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## **One Meta-Media Event, Two Forms of Censorship: The Charlie Hebdo Affair in the United Kingdom and Turkey**

### Abstract

This paper comparatively analyzed how media outlets in the UK and Turkey dealt with, and explained the dilemma of the republication or non-republication of *Charlie Hebdo*'s "Je Suis Charlie" Mohammed cartoon. Editorial decisions to republish or not to republish the cover reflected the politico-cultural pressures on the journalistic field in both countries. The dominant themes that emerged from textual analyses of editorial policy statements regarding the cartoon demonstrated that the editorial autonomy of the British media outlets under study enabled them to engage in "eclectic neutrality," while the journalistic editorial independence in Turkey is severely constrained by an Islamo-secular order where expectation of respect for religion take precedence over freedom of expression.

## **One Meta-Media Event, Two Forms of Censorship: The Charlie Hebdo Affair in the United Kingdom and Turkey**

The Charlie Hebdo affair was an emotional issue in Turkey. When news of the *Charlie Hebdo* terrorist attack in Paris reached Turkey, crowds of people gathered in stunned silence in Ankara, the capital, and in front of the French embassy in Istanbul holding *Je Suis Charlie* signs in solidarity with the embattled French satirical newspaper. In the same cities, and elsewhere in Turkey, crowds of angry demonstrators denounced Charlie for blaspheming Prophet Mohammed, Islam, and Muslims. The Turkish government soon made known its position on the issue. The official Anadolu Turkish News Agency (Anadolu, 2015b) reprinted Prime Minister, Ahmet Davutoğlu's official statement condemning the terrorist attack:

We are in solidarity with France against terror and I offer condolences to the relatives of the victims and the French people... These attacks are not only aimed at the French people, but also democracy, freedom and universal values; terror has no religion, nation nor any value it represents," said the statement. Terrorism is a crime against humanity.

Four days after the terrorist attack that left twelve journalists and celebrated cartoonists dead, and eleven others severely injured, the French government organized massive *marches républicaines pour Charlie Hebdo et pour la liberté d'expression* (republican rallies for *Charlie Hebdo* and for freedom of expression) across France. The premise of these rallies was that the Islamist attack was a direct assault on France and its national ideology, secular republicanism, whose major tenet is that in secular democratic societies, there is a sacred right/rite to satirize and even to blaspheme and offend religion (Berkowitz and Eko, 2007; Gopnik 2015; Eko and Berkowitz, 2009; Eko, 2013).

President François Hollande decided to personally lead these rallies that echoed popular

French revolutionary uprisings that led to the overthrow of the Divine rights monarchy and its established religion, Roman Catholicism in 1789. The marches were in support of the secular republican ideology of France that emerged from the Revolution. In announcing his decision to lead the rally in Paris, President François Hollande told the nation in a televised address that the terrorist attacks on *Charlie Hebdo* and other targets were attacks against France and its secular republican values, of which freedom of expression was fundamental: “we bear ideals that are greater than us,” he told the French people and the rest of the watching world (Bosse-Platière, 2015).

More than 1.5 million people participated in the Parisian rally led by President Hollande. International participants included the heads of state and government, as well as diplomats from 50 different countries. Notable among them were the following political leaders: German Chancellor Angela Merkel, British Prime Minister David Cameron, Prime Minister Benjamin Netanyahu of Israel, Prime Minister Ahmet Davutoğlu of Turkey, and King Abdallah and Queen Raina of Jordan. Many newspapers reported that the 1.5 million people who showed up in the Paris march made the event the largest march in the French capital since its liberation from Nazi Germany in 1944 (Bastié, 2015). The sight of the Turkish and British Prime Ministers working side by side in condemnation of terrorism and in support of freedom of expression was rather peculiar. As Vick (2015) of Time magazine wrote, the optics of “a Muslim nation making a show of solidarity with the victims of Islamist extremism” in Paris were good. However, in Turkey’s case it was “incredibly awkward” (Vick, 2015) because Turkey did not respect freedom of expression. With 40 journalists in prison at the time of the Parisian

march, Turkey had the dubious distinction of being the “world leader’ in the number of jailed journalists” (Freedom House, 2016).

For its part, the British government, which has had to deal with terrorist attacks in the UK, condemned the *Charlie Hebdo* attack in civilizational terms and defended freedom of expression, which had been attacked (Associated Press, 2015). Prime Minister, David Cameron, told the House of Commons:

I am sure that this whole House will join me in condemning the barbaric attack this morning at the office of a magazine in Paris... This House and this country stand united with the French people in our opposition to all forms of terrorism and we stand squarely for free speech and democracy. These people will never be able to take us off those values.

The image of British Prime Minister David Cameron, walking side by side with Turkey Prime Minister Ahmet Davutoğlu, in condemnation of Islamist terrorism and in support of freedom of expression during the *marche republicaine* in Paris seemed highly incongruous to journalists and human rights groups. Was this just an international political spectacle, or was it the public display of differential politico-cultural conceptualizations of human rights and freedom of expression? This awkward and dissonant globalized image led to this comparative case study of British and Turkish governmentalities of freedom of expression in the context of the *Charlie Hebdo* affair.

### **To Republish or Not to Republish the Je Suis Charlie Mohammed Cartoon**

One week after the terrorist attack, the surviving members of the *Charlie Hebdo* editorial team published a “survivors” edition of the newspaper (Figure 1), whose cover featured a cartoon image of a tearful Mohammed holding a sign that read: “*Je Suis Charlie.*” The banner headline of the special edition read: “*Tout Est Pardonné*” (All is

Forgiven). That defiant but controversial *Je Suis Charlie* cartoon cover went viral, and became an unprecedented global media phenomenon, a best seller, with more than eight million copies sold around the world (Vidon, 2015). The extensive global media coverage of the event transformed it into a sensational, global, “mediatized meta–event” (Christensen & Christensen, 2013, p. 352) that transcended cultures and political ideologies. Naturally, some Muslims around the world were not amused by the *Je Suis Charlie* Mohammed cartoon, which violated Muslim strictures against pictorial representations of the Prophet (Eko, 2012). There were protests in a number of countries against the *Je Suis Charlie* Mohammed cartoon and its republication. This situation presented media outlets around the world with a rather delicate dilemma—republish or refrain from republishing the Charlie Hebdo’s *Je Suis Charlie* Mohammed cartoon cover in their news reports about the Charlie Hebdo terrorist attacks and its aftermath. Many media outlets around the world republished the *Je Suis Charlie* Mohammed cartoon claiming that it was newsworthy. For example, *The Washington Post* argued that the cartoon was: “the most newsworthy image of 2015,” (Wemple, 2015). Many other media outlets, including the *New York Times*, decided against republishing the cartoon, out of a desire not to offend Muslims, or out of fear of reprisals (Sullivan, 2015). The question arose whether it was professional or even ethical for newspapers to write stories about the *Charlie Hebdo* terrorist attack and refuse to show either the cartoons that ostensibly provoked it or the defiant *Je Suis Charlie* Mohammed cartoon that had itself become a global news phenomenon because Muslims opposed. For the French press and many media outlets around the world, republishing the newsworthy Mohammed cartoons represented defense of freedom expression, editorial independence, and journalistic

solidarity with *Charlie Hebdo*. Media outlets like CNN, that decided not to republish the cartoons out of security concerns, or those, like the *New York Times*, that refused to republish the cartoons in order not to bruise the religious sentiments of audiences, came in for a lot of criticism from other media outlets (Wemple, 2015).

### **Aim of the study and Comparative Approach**

The sensational *Charlie Hebdo* terrorist attack and its aftermath constituted a series of unprecedented global media phenomena that exposed tensions between freedom of expression and respect for religious sentiments in numerous politico-cultural contexts. Media outlets around the world had to decide whether to republish or not to republish the *Charlie Hebdo* Mohammed cartoons that were at the center of the crisis. In view of the very visible role played by then Prime Ministers of the United Kingdom, David Cameron and then Turkish Prime Minister, Ahmet Davutoğlu, in the Parisian marches for *Charlie Hebdo* and freedom of expression, we wanted to see how the media in the UK and Turkey dealt with the *Charlie Hebdo* terrorist attack in general, and how they handled the delicate issue of republication of *Charlie Hebdo*'s Je Suis Charlie Mohammed cartoons.

Despite the fact that journalism and the media are functionally equivalent institutions in all societies, they are entrenched in the specificities of given national or cultural geographies of freedom of expression. In effect, implicit and explicit, culture-specific “contextual matrixes” (Legrand, 2003, p. 240) shape journalistic cultures, as well as their constructions and representations of reality. This is because journalism generally reflects the political and ideological coloration of the system under which it operates (Siebert et al, 1956, Hallin & Mancini, 2004). In this study, our purpose is to describe and explain the impact of “contextual matrixes” (Legrand, 2003, p. 240) on the tension



between human rights and religious rites in the context of the Charlie Hebdo “affair.” This conflict has often been framed as a clash between freedom of expression and freedom of religion (Berkowitz and Eko, 2007; Kunelius & Nossek, 2008; Klausen, 2009; Klausen, 2005; Selbourne, 2005). We approached this study from comparative, journalistic paradigm and editorial independence perspectives.

