

# The "Innocence of Muslims" in the US Media: An Analysis of the Media Discourses on Islam and Muslims

#### Dr. Zafar Iqbal

Media Studies, International Islamic University, Islamabad, Pakistan

#### Dr. Fazal Rahim Khan

Social Sciences Foundation University Rawalpindi Campus, Rawalpindi, Pakistan

#### **Dr. Haseeb ur Rehman**<sup>\*</sup>

Arts and Media, Foundation University Rawalpindi Campus, Rawalpindi, Pakistan

#### Abstract

The release of trailer of 'Innocence of Muslims' generated a huge debate on free speech, hate speech and the representation of the Muslims and Islam in the Western media. This paper investigates these issues in detail by taking instances from the mainstream US print media. Some other interesting debates in the mass media like the identification of the filmmaker and denigration of the Muslims and Islam in historical context have also been undertaken in the paper. Discourse theory and social construction of reality by Schutz (1976)<sup>1</sup> and Berger and Luckmann (1991)<sup>2</sup> have been applied as theoretical framework to evaluate the relationship between mass media and social construction of reality, and to see as how the US mass media constructed the reality about the movie (trailer). Three major aspects were selected for analysis; viz., filmmaker(s) and their associates, issues concerning freedom of speech and expression, and the representation of the Muslims' protesting against the YouTube clip and the ensuing violence in some Muslim countries.

*Keywords:* innocence of Muslims, free speech, hate speech, islamophobia, representation, social construction of reality and discourse analysis

#### Introduction

Islam has since long been construed as a false religion and 'inalienable enemy of the West,'<sup>3</sup> and the Prophet Muhammad (SAW) as being the barbaric, and self-claimed

<sup>\*</sup>Correspondence concerning this article should be addressed to Dr. Haseeb ur Rehman, Assistant Professor, Arts and Media at Foundation University Rawalpindi Campus, Rawalpindi, Pakistan at <u>haseebwaraich79@gmail.com</u>.

<sup>&</sup>lt;sup>1</sup>Alfred Schutz, "Alfred Schutz: Collected Papers II," *Studies in Social Theory* (UK: Springer Science and Business Media, 1976).

<sup>&</sup>lt;sup>2</sup>Peter L. Berger, and Thomas Luckmann, *The Social Construction of Reality: A Treatise in the Sociology of Knowledge* (UK: Penguin, 1991).

<sup>&</sup>lt;sup>3</sup>Zafar Iqbal, *Islamophobia: History, Context and Deconstruction* (New Delhi: Sage Publications, 2019), 76.

messenger of God in the polemical Western literature.<sup>4</sup> Post-9/11 scenario; however, added fuel to the continuing discourse of demeaning Islam and its Prophet (SAW) in variety of ways with the help of all pervasive media. Quite recently, Islam and Prophet Muhammad (SAW) are shown in a bad light, which shook the already shaken peace in the Muslim world resulting in over 40 casualties. The 'Innocence of Muslims,' a low budget film, was allegedly released in July 2012 in a theater in California, and its widely viewed 14-minute clip was later uploaded on YouTube, wherein the Prophet (SAW) was denigrated. The producer of the film is identified as Egyptian-American, who has been known by multiple aliases like Sam Bacile, Eli Basily, Nicola Basily and Mark Youssef.<sup>5</sup> The Egyptian court sentenced him and six other accomplices to death. The Egyptian court charged them with causing harm to the unity and peace of the country, stirring sectarian crisis and showing grave insolence to the religion of Islam.

During August and September 2012, most of the Middle Eastern countries, the Muslim states in Asia, North Africa and the Far East Asia underwent severe wave of mass protests, resulting in dozens of casualties and fatalities and property damage running into millions of dollars. The catastrophe in Libya caught the attention of the world media when a crowd of protesters stormed the US Consulate in Benghazi, wherein the US Ambassador Christopher Stevens and four others were killed on September 11, 2012 – the mourning day to remember the deceased souls of 9/11 incident. Initially, the global media projected it as a mob reaction to the video, which sparked off protests across the Muslim world, however the US Defense Secretary Leon Panetta declared it 'a terrorist attack.' Prior to Panetta's announcement, the US Secretary of State Hillary Clinton said that the militants have ties with Al Qaeda.<sup>6</sup> Later, it was divulged that the Ambassador Christopher Stevens died due to asphyxia during arson attack of the US Consulate at Benghazi. Seemingly, it was not a targeted attack on the Ambassador and one of his diplomats who died along with two security men. Linking the attack and the killing of the US citizens/diplomats to Al Oaeda is yet to be substantiated with evidence, as the protesters in other Muslim countries also chanted slogans against the US policies and headed towards the US Embassies to lodge protests against the YouTube clip. Nonetheless, the law and order situation in most of the Muslim countries was not as bad as it was in Libya ensuing in an easy access of the mob to the US consulate at Benghazi.

The production of "Innocence of Muslims" and subsequent uploading of its trailer on YouTube triggered huge mass protests in the Muslim world on one hand, and spawned



<sup>&</sup>lt;sup>4</sup>John Victor Tolan, Saracens: Islam in the medieval European Imagination (New York: Columbia University Press, 2002).

<sup>&</sup>lt;sup>5</sup>NBC News reported on November 28, 2012. retrieved It can be from http://worldnews.nbcnews.com/ news/2012/11/28/15509101-us-based-anti-islam-filmmaker-6others-sentenced-to-death-by-egypt-court?lite. Retrieved on April 17, 2013.

<sup>&</sup>lt;sup>6</sup>"Terrorists killed U.S. ambassador to Libya: Panetta," *Reuter* reported on September 27, 2012. It can be viewed at http://www.reuters.com/article/2012/09/27/us-libya-usa-investigationidUSBRE8801JW20120927, accessed on 10/12/2017.

media discourses on variety of issues covering free speech, media freedom and responsibility, and media portrayal of the Muslims and Islam on the other hand.

This paper primarily aims at evaluating these discussions and debates in the US media and the media narratives on the issue. The uploading of the contentious movie/trailer "Innocence of Muslims" on YouTube steered the academics, social scientists and psychologists to understand as to how media and society react to such events, and to put up a critique on the old notions of freedom of expression and media. This study evaluates the discourses made in the US media and examines whether there has been any misrepresentation of Islam and Muslims in the media. Such an inquiry is important because misrepresentations may not only stoke unrest in the Muslim world but may also stoke Islamophobia within the Western societies themselves. Media narrative and discourses having a potential for Islamophobia construction may have implications for relationship between Islamic and the Western civilizations. This negative posturing of non-Muslims towards the Muslims of all creed, caste, colour and nationality may result in racial attacks and social, cultural and political cleavages in the social fabric of societies at large.

Preliminary scanning of coverage of the "Innocence of Muslims" in the US media provides a huge multiplicity of variables/problems on the subject. But, owing to the paucity of time and space this paper is designed to analyze the discourses on three major aspects – filmmaker(s) and their associates, issues concerning freedom of speech and expression, and representation of the Muslims' protesting against the YouTube clip and the ensuing violence in some Muslim countries. Discourse and social construction of reality theories provide bases for analysis of media discourses on the selected issues.

The concept of discourse, despite abounding confusion,<sup>7</sup> primarily focuses on 'the language used in representing a given social practice.'<sup>8</sup> The discourse is considered as an 'organism of representation'<sup>9</sup> that has developed over a long 'historical linguistic practices.'<sup>10</sup> In fact, discourses provide context and meaning for words and phrases used in media about a particular issue/subject as the social constructivists believe.<sup>11</sup>

<sup>&</sup>lt;sup>7</sup>Charl Walters, and Roy Williams, "Discourse Analysis and Complex Adoptive Systems: Managing Variables with Attitudes," *Electronic Journal of Business Research Methods* 2, no. 1 (2003): 71-78.

<sup>&</sup>lt;sup>8</sup>Norman Fairclough, *Media Discourse* (London: Bloomsbury Academic, 1995).

<sup>&</sup>lt;sup>9</sup>Clive Seale, *Social Research Methods: A Reader* (London: Routledge Chapman and Hall, 2004).

<sup>&</sup>lt;sup>10</sup>Jonathan Potter, and Margret Wetherell, *Discourse and Social Psychology: Beyond Attitudes and Behaviour* (London: Sage, 1987).

<sup>&</sup>lt;sup>11</sup>Ringberg Torsten, and Markus Reihlen, "Communication Assumptions in Consumer Research: An Alternative Socio-Cognitive Approach," *Consumption Markets and Culture* 11, no. 3 (2008): 173-189.

Hall<sup>12</sup> and Dijk<sup>13</sup> and many other contemporary scholars agree that discourses are 'the reproduction of social representations' and greatly affect knowledge, attitudes, and ideologies of the people. Hence, discourse analysis, though a loosely structured method, has been felt to be providing enough space for discussions on the chosen subject of this paper.

# 2. Background of the Film and its Airing

Doubts linger as to whether the "Innocence of Muslims" was ever released formally in a cinema or any theater. Its 14-minute trailer was placed on YouTube on July 02, 2012, which ignited huge protests across the world. However, Steve Klein, who was part of the filmmaking process, claimed that a full version of the movie was played for at least a day at the Vine Theatre in Hollywood, California.<sup>14</sup> The actors of the movie are on record to have stated that they had never performed in such a movie and the dialogues in the clip were dubbed in post-production process. One of the actors, Cindy Lee Garcia, who contacted the California District Court later for removal of the trailer from YouTube, said that she signed the contract for 'Desert Warrior' whereas the title "Innocence of Muslims" never appeared during shooting of the film. Rather, she said that she had never uttered the Prophet (SAW)'s name in the entire movie but 'Master George' was the target of her hate. Emotional distress, invasion of privacy, false light, fraud and slander were among the charges that she leveled against the YouTube and the film-producer.<sup>15</sup> On her request for removal of the clip from YouTube as she claimed to have been deceived about the film and its nature and she had never delivered the dialogues the YouTube clip shows, the California District Court Judge Michael Fitzgerald denied removing the video from the internet as he was not convinced that this would prevent from 'any harm that might come to her.'<sup>16</sup>

The US mass media did not seem to be paying much heed to the District Court verdict either defending or criticizing the court judgment. Media at large did not compare and contrast the freedom of expression and media with privacy and fraudulent behavior of the film producer. Similarly, the comments by the judge appeared in media did not address the



<sup>&</sup>lt;sup>12</sup>Stuart Hall, *Culture, Media, Language: Working Papers in Cultural Studies, 1972-79* (Birmingham: Taylor and Francis, 2005); Stuart Hall, *Representation: Cultural Representations and Signifying Practices* (Milton Keynes: UK Open University, 1997).

