Imams in New Jersey, Muslim Students Association of the U.S. and Canada, Inc., All Body Shop Inside and Outside, Unity Beef Sausage Company, Muslim Foundation Inc., Moiz Mohammed, Jane Doe, Zaimah Abdur-Rahim, and Abdul-Hakim Abdullah v. The City of New York, 2:12-CV-3401 (WJM)(MF), 7 (United States District Court District of New Jersey).

Tani, Maxwell. "Trump: I Saw 'Thousands and Thousands' of People in New Jersey Cheer the

9/11 Attacks.” Yahoo! Finance. Yahoo!, November 22, 2015.

<https://finance.yahoo.com/news/trump-saw-thousands-thousands-people-164537580.html?guccounter=1>.

“Trump on Closing Mosques: ‘I Would Do That, Absolutely ...’” CBS News. CBS, October 21, 2015. <https://www.cbsnews.com/video/trump-on-closing-mosques-i-would-do-that-absolutely/>.

Trump: We Must Watch and Study Mosques. United States: MSNBC, 2015.

<https://www.msnbc.com/morning-joe/watch/trump-we-must-watch-and-study-mosques-567563331864/>.

Giuliani: Immigration ban is based on danger, not religion. United States: Fox News, 2017.

<https://video.foxnews.com/v/5301869519001#sp=show-clips>.

U.S. Congress. *Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism (U.S.A Patriot Act) Act of 2001*. H.R. 3162. 107th Cong., 1st sess. Signed into law October 26, 2001:

<https://www.congress.gov/107/plaws/publ56/PLAW-107publ56.pdf>.

“The U.S.A Patriot Act: Impact on the Arab and Muslim American Community.” The Institute for Social Policy and Understanding, 2004. <https://www.ispu.org/the-usa-patriot-act-impact-on-the-arab-and-muslim-american-community/>.

Wang, Christine. “Trump Website Takes down Muslim Ban Statement after Reporter Grills Spicer in Briefing.” CNBC. CNBC, May 8, 2017.

<https://www.cnbc.com/2017/05/08/trump-website-takes-down-muslim-ban-statement-after-reporter-grills-spicer-in-briefing.html>.

Wong, Kam C. “The U.S.A Patriot Act: A Policy of Alienation.” *Michigan Journal of Race and Law* 12 (2006): 161–202.