### **Theoretical Frameworks: The Comparative Posture, Journalistic Paradigms & Editorial Independence**

In comparative social science research studies, the traditional method is to either select cases that are “most-similar,” or cases that are “most-different,” for comparative analysis (Przeworski & Teune, 1970; Ragin, 1987; Gerring, 2007). The logic of this approach is that in “most-similar” case studies, the two cases chosen for comparison are similar in all respects except the variable(s) of interest, while in the “most-different approach,” the cases chosen for comparative analysis are different in all respects, except the variable(s) of interest (Przeworski & Teune, 1970, Ragin, 1987). The variables of interest in this study are journalistic paradigms, regimes of freedom of expression, editorial independence, and editorial decision-making in the contest of a global religious controversy in general, and republication of the Je Suis Charlie Mohammed cartoon in particular. The premise is that the media play important informational “functions or dysfunctions” (Michaels, 2006, p. 371) in given societies. Analyses of the functions of media institutions and regulatory instruments in specific societies are the domain of functionalism and “functional equivalence.” The main premise of this approach is that the role of the media is functionally equivalent in all societies despite the different politico-

cultural contexts in which they are ensconced (Michaels, 2006). Therefore, the functional equivalence comparative approach to media and law is essentially the analysis of:

“similarity in difference; it is the finding that institutions are similar in one regard (namely in one of the functions they fulfill) while they are (or at least may be) different in all other regards—not only in their doctrinal formulations, but also in the other functions or dysfunctions they may have beside the one on which the comparatist focuses” (Michaels, 2006, p. 371).

In the “similarity in difference” approach, the hypothesis is that if legislative or judicial authorities in two different countries with different politico-cultural regimes are faced with the same or similar legal problem, they will both, paradoxically, arrive at the same or similar decision due to contextual or extralegal phenomena. The second component of the functionalist comparative approach is the functional equivalence, “differences within similarity” approach. This is the mirror image of the “similarity in difference” approach. In comparative case studies that follow this approach, one can hypothesize that if legislative or judicial authorities in two different regimes that have similar politico-cultural ideologies are faced with the same or similar legal problem, they will paradoxically arrive at two different outcomes, due again to extralegal and contextual circumstances (Michaels, 2009).

Taken together, the “most-different” comparative approach and the “similarity in difference” functional equivalence approach are suitable for the comparative analysis of multi-dimensional global media phenomena like the Charlie Hebdo Mohammed cartoons affair because it focuses on concrete problems or specific events that bring to the fore the tension between the constitutional right of freedom of expression, and religious offense-taking, human rights and religious rites (Berkowitz & Eko, 2007; Eko, 2012). These perspectives enable researchers to carry out systemic comparative, institutional, doctrinal,

policy, and event analyses. They are also useful tools for the analyses of sameness and difference in journalistic cultures and paradigms, since all iterations of the craft of journalism play functionally equivalent roles of ideological sustenance, education, information, and entertainment in all societies. The significance of this study is that it adds to knowledge in the field of comparative media studies by amalgamating the traditional “most-similar” and “most-different” comparative social science approaches with functionalism and functional equivalency, a conceptual approach that is traditionally used in comparative law and policy studies to analyze the responses of different laws, policies, or legal regimes to the same or similar socio-political issues (Michaels, 2006; Eko, 2012). This combination results in a novel theoretical tool that makes it possible to compare diverse journalistic cultures that are ensconced in different politico-cultural contexts, with a common set of rules governing human rights, freedom of religion, freedom of opinion, and freedom of expression under international human rights law.

### **The Charlie Hebdo Terrorist Attack and Journalistic Cultures**

We have noted above that in traditional comparative social science studies, countries, systems or institutions are classified as either “most similar” or “most different,” in all aspects, with the exception of the main variable of interest in the study (Przeworski & Teune, 1970). The variable of interest in this study is freedom of expression and its manifestation in editorial decision-making in the *Charlie Hebdo* controversy. A fundamental premise of comparative media studies is that all national, transnational, and international freedom of expression regimes are, “authentic national expressions of universal values” (Ignatieff, 2005, p. 26) that are grounded in international law. Freedom of expression is therefore, a universal human rights phenomenon whose

expression is contextually determined (Eko, 2012; Jones, 2017). As Gordley (2003, p. 44) put it: “the difference in circumstances makes each law appropriate” to the specific jurisdiction where it is in force. In democratic societies, the media operate as a “fourth estate” that plays important information dissemination roles critical to democratic governance. They also have a checking function—they denounce governmental, institutional, corporate and individual excesses and malfeasances. In authoritarian societies, the media play functionally equivalent informational “functions or dysfunctions” (Michaels, 2006, p. 371) related to regime ideology and maintenance.

Analysis of the functions of media institutions and regulatory instruments in specific societies is the domain of functionalism and “functional equivalence.” The main premise of this approach is that constitutions and constitutional protections granted by different regimes are functionally equivalent, on paper, despite the politico-cultural differences between these regimes (Michaels, 2006). The French Declaration of the Rights of Man and of the Citizen (1789), the American First Amendment (1791), and the Canadian Charter of Rights and Freedoms (1982) are functionally equivalent instruments that protect freedom of expression in democratic societies. This study explores journalism and journalistic editorial decision-making in the context of global media controversies, using as a comparative case study, British and Turkish editorial decisions with respect to republication or non-republication of the controversial Je Suis Charlie Mohammed cartoons.

All journalistic cultures and products are politico-culturally situated adumbrations or outlines of reality, truth and power dynamics that are presented or re-presented from the perspective of the presenter. In short, despite its diverse cultural manifestations,

journalism has certain structural parallels, the most common of which is narrativity (storytelling), defense of the status quo, and of the journalistic *modus operandi* (Berkowitz & Eko, 2007; Bourdieu, 1994). Different iterations of journalistic values shape the reporting styles and traditions of journalists, and vary among countries and cultures (Hallin & Mancini, 2004; Eko, 2012; Hachten, 2016). While journalism scholars point out important differences among journalistic cultures (Esser & Umbricht, 2014; El Issawi & Cammaerts, 2016), Peter Berglez (2008) argues that transnational crises such as Charlie Hebdo call for new global ways of analyzing and producing news. He defines global journalism as news style that rests on a distinct epistemology, a so-called global outlook in regards to the representation of space, power and identity. This approach transcends the foreign-domestic dichotomy to call for a more globally-oriented and globally mindful performance of journalism (Berglez, 2008).

In the *Charlie Hebdo* case, there was simultaneity of awareness among global audiences, which allows reflectiveness and timeliness in the ways different media organizations conceptualized the journalistic paradigm. In this interconnected world, journalism must navigate between its “vertical orientation” –a journalistic paradigm ensconced in the cultural traditions of a specific nation-state, and its institutionalized paradigm, a “horizontal” perspective or global outlook, which is characterized by more cosmopolitan, pluralistic, and universal values that transcend narrow national traditions and frameworks (Reese, 2008, Eko & Hellmueller, 2017). The horizontal dimension of global journalism also transcends specific paradigms, thus bringing into question the idea that paradigm studies must take place within specific countries. This study explores how national and international flagship media in two distinct journalistic cultures– Great

Britain and Turkey— responded to the decision whether to republish or not to republish the *Charlie Hebdo Je suis Charlie* Mohammed cartoon cover. The study examines the editorial policies and justifications advanced by these media outlets for purposes of examining and comparing journalistic paradigms in an interconnected global media environment where there is an acute tension between the right of freedom of expression and expectations of respect for religion.

### **The Journalistic “Field” and Editorial Independence**

One of the ‘settled’ fundamental values of the journalistic paradigm in democratic societies is the right of editorial independence or autonomy. This is the legal protection accorded editors and publishers in democratic countries to freely and independently decide what to publish and what not to publish, despite governmental or interest group pressure. Its main premise is that journalism is a competitive “autonomous field” (Bourdieu, 1994; Karppinen & Moe, 2016) in which editors act as gatekeepers who decide what gets into their media outlets and what does not. The principle of editorial independence or autonomy has politico-cultural and legal dimensions. Bourdieu (1994) suggests that journalism is a competitive field (*un champ*) with multiple iterations. Journalism has acquired certain settled rights and privileges through “the autonomy of the field and its capacity to resist mundane demands” (p. 6). Nevertheless, the field of journalism has the power to give the last word to carefully selected sources. Bourdieu calls this practice: “*la neutralité éclectique à l’égard de toutes les parties concernées*” (eclectic neutrality towards all parties concerned) (Bourdieu, 1994, p. 6). This suggests that depending on the sensitivity of the circumstances, journalists and their editorial gatekeepers exercise their autonomy even when they indulge in a conscious, cherry-

picking, view-point selectivity that is neutral in certain situations but not in others. Indeed, in most Western countries, the media are forced, under intense pressure to assume a posture of “eclectic” neutrality by governments, global corporate interests, religious authorities, and increasingly vocal, organized interest and “memory groups” that “play memory games,” and use collective memory (the past) to control the present as well as the future (Mink & Neumayer, 2013, p. 4). In the face of this reality, Bourdieu (1994) advanced a philosophical defense of authorial and editorial independence. He argued that journalistic autonomy should be insulated from interest group and market pressures like ratings and best-seller lists. He suggests that submission of intellectual fields like publishing or journalism to the mundane, the popular will, affirms a negative, anti-intellectual impulse, namely, “the idea that art...could be submitted to the verdict of universal suffrage” (p. 7). We use Bourdieu’s idea of journalistic autonomy and eclectic neutrality, to analyze the editorial decisions of select British and Turkish media outlet to republish or not to republish the *Je Suis Charlie* Mohammed cartoon.

