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RELIGIOUS JURISPRUDENCE AND ISLAMOPHOBIA: THE UNITED STATES,
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COLLEGE OF INTERNATIONAL STUDIES

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I would like to dedicate this work to all of those I have met throughout my travel and research experience who have made me feel so very welcome to their cultures and countries, and especially to those who have been denied the same welcome from mine.

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Abstract

This research aims to take a deeper look into Islamophobia, which is discussed as indiscriminate negative attitudes or behaviors directed at Muslims and Islam in the United States, France, and Canada. This research takes the perspective of Islamophobia as an important contemporary social justice issue, and focuses on the factors that surround and facilitate Islamophobia in the United States, France, and Canada. While this research makes special note of the importance of political rhetoric and the media as driving forces behind the continuation of Islamophobia, it focuses on the ways in which the presence or absence of, and type of national policy regarding the separation of religion and government impacts both legal issues surrounding Islamophobia and the larger social atmosphere regarding Islamophobia. After discussing the differences and similarities of Islamophobia in each of the three case studies, this research provides evidence that Canadian multiculturalism is a policy that better facilitates the integration of Muslims than the policies of separation used by both the United States and France.

Introduction: Islamophobia

All across the Western world, millions of mothers, fathers, sisters, brothers, friends, and coworkers, practice Islam. Though Islam may, to them, be only one part of their life or identity, it may bring them face to face with disapproval, discrimination, and even violence from the general populations of the nation-states in which they live. Even in liberal democratic Western states where religious freedom is the standard, Muslims are targeted because of their beliefs. In the news, in political debates, as well as in academic research, there are vivacious discussions of Islam and of its place in the West. Though these discussions may vary in significant ways, they often include a discussion of Western resistance to the presence of Islam, and sometimes discuss Islamophobia.

Islamophobia is a term that attempts to define a complex socio-political phenomenon.¹ Though Islamophobia is yet to have a single, accepted, definition, many scholars have proposed working definitions. Eric Bleich defines Islamophobia as “indiscriminate negative attitudes or emotions directed at Islam or Muslims.”² The Runnymede Trust, a think tank that specializes in ethnic and racial diversity issues, published a report titled *Islamophobia: A Challenge for Us All* in which they defined Islamophobia as “an unfounded hostility toward Islam” and suggest that the “practical consequences of such hostility are unfair discrimination against Muslim individuals and communities, and the exclusion of Muslims from mainstream political and social

¹ Carl W. Ernst. *Islamophobia in America: The Anatomy of Intolerance*. New York, New York: Palgrave Macmillan, 2013.

² Erick Bleich. "Defining and Researching Islamophobia." *Review of Middle East Studies* 46, no. 2 (2012): 180-89.

affairs”.³ Juliane Hammer defines Islamophobia as a literal fear of Islam, but suggests that it is not a natural fear but an ideological construct that has resulted from political and public discourse.⁴ Andrew Shyroock suggests that Islamophobia is not the fear or hate of Islam alone, but the political designation of a universalized national enemy.⁵ The result of this designation, Shyroock suggests, is a pervasive negative attitude toward Muslims and Islam recognized by journalists, politicians, and intellectuals, among other interested parties, including the general public.⁶ Many scholars include Edward Said’s work on Orientalism as an important part of the explanation for negative attitudes towards Islam, which according to Said has been designated a cultural “other” that exists in opposition to the West.⁷ Modern Islamophobia has been shaped by a worldview in which European Christianity and the Oriental Muslim worlds of history represent separate civilizations that exist in a persistent clash, an idea that Samuel Huntington made famous in his work *Clash of Civilizations*.⁸ This research will not seek to define or challenge any existing definition of Islamophobia, but seeks to explain why Islamophobia is more prevalent in certain countries than others.

The understanding of Islamophobia as a concept is important, and should be understood not only as negative feelings, fear, or hatred of Islam, but as a larger socio-

³ Andrew Shyroock, *Islamophobia/Islamophilia: Beyond the Politics of Enemy and Friend*. Indiana Series in Middle East Studies. Bloomington, Ind.: Indiana University Press, 2010.

⁴ Juliane Hammer, “Center Stage: Gendered Islamophobia and Muslim Women,” *In Islamophobia in America: The Anatomy of Intolerance*, ed. Carl W. Ernst (New York, NY: Palgrave Macmillan, 2013) 107-144

⁵ Andrew J. Shyroock, “Attack of the Islamophobes: Religious War (and Peace) in Arab/Muslim Detroit *In Islamophobia in America: The Anatomy of Intolerance*, ed. Carl W. Ernst (New York, NY: Palgrave Macmillan, 2013) 145-174

⁶ Andrew Shyroock, *Islamophobia/Islamophilia: Beyond the Politics of Enemy and Friend*. Indiana Series in Middle East Studies. Bloomington, Ind.: Indiana University Press, 2010.