<sup>&</sup>lt;sup>13</sup>Teun A. Van Dijk, *Discourse as Social Interaction* (London: Sage, 1997); Teun A. Van Dijk, *Discourse Studies: A Multidisciplinary Introduction* (London: Sage, 2011).

<sup>&</sup>lt;sup>14</sup>Multiple sources revealed this information on September 13, 2012 including CNN, *The New York Times, The Wall Street Journal,* and *The Week.* To know more, please visit this site: <u>http://theweek.com/article/index/233263/does-the-movie-that-provoked-the-libyan-slayings-even-exist.</u> Retrieved on April 15, 2013.

<sup>&</sup>lt;sup>15</sup>Alexandra Cheney, "Innocence of Muslims Actress Files Suit against Filmmaker and Google," *The Wall Street Journal*, September 19, 2012.

<sup>&</sup>lt;sup>16</sup>Steve Gorman, "US Judge Refuses to Order Anti-Muslim Film Off YouTube," *Reuters*, December 01, 2012. It can be viewed at <u>http://www.reuters.com/article/2012/12/01/us-protests-lawsuit-idUSBRE8B003W20121201</u>. Retrieved on April 17, 2013.

problems Garcia posed in her request to the Court including invasion of privacy, threat to her life and career, etc. Two propositions are significant in this regard; (i) whether the mass media themselves were out to defend free expression even at the cost of someone's life and violation of privacy; or (ii) it was seemingly a fight for the media against its own family member; i.e. the 'Google' In later part of this paper, issues concerning freedom of expression and media will be discussed and analyzed within this particular perspective in detail.

Real identification of the filmmaker was an enigma in the beginning; however, he was later identified as Nakoula Basseley Nakoula, a 56-year old Coptic Christian and an Egyptian-American. Earlier, he introduced himself as Sam Bassile, a property developer from Israel, based in California, who claimed to have received donation from 100 Jewish donors for an estimated production cost of US\$ 5 million for the film. Despite being poor in production quality, 60 actors and 45 crewmembers participated in filmmaking for over three months.<sup>17</sup> Israeli Foreign Ministry's spokesman Yigal Palmor denied his claim and said, 'Nobody knows who he is. He is totally unknown in filmmaking circles in Israel. And anything he did - he is not doing it for Israel, or with Israel, or through Israel in any way.'<sup>18</sup> The spokesman remarked that Bacile is 'a complete loose cannon and an unspeakable idiot.'

His past is also plagued with series of unlawful activities. Summarily, Nakoula, in August 1991, was convicted by the court of law on charges of selling watered-down gasoline in California. He was found involved in manufacturing of synthetic drugs in the US, which is commonly known as PCP, along with another accomplice Abraham.<sup>19</sup> Both of them were charged even before that for producing methamphetamine on March 27, 1997. Not only this, he was reportedly arrested with a whopping US\$45,000 worth of currency notes, his accomplice Abraham had 30 boxes of pseudoephedrine, an ingredient of methamphetamine, in his house. Similarly, the British media reported that he was 'a federal informant who avoided spending longer in jail by telling investigators about an elaborate bank fraud scheme he was involved in',<sup>20</sup> in a plea bargain.

<sup>&</sup>lt;sup>17</sup>The Correspondent, "Twitter Responds to Anti-Islam Movie that Sparked Protests," *The Wall Street Journal*, September 12, 2012; and also *International Business Times News*, September 14, 2012.

<sup>&</sup>lt;sup>18</sup>Rod Nordland, "Afghan Leader Condemns Anti-Islam Film," *The News York Times*, September 12, 2012.

<sup>&</sup>lt;sup>19</sup>Harriet Ryan, and Jessica Garrison, "Christian charity, ex-con linked to film on Islam," *Los Angeles Times*, September 13, 2012; and also Serge F. Kovaleski, and Brooks Barnes, "From Man Who Insulted Muhammad, No Regret," *The New York Times*, November 25, 2012.

<sup>&</sup>lt;sup>20</sup>Daniel Bates, and Lydia Warren, "Californian behind Mohammed movie that has Middle East in flames is a meth-making federal informer... and the director made soft porn films," *Mail Online*, September 14, 2012. Retrieved from <u>http://www.dailymail.co.uk/news/article-2203267/Nakoula-Basseley-Nakoula-Innocence-Muslims-producer-gets-police-protection.html</u> on April 17, 2013.

The filmmaker, Nakoula, has been found condemning extremist Muslims, and has had a long lasting desire to work against them. His son, Abanob Nakoula, confirmed that he was always fueled by the atrocities carried out by the Muslims in the name of Islam in various parts of the world. His son confirmed that he had personal vendetta against Islam. His extreme hatred and negative proclivity towards Islam and its followers made him script the film, which he entitled "Desert Warrior" and used 'Master George' as the main player of the 105-page script. It was easy for him to dub in 'Master George' as 'Muhammad' (*SAW*) in the editing process. He was sure of non-cooperation of actors and editors to work on such an inflammatory and controversial movie; hence he conspiratorially misled and deceived all of them. This is evident from his talk with Garcia on phone telling her that she should 'tell the world that you are innocent'<sup>21</sup> and he (Nakoula) was tired of radical Muslims attacking innocent people around the world.

Nakoula was allegedly agitated by the killing of 13 US soldiers at Fort Hood in Texas on November 05, 2009. The killer was a US Army officer working in the military as a psychiatrist. He was later found to have some connections with clerics in Egypt, however the US official statement on the event declared it an incident of workplace violence. This event, reported by almost all international media, worked as the catalyst for Nakoula to believe that the Muslims are threat to the world peace. Nonetheless, his approach towards the Muslims and Islam was all the same even before this event, as he was more often found mentoring his son about Islam saying 'Don't fight Muslims, fight their ideology'.<sup>22</sup>

*The Wall Street Journal* quoted him saying that it was a 'political movie' and not a 'religious movie.'<sup>23</sup> Nakoula's unfathomable odium towards Islam and the Muslims was quite evident in his life and he showcased his hatred against the religion having more than a billion followers in a distasteful fashion in the movie. For instance, he expressed once that he would burn himself at a public place to let the American people and the people of the world know his message of hate and disgust against the religion of Islam. Quoting *The Wall Street Journal*, he once said, 'Islam is a cancer.'<sup>24</sup>

Strangely enough, a man of such character and background was arrested by the California police on the charge of violating the terms of his parole for a bank-fraud conviction, wherein he was debarred using Internet without the approval of his probation officer. His arrest was not because he produced and uploaded an inflammatory video clip on YouTube in the summer of 2012, which effected huge human losses in the Muslim



<sup>&</sup>lt;sup>21</sup>Cindy Lee Garcia said this in an interview with 'The View' on *ABC News* on September 26, 2012. Details of her interview can be reached at <u>http://abcnews.go.com/Blotter/innocence-muslims-actress-tells-view-forgives-filmmaker/story?id=17330024#.UW5UaaKzabo</u>. She said the same to *USA Today* on September 13, 2012.

<sup>&</sup>lt;sup>22</sup>The New York Times, November 25, 2012. Op.cit.
<sup>23</sup>The Wall Street Journal, September 12, 2012. Op.cit.
<sup>24</sup>Ibid.

world, but using Internet for which he was debarred by the Court. He was released on probation in 2011.

In a bid to avoid conflict with the Muslim world, President Barak Obama and Secretary of State Hillary Clinton denounced the US Government involvement with the making of the video. Rather, messages of the USA President and Secretary of State appeared as paid advertisement on almost all channels of Pakistan. The messages criticized the contents of video and emphasized on the US's belief in religious tolerance. This pronouncement by the Obama Administration was taken as a good gesture by the Muslims all across the world and helped mitigate the tension. Killing of the US Ambassador at Benghazi was taken as a well-hatched and well-executed plan by al-Qaeda than an act of mob protesting against the film and filmmaker. This diverted the attention of world media towards al-Qaeda, which was initially taken an act of war by the Muslims against the most protected principle of freedom of expression in the West, particularly the US. The debate and focus of the US media then turned to protests in the Middle East, Pakistan and other Muslim countries; and on the issue whether such movies come under the ambit of freedom of expression and media.

## 3. Limits to Free Speech

The "Innocence of Muslims" is a brutal attack on the freedom of expression. From John Stuart Mills to contemporary scholars and advocates of human rights, all have contributed to protect the freedom of speech and expression as an inalienable individual right. The First Amendment in the US Constitution, introduced in December 1791, sufficiently protects this right and so do numerous international conventions and covenants. The amendment is known to be the classical draft of the 18<sup>th</sup> century, which says: "Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof; or abridging the freedom of speech, or of the press; or the right of the people peaceably to assemble, and to petition the government for a redress of grievances."<sup>25</sup>

The First Amendment in the US constitution is an endorsement of the West's indifference towards religion when it says that 'Congress shall make no law respecting an establishment of religion'. Of this, Christianity was the first victim that was washed out from the social and political spheres of the Western societies. The world at large warmly welcome limiting the influence of religion to personal lives, however it could not affect the Muslim world that remained under the influence of Islam, which was not viewed by the Western democracies with respect.