### **Research Questions**

As noted above, the UK and Turkey can be classified as “most different” countries (Przeworski & Teune, 1970) because their politico-cultural contexts are different in all respects except the functionally equivalent institution of journalism and mass communication (the variable of interest in this study). Though their respective politico-cultural contexts are different, the media in both countries are functionally equivalent in terms of the roles they play as disseminators of information, and writers of the first draft of the history of both societies. Additionally, they use the same or similar information and communication technologies in real space and cyberspace, and subscribe

to the same human rights standards set forth in the Universal Declaration of Human Rights (1948). What interests us is the substance of the media in both countries, and the contextual constraints placed upon their editorial decision-making with respect to republication of the *Je Suis Charlie* Mohammed cartoon. In the light of the above, the following research questions guided this study: Research question #1: What are the politico-cultural specificities and contextual matrixes that make both countries “most-different?” #2: How do these characteristics explain the decisions of the media under study to republish or not to republish the *Je Suis Charlie* Mohammed cartoon?

We have seen that under Bourdieu’s field perspective, the media enjoy context-specific autonomy and practice gatekeeping that is consonant with their specific politico-cultural contexts. This gave rise to the second research question: How did the editorial decisions of the British and Turkish media under study with respect to republication or non-republication of the *Charlie Hebdo* Mohammed cartoon demonstrate contextual editorial autonomy and “eclectic neutrality towards all parties concerned?” (Bourdieu (1994, p. 6). In other words, how did the editorial decisions of the media under study reflect contextual viewpoint-based gatekeeping?

## **Methods**

In order to answer these research questions, we carried out a mixed-method research design that combined historical analysis, policy analysis (of regulatory provisions governing the media in the United Kingdom and Turkey), and textual analyses of the policy statements, editorials, interviews, and blog posts of the editors of the British and Turkish media outlets under study. In order to compare the politico-cultural contexts of the UK and Turkish media, we carried out a comparative analysis of both countries,



and their media regimes. Furthermore, we consulted their classification on the Freedom House “Freedom in the World Report,” an annual study of political rights and civil liberties around the world. We also consulted the World Press Freedom Index, the press freedom rankings of Reporters Without Borders, an international organization that protects journalists and media personnel around the world.

Our textual analysis of editorial postures and decisions focused on a number of media outlets in both countries. In the UK, all the national newspapers stayed clear of the Je Suis Charlie Mohammed cartoon. We chose *The Guardian* and the *Independent*, which are among the world’s most respected newspapers, because of their strident deployment of editorial autonomy to justify their decision not to republish the cartoon. BBC News, and SkyTV (UK) were chosen for this study because they were the only media outlets in the UK that republished the *Je Suis Charlie* Mohammed cartoon, voluntarily and involuntarily, respectively. In Turkey, four media outlets published material in solidarity with *Charlie Hebdo*. Three satirical magazines: *Leman*, *Uykusuz* and *Penguen*, printed an identical "Je suis Charlie," on a black background, as their common cover page. For this study, we chose *Cumhuriyet Gazetesi* of Istanbul, the only newspapers that republished the *Je Suis Charlie* Mohammed cartoons in Turkey.

The timeframe for the study was January 8-15, 2015, the period between the terrorist attack and publication of the special survivors’ edition of *Charlie Hebdo* with the *Je Suis Charlie* Mohammed cartoon cover. Searches were carried out within the Web pages of the British media outlets under study, as well as the English language databases of Anadolu, the official Turkish News Agency, to identify stories and videos about republication of the *Charlie Hebdo* cartoons. Only policy and position statements that

dealt with republication or non-republication of the “Je Suis Charlie” cover were selected for analysis. We found a total of 10 stories/interviews of editors (four from Turkey and six from the UK). We used a grounded textual analysis (Lindlof, 2002) to analyze the data, and allow themes to emerge through multiple, iterative readings and verifications with international media: Al-Jazeera and CNN International, which covered the controversy in both countries. We took detailed notes on the downloaded news items and re-read them in the writing process.

## **Results**

The purpose of this study was to carry out a comparative analysis of editorial decisions made in the context of the highly publicized, global religious and media controversy, the *Charlie Hebdo* “affair,” using selected media outlets in the UK, and Turkey as case studies. We therefore explored the tensions between freedom of expression and respect for religion in the UK and Turkey as the context in which editorial decisions to republish or not to republish the *Je Suis Charlie* Mohammed cartoon were made. Since the media are culturally entrenched institutions, our first question was concerned with the placement of the United Kingdom and Turkey on the “most-similar” and “most- different” comparative scale (Przeworski & Teune, 1970) as the context for examining the variable of interest to this study—factors affecting journalistic editorial decision-making with respect to republication of the *Je Suis Charlie* Mohammed cartoon. This section analyzes the politico-cultural specificities and contextual matrixes (Legrand, 2003, p. 240) that influenced the decision to republish or not to republish the cartoon in both countries.

<<Figure 1: Je Suis Charlie Mohammed cartoon about here>>

### **Politico-cultural Realities and Contexts: Turkey & the United Kingdom**

The United Kingdom and Turkey have different journalistic cultures that are ensconced in their respective, context-specific histories and civilizations. Turkey has historically been presented as the quintessential orientalist foil of the occidental culture of the United Kingdom and the West (Said, 1979, Artan and Schick, 2013; Eide, 2008; Klausen, 2009; Frachini, 2002; Hallaq, 2003 ; Eko, 2012). Historically and culturally, Turkey is the successor state of the multiethnic super-state, the Ottoman Muslim Caliphate. This was a politico-religious state that asserted “a direct line of political succession from the Prophet Mohammed” (Kissinger, 2014, p. 103). The Ottoman Caliphate had inherited “Muslim World leadership,” and ruled the faithful in the expanding and receding Muslim world more or less as a single political entity from 1299-1924. Turkish sultans took the official titles of “Warrior of the Faith,” “Defender of the Sharia’a” (Lapidus, 2014, p.337), and “the Shadow of God on Earth” (Kissinger, 2014, p. 108). When the Ottoman Caliphate was officially abolished in 1924, its successor state was a young Turkish republic conceptualized as a modern secular state with Western values grounded in Islamic culture and traditions. Turkey has a secular constitution and a penal code that criminalizes blasphemy or “defamation of religion.” Contemporary Turkey is thus a unique Islamo-secular democracy with a political culture in which Islam and the state are intertwined (Eko, 2012). There has been clash of political and human rights cultures between Turkey and the European Union. Though Turkey is a member of NATO and the Council of Europe, it has not been successful in gaining membership into the European Union due to the fact that some EU countries claim that Turkey does not meet “Western” standards of democracy, human rights and freedom. Indeed, in 2003 the

European Court of Human Rights ruled that Sharia law, which is espoused by the ruling political party and its allies in Turkey, is at variance with the values of Western democracy and human rights (*Refah Partisi and Others v. Turkey*, 2003).

### **The Media and Freedom of the Press in Turkey**

Turkey is an Islamo-secular republic that has deep religious and politico-cultural continuities with the Ottoman Empire (Yesil, 2016; Eko, 2012). Since it was founded in the early 20<sup>th</sup> Century, the Republic of Turkey has had to navigate perennial politico-cultural tensions caused by the clash between Kemalist laicism and political Islamicism. This has resulted in uniquely Turkish political economy of the media with its culture-specific legal interpretations of freedom of expression, media agency, and instrumentality in real space and cyberspace (Farmanfarmaian, Sonay, & Akser, 2018). Akser, Murat, and Banu Baybars-Hawks (2012) suggest that Turkey has evolved into a country with a neoliberal model of media autocracy characterized by economic pressure on media outlets, judicial suppression, Internet black outs and banishment of YouTube and other platforms that could be used to post material critical of the government, as well as surveillance of reporters and politicians, and publication of illegally obtained compromising sexual material to black mail opponents, and denying journalists that are critical of the government access to information and political events. The entwining of the sacred and the secular has accelerated under the regime of Prime Minister, turned President, Recep Tayyip Erdoğan (Eko, 2012; Freedom House, 2016; Anadolu, 2015; Anadolu 2015a). Bilge Yesil suggests that Turkey has a centralized, statist authoritarian political culture in which “primacy and reverence for the state” and its interests rather than “respect for the rule of law, civil society, and individual rights” hold sway (p. 9).