⁷ Kimberly A. Powell, “Framing Islam: An Analysis of U.S. Media Coverage of Terrorism Since 9/11,” *Communication Studies*. Vol. 62, No. 1, January–March 2011, pp. 90–112

⁸ Samuel P. Huntington, *The Clash of Civilizations and the Remaking of World Order*. New York: Simon & Schuster, 1996; Andrew Shyroock. *Islamophobia/Islamophilia: Beyond the Politics of Enemy and Friend*. Indiana Series in Middle East Studies. Bloomington, Ind.: Indiana University Press, 2010.

political construct that has permeated into prevalence within current Western society. Though Islamophobia is sometimes understood as an attitude, it is far more impactful than simply the sum of personal opinions alone. This is because Islamophobia negatively impacts the sizeable, and highly diverse group of people that identify as Muslims in the West. Islamophobia, which is conceptually comparable to xenophobia, is further complicated by the fact that Islam is not a phenotypical or single origin trait, but a religion that is practiced by more than one billion people across that globe, who occupy a variation of races, cultural backgrounds, physical locations, economic statuses, denominations of Islam, and levels of religiosity.⁹ Despite this vast diversity within Islam, it is often treated as a homogenous group, which functionally makes all of Islam responsible for the actions and behaviors of any individual or group that is identified with it.¹⁰

The purpose of this research is to take a deeper look at the policies and jurisprudence surrounding the relationship between religion and government and the ways in which those policies may contribute to the prevalence and intensity of Islamophobia. This research will compare policies that focus on separating religion and government, separation of church and state in the United States and *laïcité* in France, with the multicultural policy of Canada, multiculturalism, to gain a better understanding of the ways in which Islamophobia is affected by these different policies. The purpose of this comparison is to gain some understanding on which policies facilitate the most functional foundation for successful cultural integration, and therefore which policies will be most useful in the future for an increasingly globalized world. This research will

⁹ Pew Research Center, “The World’s Muslims: Religion, Politics, and Society.” Last Modified April 30, 2013.

¹⁰ Will Kymlicka, *Multicultural Odysseys: Navigating the New International Politics of Diversity*. Oxford; New York: Oxford University Press, 2007.

focus on the policies of separation of the United States and France because, while seeking the same goal of separating government from religion, they have taken approaches that differ in significant ways. While the separation of church and state in the United States focuses on protecting religion from government influence, *laïcité* focuses on protecting the public space from the influences of religion. This is an important difference that could affect the presence of Islamophobia within these two nation states. This research will then compare these two policies of separation to the policy of separation in Canada that includes multiculturalism, which is a constitutional act that aims to protect minority cultures in Canada. This research suggests that the inclusion of multiculturalism has significantly improved the experience for Muslims in Canada, helped Canada maintain less intense Islamophobia, and facilitated more successful integration for Muslims in Canada than the policies of separation in the United States and France.

Islamophobia is different in the United States, France, and Canada. The presentation of Islamophobia is much the same in all three nation states, which this research will observe through public opinion polls and hate crime statistics. By highlighting public opinion polls, this research seeks to present the opinions of the general populations, as well as the opinions of Muslim populations, on a variety of topics surrounding Islamophobia. By providing hate crime statistics, this research aims to highlight the prevalence and intensity of Islamophobia within the three nation states. However, hate crime statistics are limited. It is important to point out that hate crime statistics only include crimes that are reported, and that meet specific criteria to be

classified as hate crimes¹¹. Therefore, though hate crime statistics give some indication of the realities of Islamophobia, it is reasonable to believe they do not include all anti-Muslim or anti-Islam hate crimes that occur.

Though the presentation of Islamophobia is much the same, the central issues vary in meaningful ways. In the United States, the most unique significant factor surrounding Islamophobia is its implementation as a political tool to gain support for wars in the Middle East. In the United States, religiously charged language was used to mobilize public opinion to support wars that were framed as wars of liberation.¹² Specifically, the idea that freedom is a human right granted by the Judeo-Christian God to all of humanity, and a Christian duty to provide to those oppressed by a dictatorial and vilified Islam.¹³ For example, much of the oppressive image of Islam is centered on women's rights, where Muslim women are represented as oppressed, second-class citizens with unequal rights and unequal opportunities, who require the help of a Western savior.¹⁴ This image is commonly connected to the wearing of religious traditional clothing such as the Hijab, a headscarf that covers some or all of a woman's hair and face, that some argue serves as a tool to deny Muslim women identity and agency over their own lives.¹⁵ Juliane Hammer points out the hypocrisy of the use of women's rights as justification for American involvement in international conflicts, being that the same conservative political affiliates who promote the wars typically

¹¹ Nickie D. Phillips, "The Prosecution of Hate Crimes." *Journal of Interpersonal Violence* 24, no. 5 (2009): 883-905.

¹² Kevin Coe and David Domke, *The God Strategy*. (New York, New York: Oxford University Press, 2010).

¹³ Kevin Phillips, *American Theocracy* (London, England: Viking Penguin, 2006).