Second most significant aspect of the Amendment deals with free speech and press. Press or media are the conduits (or technologies) through which free speech or expression is usually made, but substance in principle lies in the concept of free speech or expression. It is generally agreed to be one of the most sacred human rights; however, it may have two

JOURNAL OF ISLAMIC THOUGHT AND CIVILIZATION

114-

<sup>&</sup>lt;sup>25</sup>Henry Cohen, *Freedom of Speech and Press: Exceptions to the First Amendment* (Washington, DC: Congressional Research Service, Government of the United States, 2009).

important dimensions. In many parts of the world, individual's free speech is guaranteed and granted without any lawful hindrance or restriction, but when it comes to freedom of public expression, the role of society and state becomes vital to determine the limits of this freedom. Here, free public expression demands certain rules to follow and in some instances, it has been found that the First Amendment guarantees seem to be losing strength. For instance, the US Supreme Court Justice Oliver Wendell Holmes Jr. wrote in a verdict that freedom of speech may not be unlimited as it 'would not protect a man in falsely shouting fire in a theater and causing a panic'.<sup>26</sup> This clearly indicates that when free speech hurts, it gets hurt too; proposing the right of free speech to be guarded by certain limits.

UN Universal Declaration of Human Rights (UDHR) 1948 presents a relatively holistic view of freedom of speech and expression. Its Article 19 says: "Everyone has the right to freedom of opinion and expression; this right includes freedom to hold opinions without interference and to seek, receive and impart information and ideas through any media and regardless of frontiers."<sup>27</sup>

Interestingly, Article 19 separates opinion from expression, which essentially means private and public expressions of an individual. One is free to hold any opinion and free to express opinion at the same time through any media. However, in contrast to the US First Amendment, it does protect the right to have 'freedom of thought, conscience and religion' in the Article 18.<sup>28</sup> Not only this, it is notable that UN UDHR 1948 places freedom of religion before the freedom of holding an opinion and freedom of expression. Here, one should note that such declarations are well thought and never capricious in their contents and context, and get passed after long deliberations.

Article 29 of UDHR concludes the right to freedom of expression in a subtle but comprehensive manner when it says that exercise of freedoms have 'limitations as are determined by the law solely for the purpose of securing due recognition for the rights and freedoms of others and of meeting the just requirements of morality, public order and general welfare of a democratic society.'<sup>29</sup> This article makes the right of free expression more a responsibility than just a right. If seen under the principles of morality and requirement of public order, can anyone defend 'Innocence of Muslim' as an exercise of freedom of expression?

Another notable covenant to freedom of expression is the European Conventions on Human Rights 1950, which in its Article 10(1) says that 'everyone has the right to freedom

<sup>&</sup>lt;sup>26</sup>Schenck Vs. United States, 249 U.S. 47, 39 S. Ct. 247, 63 L. Ed. 470 [1919]

<sup>&</sup>lt;sup>27</sup>The Article 19 of UDHR 1948 can be retrieved from official site of United Nations: <u>http://www.un.org/en/documents/udhr/index.shtml#a19</u>.

 <sup>&</sup>lt;sup>28</sup>Ibid., all Articles of UDHR 1948 are available in a sequence.
 <sup>29</sup>Ibid.

of expression...without interference by public authority and regardless of frontiers.<sup>30</sup> This Convention presents two significant provisions – one relates to formal control mechanism by the states on media and individual to hold and express opinions, and the other is interstate control over the means of communication. The second aspect seems to be restricting the powerful state to control the means of expressions of weaker states. This is unique in nature as so far no such explicit expression has been made in any conventions/rules by the states or by the comity of nations.

Above enunciated expression is not the only uniqueness of this convention rather its next sub-section Article 10(2) talks much louder than any other convention on religion. It says:

The exercise of these freedoms, since it carries with it duties and responsibilities, may be subject to such formalities, conditions, restrictions or penalties as are prescribed by law and are necessary in a democratic society, in the interest of national security, territorial integrity or public safety, for the prevention of disorder or crime, for the protection of health or morals, for the protection of reputation or rights of others, for preventing the disclosure of information received in confidence, or for maintaining the authority and impartiality of the judiciary."<sup>31</sup>

Article 10(2) of the European Convention on Human Rights does not only talk about limits to freedom of expression, rather identifies some significant aspects for consideration of its member states to employ in their practices of freedom of opinion and expression. Nonetheless, when to employ these restrictions without harming the right to free expression and to whom this responsibility should be vested in are some of the vital concerns. Hardly, there have been any proponents of free speech arguing limitless freedom for expression to individuals and media. When Mill (1985) talks *on liberty*,<sup>32</sup> he leaves some space for the 'harm principle' to prevent society from the negative fallouts of limitless freedom. Similarly, when Kant (1724-180)<sup>33</sup> advocates free expression, he is scared of the authority for its historic propensity to misuse what it possesses, and when he passes on this freedom to individuals, he is concerned about a self-controlled mechanism of censorship by them.<sup>34</sup> Feinberg (1988)<sup>35</sup> is also skeptical like his predecessors when he presents offence principle, wherein he stresses on to consider motives behind any speech whether it is the speaker, media or those got offended by the speech. Succinctly, if we look at the free speech right

<sup>&</sup>lt;sup>30</sup>Laurence R. Helfer, "Redesigning the European Court of Human Rights: Embeddedness as a Deep Structural Principle of the European Human Rights Regime," *The European Journal of International Law* 19, no. 1 (2008): 125-159.

<sup>&</sup>lt;sup>31</sup>Ibid.

<sup>&</sup>lt;sup>32</sup>Original book was first published in 1889.

<sup>&</sup>lt;sup>33</sup>The book is a translation by the author and is one of Oxford World's Classics, written by Kant in 1790.

<sup>&</sup>lt;sup>34</sup>James Creed Meredith, *Immanuel Kant: Critique of Judgement* (Oxford: Oxford University Press, 2007).

<sup>&</sup>lt;sup>35</sup>J. Feinberg, *Offence to Others* (London: Oxford University Press, 1988).

beyond the extremes of libertarian approach, the freedom of speech and expression always face certain limits and boundaries of varying nature.

The "Innocence of Muslims" is a quite recent controversy on limitless freedom of media, rather some examples much lower in intensity to the movie have been found in the recent past. For instance, Jerry Springer: The Opera, a popular show on BBC, had to encounter a huge criticism from the masses for long when one of its comic scenes disrespected the Christ.<sup>36</sup> BBC had to face a fierce pressure from its audience and critics said its acronym actually stood for 'Blasphemy Broadcasting Corporation (BBC)'.<sup>37</sup> Similar reaction was observed when a performance in *Behzti<sup>38</sup>* at Birmingham Repertory Theater in England depicted criminality at Sikh's religious place 'Gurdwara.'39 The reaction was so violent, virulent and spontaneous that the show staff had to shutdown further exhibition of the play written by Gurpreet Kaur Bhatti. However, when it came to Jyllands Posten's disrespect to the Holy Prophet (SAW) of Muslims, the cartoons were again and again reproduced by other media outlets in various parts of the world with complete disregard to the sentiments of billions of Muslims all across the world. The reaction of Western media and Muslims has been unique in this regard, which seems to be all out to prove the Muslims a perfect picture of the Orients<sup>40</sup> - violent, irrational, rigid and ignorant.41

The freedom of speech and expression needs to be analyzed at various levels of responsibility to the community and society. For instance, *Behzti* was insolence to the



<sup>&</sup>lt;sup>36</sup>Please visit the web site <u>http://www.spotlightministries.org.uk/jerryspringertheopera.htm</u> to learn more on how Christ was disrespected in the Show. The site was retrieved on January 31, 2013.

<sup>&</sup>lt;sup>37</sup>BBC in its popular program *Jerry Springer* in January 2005 portrayed Christ in a disrespectful fashion, which was bitterly condemned by the Catholic Church and non-governmental organizations working for the promotion of Christianity. People at large enchanted slogans against the BBC and contacted the court of law, posted online petitions and condemned BBC for its denial to tender apology. A news item in this regard can be viewed at http://news.bbc.co.uk/2/hi/entertainment/4161109.stm, retrieved on April 10, 2013.

<sup>&</sup>lt;sup>38</sup>*Behzti* is an Urdu word, means dishonor. In fact, the theater scene was showing an act of rape at a religious place of Sikh community.

<sup>&</sup>lt;sup>39</sup>Tom Garbett, "Problems of (Self-)Censorship in British Theater: Depravity, Corruption and the Lord Chamberlain's Imprimatur," *The Online Journal of Law and Theater*, Issue 2, July 2012: 30-65, retrieved from <u>http://masksjournal.com/files/MASKS%20ISSUE%202%20-%20Garbett.pdf</u> on April 10, 2013.

<sup>&</sup>lt;sup>40</sup>Edward Said, Orientalism (London: Routledge & Kegan Paul, 1978).

<sup>&</sup>lt;sup>41</sup>Edward Said used 'Orient' as opposed to 'Occident' in his famous book *Orientalism*. Orient refers to group of people who are violent, rigid and orthodox in their outlook and behavior and are incapable of defining themselves, a nutshell, a bunch of ignorant. On the other hand, he attributed 'Occident' to those who are open, democratic, tolerant and modern / civilized in their outlook. Here, 'orient' has been used to indicate the majority of people from Arab and Muslim world, while 'Occident' refers to non-Muslim developed world. This binary schematization divided the world into two main blocs, as Said indicated.

sacred place of Sikh community and its reach was limited to certain geographic proximity, as being a theater play. While on the other hand, *Jerry Springer: The Opera* is one of the top rated popular comic show with a vast audience, broadcast by an international media (BBC), which is further carried out by social and news media, multiplying its reach and impact. Hence, the level of responsibility of international or social media is much higher than a play in a theater or for that matter speech by a single person. Not only this, media have become corporations and conglomerates now capable of creating images and constructing social realities in the minds of the people. This demands a higher sense of responsibility to avoid developing hatred and rocking the world peace. It is quite possible that what they portray does not fall in the category of hate speech, but their responsibility to society as enshrined in Article 29 of UDHR 1948 and other similar conventions demands a careful selection of messages, its meanings and implications on the world and public order. But probably media is a commercial entity and is not bound by any social responsibility, and more often responds to economic forces (and to shaming) not to UN declarations.