Since 2002, Turkey has successfully blended religion, politics and economics: “Muslim nationalism, and neo-Ottoman revivalism,” as well as a Turkish variant of market economics under the “super-presidency” of Islamist leader Recep Tayyip Erdoğan (Yesil, 2016, p. 2, 11; Anadolu, 2015). Akser (2018) suggests that since 2009, there has been a contentious, adversarial relationship between the Turkish Islamist leader, Recep Tayyip Erdoğan and the media. The power dynamics have dramatically changed in favor of the government, which has used political, economic, legal, and regulatory tools to punish or control the media. These instruments have included the takeover of media corporations seen as unfriendly to the government, censorious taxation against media corporations, the arrest and trial of tens of journalists and media workers, and prison sentences for journalists

These politico-cultural forces have shaped the media system. Turkey has what Yesil (2016, p. 8) describes as a “highly clientelistic and politicized” media system over which the powerful authoritarian government has direct control through a “highly politicized” judiciary and its politico-Islamist interpretations of the Press Law, the Internet Law, the Broadcasting Law, the Penal Code, and the Anti-Terror Law, and indirect control through licensing and contracts. The Turkish judiciary is the branch of governmental that “criminalize media practitioners, confiscates publications, shuts down websites, and prosecutes writers, publishers, and artists” (Yesil, 2016, p. 8). Turkish prosecutors routinely charge, and judges routinely convict media practitioners on a litany of criminal charges against the state: “spreading Kurdish propaganda, harming Turkey’s national security and territorial integrity, inciting hatred and enmity among the Turkish public, insulting state institutions, undermining the moral values of Turkish society, and

insulting Islam and the Prophet Muhammad” (Yesil, 2016, p. 8). The result is that Turkey has the dubious distinction of being the “world leader” in the number of jailed journalists. Dozens of journalists, activists, and politicians were jailed for “anti-state” activities that included insulting the president, and other state figures, as well as “offending the sensibilities of Muslims.” Twitter, YouTube and thousands of websites are blocked or banned from time to time for hosting objectionable content, and many journalists have been fired, forced to resign under political pressure, or flee the country (Yesil, 2016, p.2).

Akser (2018) adds that the failed 2016 coup attempt against Erdogan proved to be a turning point for Turkey and its media. It led to the wholesale detention of journalists and the forceful takeover of television stations and newspapers. “And from time to time, social media outlets were blocked wholesale, with bans on YouTube, Twitter, and Wikipedia.” (p. 80). The result has been the diminishment of independent or critical media outlets, and emergence of media outlets biased in favor of the government. “This wrath of the government toward the media resulted in a significant shift in the media’s monitoring of public affairs and critical commentary” (Akser, 2018 p.81). This is the politico-cultural context in which the Je Suis Charlie Mohammed cartoon controversy was dealt with in Turkey.

### **The Politico Cultural Context of the Media in the United Kingdom**

The United Kingdom is classified as part of “Western civilization or Western Christendom...or European Civilization” (Huntington, 1996, p. 46-47). It has a Christian culture grounded in an ancient establishmentality–entwinement of church and state–that was recognized in the Magna Carta of 1215. The Church of England is the established

Church, while the British monarch is the head of the Church and “Defender of the Faith.” The British press, whose origins can be traced to the establishment of the first English printing press in 1476, and launching of the oldest surviving English newspaper, *Worcester Postman* in 1690, is the “mother” of the Anglo-American journalistic culture. Under this British system, which diffused to the United States during the colonial era, the press is conceptualized as “a Fourth Estate,” a counter-power equivalent to the “Fourth Estate” that had emerged in France at the onset of the French Revolution of 1789 (Carlyle, 1837). This metaphor conceptualized the media as a watchdog of the public interest against governmental, corporate and individual excesses. The British press has a historic tradition of freedom of expression, editorial autonomy, gatekeeping, and agenda-setting aimed at checking the powerful. Due to its reputation as the cradle of the “world’s most flamboyant and sensationalist tabloids” (Fridriksson, 2004), and other excesses, the British print media have a tradition of voluntary self-regulation, through organizations like the Newspaper Proprietors Association, the National Union of Journalists, the Society of Editors, the Press Complaints Commission, Independent Press Standards Organisation, and the News Media Association (News Media Association, 2017). Though the British broadcast media are not subject to content-based regulations, they are required “not to offend good taste” (Fridriksson, 2004). This vague and elastic concept covers everything from indecent sex-themed speech to criticism of religion. Furthermore, as a result of the increasing multiculturalism in the United Kingdom, and a number of controversies involving a clash between religion and freedom of expression, the common law offences of blasphemy and blasphemous libel were decriminalized in England and Wales in 2008.

## **Comparative Analysis of the British and Turkish Media**

As a result of their deep historical and cultural differences, the media systems of the United Kingdom and Turkey can also be classified as “most different” in form and substance (Przeworski & Teune, 1970). Freedom House, an international independent watchdog organization that monitors the status of freedom around the world, and advocates for democracy and human rights, ranks countries according their overall freedom, freedom of the Internet within their jurisdictions, and freedom of the traditional media in real space. Freedom House ranked Turkey as “partly free” in its 2016 Freedom in the World report, “partly free” in its 2015 Freedom on the Net report, and “not free” in its 2016 Freedom of the Press report. In contrast, Freedom House rated the United Kingdom as “free” in all three variables (Freedom House, 2016). For its part, Reporters Without Borders (RSF), an international organization set up to protect journalists and other media personnel, publishes an annual World Press Freedom Index, which ranks 180 countries according to the level of freedom available to journalists. This index is an annual snapshot of the scope of media freedom, based on an evaluation of pluralism, independence of the media, quality of legislative framework, and safety of journalists in each country. While the RSF Index has validity issues because of its lack of transparency and its tendency to highlight the freedom of expression regimes of small to medium-size, homogeneous, European countries as worthy of emulation, it is a useful barometer of the freedom of opinion, information, and expression in the authoritarian countries of the world. In 2016, the UK was ranked 38 out of 180 countries, while Turkey was ranked 151 out of 180 countries in the Index (The World Press Freedom Index, 2016). In 2017, the UK was ranked 40 out of 180 countries, while Turkey’s ranking on freedom of the



press was 155 out of 180 countries (The World Press Freedom Index, 2017).

Additionally, RSF reported that in the aftermath of an abortive coup d'état in Turkey in 2016, "Dozens of journalists have been imprisoned without trial, turning Turkey into the world's biggest prison for media personnel" (Journalism Engulfed by the Purge, 2017).

However, despite their politico-cultural differences, the UK and Turkey have one thing in common: They are bound by the Universal Declaration of Human Rights and its provisions on freedom of opinion and expression, as well as the European Convention on Human Rights and Fundamental Freedoms. They also have in common the variable under study, journalism, which is conceptualized as a universal craft with multiple national and cultural iterations or paradigms (Eko & Hellmueller, 2017). Indeed, journalism, a craft whose stock-in-trade is information and expression, plays a functionally equivalent (Michaels, 2006) institutional, informational, social and cultural role in both countries. What makes the British and Turkish media "most different" is their respective cultural contexts, and their differential degrees of freedom of information and expression. This rest of the paper explores how the media under study in these "most different" countries balanced the right of freedom of expression and expectations of respect for Islam and Muslims in the context of editorial decisions regarding republication of the Je Suis Charlie Mohammed cartoon. The question then is whether the observed differences in history, political culture, and establishmentality between the two countries was evident in their journalistic editorial decisions with respect to republication of the Je Suis Charlie Mohammed cartoon.

### **The British and Turkish Media and the Je Suis Charlie Mohammed Cartoon**

The third research question was concerned with how the British and Turkish media outlets under study deployed their editorial autonomy to resolve the dilemma regarding (re)publication of the *Je Suis Charlie* Mohammed cartoon. We wanted to find out how the editorial decisions of the media under study demonstrated contextual editorial autonomy and “eclectic neutrality towards all parties concerned?” (Bourdieu (1994, p. 6). In other words, how did the editorial decisions of the media under study to publish or not to publish the Je Suis Charlie Cartoon reflect contextual viewpoint-based gatekeeping? Did these respective decisions reflect “similarity in difference” with respect to republication of the *Je Suis Charlie Hebdo* Mohammed cartoon?

### **The British Media and the *Je Suis Charlie* Mohammed Cartoon**

The United Kingdom has an old and famous cartoon culture that is exemplified by the iconic *Punch* magazine (1841-2002). The legendary British humor and satirical magazine, was influenced by the visual journalistic satire and caricature of France. Actually, *Punch* gave the English language the word “cartoon” as a reference to visual journalistic satire (About Punch Magazine Cartoon Archive, 2003; Altick, 1997). Due to the unique establishmentarian logic of the United Kingdom, whereby the Church of England is the Established Church whose head or Supreme Governor is the monarch, the British press is critical of religion but it is not anti-religious or secularist like the French press. Furthermore, the culture of the British press as a detached watchdog with a checking function that focuses on exposing political excesses and malfeasance, rather than systemic or institutional change (Hallin & Mancini, 2003), British cartoons and caricatures have always been culturally and radically different from those in France and

Turkey. In the British press tradition, cartoons are relatively mild, witty, ironic, ritualistic instruments of social and political criticism that reflect national wit and a sense of humor that is different from the Rabelaisian humor of France. While the British National press was outraged at the murderous terrorist attack against *Charlie Hebdo*, and expressed support for freedom of expression, it was nearly unanimous in its editorial decisions not to republish the newsworthy but controversial *Je Suis Charlie* Mohammed cover. Some of these decisions were taken out of fear of outraging the religious sensibilities of powerful British Muslim communities (Greenslade, 2015).