¹⁴ Juliane Hammer, "Center Stage: Gendered Islamophobia and Muslim Women," *In Islamophobia in America: The Anatomy of Intolerance*, ed. Carl W. Ernst (New York, NY: Palgrave Macmillan, 2013) 107-144

¹⁵ Juliane Hammer, "Center Stage: Gendered Islamophobia and Muslim Women," *In Islamophobia in America: The Anatomy of Intolerance*, ed. Carl W. Ernst (New York, NY: Palgrave Macmillan, 2013) 107-144

support restrictive domestic policies on Women's rights, and that Women's rights issues remain a prevalent contemporary problem in the United States.¹⁶ Though disputes regarding Muslim women's rights are not singular to the United States, it is specifically American that they are exploited as a justification for military engagement. Moustafa Bayoumi points out the further hypocrisy of religious liberation as a just cause for military intervention, in that it is only applied to specific Muslim majority nation states with whom the United States has a conflict, and excludes Muslim majority nation states with which the U.S. enjoys close economic and political ties.¹⁷

These discrepancies suggest that a specific image of Islam is used as a tool for political purposes, but that image is neither a fair representation nor distributed universally. This image of Islam is pervasive in the U.S. because of the legacy created by the jurisprudence surrounding the separation of church and state, and the failure of its implementation as a universal regulation that excludes the influence of all religions in political action. Instead, separation of church and state has become grounds for judicial argument that has evolved to favor Judeo-Christianity, and exclude minority religions from its original intent to protect them from a dominating majority religion. Because this separation cannot be accomplished in a way that brings justice to both majority and minority religions fairly, it is not a functional policy for a democratic nation state.

France is troubled by a similar problem, caused by the failure of their policy of separation, *laïcité*. While separation of church and state in the U.S. aims to protect the individual's rights to religious practices from the influence of the State, *laïcité* aims to

¹⁶ Ibid.

¹⁷ Moustafa Bayoumi, "Racing Religion." *CR: The New Centennial Review* 6, no. 2 (2006): 267-93

protect the public sphere from the influence of religion. This means that religion in France is treated as a private practice, the expression of which is excluded from public view by a strong socio-cultural norm. This leaves Islam, that is an inherently public practice that includes unique religious clothing, in staunch opposition to traditional French customs of religious discretion. Though *laïcité* was not implemented with the intent to discriminate against Islam specifically, it has been used in way that has indirectly marginalized Muslims, such as the Burka ban and banning of the hijab in public schools¹⁸.

This suggests that *laïcité* impacts Islam differently than it impacts Judeo-Christianity in France which, like the United States, is another Christian heritage nation-state that relies on a policy of separation to regulate the relationship between religion and government of both majority and minority religions. In France this does not facilitate the implementation of religious principles as a justification for war as it does in the United States, but is used to influence public opinion concerning immigration issues that are often presented as concerns for domestic economics. The unemployment rate in France has been at an all-time high throughout the last decade, peaking at over 10 percent in 2016. For immigrants, the unemployment rate is astronomically higher, at 17 percent.¹⁹ Adida, Laitin, and Valfort conducted a research study comparing the results of job applications between Senegalese Muslim immigrants and Senegalese Christian immigrants. They found that Christian applicants were 2.5 times more likely to receive a call back for an interview.²⁰ This is a clear indication that immigrants in

¹⁸ Alec Hargeaves, John Kelsey, and Sumner Twiss, *Politics and Religion in France and The United States*. (Lanham, MD. Lexington Books, 2007).

¹⁹ OECD, "Foreign Born Unemployment," last modified 2018, <https://data.oecd.org/migration/foreign-born-unemployment.htm#indicator-chart>

²⁰ Claire Adida, David Laitin, and Marie-Anne Valfort, "Identifying Barriers to Muslim Integration in France", *Proceedings of the National Academy of Sciences of the United States of America*. 107(52),

France face more barriers to jobs than the general French population, and that Muslim immigrants face even greater challenges finding jobs in France. Hargeaves, Kelsey, and Twiss attribute the exclusion of Muslims on the job market to a failure of cultural integration, caused primarily by the outward expression of the Muslim faith in *laïcité* France.²¹ Instead of protecting the practitioners of this minority religion, the *laïcité* separation policy creates the framework for a society that rejects the public presence of Islam, even though it tolerates the comparably subtle presence of the majority Judeo-Christian religion. Just like separation of church and state in the United States, *laïcité* is incapable of separating religion from the public sphere in a way that is fair for all religions.

Based on the evidence from the case study on the United States and France, the problem may not lay in one specific form of separation policy, but within the focus on separating religion and government. Though there are still some anxieties and problems surrounding the integration of Muslims in Canada, the success that Canada has had with the social integration of Muslims under their policy of multiculturalism could indicate that multiculturalism is a more functional policy alternative to policies of separation. Though multiculturalism is a relatively new policy, its success has been significant. Though anti-Islamic hate crimes still occur in Canada, there are far fewer cases than in the United States or France, and those cases are less violent, indicating that Muslims are more successfully social integrated in Canada.²² Poynting and Perry suggest that the prevalence of hate crimes is less severe in Canada specifically because of Canada's

2010.