## 4. Hate Speech in International Conventions

Hate speech is discouraged and free speech is protected under international conventions, probably without any exception. Hate speech in many ways contrasts free speech and the former is considered to be an attack on the latter. Nonetheless, it becomes paramount to distinguish as when free speech may amount to hate speech and under what circumstances. Individual level free speech, may be directed at someone's belief system, is well protected constitutionally almost everywhere, but it may turn into a hate speech when delivered to mass of people through mass or social media as it may have a potential to incite violence. Whereby, one kind of speech may have different connotations and of course impacts because of its level of reach and access. Thus, freedom to speak on any issue at individual level may be taken differently than making a speech that may reach many. This, indeed, necessitates avoiding harm and offence that may occur at a larger scale, and of course creating a good balance between fundamental human right of free speech and right to safety from hate speech and hatred, eventually. However, this complexity between free and hate speech can be reduced once we are clear about hate speech.

Universal Declaration of Human Rights 1948 states in Article 1, "All human beings are born free and equal in dignity and rights."<sup>42</sup> This makes it binding for the member states to check the speech which may denigrate one's race, colour or religion (and belief). The speech violating this article may be declared as hate speech, as the prospect to disturb public order is high. Hate speech clearly dictates that right to speech is not absolute in its nature, and can be curtailed or limited if it harms the peace, tranquility and public order by way of undermining someone's belief/religion, race, caste, colour or creed. The United

<sup>&</sup>lt;sup>42</sup>Part of the UN UDHR 1948 available on many websites; however, we accessed it from <u>http://www.un.org/en/documents/udhr/index.shtml#a1</u>, the site makes UN documents available for public scrutiny and reference. This was retrieved on April 15, 2013.

Nations makes a mention of this in it's another historic treaty commonly known as International Convention on the Elimination of All Forms of Racial Discrimination 1965. Not only this, International Convention on Civil and Political Rights (ICCPR), European Convention on Human Rights (as mentioned earlier), African Charter on Human and Peoples' Rights and American Convention on Human Rights, and some conventions adopted by the Muslim world, all support free speech and deem it as a basic human right, but with varying degree these conventions caution the misuse of this right in the form of hate speech. Rather hate speech is considered as a limit to free speech.

Then what is hate speech? Smolla  $(1990)^{43}$  defines it as 'the generic term that has come to embrace the use of speech attacks based on race, ethnicity, religion, and sexual orientation or preference.<sup>44</sup> Boeckmann (2002)<sup>45</sup> adds another dimension to the hate speech definition when he states that 'any form of expression directed at objects of prejudice that the perpetrators use to wound and denigrate its recipient.<sup>46</sup> The European Council declares 'all forms of expression which spread, incite, promote or justify racial hatred, xenophobia, anti-Semitism' are hate speech besides making 'other forms of hatred based on intolerance, including: intolerance expressed by aggressive nationalism and ethnocentrism, discrimination and hostility against minorities, migrants and people of immigrant origin<sup>47</sup> as an outcome of hate speech. Matsuda<sup>48</sup> argues that hate speech on the basis of race must be defined separately as it has three vital features, which includes (a) racial inferiority directed at (b) a group and is (c) persecutory in nature. Parekh (2006)<sup>49</sup> concerns that when hate speech propagates, it may have a potential of treating the target group with denigration and 'discriminatory treatment is accepted as normal.<sup>50</sup>' Similarly, ICCPR 1966 states in Article 20 that 'any advocacy of national, racial or religious hatred that constitutes incitement to discrimination, hostility or violence shall be prohibited by law.'51

The US First Amendment deals with multiplicity of exceptions that do not warrant its use to protect the communication contents loaded with child pornography, libel or slander,

<sup>44</sup>Ibid., 195.

<sup>46</sup>Ibid., 207.

<sup>47</sup>Anne Weber, *Manual on Hate Speech* (France: Council of Europe Publishing, 2009).

<sup>48</sup>Schwartzman et. al. cites Mastuda in "Hate Speech, Illocution, and Social Context: A Critique of Judith,". Journal of Social Philosophy 33, no. 3 (Fall 2002), 421-441.

<sup>49</sup>Bhikhu Parekh, "Hate Speech: Is There a Case of Banning?" *Public Policy Research* 12, no. 4 (2006): 213-223.

<sup>50</sup>Ibid., 214.



<sup>&</sup>lt;sup>43</sup>Rodney A. Smolla, "Academic Freedom, Hate Speech, and the Idea of a University," Law and Contemporary Problems 53, no.3, (1990): 180-201.

<sup>&</sup>lt;sup>45</sup>R. Boeckmann, C. Turpin-Petrosino, "Understanding the Harm of Hate Speech," Journal of Social Sciences 58, no. 2 (2002): 207-225.

<sup>&</sup>lt;sup>51</sup>International Convention on Civil and Political Rights adopted by the UN in 1966; its provisions are available on many sites on web. The text mentioned has been taken from Wikipedia.com.

and hate speech to some extent. However, most of the free speech absolutists argue that the best remedy to hate speech is more speech. This notion might have some support from the US society and the media, but majority of the world would hardly buy this argument as they are at the receiving end, and this perspective is usually taken as hegemonic in nature. Additionally, the American society has evolved through a process of multi-culture and multi-religious mixing before it reached to its present state; thus making a sense if given such liberty to purport tolerance among the conflicting cultures and differing religious backgrounds. Nonetheless, when it crosses the US boundaries as world media is predominantly US controlled, it might be received differently in different societies being different in culture, religion and civilization, which at times contrasts with American social system. Hence, impression of monopolization by American political and cultural hegemonies over their indigenous systems is the natural outcome. And as agreed widely, this could be done with quite ease through global media, which has roots in the US.

Dijk (1992)<sup>52</sup> agrees that global media are not only capable of creating racist bias and prejudice through its various forms of expression, but are contributing tremendously in constructing attitudes and ideologies towards various ethnic and religious groups. It happens so because majority of the people do not have any direct and regular contact with various social entities, and carries on the racist and anti-religion speeches and discourses by the media.<sup>53</sup> This indicates that mass media help people determine what is what, and who is who, especially when people generally don't have enough opportunities to interact or less or no contact with the subjects of media denigrated community.

A classic example of media construction of people and groups/communities is when a 16-year boy killed Hrant Dink, a Turkish Armenian journalist and human rights activist, who was part of the group belittled and denigrated by the extreme nationalists in Turkish media. The boy wrote to the court that 'guilty are the headlines that showed Dink as a traitor.'<sup>54</sup>

## 5. Western Media and the 'Innocence of Muslims': Discoursing the Discourse

Anti-Muslims sentiments in the West generally and in the USA particularly are not new. A huge literature produced over a long period of time in Europe depicts the Muslims

<sup>&</sup>lt;sup>52</sup>Taun Van Dijk, *Power and the News Media* (Amterdam : Amsterdam University Press, 1992).

<sup>&</sup>lt;sup>53</sup>Tanya Kateri Hernandez, "Hate Speech and the Language of Racism in Latin America: A Lens for Reconsidering Blobal Hate Speech Restructions and Legislation Models," *University of Pensylvenia Journal of International Law* 32, no. 3 (2011): 805-841.

<sup>&</sup>lt;sup>54</sup>An unpublished paper by H. Esra Arcan, titled *Interrupted Social Peace: Hate Speech in Turkish Media*, which he presented in The Asian Conference on Media and Mass Communication 2012, held in Osaka, Japan. The paper can be viewed at <u>http://iafor.org/mediasia2012\_offprints/MediAsia2012\_offprint\_0042.pdf</u>, retrieved on April 11, 2013.

and Islam as a race and essentially a 'problem'<sup>55</sup> to the world peace, particularly to the Christians.<sup>56</sup> Rather, the rebirth of Islam some 14 centuries ago was considered as a punishment to the unscrupulous sins of the Christians.<sup>57</sup> Continuing on academic condemnation of the Muslims and Islam, the Spanish literature made the 'race' synonymous to 'blood' and 'religion,' while referring to Islam.<sup>58</sup> Following the given line, the literature invented new terminologies for people from newly discovered region, now forming USA, as 'mestizo' – mixed blood, and coined 'mulatto' for the mixed breed of Spanish and black, and they were speculated as Muslims.<sup>59</sup> The list goes on and on.

Since the uploading of the 14-minute clip of the "Innocence of Muslims" on YouTube in July 2012, there have been a huge debate predominantly centered on the issues of free speech and freedom of Western media and the guarantees provided by the First Amendment in the US constitution. Till late, global media, especially the print media, mainly positioned its reporting on identifying the producer and the filmmaker of the movie. Analysis of the media reports would reveal that media and the media-men were greatly confused as to who was the real filmmaker. Multiple names and aliases of the filmmaker were on sale in the media market,<sup>60</sup> as were the issues of whether there did exist any full-length movie and whether it was formally released and played in any theater. These



<sup>&</sup>lt;sup>55</sup>It is mentioned in the first edition of H. Prideaux's *Mahomet: The True Nature of the Imposter Fully Displayed in the Life of Mahomet* published in 1697, which the author obtained from the preserved books section of library of University of Glasgow, UK. The 4<sup>th</sup> edition of book was published in 1708, while 8<sup>th</sup> edition appeared in 1723. For further details, please refer to *New Cambridge Bibliography of English Literature*, Vol.2, 1660-1800 by George Watson under the Humphrey Prideaus (1648-1724) title on page no.1705.

<sup>&</sup>lt;sup>56</sup>Patricia Crone and Michael Cook, *Hagarism: The Making of Islamic World* (Cambridge: Cambridge University Press, 1977); Erwin Fahlbusch, Jan Milič Lochman, John Mbiti, Jaroslav Pelikan, Lukas Vischer, Geoffrey W. Bromiley, David B. Barrett, *Encyclopaedia of Christianity* (Brill: William B. Eerdmans Publishing Company, 2001), 758-62; Alastair Hamilton, *William Bedwell, The Arabist* (Leiden: Brill, 1985), 67; Humphrey Prideaux, *Mahomet: The True Nature of the Imposter Fully Displayed in the Life of Mahomet* (London, 1697); R.W. Southern, *Western Views of Islam in Middle Ages* (Cambridge, Massachusetts: Harvard, 1962).