The most important paradigmatic feature that emerged from the textual analyses of the editorial statements and interviews of the *Guardian* and the *Independent* with regard to the *Charlie Hebdo* cartoon controversy was editorial independence. Both newspapers instrumentalized editorial independence and autonomy to justify decisions to republish or not to republish the cartoons. *The Guardian*, published the *Je Suis Charlie* cover on its website with a disclaimer that read: “This article contains the image of the magazine cover, which some may find offensive” (Penketh & Weaver, 2015). In the wake of ensuing controversy over its decision to publish the cartoon cover, Elliott (2015), the *Guardian* readers’ editor explained that the newspaper valued its autonomy and editorial independence: “Showing the magazine’s response in the wake of the deaths was an important part of telling the story, and the *Guardian* did so in a measured, restrained fashion. It has to feel free to tell it in its own way.” In an editorial piece, the *Guardian*’s editor-in-chief, Alan Rusbridger (2015), justified the decision to partially republish the *Charlie Hebdo* cover, as the newspaper’s freedom not to be forced to speak in a different voice and in particular, not to be forced to embrace an editorial policy other than its own:

“Each and every publication has a different purpose and ethos. *Charlie Hebdo* is not the *Guardian* or the *New York Times*, nor is it the *Daily Mail* or *Private Eye*. The animating intention behind its work was to satirise and provoke in a distinctive voice, one that would not sit easily in other publications. Other publications can defend – and defend absolutely – the necessary diversity of press voices along with an editor’s right to offend. But the best response is not to be forced to speak in a different voice...“ The real clash is between free speech and a tiny number of jihadist murderers. We do not have to alter our editorial values to be on the right side of that divide.” For its part, the editor of the *Independent*, Amol Rajan, declined to republish the Je Suis Charlie Mohammed cartoon. He declared that publishing the Charlie Hebdo cartoon caricaturing Prophet Mohammed would have been “to risky” (Plunkett, 2015). Rajan told the *Guardian* that the *Independent*’s decision not to republish the controversial cartoon amounted to “self-censorship” carried out in an autonomous attempt to balance a number of competing values, and stay on the same page with his peers:

The fact is as an editor you have got to balance principle with pragmatism, and I felt yesterday evening a few different conflicting principles: I felt a duty to readers; a duty to the dead; I felt a duty to journalism – and I also felt a duty to my staff. I think it would have been too much of a risk to unilaterally decide in Britain to be the only newspaper that went ahead and published so in a sense it is true one has self-censored in a way I feel very uncomfortable with. It’s an incredibly difficult decision to make (Plunkett, 2015).

### **The British Broadcast Media and the Je Suis Charlie Cartoon**

British broadcasting organizations also shied away from republishing the Je Suis Charlie cartoon. Only the BBC republished the cartoon cover in its newscasts and on its website (White, 2015). When British Muslim politicians and members of the Muslim community in the United Kingdom and around the world criticized the BBC, the broadcaster used its editorial independence as a defense. In effect, the charter of the

British Broadcasting Corporation (BBC) stipulates that the public service broadcaster is an “independent corporation” that should be immune to governmental and organized interest group pressure. A BBC spokesperson (White, 2015) justified the public broadcaster’s decision to publish the cartoon, with an editorial independence and judgment argument:

Following the attacks in Paris last week, BBC News has reported the story thoroughly and responsibly. This has included running images of cartoons carried in *Charlie Hebdo*. We have broadcast television packages reporting the attacks and explaining the history of *Charlie Hebdo*, including images of the Prophet Muhammad...Last night, Newsnight broadcast a picture of the planned *Charlie Hebdo* front page...The BBC is a news organisation committed both to free speech and respecting our audiences in the UK and around the world. We have made the editorial judgment that the images are central to reporting the story and will continue to report the story in a careful and considered manner.

The BBC was clearly using its editorial independence and gatekeeping role as a journalistic paradigm defense mechanism to justify its decision to publish the cartoons in the face of blistering criticism from Muslims.

The most dramatic display of editorial independence and censorious gatekeeping occurred live on January 15, 2015, on Sky News Tonight. Caroline Fourest, a contributor to *Charlie Hebdo* was being interviewed live from her office in Paris. Scenes of people lined up for blocks to purchase copies of the *Je suis Charlie* survivors’ edition were inserted over parts of the interview. Fourest told the Sky TV reporter in the studio that: “I am very sad that journalists in the UK do not support us...I am very sad that journalists in the UK betray what journalism is about...” Whereupon she reached down and pulled up a copy of the *Je suis Charlie* Mohammed cover and showed it. The camera operator quickly tilted down to avoid the image, and the journalist in the studio quickly cut off the Charlie Hebdo contributor in mid-sentence with a statement of the official policy of Sky

TV with respect to *Charlie Hebdo*. The rationale was editorial independence: “At Sky TV we have decided not to show that cover so I would appreciate it Caroline if you do not show it...” When Caroline Fourest had been cut off, the news reader looked into the camera and said, “I do apologize to any of our viewers who may have been offended by that [*Charlie Hebdo* cover]...as you know, here at Sky News, we have taken the editorial decision not to show the cover of Charlie Hebdo.” The video quickly went viral. The media around the world accused Sky TV of cowardly self-censorship. Eric Wemple (2015), a *Washington Post* blogger wrote an article entitled, “Sky News Showcases *Charlie Hebdo* Self-Censorship in real time.” He called Sky TV’s unprecedented live censorship of *Charlie Hebdo*’s Caroline Fourest, “seat-of-the-pants censorship live.” Stung by the global criticism, Sky TV issued an official statement in an attempt to repair the journalistic paradigm that had taken a beating as a result of the crude act of live censorship worthy of a station in a banana republic. The statement emphasized the importance of editorial judgment and the decision-making process at the organizational level: “As with any controversial story, the issue of publication of the cartoons has been subject to rigorous editorial scrutiny and discussions – which will continue. Currently, SkyNews will not be broadcasting these images on any of its platforms.” This was editorial independence and gatekeeping on the fly. As the foregoing discussion demonstrates, editorial independence is a paradigm defense and repair mechanism that can be used to justify any kind editorial decision.

### **The Je Suis Charlie Hebdo Mohammed Cartoon Controversy in Turkey**

Immediately after the terrorist attacks against *Charlie Hebdo* on January 7, 2015, four media outlets published material in solidarity with *Charlie Hebdo*. Three magazines,

Leman, Uykusuz and Penguen, coordinated their editorial positions, and printed an identical black and white ‘Je Suis Charlie,’ cover. Only their mastheads differed. For its part, left-of-center secularist Turkish newspaper, *Cumhuriyet* (The Republic), which was set up in 1924, published a four-page selection of cartoons and articles from the 16-page ‘survivors’ edition of *Charlie Hebdo*: "with the aim of criticizing the attack on a media corporation and showing solidarity" with Charlie Hebdo and freedom of expression (Anadolu, 2015). The portfolio did not include Mohammed cartoons. However, inside the newspaper, two columnists, Ceyda Karan and Hikmet Cetinkaya, republished the reprinted images of the front cover of Charlie Hebdo special edition with the cartoon of Prophet Mohammed in their columns. Anticipating criticism, an editorial in the newspaper stated that the controversial cartoon did not have "anything to do with Prophet Mohammed. That drawing is a symbol of a humane and conscientious attitude and it says, 'All is forgiven'" (Levs e al, 2015). The acting editor-in-chief editor, Utku Çakırözer (2015), followed up with a tweet in which he stated that *Cumhuriyet*'s solidarity with *Charlie Hebdo* was because *Cumhuriyet* itself had been the target of terrorist attacks: "We have lost our writers in terror attacks. We understand the pain of the Charlie Hebdo massacre." Indeed, the newspaper's editor-in-chief, Can Dunder, and his colleague, Erdem Gul, were languishing in a Turkish jail on sedition, espionage and other charges, at the time Çakırözer wrote his message of solidarity with *Charlie Hebdo*.

<<Insert Figure 2 magazine covers Getty Image about here>>

Turkish government and religious officials were not amused by the republished Je Suis Charlie Mohammed cartoon. They roundly condemned *Cumhuriyet* for disrespecting Islam. Turkish Prime Minister, Ahmet Davutoğlu, who had participated in the *Je Suis*

*Charlie marches republicaines* in Paris with other world leaders to show support for *Charlie Hebdo* and freedom of expression, condemned *Cumhuriyet* for republishing the *Charlie Hebdo* cover (Orucoglu, 2015; PEN International, 2015). Davutoglu said that freedom of press did not mean freedom to insult Prophet Mohammed "There is open sedition if you publish those insulting caricatures considering the massive sensitivity in Turkey about Prophet Muhammad" (Anadolu (2015). For his part, the Deputy Prime Minister, Yalcin Akdoğan proclaimed on Twitter: "Those who disregard the sacred values of Muslims by publishing forms allegedly referring to our Prophet are clearly committing a provocation. The fact that those who irresponsibly target the values of society publicly express it via media or through art doesn't change its aggressive nature" (Kaplan, 2016). Shortly thereafter, in order to stop further distribution of the *Charlie Hebdo* cover in the country, a court in Diyarbakir province ordered the country's telecommunications authorities to block Web pages showing the *Je Suis Charlie* Mohammed cartoon (World Bulletin, 2015; Orucoglu, 2015).