²¹ Alec Hargeaves, John Kelsey, and Sumner Twiss, *Politics and Religion in France and The United States*. (Lanham, MD. Lexington Books, 2007).

²² OSCE ODHIR, "Hate Crime Reporting: Canada," <http://hatecrime.osce.org/canada>

multicultural policy.²³ They argue that multiculturalism, a constitutional amendment that states that judicial decisions will be made in a way that is consistent with the enhancement of the multicultural heritage of Canada, has created a culture of cooperation among the general population.²⁴ Despite the fact that Canada is a Christian heritage nation-state, just like the U.S. and France, multicultural policy is specifically defined in the nation's constitutional Charter. By including it, judicial argument and interpretation have had official means to better accommodate the practices of minority cultures, and religion has not been left as a vulnerable target for legal arguments. Instead, multiculturalism has generated an atmosphere of social acceptance, and created the groundwork for successful social integration for Muslims.

These are the factors that make each case study unique to Islamophobia in regard to regulations of government and religion, but there are some other important contributing factors to Islamophobia that should be discussed. Those factors are the rhetoric used by democratically elected political leaders, and the rhetoric then used by the media. In all three nation states, the mainstream media has represented Muslims as violent, and often barbaric, stereotypes, that are a threat to national security.²⁵ These unfounded, racist, stereotypes feed fear and hatred of Muslims among the general population.²⁶ Hate crimes against Muslims increased, and public opinion of Muslims

²³ Scott Poynting, and Barbara Perry, "Climates of Hate: Media and State Inspired Victimisation of Muslims in Canada and Australia Since 9/11," *Current Issues in Criminal Justice* 19, no. 2 (2007): 151-71.

²⁴ CanLII, "The Constitution Act, 1982, Schedule B to the Canada Act 1982 (UK), 1982, c 11," last modified April 17, 1985, <https://www.canlii.org/en/ca/laws/stat/schedule-b-to-the-canada-act-1982-uk-1982-c-11/latest/schedule-b-to-the-canada-act-1982-uk-1982-c-11.html>; Scott Poynting, and Barbara Perry, "Climates of Hate: Media and State Inspired Victimisation of Muslims in Canada and Australia Since 9/11," *Current Issues in Criminal Justice* 19, no. 2 (2007): 151-71.

²⁵ Manaf Bashir, Christine Ogan, Rosemary Pennington, and Lars Willnat. "The rise of anti-Muslim prejudice: Media and Islamophobia in Europe and the United States," *The international Communication Gazette*. Vol 76, Issue 1, (2014): pp. 27 – 46, doi: 10.1177/1748048513504048

²⁶ Claire Aida, David Laitin, Marie-Anne Valfort, *Why Muslim integration fails in Christian Heritage Societies*. (Cambridge, Massachusetts. Harvard University Press, 2016).

decreased following the negative portrayal of Muslims in the media.²⁷ Though this is common across all three cases, the extent to which it influences the general population is different. These stereotypes become so normalized in the Western mind by their repetition, they become truisms, especially in the United States and in France.²⁸

This representation of Islam mobilizes the entire religion as a tool of political influence. This mobilization was especially evident in the United States during the George W. Bush administration's "war on terror" when stereotyped images of Muslims were used to gain support for military action against "radical Islam" and again during the Trump administration to gain support for racist political endeavors including a travel ban on Muslim majority nation states.²⁹ Muslim stereotypes were also used in the French media most recently surrounding the presidential election campaign of Marine Le Pen, whose platform included the immediate reduction of immigration, specifically from Muslim majority North Africa, for security purposes. In Canada, though Muslim stereotyping does occur in the mainstream media, because there is an official multicultural policy there is a smaller populist media culture than in the U.S. and France. There are fewer stereotyped publications in Canada, and the Canadian general population is less susceptible to the ones that do exist, because multiculturalism has established a stronger culture of cooperation and understanding.³⁰

²⁷ Manaf Bashir, Christine Ogan, Rosemary Pennington, and Lars Willnat. "The rise of anti-Muslim prejudice: Media and Islamophobia in Europe and the United States," *The International Communication Gazette*. Vol 76, Issue 1, (2014): pp. 27 – 46, doi: 10.1177/1748048513504048

²⁸ Peter Gottschalk and Gabriel Greenberg, "From Muhammad to Obama" Caricatures, Cartoons, and Stereotypes of Muslims," *In Islamophobia: The Challenge of Pluralism in the 21st Century*, ed. John L. Esposito and Ibrahim Kalin. (New York, NY: Oxford University Press, 2011) 191-209.

²⁹ Juan Cole, "Islamophobia and American Foreign Policy Rhetoric: The Bush Years and After," *In Islamophobia: The Challenge of Pluralism in the 21st Century*, ed. John L. Esposito and Ibrahim Kalin. (New York, NY: Oxford University Press, 2011) 191-209.