<sup>&</sup>lt;sup>57</sup>Please refer to footnote 52 for details.

<sup>&</sup>lt;sup>58</sup>Zafar Iqbal, "Islamophobia or Islamophobias: Towards Developing a Process Model," *Islamic Studies* 49, no. 1 (2010): 81-101.

<sup>&</sup>lt;sup>59</sup>Walter D. Mignolo, "Islamophobia/Hispanophobia: The (Re)Configuration of the Racial Imperial/Colonial Matrix," *Human Architecture: Journal of the Sociology of Self-Knowledge* 1 (Fall 2006): 19.

<sup>&</sup>lt;sup>60</sup>For instance, *The Wrap*, a famous blog, which provides reviews and insights on Hollywood movies, was unable to identify the filmmaker. The blog is edited and managed by Sharon Waxman who worked for *The Washington Post* and *The New York Times* and is considered to be a credible source on Hollywood movies. Please refer to its report on November 28, 2012 on the filmmaker. Similarly, *Los Angeles Times* in its report on September 14, 2012 could not identify the real filmmaker or producer of the film. *Associated Press Online* also stands in the row as is obvious from its report appeared on September 12, 2012.

continue to be unresolved mysteries to-date. So much so that some of the media reports were merely based on telephonic talk with an anonymous individuals claiming to be the producer and filmmaker of the movie.<sup>61</sup> All this indicates a clear dearth of investigative journalism.

Further, the debate on "Innocence of Muslims" provided an ample opportunity to extremists to spill venom against the Muslims and Islam. Media, in this regard, have appeared to be liberal beyond decency and invited and accommodated the comments, which otherwise might have called journalists' conscience before putting those polemics on the paper for the consumption of masses. Though it was Steve Klein, an extremist and a notorious anti-Muslim activist, who used inflammatory words against the Holy Prophet (SAW) but The New York Times<sup>62</sup> also did not find, intentionally or unintentionally, other way(s) to quote him – showing decency a little more than the extremist. Klein calls California a home of "Muslim Brotherhood Sleeper," of which occupants may 'begin randomly killing as many of us as they can'<sup>63</sup> once they received instructions from their spearheads. Not only this, he has been found provoking non-Muslims to exterminate the Muslims as and when they grow over 10 percent of a country's population, because they (the Muslims) wish to reign the land when exceed certain percentage even being in minority. And for such venomous statements/sayings, media provided plenty of space disregarding altogether the negative fallouts of such communication on the masses at large; apart from the denigration of a religion having millions of followers around the globe. Can we assume that Western newspapers often seek out the most extreme quotes to intensify conflict by privileging the conflict narrative and reinforcing polarization?

Pastor Terry Jones is another glaring example in this regard, who burnt the Holy Qur'ān declaring it a 'dangerous book' and proclaiming 'Islam is of the devil.'<sup>64</sup> His comments got enormous space in the headlines of the international media. Even when he made such inflammatory announcement(s) that he would burn 3,000 copies of the Qur'āns to mark 9/11 as around 3,000 people died in the attack, media did not hesitate to report his statements prominently.<sup>65</sup> Terry Jones was on the forefront of advocating and advertising

<sup>&</sup>lt;sup>61</sup>For instance, *Los Angeles Times*, September 13, 2013, reported in a story titled 'Attack on US Consulate in Libya: Mystery shrouds movie's local origins'.

<sup>&</sup>lt;sup>62</sup>See 'Origins of Provocative Video Are Shrouded' by Adam Nagourneyin September 12, 2012 issue.

<sup>&</sup>lt;sup>63</sup>AP News. "The California Man Behind the Anti-Islam Film," *CNBC*, September 13, 2012. Retrieved from <u>https://www.cnbc.com/2012/09/13/the-california-man-behind-the-antiislam-film.html</u> on December 15, 2017.

<sup>&</sup>lt;sup>64</sup>Kevin Sieff, "Florida Pastor Terry Jones's Koran burning has far-reaching effect," *The Washington Post*, April 02, 2011. It can be accessed from the web page <u>http://articles.washingtonpost.com/2011-04-02/local/35229731 1 dove-world-outreach-center-florida-pastor-koran</u>. Retrieved it on April 12, 2019.

<sup>&</sup>lt;sup>65</sup>Steven Nelson, "Qur'ān-Burning Pastor Terry Jones' Arrest Could Be Unconstitutional, Experts Say," US News, April 12, 2013. Retrieved from

the movie by Nakoula Bassely Nakoula, was openly criticizing Islam and the Muslims while the filmmaker was hiding and was ultimately put behind the bars.

*The Wall Street Journal*, one of the most credible and widely read newspapers in the US, wrote, while quoting the film producer, 'Islam is a cancer' and 'he wanted to showcase his view of Islam as a hateful religion.'<sup>66</sup> Besides other polemics, the paper also quoted Pastor Terry Jones saying that, 'It is an American production, not designed to attack Muslims but to show the destructive ideology of Islam.'<sup>67</sup> On the other hand, when reaction against the movie from the Muslim world was shown, it was shown in two major dimensions – first, the Muslims are rioting, killing and damaging their own properties, and second, the burning of the US flag or *mujasma*.<sup>68</sup>

The Los Angeles Time in its issue on September 16, 2012<sup>69</sup> quoted Zakaria Botros Henein, a controversial Coptic Christian, known as enemy no.1 of Islam and Muslims, saying that Muslims are proving to be what they are as they follow Islam, which is 'terrorism to whole world' and 'Islam is like: Islam of killing, Islam of setting things on fire.' The news item seems to be introducing the preacher and his polemics towards the Muslims and Islam to the massive readership of the newspaper. Not only this, Joseph Nassralla whose place was used to shoot the film and anti-Muslim blogger Pamela Geller were given enough space by the media at large to share their sentiments on the movie and the reaction of the Muslims on it. It is important to note that both of them are on the board of 'American Freedom Defence Initiatives' and 'Stop Islamization of America.' Joseph Nassralla also owns 'Media for Christ,' a non-profit organization.

Interesting has been the case with *Newsweek* in its September 24, 2012 issue titled "Muslim Rage" that showed Muslims in their oriental fashion - violent, belligerent and ignorant; chanting slogans against the West, and not against "The Innocence of Muslims." Probably, that is what was desired from the movie to feature Muslims as ignorant, violent and unpredictable. While, there does not seem to have any narrative on the fact that the Arab world is going through a phase of transformation from autocracy and dictatorship to democracy and the movie has added insult to the injury. Probably, none of the Western



https://www.usnews.com/news/newsgram/articles/2013/09/12/quran-burning-pastor-terry-jonesarrest-could-be-unconstitutional-experts-say on December 12, 2018.

<sup>&</sup>lt;sup>66</sup>AP Report. Anti-Islam Filmmaker in Hiding after Protests," *The Wall Street Journal*, September 12, 2102. Accessed from

https://www.wsj.com/articles/SB10000872396390444426404577647330480547246 on December 12, 2019.

<sup>&</sup>lt;sup>67</sup>Ibid.

<sup>&</sup>lt;sup>68</sup>Dion Nissenbaum, James Oberman, and Erica Orden, "Behind Video, a Web of Questions," *The Wall Street Journal*, September 13, 2012. Retrieved from

https://www.wsj.com/articles/SB10000872396390443884104577647691429314660 on November 23, 2019.

<sup>&</sup>lt;sup>69</sup>The news item titled 'Innocence of Muslims: Cleric known as Islam's 'enemy' defends film' appeared with a provocative picture from the movie.

media could show the scene when the US Ambassador was being taken to car by a few Muslim men to help him reach hospital who was suffocated in the arson at the US Consulate in Benghazi (Libya).<sup>70</sup> It happened when a crowd much bigger in size than the mob attacked the US Consulate in Benghazi was protesting the burning of the consulate and the death of US Ambassador by the violent protestors, just ten days later.<sup>71</sup>

This symbolic portrayal and depiction of the Muslims and Islam by the mass media is the main cause of widespread anti-Muslim sentiments among the Westerners and may well eventually be responsible for rapidly increasing Islamophobia in the West. This could have been avoided if the media and media-men had understood well the message behind such moves by the extremists who perhaps wanted to create unbridgeable cleavages between the Muslims and the non-Muslims, and appeared bent upon making Islam a religion of hate and the Muslims a hateful creatures.

Let's move on to the debates on free speech, which has been the most favorite topic of discussion for media while reporting on YouTube's trailer of 'Innocence of Muslims'.

## 6. Discourse on Free Speech

Banning of "Innocence of Muslims" on YouTube ushered in a debate in the Western media as this act was taken as usurping people's right of access to information. When the Russians banned the movie's trailer as being 'extremist' and equivalent to child pornography,<sup>72</sup> the media by and large condemned this act by the Russian authorities, claiming that the trailer did not stir the law and order situation in Russia and did not cause any massive riots. The ban was taken "more scabrous than the film itself.'<sup>73</sup> However, the Russian Prosecutor General's office opined in the court of law, 'a psychological and linguistic examination of a copy of the film confirmed that its contents aim to incite religious hatred and enmity, and to humiliate people on the grounds of ethnicity and attitude toward religion' and the film 'aims to portray Islam as an inferior religion.'<sup>74</sup> Though Russian Rights Watchdog and Russian Human Rights watch considered this ban justifiable

<sup>&</sup>lt;sup>70</sup>A freelance put the video on YouTube trying to save the US Ambassador who inhaled smoke and was found alive and men were happily saying 'God is great' who saved him. The video can be watched on <u>http://www.YouTube.com/watch?v=hC0B0qrv2wA</u>, retrieved on November 13, 2018.

<sup>&</sup>lt;sup>71</sup>Zafar Iqbal, 2020, op. cit.