The Turkish government promptly ordered an investigation of Ceyda Karan and Hikmet Cetinkaya for religious defamation, a crime punishable under sections 125 (defamation) and 216 (3) (religious provocation), of the Criminal Code of the Republic of Turkey, which forbids causing religious offense. The law states in part:

(3) Any person who openly disrespects the religious belief of a group is punished with imprisonment from six months to one year if such act causes potential risk to public peace.

The Istanbul Chief Public Prosecutor and 1280 other co-complainants, who included Bilal and Sumeyye Erdogan, children of the president of Turkey, and numerous high- ranking government officials, politicians, and religious leaders, filed criminal



charges against the columnists, Karan and Cetinkaya in Istanbul's Second Criminal Court. The issue before the court was whether Karan and Cetinkaya's republication of *Charlie Hebdo's Je Suis Charlie* Mohammed cartoon constituted defamation of religion, and an incitement to hatred and public enmity. The court answered in the affirmative. It convicted the journalists of "inciting hatred and public enmity via media," and sentenced each of them to two years in prison. The court however acquitted them of the more serious charge of "publicly insulting religious values adopted by some parts of the community" (Anadolu Agency, 2016). Karan and Cetinkaya joined hundreds of other journalists and media personnel in Turkish jails, solidifying Turkey's reputation as the country in the world where the most journalists are imprisoned (Turkey Worst in the World for Jailed Journalists, 2018). Another *Cumhuriyet* staffer, veteran cartoonist Musa Kart, who had been in and out of Turkish jails because of his cartoons that were critical of Turkish authoritarian leader, Recep Tayyip Erdoğan and his regime, also got into trouble because of a cartoon criticizing the president's reaction to the *Charlie Hebdo* terrorist attack. The cartoon depicted Erdoğan saying that he opposed the *Charlie Hebdo* assassinations: "10 years in prison is good enough" (See figure 3). This cartoon compounded Kart's problems with the government. He was arrested and charged with "aiding terrorist organizations" and supporting terrorism. After spending months in jail, he was sentenced to four years imprisonment on multiple trumped-up charges (Agence France Presse, 2018).

Figure 3 <<Insert Musa Kart cartoon about here>>

## **Discussion and Conclusion**

Journalism is a profession with multiple national and cultural iterations that are entrenched in specific politico-cultural contexts. Bourdieu (1994) advanced the idea that journalism is a field that is subject to numerous context-specific pressures. Globalization and interconnection of nations, cultures and peoples has made journalism a competitive, global field that is subject to global politico-cultural and religious pressures. Meta-mediated events like the Charlie Hebdo terrorist attack bring national and global pressures to bear on media outlets around the world. Nevertheless, despite these pressures, the field of journalism has earned a level of relative autonomy that enables it to engage in “eclectic neutrality” Bourdieu (1994). That means, in situations of controversy and conflict, editors can choose to be neutral towards all parties concerned or towards some and not others. This enables media scholars to compare how journalists and editors from different nations and politico-cultural contexts. deploy their editorial independence in furtherance of journalistic functions and values.

In this study, we found that the “most-different,” social scientific comparative approach was appropriate for comparison of the United Kingdom and Turkey. The logic of this approach is that in the “most-different approach,” the cases chosen for comparative analysis are different in all respects, except the variable(s) of interest (Przeworski & Teune, 1970, Ragin, 1987). It was found that the UK and Turkey were most different in terms of their history, politico-cultural and civilizational specificities. Furthermore, it was found that though the media in the UK and Turkey were functionally equivalent, they were most different in context, culture, form, and substance. That is to say, in all respects. As per the most-different comparative logic, media that are being

compared are different in all respects except the variable of interest, in this case, republication of the Je Suis Charlie Mohammed cartoon.

<<<Insert Figure 4 comparative diagram about here>>>

In this study, we found that besides being most different in the politico-cultural contexts as well as their journalistic forms and substance, their postures towards the variable of interest, the Je Suis Charlie cartoon was also different. The British media relied on its editorial autonomy and practiced eclectic neutrality. *The Guardian* used its editorial independence to justify its editorial difference and autonomy. For its part, *The Independent* relied on its editorial independence to engage in self-censorship in the name of pragmatism and safety. Among the Broadcast media studied, the BBC instrumentalized its royal charter of independence to practice eclectic neutrality; what it considered professional, fair and balanced journalism. For its part, SkyTV used its editorial autonomy to practice live self-censorship. Clearly all the British media outlets acted in response to pressures from the field—the powerful Muslim community, readers, viewers, and advertisers. Only the BBC seemed to be immune from, and resisted these pressures.

Turkey is an Islamo-secular country. With the rise of Islamism under President Erdogan, the politico-cultural and religious context has been transformed into a political and cultural geography of repression. The pressures of the Turkish journalistic field precludes editorial independence, autonomy, or even neutrality. Journalists who publish material frowned upon by politicians, the government and religious leaders, get into trouble. In the *Charlie Hebdo* affair, the most-different comparative analysis of the UK and Turkey revealed that both countries were most different in all respects. However,

with respect to the variable of interest, republication of the Je Suis Charlie Mohammed cartoon, there was an interesting “similarity in difference” situation. Virtually all national media outlets in the UK decided not to republish the newsworthy cartoon; as did the majority of the media in Turkey (with the exception of *Cumhuriyet*). The cause of this similarity in difference situation is the politico-cultural context in which the media in both countries are ensconced. In the UK, multiculturalism, organized interest groups, and market pressures ensured generalized editorial decisions not to republish the cartoons. The freedom of expression proclaimed by the British Prime Minister in the House of Commons after the Charlie Hebdo terrorist attack did not result in British media republication of the Je Suis Charlie cartoon. Things were different in Turkey. The main pressure came from authoritarian government, religious institutions and pressure groups.

The main finding of this study is that the much talked about clash of civilizations (Huntington, 1996) was not evident in the postures of the British and Turkish media in the *Charlie Hebdo* affair. In other words, the media in the UK did not come out en masse in favor of republishing the cartoons or proclaiming “Je Suis Charlie” in the name of Western values of freedom of expression. Though they condemned the attacks and supported freedom of expression, they were not comfortable endorsing *Charlie Hebdo*'s radical secularism and its offensive anti-religious and anti-Muslim cartoons. As for the Turkish media though a big chunk of it is nationalist and Islamist, sections of the were not instinctively critical of *Charlie Hebdo* or scornful its secularist critiques of Islam. There is a secularist strand of the Turkish media that has been the target of Islamist extremists and terrorists for decades. This secularist section of the Turkish media, exemplified by the venerable *Cumhuriyet*, and the three magazines that coordinated their

cover graphics and produced an identical *Je Suis Charlie* cover, associated itself completely with *Charlie Hebdo* and bravely demonstrated its support for freedom of expression and proclaimed “Je Suis Charlie” despite the dangers. Indeed, more Turkish newspapers openly demonstrated support for *Charlie Hebdo* than British newspapers. This study showed that the clash of civilization perspective might be reductionist and not necessarily valid in politico-religious conflicts in Western countries. After all, neither the so-called Western World nor the so-called Muslim World are politically and culturally monolithic.

### References

- About Punch Magazine Cartoon Archive (2003). *Punch*. Retrieved from: <https://www.punch.co.uk/about/index>
- Agence France Presse (2018). Turkish cartoonist Musa Kart wins press freedom prize. *Hurriyet Daily News* (Turkey). May 3. Retrieved from: <http://www.hurriyetdailynews.com/turkish-cartoonist-musa-kart-wins-press-freedom-prize-131243>
- Akser, Murat, and Banu Baybars-Hawks(2012):. "Media and democracy in Turkey: Toward a model of neoliberal media autocracy." *Middle East Journal of Culture and Communication* 5, no. 3 302-321.
- Akser, Murat (2018): News Media Consolidation and Censorship in Turkey: From Liberal Ideals to Corporatist Realities. *Mediterranean Quarterly* 29, (3) 78-97.
- Al-Jazeera* (2015). Charlie Hebdo Cover Printed in Turkish Daily. January 13. Retrieved from: <http://www.aljazeera.com/news/middleeast/2015/01/charlie-hebdo-cover-printed-turkish-daily-201511495837706528.html>.
- Anadolu Agency (2015). Turkish PM Slams Paper for Charlie Hebdo Cover.