³⁰ Scott Poynting, and Barbara Perry, "Climates of Hate: Media and State Inspired Victimisation of Muslims in Canada and Australia Since 9/11," *Current Issues in Criminal Justice* 19, no. 2 (2007): 151-71.

This research will compare the policies of separation, the separation of church and state and *laïcité*, with multiculturalism, to gain a better understanding of how these policies create a social framework that affects the prevalence and intensity of Islamophobia within the general population of the nation states that implement them. This research also considers the influential power of the rhetoric surrounding Islam used by democratically elected leaders in each state, the rhetoric surrounding Islam that is used in the mainstream media, and how that rhetoric influences the public's understanding of Islam and Muslims. The prevalence and intensity of Islamophobia will be measured by hate crime statistics and public opinion polls. However, it is important to point out that this research will not include a specific discussion of Muslim women's issues. This is excluded because the topic of Muslim women is more complex and deserves more in-depth study than the parameters of this work can allow. This research will focus on the general Muslim populations experiences within the United States, France, and Canada.

This research, which highlights those experiences, is important because it will take a critical look at the religious policies and jurisprudence of the United States, France, and Canada, and discuss the ways in which they contribute to Islamophobia. By establishing a better understanding of how Islamophobia has been allowed to grow and circulate, we can gain a better understanding of how Islamophobia can be diminished.

Chapter 1

A Case Study of Islamophobia in the United States

Under the Separation of Church and State

Religion has a central role in American culture. This is evidenced by the prominence of religious establishments across the United States, the presence of religion in public institutions, and the prominence of religious discourse within public forums such as popular media and among the nation's elected leaders. According to a Pew Research Center study conducted in 2017, 70.6 percent of Americans identify as some variation of Christian, 5.9 percent identify with a non-Christian faith, 22.8 percent are unaffiliated with religion, and 15.8 percent do not have a particular religious belief system.³¹ With 70.6 percent of Americans identifying as some variation of Christian, it is reasonable to believe that Judeo-Christian beliefs are prominent in the U.S. However, religious affiliations are declining, revealing a substantial shift from Christian affiliation to affiliations with other religions, and with no religion at all. In 2007, 78.4 percent of Americans identified as Christians, a number that dropped to 70.6 percent by 2014. During the same time period, Non-Christian faiths increased by 1.2 percent and 6.7 percent more Americans considered themselves unaffiliated with any religion, rising from 16.1 percent to 22.8 percent.³²

Even with this shift in numbers, the importance of religion in the lives of Americans is unique among wealthy nations. A 2015 Pew Research Center study found in its comparison of 44 nations that wealthier nations are usually less religious, but the

³¹ "Religious Landscape Study," Pew Research Center, last modified 2017, <http://www.pewforum.org/religious-landscape-study/>.

³² "Americans Changing religious landscape", Pew Research Center, last modified 2015, <http://www.pewforum.org/2015/05/12/americas-changing-religious-landscape/>

United States is a prominent exception. Fifty-four percent of Americans claimed that religion is very important in their lives, while only 24 percent of Canadians, 21 percent of Australians, and 21 percent of Germans agreed.³³ The importance of religion in the lives of citizens impacts the beliefs and value systems of those citizens, and is reflected in their political decision-making, which is expected in a liberal Democracy.

Individual rights, specifically religious freedom, is an inseparable and central part of liberal democracy.³⁴ Liberal democracy is the political ideology that protects the autonomy of the individual citizen.³⁵ The United States is widely known not only as a democracy, but as a liberal democracy. This means it functions under a political system that is marked by a separation of powers, and the protection of free speech, assembly, religion, and property ownership. Fareed Zakaria points out that though democracy and liberalism are “theoretically different and historically distinct” their concurrent rise has linked them as a single, and defining, concept of the American political structure.³⁶ For the majority of Americans, freedom is more important than the guarantee of access to their basic needs.³⁷ Fifty-eight percent of Americans value the right to pursue their goals without state influence more than a guarantee that basic needs will always be met.³⁸

Therefore individualism is central, and U.S. politics is heavily influenced by religion.³⁹

³³ “How do Americans stand out from the rest of the world,” Pew Research Center, last modified 2015, <http://www.pewresearch.org/fact-tank/2015/03/12/how-do-americans-stand-out-from-the-rest-of-the-world/>

³⁴ Aldir Guedes Soriano, “Liberal Democracy and the Right to Religious Freedom” *Brigham Young University Law Review* 2013, no. 3 (2013): 581-603.

³⁵ Robert Audi and Nicolas Wolterstorff, *Religion in the Public Square*. (London, England: Rowman & Littlefield Publishers, 1997)

³⁶ Fareed Zakaria, “The Rise of Illiberal Democracy” *Foreign Affairs* Vol. 76, No. 6 (Nov. - Dec., 1997), pp. 22-43.