<sup>&</sup>lt;sup>72</sup>This has been said by one of member of Russian Government and quoted on a famous media blog Mediaite.com, September 18, 2012, and can be viewed at <u>http://www.mediaite.com/online/the-free-speech-question-how-governments-are-reacting-to-innocence-of-muslims/#disqus\_thread</u>.

<sup>&</sup>lt;sup>73</sup>BBC Monitoring Former Soviet Union, September 28, 2012, Text of report by RussianGazeta.ru news website, often critical of the government, on 18 September 2012. Retrieved from <u>http://www.biyokulule.com/view\_content.php?articleid=5231</u> on November 12, 2018.

<sup>&</sup>lt;sup>74</sup>This has been communicated by *Interfax.com*, primarily a Russian news service. But, hardly of its text was reproduced with justification in the mainstream US media. Retrieved from http://www.interfax-religion.com/?act=news&div=9944, on December 20, 2017.

as the trailer caused massive riots and killings,<sup>75</sup> but its counterparts in the West had differing opinion about the ban.

The movie was banned in majority of the Muslim countries and in some of the non-Muslims countries also like India, Singapore, Russia, and Brazil, to name a few. But, this was not received as a welcome step by the Western media in general that considered it against the fundamental human right of freedom of expression. According to *New York Post*, the film may not be good, 'but it has every right to exist – a right guaranteed by no less than the US Constitution' and this was stated in an inflammatory headline, which reads 'Appeasing thugs by trampling our rights.'<sup>76</sup>

Hardly a few examples from the US media cite the trailer a speech beyond the protection of First Amendment as being 'clear and present danger' meeting 'the imminence standard,' of which intended result is certain violence.<sup>77</sup> However, most of the media debate was framed and built around whether or should there be any limit on media freedom, and if so, then what should be the limit and who should be imposing these restrictions. Shouting 'fire' in a theater, as said by the US Supreme court in a decision, might cause panic and may result in casualty is the defining limit for free speech, then what would be the equivalent of it for social and digital media. Moreover, the trailer is often compared with satirical cartoons of Christ, Budha and Ganesha<sup>78</sup> showing them in humiliating manner in the context of free speech. Reaction to this when compared with "Innocence of Muslims" raises many questions ranging from the free speech issue, which deludes masses that are not only without any historical context of demonization of the Muslims and Islam to the nuances of freedom of speech -a sacred democratic right at the verge of extinction in the hands of the Muslims. People in general being unaware of the level of religious sentiments of Muslims and the plight the Muslim societies are going through, are the easy prey to critical media discourses formed around their hard earned right to free speech and expression. John Esposito, a Western authority on Muslims and Islam, rightly observed while talking to the NBC News that 'The Muslim world remains religiously conservative and its people are simply unaccustomed to such extreme critique of their religion and its



<sup>&</sup>lt;sup>75</sup>*Itar-Tass*, one of the biggest news agency from Russia states it in its wires released on September 19, 2012 titled "RF consumer rights watchdog finds ban on anti-Muslim film correct", retrieved from <u>https://tass.com/russia/746783</u>, on October 20, 2018.

<sup>&</sup>lt;sup>76</sup>Andrea Peyser, "Appeasing Thugs by Trampling our Rights," *New York Post*, September 17, 2012. Retrieved from <u>https://nypost.com/2012/09/17/appeasing-thugs-by-trampling-our-rights/</u>, on October 12, 2018. under headline '.

<sup>&</sup>lt;sup>77</sup>Sarah Chayes, "Does 'Innocence of Muslims' Meet the Free-Speech Test?" *Los Angeles Times*, September 18, 2012.

<sup>&</sup>lt;sup>78</sup>*The Onion.com* is a well-known online source for news and current affairs in the US, also publishes the paper with same title, write in its online edition on September 15, 2012. *Digital Journal* also carried its story on the same date.

prophet'.<sup>79</sup> He compared this with Hollywood movie "The Last Temptation," wherein Jesus was shown in disrespect. According to him, the Christians protested against it violently as such satire was uncommon in the pre-internet era, unlike today.

Depiction of the Holy Prophet (SAW) as in the "Innocence of Muslims" is not new in the Muslim societies as some media outlets claim. Restriction of iconographic representation of holy prophets is a recent phenomenon in the Muslim societies, predominantly purported by Salafists,<sup>80</sup> and one could easily buy the pictures of holy persons in Pakistan till few decades back as pronounced by Oliver Roy while talking to Radio Free Europe, which was reprinted quite often in the press. This seems to be an effort to divert the focus of mainstream discussion from polemics, misrepresentation and insolence of Islam to creating a difference of opinion on an undisputed precept between various schools of religious thought and practice in Islam. Salman Rushdie's novel Satanic Verses also became a point of reference at many instances in media discourses demonstrating the Muslims' rage and wrath, quite unwittingly, when it comes to their religion and Holy Prophet (SAW). Also, it has been widely under discussion in media and blogs that freedom of speech and expression primarily meant to protect the unpopular discourses, whether aiming at distorting facts or insulting religious entities. Rather an invisible campaign in a very silent fashion started to push the Hollywood to come to rescue of the filmmakers who are under attack by the so-called enemies of free speech. Nonetheless, this is not new in its spirit but has become too visible after 9/11, and the mention of it can be viewed and read in "Reel Bad Arabs"<sup>81</sup> produced by Jack Shaheen.

Comparing and contrasting the differences between reactions to 'Piss Christ' by the Christians and 'Innocence of Muslims' by the Muslims in some of the major media outlets<sup>82</sup> in the context of freedom of expression was another hoax. The blasphemous photograph of Jesus by a photographer Andres Serrano is not only a provocation to the conservative Christians but also to the Muslims to the same extent, because as per their belief, Jesus was

http://worldnews.nbcnews.com/\_news/2012/09/13/13834703-whyfilmsandcartoonsofmuhammadspark-violence?lite. The commentary appeared with the title 'Why Films and Cartoons of Muhammad Spark Violence?' Retrieved on November 14, 2018.

<sup>&</sup>lt;sup>79</sup>It was said by him in an interview with NBC on September 13, 2012. The commentary is available on the NBC News site, which can be reached at

<sup>&</sup>lt;sup>80</sup>Oliver Roy is a professor at European University Institute at Florence, Italy, and said this in an interview with Radio Free Europe on September 20, 2012. Whole interview can be viewed at <u>http://www.rferl.org/content/islamprotestsinterviewolivierroyinnocenceofmuslimsfilm/24713613.h</u> tml, retrieved on October 28, 2017.

<sup>&</sup>lt;sup>81</sup>Glimpses of the documentary by Jack Shaheen on portrayal of Arabs in Hollywood movies, mostly prior to 9/11, can be watched at <u>http://www.reelbadarabs.com/</u>, wherein demonization and vilification of Arab Muslims in movies was common.

<sup>&</sup>lt;sup>82</sup>For instance, *The News York Times*, September 22, 2012, in a series of pieces of writing by Nicholas Kristof, and then discourses on the same topic by *The Nation*, leftist weekly from New York.

also a prophet of God and the Bible was revealed to him. Nonetheless, satirical discourses in the media declaring Islam as a so-called 'religion of peace' send a clear and loud message to masses differentiating between violent (Muslims) and non-violent entities (the Westerners) on a blasphemous disclosure in a binary fashion. While, an objective analysis might reveal a different shade of opinion on the riots in the Middle East. As Arab world is passing through a phase of transition – from monarchy and tyranny to democracy, hence eruption of violence is a natural phenomenon in the wake of blasphemous clip on the YouTube. Nothing of this sort we see in Malaysia, Indonesia and other democratic and peaceful Muslim counties where politics and economy is stable, despite protests on the clip.

Relishing freedom of expression under the First Amendment, the media might not wait for long to splash opinions and continue with the same kind of disrespectful discourses on Islam and the Muslims as Mosab Hassan Yousaf, a Palestinian and Ali Sina,<sup>83</sup> a Canadian atheist have already announced to further pursue the agenda set by their predecessors (like Nakoula). Coverage of such events sells big. The "Bullies of Islam" and the "Jihadis to decide for us what trash is"<sup>84</sup> are the common strains of media discourses in the hands of the likes of Nakoula, Yousaf, Sina and Rushdie, to name a few contemporaries. However, even Salman Rushdie, who himself wrote a blasphemous piece over two decades ago, in an NBC News appearance, called the film as 'disgusting.'<sup>85</sup>

At times, condemnation of the trailer and its filmmaker is done in media but it more often turns to question media freedom in case of any restriction imposed on such speeches. For instance, the Google executive chairman Eric Schmidt<sup>86</sup> said that remedy to bad speech is more bad speech. On this analogy, can we think of more violence in response to violence or was the movie a bad, or for that matter a hate speech or an act of blasphemy? All these constructs need to be defined clearly with clearly marked boundaries. Of course, restrictions on media for bad speech is a 'slippery slope'<sup>87</sup> and censorship should not be imposed by riots,<sup>88</sup> but media giants should come forward to arbitrate on issues concerning

<sup>87</sup>Jerome Socolovsky, "Americans Say Curbing Anti-Muslim Speech Would Be 'Slippery Slope," *Voice of America*, September 26, 2012. Retrieved from

<sup>&</sup>lt;sup>83</sup>*The Guardian*, September 28, 2012. *Los Angeles Times*, September 21, 2012 also quotes the same, showing the picture of Mosab Hassan Yousaf.

<sup>&</sup>lt;sup>84</sup>Andrew Bolt, "e should not bow to the Bullies of Islam," *The Daily Telegraph*, Australia edition, September 20, 2012.

<sup>&</sup>lt;sup>85</sup>He appeared in 'Today' – a popular political show on NBC News, on September 17, 2012. Retrieved from <u>https://www.thewrap.com/salman-rushdie-calls-innocence-muslims-filmmakers-disgusting-video-56686/</u>, on October 23, 2018.