- <http://aa.com.tr/en/politics/turkish-pm-slams-paper-for-charlie-hebdo-cover/84008>
- Anadolu Agency (2015b). Turkey in solidarity with France against terror: PM. Retrieved from: <http://aa.com.tr/en/turkey/turkey-in-solidarity-with-france-against-terror-pm/473181>
- Anadolu Agency (2016). Turkish journalist fined \$10,000 for insulting Erdogan (April 25). Retrieved from: <http://aa.com.tr/en/turkey/turkish-journalist-fined-10-000-for-insulting-erdogan/561214>
- Anadolu (2016a). Istanbul Court Sends Two Turkish Columnists to Jail. Retrieved from: [aa.com.tr en turkey istanbul court sends two turkish columnists to jail 563199](http://aa.com.tr/en/turkey/istanbul-court-sends-two-turkish-columnists-to-jail/563199)
- Altick, Richard (1997). *Punch: The Lively Youth of a British Institution*. Columbus, OH.: Ohio University Press.
- Associated Press (2015). Charlie Hebdo Shooting: World Responds to Terror Attack. Retrieved from: <https://www.nbcnews.com/storyline/paris-magazine-attack/charlie-hebdo-shootings-world-responds-terror-attack-n281436>
- Bastié, E. (2015). *Marche républicaine : la plus grande manifestation de l'histoire de France* (Republican March: The largest demonstration in French History). Le Figaro Online. Retrieved from: <http://www.lefigaro.fr/actualite-france/2015/01/11/01016-20150111ARTFIG00174-marche-republicaine-la-plus-grande-manifestation-de-l-histoire-dfrance.php>
- Berglez, Peter. "What is global journalism? Theoretical and empirical conceptualisations." *Journalism Studies* 9,( 6). 845-858.
- Berkowitz, D. & Eko L. (2007). Blasphemy as Sacred Rite/Right. *Journalism Studies*. 10/2007; 8:779-797. DOI: 10.1080/14616700701504757.
- Bosse-Platière (2015). *François Hollande: Je serai à la marche dimanche*. RTL. Retrieved from: <http://www.rtl.fr/actu/politique/francois-hollande-s-exprime-apres-la-double-prise-d-otages-7776159938>.
- Bourdieu, P. (1994). *L'emprise du journalisme, (Pressures on Journalism) Actes de la Recherches en Sciences Sociales*, 101 (1), 3-9.
- Christensen & Christensen (2013). The Arab Spring As Meta- Event and Communicative Spaces. *Television and New Media* 14 (4) 351-364.

- Çetinkaya, H. (2015). Charlie Hebdo. *Cumhuriyet* (The Republic), January 14. Retrieved from: [http://www.cumhuriyet.com.tr/koseyazisi/184479/Charlie\\_Hebdo....html](http://www.cumhuriyet.com.tr/koseyazisi/184479/Charlie_Hebdo....html)
- Eide, E. Risto, K. & Philips, A (eds.). *Transnational media events: The Mohammed Cartoons and the Imagined Clash of Civilizations*. Göteborg, Sweden: Nordicom.
- Farmanfarmaian, R., Sonay, A., & Akser, M. (2018). The Turkish Media Structure in Judicial and Political Context: An Illustration of Values and Status Negotiation. *Middle East Critique* 27(2), 111-125.
- Eko, L. & Berkowitz, D. (2009) *Le Monde, French Secular Republicanism and 'The Mohammed Cartoons Affair': Journalistic 'RePresentation' of the Sacred Right to Offend*. *International Communication Gazette*, 71(3):181-202.
- Eko, L. (2013). *American Exceptionalism, the French Exception and Digital Media Law*. Lanham, MD. Lexington Books.
- Eko, L (2012). *New Media, Old Regimes: Case Studies in Comparative Communication Law and Policy*, Lanham, MD.: Lexington Books.
- El Issawi, F., & Cammaerts, B. (2016). Shifting journalistic roles in democratic transitions: Lessons from Egypt. *Journalism*, 17(5), 549-566.
- Esser, Frank, and Andrea Umbricht (2014). The evolution of objective and interpretative journalism in the Western press: Comparing six news systems since the 1960s. *Journalism & Mass Communication Quarterly* 91, no. 2 (2014): 229-249.
- Facchini, François (2002). Religion, Law and Development: Islam and Christianity, why the institutions of freedom have not been discovered in the Orient but in the Occident, *European Journal of Law and Economics* 29, 103-110
- Freedom House (2016). Turkey. Retrieved from: <https://freedomhouse.org/report/freedom-press/2016/turkey>
- Gaunt, P. (1990) *Choosing the News*. New York: Greenwood Press.
- Gordley, J. (2003). The Universalist Heritage, *in Comparative Legal Studies: Traditions and Transitions*. Pierre Legrand & Roderick Munday (eds.). pp. 31-45. Cambridge: Cambridge University Press.
- Guénoun, D. (2013). *About Europe: Philosophical Hypotheses*. Stanford,

- CA.:Stanford University Press.
- Gopnik A. (2015). Satire Lives, *The New Yorker*, January 19<sup>th</sup>. Retrieved from: <http://www.newyorker.com/magazine/2015/01/19/satire-lives>
- Hachten, William & Scotton; James (2016). *World News Prism* (9<sup>th</sup> edition). Wiley.
- Hallaq, Wael (2003). Juristic Authority vs. State Power: The Legal Crises of Modern Islam, *Journal of Law and Religion*, (19) 243-258.
- Hallaq, Wael (2012). *The Impossible State: Islam, Politics, and Modernity's Moral Predicament*. New York: Columbia University Press.
- Hallin, D. & Mancini, P. (2004). *Comparing Media Systems: Three Models of Media and Politics*. Cambridge: Cambridge University Press.
- Huntington, S. (1996). *The Clash of Civilizations and the Making of the World Order*. New York: Simon and Schuster.
- Ignatieff, Michael (2005). Introduction: American Exceptionalism and Human Rights, in *American Exceptionalism and Human Rights*, Michael Ignatieff (ed.) pp. 1-26. Princeton, NJ: Princeton University Press.
- Jaxel-Truer, P. (2015). Richard Malka, *l'avocat des "sales gosses" de Charlie Hebdo* (Richard Malka, Lawyer of the "Bad Boys" of Charlie Hebdo. *Le Monde*, January 15. Retrieved from: [http://www.lemonde.fr/m-actu/article/2015/01/15/richard-malka-l-avocat-de-charlie\\_4556992\\_4497186.html](http://www.lemonde.fr/m-actu/article/2015/01/15/richard-malka-l-avocat-de-charlie_4556992_4497186.html)
- Jones, Meg (2017). The right to a human in the loop: Political constructions of computer automation and personhood. *Social Studies of Science* 47(2):216-239. DOI: 10.1177/0306312717699716
- Kaplan, Michael (2016). Turkey's Charlie Hebdo Case: Cumhuriyet Journalists Sentenced for Republishing Controversial Cartoon. *International Business Times*, April 28. Retrieved from: <http://www.ibtimes.com/turkeys-charlie-hebdo-case-cumhuriyet-journalists-sentenced-republishing-2361201>
- Karppinen, Kari & Moe, Hallvard (2016) What We Talk About When Talk About "Media Independence", *Javnost - The Public*, 23:2, 105-119, DOI: 10.1080/13183222.2016.1162986
- Klausen, J. (2005). *The Islamic Challenge: Politics and religion in Western Europe*. Oxford: Oxford University Press.
- Klausen, Jytte (2009). *The Cartoons that Shook the World*. New Haven, CT.: Yale



- University Press.
- Kunelius, R. & Nossek, H. (2008). Between the Ritual and the Rational: From Media Events to Moments of Global Public Sphere. In Elizabeth Eide, Risto Kunelius & Angela Philips (eds.). *Transnational media events: The Mohammed Cartoons and the Imagined Clash of Civilizations*. Göteborg, Sweden: Nordicom.
- Lagarde, Christine (2007). *Présentation du Projet de Loi en faveur du Travail, de l'Emploi et du Pouvoir d'Achat à Assemblée Nationale* (Presentation of Draft Law on Labor, Employment and Purchasing Power to the National Assembly). Retrieved from: <http://www.minefi.gouv.fr>
- Legrand, Pierre (2003). The Same and the Different. In Pierre Legrand and Roderick Munday (eds). *Comparative Legal Studies: Traditions and Transitions*, pp. 240-311. Cambridge: Cambridge University Press.
- Lindlof, T. & Taylor, B. (2002). *Qualitative communication research methods*, 2<sup>nd</sup> ed. Thousand Oaks, CA: Sage
- Michaels, Ralf (2006). The Functional Method of Comparative Law, in *The Oxford Handbook of Comparative Law*, p. 339-382 (Mathias Reimann & Reinhard Zimmermann eds.). New York: Oxford University Press.
- Przeworski, Adam & Teune, Henry (1970). *The Logic of Comparative Social Inquiry*. New York: Wiley-Interscience.
- Ragin, Charles (1987). *The Comparative Method*. Berkley, Ca.: Univ of Cal Press.
- Refah Partisi (The Welfare Party) and Others v. Turkey*, Nos. 41340/98, 41342/98, 41343/98 and 41344/98, (2003) p.72.
- RSF (2016). The World Press Freedom Index. Retrieved from: <https://rsf.org/en/world-press-freedom-index>
- RSF (2017). World Press Freedom Index. Retrieved from: <https://rsf.org/en/ranking>
- RSF (2017). Turkey: Journalism Engulfed by the Purge. Retrieved from: <https://rsf.org/en/turkey>
- Said, Edward, 1979. *Orientalism*, New York: Vintage.
- Schauer, Frederick (2005). The Exceptional First Amendment. In . In *American*