³⁷ Richard Wike, “5 Ways Americans and Europeans are different” *Pew Research Center*, last modified April 19, 2016, <http://www.pewresearch.org/fact-tank/2016/04/19/5-ways-americans-and-europeans-are-different/>

³⁸ *Ibid.*

³⁹ Robert Audi and Nicolas Wolterstorff, *Religion in the Public Square*. (London, England: Rowman & Littlefield Publishers, 1997).

The central role of religion within decision making, specifically within political decision making, is problematic because of the variety of religious beliefs that must coexist in the United States. This is further complicated by continued immigration.

The U.S. is a society comprised of generation after generation of immigration.⁴⁰ Immigrants represent cultures, and religions, from all over the world. The variance in cultural groups within the U.S., that have continued to grow through immigration, have created a need for a different type of “American” identity. From this, the distinction of “nationality” emerged as a way to combine all cultures living in the U.S. under one collective identity.⁴¹ Though American national identity may have developed from a need to include all cultures, religious beliefs, and the core values they have, a social friction still exists in the U.S. and it is made evident by religious-based discrimination.⁴² Religious based discrimination is exacerbated when judicial decisions favor one religion over another. This is where the presence of religion within political decision making in the multi-faith United States becomes problematic.

The influence that Judeo-Christianity has had over laws in the U.S. brings the foundational concept of separation of church and state into question. The interpretation of separation of church and state has evolved since the founding of the U.S.⁴³ It was originally derived from the first amendment of the constitution, which mandated freedom of religion in the sense that it inhibits the Federal Government from declaring a

⁴⁰ Kathleen Neils Conzen, David A. Gerber, Ewa Morawska, George E. Pozzetta, and Rudolph J. Vecoli, "The Invention of Ethnicity: A Perspective from the U.S.A." *Journal of American Ethnic History* 12, no. 1 (1992): 3-41.

⁴¹ Ibid.

⁴² Equal Opportunity Employment Commission. "What You Should Know about the EEOC and Religious Discrimination," https://www.eeoc.gov/eeoc/newsroom/wysk/religious_discrimination.cfm

⁴³ Julian R. Kassow, "Preaching to the High School Choir: Rachel Bauchman, The Establishment Clause, and the Search for the Elusive Bright Line", 24 Fla. St. U. L. Rev. 79 (1996).

single official and potentially hegemonic religion.⁴⁴ The idea that the first amendment goes further to officially separate the institutions of religion from the institutions of government is a product of the interpretation of Thomas Jefferson's 1802 Letter to the Danbury Baptists.⁴⁵ The First Amendment of the Constitution, the Jefferson Letter, and the subsequent interpretations of them have formed the official framework that now presides over the interaction between religion and government.⁴⁶ Separation of church and state is often a topic in American courtrooms where religion often becomes the battleground for a multitude of issues.⁴⁷

The prevalence of cases that involve separation of church and state, and the often inconsistent outcomes of decisions, is evidence that separation of church and state remains a vague guide to issues of religion and government.⁴⁸ Because it is vague it has become a source for argument and interpretation, which has left space for religious favoritism, specifically favoritism for the Christian majority.⁴⁹ Justice O'Connor in the case of *Lynch v Donnelly* stated that when a government shows favor to one religion over another, it "sends a message to non-adherents that they are outsiders, not full members of the political community, and an accompanying message to adherents that they are insiders, favored members of the political community".⁵⁰ If separation of church and state fails to protect all religions equally, religious-based discrimination can easily grow in an environment where political powers show favoritism to majority

⁴⁴ U.S. Const. amend. I

⁴⁵ "Jefferson's Letter to the Danbury Baptists," The Library of Congress. <https://www.loc.gov/loc/lcib/9806/danpre.html>

⁴⁶ Julian R. Kassow, "Preaching to the High School Choir: Rachel Bauchman, The Establishment Clause, and the Search for the Elusive Bright Line", 24 Fla. St. U. L. Rev. 79 (1996).

⁴⁷ Ibid.

⁴⁸ Ibid.

⁴⁹ Ibid.

⁵⁰ Ibid.

religions. The individual rights that are central to Liberal Democracy are therefore threatened by unbalanced Christian influence over political decision making, and undermine the success of integration in a society comprised of a multitude of religions from across the globe.

The Separation of Church and State

During the founding of the United States, religious freedom was a primary concern. This is evident by the inclusion of religious freedom in the first amendment of the constitution. However, the first amendment did not secure a clear relationship between religion and government, but only prevented the U.S. government from declaring an official, national, religion that could potentially gain a hegemonic role.⁵¹ The U.S. Constitution is a secular document.⁵² Within this document, the first amendment of the constitution states “Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof...”.⁵³ Article VI of the constitution goes on to state that “no religious test shall ever be required as a qualification to any office or public trust under the United States”.⁵⁴ In 1802 Thomas Jefferson famously wrote a letter in response to the Danbury Baptists in which he quotes the First Amendment of the Constitution, and goes on to explain that the first amendment is “thus building a wall between Church and State”.⁵⁵ Jefferson could not have anticipated the significance of this letter during his lifetime, as it was published in a Massachusetts newspaper in 1802, and not again until it was included in an edition of

⁵¹ U.S. Const. amend. I.