<sup>&</sup>lt;sup>86</sup>Also Judge Andrew Napolitano said the same to Megyn Kelly on Fox News on September 17, 2012 and praised Google for its effort to 'Defending Freedom' by not taking down the trailer.

https://www.voanews.com/usa/americans-say-curbing-anti-muslim-speech-would-beslipperyslope, on October 12, 2018.

<sup>&</sup>lt;sup>88</sup>Charles Lane, "Censorship by Riots." *The Washington Post*, September 20, 2012.

their future, and volunteer to resolve the situation as was done in the case of Apple's removal of Manhattan Declaration and Exodus International applications from its iTunes in 2010 when huge protests mounted against these applications declaring them as hateful and 'anti-gay'.

The US culture, law and media practices greatly differ on the free speech and freedom of expression issue from the most of the European countries. Hate speech and blasphemy hardly seem to be defined in the US law; nonetheless, much on protection of free speech and expression exists in the form of First Amendment and verdicts of the US Supreme Court. It is, primarily, due to the long struggle that this nation has to go through to have the right of free expression, and may partly be because of the framers of the US constitution who drunk deep on the fountains of freedom, and fought bitterly against the odds, hence knew the value of free speech well. On the other hand, in some parts of Europe even discussion on Holocaust is a crime under the law, which is nothing but a historic event and not part of any religion or a sacred religious entity. Not only this, even privacy laws in Europe are strict and do not permit media to the extent of bringing a celebrity's private life to public. For instance, a court in Paris ordered to suppress the publication of half nude exposures of the spouse of Prince Williams, which were published by a fashion magazine *Closer.*<sup>89</sup>

Google has, however, a different plea for its support for or refusal to remove the clip from the YouTube. It says that the trailer meets the terms of service for uploading any material on YouTube. According to the YouTube terms of service, it would not permit hate speech – the 'speech that attacks or demeans a group based on race or ethnic origin, religion, disability, gender, age, veteran status, and sexual orientation/gender identity.<sup>90</sup> Probably, YouTube itself has violated its terms of service by uploading the trailer and then insisting on keeping it there come what may. The trailer by no way is an aesthetic piece or work of art, acting is worst of its kind, evidently demeaning of the religion of Islam, devoid of facts and potentially provoking violence; but still it falls in the ambit of accepted protocols of YouTube. This raises many questions on the intent of Google/YouTube to allow uploading it and subsequently keeping it uploaded.

Contrarily the *Los Angeles Times* notes that YouTube has removed and blocked several videos on the requests of the government in the recent pasts fearing those would invoke violence in northeast India.<sup>91</sup> This fact puts a serious question mark on the credibility of Google; whether it supports violence triggering moves (in the Muslim world) or protects freedom of (irresponsible) speech (in the US).

128

<sup>&</sup>lt;sup>89</sup>Lisa O'Carroll, "Kate Topless Pictures: Palace Consulting Lawyers," *The Guardian*, September 14, 2012.

<sup>&</sup>lt;sup>90</sup>The Community Guidelines by YouTube can be viewed on http://www.YouTube.com/t/community\_guidelines.

<sup>&</sup>lt;sup>91</sup>Dawn C. Chmielewski, "'Innocence of Muslims' Video raises new Questions for YouTube," *Los Angeles Times*, September 14, 2012.

# 7. Media Representation of Islam and Muslims

Third most significant aspect in respect of the 'Innocence of Muslims' is the representation of the Muslims in the media discourses. Before moving on to see how media represented the Muslims in the aftermath of YouTube trailer, it would be befitting if we could understand what does the construct representation stands for. In fact, media do not present the facts and truths, but represent them. Here, representation includes several considerations on part of those who present the news and facts to the people like the journalists, the editors and the editorial staff. Quoting from a documentary by John Pilger "The war you don't see,"<sup>92</sup> facts do not matter; what matters is how media represent facts to construct a desired picture in the minds of people. Media do not present the reality; rather media construct the realities for its audience. In the wake of this, let us examine how US media represented the Muslims and Islam as a result of the outbreak of the events after the 'Innocence of Muslims' surfaced on YouTube in July 2012.

Media continued with its buzzwords for Muslims like jihadists, violent, outraged, irrational, etc., while covering events following the release of the trailer. Interestingly, the term '*Jihadi*' is somehow associated with certain images like burning of US flag or an emblem of USA wrapped in the US flag being beaten and burnt by an outraged mob majority of them bearded and head-scarfed. On the contrary, the 'freedom of speech' like phrases surface when something humiliating or critical to Islam, Christianity, Judaism or any other religion or sensitive issue(s) appears in the media. Notable is the point that it happens to be only on the mass media, and probably no one bothers to see as how many books have been blacklisted or banned in the US Libraries from public exposure.<sup>93</sup> Probably, mass media are confined to just a few media-type when it comes to protection of free speech under the First Amendment.

The Muslims are irrational in their behavior is also not new in the series of labels bestowed upon them, particularly after 9/11. For instance, 'Muslims should embrace reason and responsibility' headlined by *The Guardian*<sup>94</sup> from the UK. When said this while commenting on 'Innocence of Muslims,' the paper emphasizes that they (Muslims) should extend the same level of respect to other religions and sects, even within themselves, what they expect others for their religion. There had been some reasons if the paper had said this about the people and not the religion as there are multiple instances from the Muslim world

<sup>&</sup>lt;sup>92</sup>The video can be accessed on YouTube.com, available in multiple pieces besides some other documentaries by John Pilger like 'Invisible Governments', 'Freedom Next Time' etc.

<sup>&</sup>lt;sup>93</sup>A list of books can be seen in the Newsletter by American Library Association meant to create awareness on such books and Banned Book Awareness is being celebrated every year since 1982 by ALA. The newsletter can be viewed at

http://www.ala.org/advocacy/sites/ala.org.advocacy/files/content/banned/bannedbooksweek/ideasa ndresources/free\_downloads/2011banned.pdf. Retrieved on October 12, 2018.

<sup>&</sup>lt;sup>94</sup>Henry Porter, "Muslims should Embrace Reason and Responsibility," *The Guardian*, September 23, 2012.

when people of other beliefs are insulted and persecuted. Nonetheless, most of the sacred persons from other religions like Christianity and Judaism are sacred for Muslims as well, and they take them as messengers of God, bearers of revelation, the Bible and the Torah. Any insult to messengers of God is declared as blasphemy in all parts of the Muslim world. Rather it is amongst the basic tenants of Islam, which the Holy Qur'ān narrates as, 'We make no distinction between one and another of His messengers.'<sup>95</sup>

Like many national and international US media facets, regional media are also parochial in their outlook and represent the Muslims as disgusting. "It's not the video: They hate 'US'" and the US national leaders should avoid appeasing Muslims and 'call thugs a thug,"<sup>96</sup> are some of the phrases very often US citizens read in the newspapers. This naivety of media in representing the Muslims and Islam may cause extreme Islamophobia. Media are not just conveyers of comments and news to people; rather they have become weapons of mass dissemination capable of causing huge destructions. Can this be termed as 'Innocence of media'? Similar pieces appeared in other media also wherein they (the Muslims) are shown as violent not because of such movies, but they show 'us' how much they hate 'us (US), we don't but they behead people, and eventually 'they (Muslims) won because they are violent'. And the list goes on and on.

Some scholars opine that US manufactures such situations in the Muslim world to show to the people at large as how irrational and violent the Muslims are, whereby creating a justification for attacks on them (the Muslims) and the reasons for the US being involved in their internal affairs.<sup>97</sup> In fact, series of events in the last couple of decades have occurred in this respect; demonizing the Muslims and Islam, showing them violent, *jihadists* and irrational in their behavior, and media in this wake represented them as such.

In sum, the media overall did not deviate from the way it has been representing the Muslims and Islam, rather at some points media crossed the line of decency. Probably, it has been for this reason that this time the matter related to their own right of free speech and the interlocutor was the Muslim world, which has more often been in a disadvantaged position. Events of violence in the Middle East and Pakistan for many reasons beyond the trailer also added fuel to the flames. The journalists and media organizations being aware of the situation did not seem to be doing much to ameliorate the situation by presenting discourses in a euphemistic fashion to avoid further deteriorating the Muslims' image in the US society, but violence sells, and a bad story is always a 'good business'. The journalists, also being aware of the nuance of violence in the Middle East, did not try much to alter the normal patterns of discourses; probably they had to keep pace with their fellows

130

<sup>&</sup>lt;sup>95</sup>Al-Baqarah 02:285.

<sup>&</sup>lt;sup>96</sup>Michael Blaustein, "Madonna calls Obama a 'Muslim,' begs Audience to vote for him," *New York Post*, September 25, 2012.

<sup>&</sup>lt;sup>97</sup>For instance, Tariq Ali, a historian from Britain commented in this fashion while talking to Radio Free Press on September 20, 2012.

in other media organizations, which turned the reporting on 'Innocence of Muslims' into 'Innocence of Journalists.'

## 8. Conclusion

Media discourse related to the Muslims and Islam is mostly in political terms and Edward Said (1981)<sup>98</sup> characterization as "word politics" rings true even 30 years on. The discourse seems to suffer from a great disconnect with the totality of Islam and the Muslims' life. Thus, political Islam is greatly the subject of the US media, wherein Islam as an ideology is seen in conflict with the West and the Western way of life. While, ordinary life of a Muslim and their cultural and religious festivals seldom become subject of media, thereby leaving common masses to see the Muslims and Islam from only one angle; i.e., the political aspect of the Muslims which is greatly marred by unrest and violence. After the Rushdie's spectacle of 1988, the "Innocence of Muslims" and reaction to it in the Muslim world has reinforced media constructed image of Islam and the Muslims as the youth of today was too young to recall what happened some 25 years back on the release of *Satanic Verses*.