- Exceptionalism and Human Rights* pp. 1-26. Princeton, N.J.: Princeton University Press.
- Selbourne, D. (2005). *The Losing Battle With Islam*. Amherst, N.Y. Prometheus Books.
- Siebert, F., Peterson, T. & Schramm, W. (1956). *Four Theories of the Press*. Urbana/Champaign. University of Illinois Press.
- Sullivan, M. (2015). A Close Call on Publication of Charlie Hebdo Cartoons. *The New York Times*, January 8. Retrieved from:  
[http://publiceditor.blogs.nytimes.com/2015/01/08/charlie-hebdo-cartoon-publication-debate/?\\_r=0](http://publiceditor.blogs.nytimes.com/2015/01/08/charlie-hebdo-cartoon-publication-debate/?_r=0)
- Tourancheau Patricia (2015). “*Un Commando Organisé*” (An Organized Commando). *La Liberation*, January 7, 2015. Retrieved from:  
[http://www.liberation.fr/societe/2015/01/07/un-commando-organise-et-prepare\\_1175841](http://www.liberation.fr/societe/2015/01/07/un-commando-organise-et-prepare_1175841)
- Vick, Karl (2015). Turkey’s Awkward Place in the Paris March. *Time*, January 12. Retrieved from: <http://time.com/3664575/turkey-paris-syria-march-charlie-hebdo/>
- Vidon, M. (2015). First 'Charlie Hebdo' issue since attack sells out. *USA Today*, January 14. Retrieved from:  
<http://www.usatoday.com/story/news/world/2015/01/14/charlie-hebdo-prophet-muhammad-paris-attacks/21737785/>.
- Wemple, Eric (2015). CNN won’t republish Charlie Hebdo cartoons, will republish al-Qaeda propaganda: *The Washington Post*, January 13. Retrieved from:  
<http://www.washingtonpost.com/blogs/erik-wemple/wp/2015/01/13/cnn-wont-republish-charlie-hebdo-cartoons-will-republish-al-qaeda-propaganda/>
- Wemple, E. (2015a). CNN Cut off Controversial Charlie Hebdo Cartoons. *The Washington Post*, January 7. Retrieved from:  
<https://www.washingtonpost.com/blogs/erik-wemple/wp/2015/01/07/cnn-cut-off-controversial-charlie-hebdo-drawings/>.
- Wemple E (2015b). *Washington Post Opinions Section Publishes Charlie Hebdo Cartoon*. *The Washington Post*. January 8, Retrieved from:  
<https://www.washingtonpost.com/blogs/erik-wemple/wp/2015/01/08/washington-post-opinions-section-publishes-controversial-charlie-hebdo-cartoon/>
- White, Alan (2015). Most British Media Outlets Won’t Discuss Why They Didn’t Publish The New Cover Of Charlie Hebdo. *Buzzfeed* (01/13/2015). Retrieved from: <http://www.buzzfeed.com/alanwhite/most-british-media-outlets-wont-discuss-why-they-didnt-publi#.wi3EPOvQg>.
- World Bulletin (2015). Turkish Court Blocks Web Pages with Charlie Hebdo Cover

January 13. Retrieved from: <http://www.worldbulletin.net/news/153005/turkish-court-blocks-web-pages-with-charlie-hebdo-cover>

Yesil, B. (2016). *Media in New Turkey: The Origins of an Authoritarian Neoliberal State*. Urbana: University of Illinois Press.

Figures

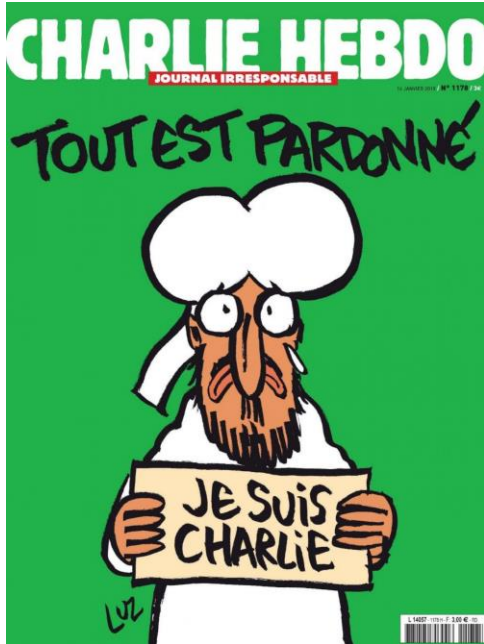


Figure 1: *Je Suis Charlie, Tout est Pardoné* (Luz, *Charlie Hebdo*, January 14, 2015)



Figure 2. Turkish magazines with identical Je Suis Charlie Covers. Istanbul, Turkey.

January 15, 2015. GettyImages



Figure 3. TV set: “Massacre in Paris. Twelve dead.” President Erdogan responds: “I condemn the attack. 10 years prison would have been enough for the cartoonists.” Cartoon by Musa Kart, *Cumhuriyet*, Istanbul.

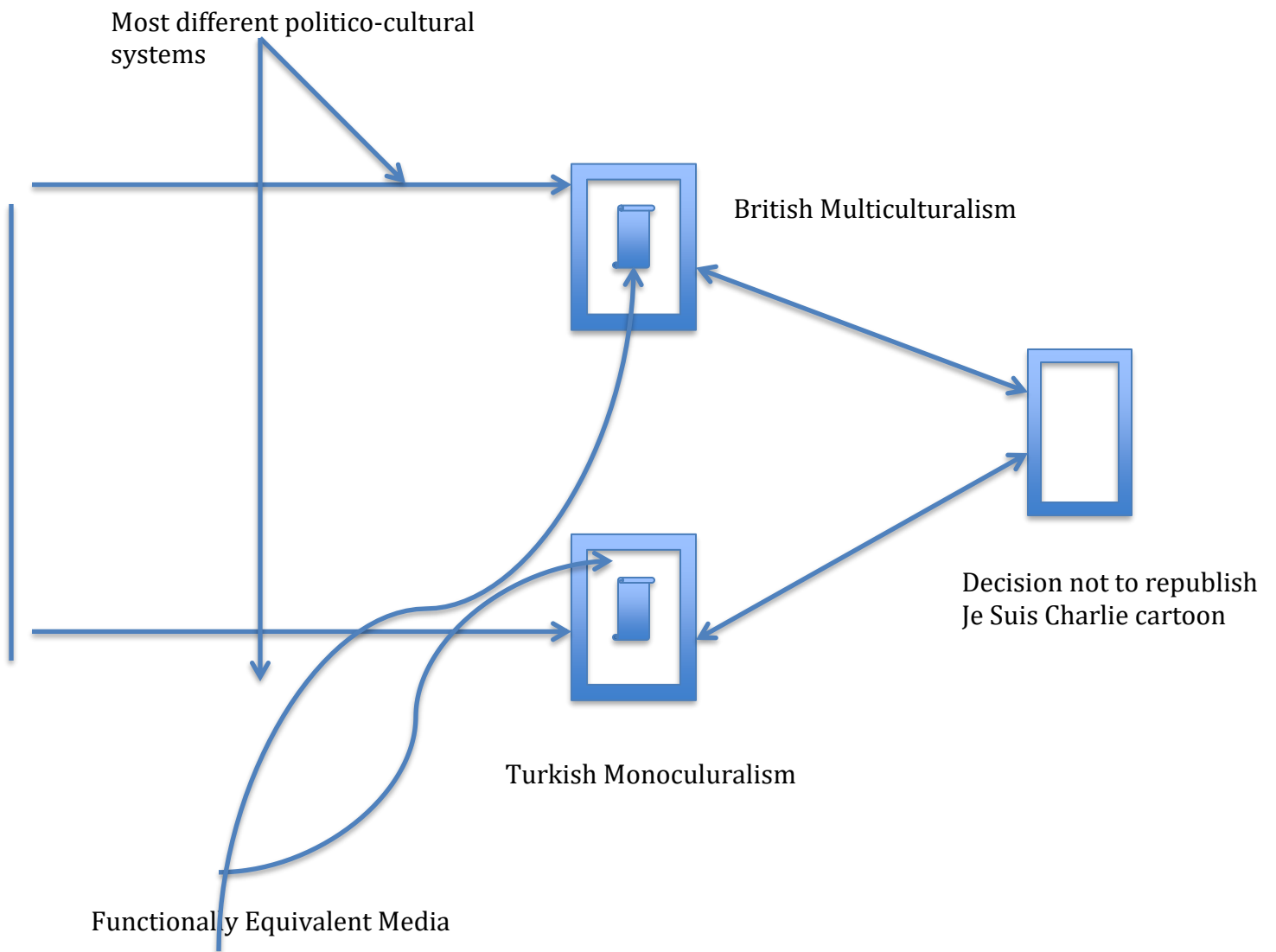


Figure 4. Similarity in Difference: Charlie Hebdo most-different politico-cultural contexts & functionally equivalent media in the UK & Turkey.