⁵² James Hutson, “A Wall of Separation,” *The Library of Congress*
<https://www.loc.gov/loc/lcib/9806/danbury.html>

⁵³ U.S. Const. amend. I.

⁵⁴ U. S. Const. amend. I VI, § art. VI

⁵⁵ The Library of Congress. “Jefferson’s Letter to the Danbury Baptists,”
<https://www.loc.gov/loc/lcib/9806/danpre.html>

Jefferson's writings in 1853. It was not legally significant until 1878, when the Supreme Court included the "wall of separation" phrase in the *Reynolds v United States* decision, declaring that the phrase "may be accepted almost as an authoritative declaration of the scope and effect of the [first] amendment."⁵⁶

Following *Reynolds v United States*, there were five major court decisions concerning the separation of church and state between 1947 and 1963. These cases were *Everson v Board of Education of Ewing Township*, *McCullum v Board of Education*, *Zorach v Clauson*, *Engel v Vital*, and *Abington School District v Schempp*.⁵⁷ The 1971 case *Lemon v Kurtzman* was also a major decision concerning separation of church and state.⁵⁸

In *Everson v Board of Education of Ewing Township* Everson filed a suit against the schoolboard, claiming that the reimbursement of money for transportation to parents of parochial schools was a violation of the establishment clause of the first amendment. The court ruled that the establishment clause "erected a wall between church and state", quoting Jefferson's letter to the Danbury Baptists, and ruled that the reimbursement of transportation funds was not in violation of it because the school board provided the same reimbursements to everyone, regardless of their attendance in secular or religious schools.⁵⁹ In *McCullum v Board of Education*, the Supreme Court outlawed religious education on public school grounds during regular school hours⁶⁰. In *Zorach v Clauson*

⁵⁶ James Hutson, "A Wall of Separation," *The Library of Congress*
<https://www.loc.gov/loc/lcib/9806/danbury.html>

⁵⁷ Kevin M. Schultz, "Religion and Politics in the Contemporary United States"
American Quarterly, Vol. 59, No. 3, (Sep., 2007), pp. 565-591

⁵⁸ Julian R. Kassow, "Preaching to the High School Choir: Rachel Bauchman, The Establishment Clause, and the Search for the Elusive Bright Line", 24 Fla. St. U. L. Rev. 79 (1996).

⁵⁹ "Everson v. Board of Education", Berkley Center for Religion, Peace, World Affairs, Georgetown University, <https://berkeleycenter.georgetown.edu/cases/everson-v-board-of-education>

⁶⁰ Kevin M. Schultz, "Religion and Politics in the Contemporary United States"
American Quarterly, Vol. 59, No. 3, (Sep., 2007), pp. 565-591; *McCullum v. Board of Education*, 333

the Supreme Court ruled to permit the absence of students from public schools for religious observance and religious education, against the claim that doing so would violate the establishment clause.⁶¹ In *Engel v Vital*, the Supreme Court ruled that the requirement of students to recite a state-created prayer is a violation of the establishment clause. Though the prayer was “nondenominational” the court ruled that requiring students to recite it would be considered “advancement of a specific religion” and therefore a violation of the establishment clause. The court stated that the establishment clause “at least means that in this country it is no part of the business of government to compose official prayers for any group of the American people to recite as a part of a religious program carried on by government”.⁶² In *Abington School District v Schempp*, the Supreme Court ruled that the recitation of Judeo-Christian prayers at the beginning of every school day is a violation of the establishment clause, because the reading of the prayer could create an atmosphere of social exclusion for other than Christian students. The court declared that the purpose of the establishment clause is to “create a complete and permanent separation of the spheres of religious activity and civil authority by comprehensively forbidding every form of public aid or support for religion” and emphasized the importance of religious neutrality in government stating “while the government protects all it prefers none”.⁶³ A few years later in 1971 the Supreme Court established the Lemon Test, that set exact parameters for separation of church and state. To pass the Lemon Test, a government practice must

U.S. 203 (1948), <https://supreme.justia.com/cases/federal/us/333/203/case.html>

⁶¹ *Zorach v. Clauson*, 343 U.S. 306 (1952) <https://supreme.justia.com/cases/federal/us/343/306/case.html>

⁶² Julian R. Kassow, “Preaching to the High School Choir: Rachel Bauchman, The Establishment Clause, and the Search for the Elusive Bright Line”, 24 Fla. St. U. L. Rev. 79 (1996).

⁶³ Julian R. Kassow, “Preaching to the High School Choir: Rachel Bauchman, The Establishment Clause, and the Search for the Elusive Bright Line”, 24 Fla. St. U. L. Rev. 79 (1996).