Further, US media hardly distinguishes between the Arabs and the non-Arab Muslims. In fact, the Arabs are seen as all Muslims and all Muslims are seen as Arabs by the US media and journalists, while the Arabs constitute only 24% of Muslims in the US.<sup>99</sup> Probably, this over-simplification of the problem renders journalists responsible for their incapacity to dig deeper into the facts besides expressing their callous attitude towards issues of great sensitivity. Not only this, journalists can hardly understand the theological differences between various sects of Islam and treat all of them alike under one umbrella. But, when they talk about Christianity, they do mention whether the one under discussion is a catholic, protestant, Baptist or Coptic etc. This misunderstanding of the US media and the journalists leads to treating the radicals and the peace-loving alike. As Islam and the Muslims are mostly discussed in political terms in the US media, hence radicals' behavior is perceived to be the normal behavior of a Muslims by the common masses.

Last but not the least, the US mass media clearly distinguished between the worthy and non-worthy victims of riots surfaced in the aftermath of blasphemous clip the 'Innocence of Muslims'. For instance, the killing of the US Ambassador and others took a greater part of the media discourses and official statements, demonstrating a clear divide between the worthy victims like Stevens and the non-worthy victims including dozens of innocent killed as a result of refusal of the YouTube to offload the clip. Here arises a question that whether the journalists and the media outlets were supporting the clip as a symbol of free



<sup>&</sup>lt;sup>98</sup>Edward Said (1981), op. cit.

<sup>&</sup>lt;sup>99</sup>As per Pew Research Centre's survey conducted from April 14, 2012 to July 22, 2012. It can be retrieved from <u>http://www.pewresearch.org/2007/05/22/muslim-americans-middle-class-and-mostly-mainstream/</u>. Retrieved on April 19, 2013.

speech and generating the Islamophobic discourses or they were stoking unrest and violence in the Muslim world and destabilizing many of the Muslim societies, or both?

### Bibliography

- Bates, Daniel and Warren, Lydia. "Californian behind Mohammed movie that has Middle East in flames is a meth-making federal informer and the director made soft porn films." *Mail Online*, September 14, 2012. Retrieved from http://www.dailymail.co.uk/news/article-2203267/Nakoula-Basseley-Nakoula-Innocence-Muslims-producer-gets-police-protection.html on April 17, 2013.
- Berger, Peter L. and Thomas Luckmann. *The Social Construction of Reality: A Treatise in the Sociology of Knowledge*. UK: Penguin, 1991.
- Blaustein, Michael. "Madonna calls Obama a 'Muslim,' begs Audience to vote for him." *New York Post*, September 25, 2012.
- Boeckmann, R. C. Turpin-Petrosino. "Understanding the Harm of Hate Speech." *Journal* of Social Sciences 58, no. 2 (2002): 207-225.
- Bolt, Andrew. "We should not bow to the Bullies of Islam." *The Daily Telegraph*, Australia edition, September 20, 2012.
- Chayes, Sarah. "Does 'Innocence of Muslims' meet the Free-Speech Test?" Los Angeles Times, September 18, 2012.
- Cheney, Alexandra. "Innocence of Muslims Actress Files Suit against Filmmaker and Google." *The Wall Street Journal*, September 19, 2012.
- Chmielewski, Dawn C. "Innocence of Muslims' video raises new Questions for YouTube." *Los Angeles Times*, September 14, 2012.
- Cohen, Henry. *Freedom of Speech and Press: Exceptions to the First Amendment*. Washington, DC: Congressional Research Service, Government of the United States, 2009.
- Crone, Patricia., and M. Cook. *Hagarism: The Making of Islamic World*. Cambridge: Cambridge University Press, 1977.
- Dijk, Taun Van. Power and the News Media. Amterdam : Amsterdam University Press, 1992.
- —. Discourse as Social Interaction. London: Sage, 1997.
- -... Discourse Studies: A Multidisciplinary Introduction. London: Sage, 2011.
- Fahlbusch, E., J. M. Lochman, J. Mbiti, J. Pelikan, L. Vischer, G.W. Bromiley, David B. Barret., *Encyclopedia of Christianity*. Brill: William B. Eerdmans Publishing Company, 2001.

Fairclough, Norman. Media Discourse. London: Bloomsbury Academic, 1995.

132 -

Feinberg, J. Offence to Others. London: Oxford University Press, 1988.

- Garbett, Tom. "Problems of (Self-)Censorship in British Theater: Depravity, Corruption and the Lord Chamberlain's Imprimatur." *The Online Journal of Law and Theater*, Issue 2, July 2012: 30-65, retrieved from http://masksjournal.com/files/MASKS%20ISSUE%202%20-%20Garbett.pdf on April 10, 2013.
- Gorman, Steve. "US Judge Refuses to Order Anti-Muslim Film Off YouTube." *Reuters*, December 01, 2012. It can be viewed at http://www.reuters.com/article/2012/12/01/us-protests-lawsuit-idUSBRE8B003W20121201. Retrieved on April 17, 2013.
- Hall, Stuart. *Culture, Media, Language: Working Papers in Cultural Studies, 1972-79.* Birmingham: Taylor and Francis, 2005.
- —. Representation: Cultural Representations and Signifying Practices. Milton Keynes: UK Open University, 1997.
- Hamilton, Alastair. William Bedwell, The Arabist. Leiden: Brill, 1985.
- Helfer, Laurence R. "Redesigning the European Court of Human Rights: Embeddedness as a Deep Structural Principle of the European Human Rights Regime." *The European Journal of International Law* 19, no. 1 (2008): 125-159.
- Hernandez, Tanya Kateri. "Hate Speech and the Language of Racism in Latin America: A Lens for Reconsidering Blobal Hate Speech Restructions and Legislation Models." *University of Pensylvenia Journal of International Law* 32, no. 3 (2011): 805-841.
- Iqbal, Zafar. "Islamophobia or Islamophobias: Towards Developing a Process Model." *Islamic Studies* 49, no. 1 (2010): 81-101.
- -... Islamophobia: History, Context and Deconstruction. New Delhi: Sage Publications, 2019.
- Kovaleski, Serge F., and Brooks Barnes. "From Man Who Insulted Muhammad, No Regret." *The New York Times*, November 25, 2012.
- Lane, Charles. "Censorship by Riots." The Washington Post, September 20, 2012.
- Meredith, James Creed. Immanuel Kant: Critique of Judgement. Oxford: Oxford University Press, 2007.
- Mignolo, Walter D. "Islamophobia/Hispanophobia: The (Re)Configuration of the Racial Imperial/Colonial Matrix." *Human Architecture: Journal of the Sociology of Self-Knowledge* 1 (Fall 2006), 19.
- Nelson, Steven. "*Qur'ān*-Burning Pastor Terry Jones' Arrest Could Be Unconstitutional, Experts Say." *US News*, April 12, 2013. Retrieved from https://www.usnews.com/news/newsgram/articles/2013/09/12/*Qur'ān*-burning-



pastor-terry-jones-arrest-could-be-unconstitutional-experts-say on December 12, 2018.

- Nissenbaum, Dion., James Oberman, Erica Orden., "Behind Video, a Web of Questions." *The Wall Street Journal*, September 13, 2012. Retrieved from https://www.wsj.com/articles/SB10000872396390443884104577647691429314660 on November 23, 2019.
- Nordland, Rod. "Afghan Leader Condemns Anti-Islam Film." *The News York Times,* September 12, 2012.
- O'Carroll, Lisa. "Kate Topless Pictures: Palace Consulting Lawyers." *The Guardian*, September 14, 2012.
- Parekh, B. "Hate Speech: Is There a Case of Banning?" Public Policy Research 12, no. 4 (2006): 213-223.
- Peyser, Andrea. "Appeasing thugs by Trampling our Rights." New York Post, September 17, 2012. Retrieved from https://nypost.com/2012/09/17/appeasing-thugs-bytrampling-our-rights/, on October 12, 2018.
- Porter, Henry. "Muslims should Embrace Reason and Responsibility." *The Guardian*, September 23, 2012.
- Potter, Jonathon., and Margret Wetherell. *Discourse and Social Psychology: Beyond Attitudes and Behaviour*. London: Sage, 1987.
- Prideaux, Humphrey. *Mahomet: The True Nature of the Imposter Fully Displayed in the Life of Mahomet.* London, 1697.
- Ryan, Harriet., and Jessica Garrison, "Christian Charity, ex-con linked to Film on Islam." Los Angeles Times, September 13, 2012.
- Said, Edward. Orientalism. London: Routledge and Kegan Paul, 1978.
- Schutz, Alfred. "Alfred Schutz: Collected Papers II." *Studies in Social Theory*. UK: Springer Science and Business Media, 1976.
- Schwartzman et. al. "Hate Speech, Illocution, and Social Context: A Critique of Judith." *Journal of Social Philosophy* 33, no. 3 (Fall 2002), 421-441.
- Seale, Clive. Social Research Methods: A Reader. London: Routledge Chapman & Hall, 2004.
- Smolla, Rodney A. "Academic Freedom, Hate Speech, and the Idea of a University." *Law* and Contemporary Problems 53, no.3, (1990): 180-201.
- Socolovsky, Jerome. "Americans Say Curbing Anti-Muslim Speech Would Be 'Slippery Slope." Voice of America, September 26, 2012. Retrieved from

https://www.voanews.com/u`sa/americans-say-curbing-anti-muslim-speech-wouldbe-slippery-slope, on October 12, 2018.

- Southern, R.W. Western Views of Islam in Middle Ages. Cambridge, Massachusetts: Harvard, 1962.
- The Article 19 of UDHR 1948 can be retrieved from official site of United Nations: http://www.un.org/en/documents/udhr/index.shtml#a19.
- Tolan, John Victor. *Saracens: Islam in the Medieval European Imagination*. New York: Columbia University Press, 2002.
- Torsten, Ringberg, and Makus Reihlen. "Communication Assumptions in Consumer Research: An Alternative Socio-Cognitive Approach." *Consumption Markets and Culture* 11, no. 3 (2008): 173-189.
- Walters, Charl., and Roy Williams. "Discourse Analysis and Complex Adoptive Systems: Managing Variables with Attitudes." *Electronic Journal of Business Research Methods* 2, no. 1 (2003): 71-78.
- Weber, Anne. Manual on Hate Speech. France: Council of Europe Publishing, 2009.