(1) reflect a clearly secular purpose, (2) have a primary effect that neither advances or inhibits religion, and (3) avoid excessive government entanglement with religion.⁶⁴

Though the creation of the Lemon Test was a landmark for separation of church and state, its rules are still vague enough to leave much to argument and interpretation. The following years marked a decline in adherence to the Lemon Test and separation of church and state during the court of Chief Justice Burger. In the 1984 case *Lynch v Donnelly* the Court ruled to allow a Christian nativity scene to be publicly displayed during Christmas time, ruling that the constitution allows for accommodation of all religions and does not necessitate a strict separation of church and state as long as the state does not show favoritism.⁶⁵ This is a very different interpretation of the establishment clause. The following court of Chief Justice Rehnquist revealed a personal agenda to transfer legal favor of the first amendment from the Establishment Clause to the Free Exercise Clause. The court made its agenda evident in the decision of *Edwards* which required that public school teachings of evolution must be accompanied by teachings of creation science, but was never more clear than in the decision of *Bowen v Kendrick*. Bowen claimed that the Adolescent Family Life Act (AFLA) to be unconstitutional because it allowed federal funding for both secular and sectarian organizations to offer council and research on subjects relating to adolescent premarital sexual relations and pregnancy. Chief Justice Rehnquist allegedly applied the Lemon Test, but declared that the AFLA did not violate the constitution because it did not have the *primary* effect of advancing one particular religion, though it did allow direct religious principles to guide the education of a federally funded organization.⁶⁶ The

⁶⁴ Ibid.

⁶⁵ Ibid.

⁶⁶ Julian R. Kassow, "Preaching to the High School Choir: Rachel Bauchman, The Establishment Clause, and the Search for the Elusive Bright Line", 24 Fla. St. U. L. Rev. 79 (1996).

court's decision not only revealed Rehnquist's agenda, but also the weakness of separation of church and state, even with the application of the Lemon Test.

The transfer of favor to the Free Exercise clause made a very important change for separation of church and state. It allowed state entities to no longer adhere to strict separationist practices as long as it remains neutral among all religious affiliations, and allows only "non-coercive" religious displays.⁶⁷ However, it is simply impossible for a government entity to remain meaningfully neutral while endorsing any specific religious practice, symbol, or expression, and impossible to endorse them all. By endorsing any religious affiliation, the government would simply be endorsing the majority religious affiliation.⁶⁸ Showing favoritism toward the religious majority violates the one interpretation of separation of church and state that is clearest, that the government cannot endorse one religion over another. Furthermore, the interpretation of a religious display as coercive or not is a difficult decision to make, and may vary depending on individual opinion. In the case of *Bowen v Kendrick*, religious organizations offering guidance to pregnant adolescents could be perceived as a coercive act, and if so, granting them federal funding would be a violation of the Establishment Clause. The transition to a neutrality interpretation of separation of church and state is a transition that allows the court to make decisions that preference the religious majority.⁶⁹ Separation of church and state is neither successfully separatist or neutral. Instead, it struggles to draw lines between religion and government, and is unable to neutralize religious majority influence. The absence of neutrality creates an

⁶⁷ Frederick Mark Gedicks, "Undoing Neutrality? From Church-State Separation to Judeo-Christian Tolerance," 46 Willamette L. Rev. 691 (2010).

⁶⁸ Ibid.

⁶⁹ Frederick Mark Gedicks, "Undoing Neutrality? From Church-State Separation to Judeo-Christian Tolerance," 46 Willamette L. Rev. 691 (2010).

opening for preference. The absence of genuine neutrality in the interpretation of separation of church and state has the potential to create an atmosphere of inequality, which could be detrimental to the integration of non-Judeo-Christian groups in the United States.

Policy and Behavior

The Shortcomings of Separation of Church and State

Forty-one percent of the general American population say that separation of church and state should be absolute.⁷⁰ A 2017 Pew Research study has found that the majority of Americans have consistently agreed, with little fluctuation since 2008, that churches and other houses of worship should keep out of political matters and should not express their views on day to day social or political questions.⁷¹ However, the same study found that 62 percent of Americans agree that it is important for the President of the United States to have strong religious beliefs.⁷² These statistics indicate that the majority of the American people do not want religious leaders to openly endorse political viewpoints. Meanwhile, they require the leader of the U.S. to have a public religious affiliation. These poll results suggest a disconnection regarding the spirit of separation of church and state among the collective American population.

Rebecca Sager further investigates this apparent disconnect, suggesting that the current reality of separation of church and state functions based on a “culture of cooperation”, implying that there is no exact dividing line between religion and government.⁷³ Audi, Robert, & Wolterstorff attempt to draw the line between religion

⁷⁰ “By 41% to 34%, Americans Think Separation of Church and State Should Be Absolute,” *You Gov*, last modified March 3, 2012.

⁷¹ Gregory Smith, “Most Americans oppose churches choosing sides in elections,” *Pew Research Center*, last modified February 3, 2017.

⁷² *Ibid.*

⁷³ Rebecca Sager. “Faith Politics and Power”. New York, New York: Oxford University Press, 2010.

and State, and describe religious variation in “Liberal Democratic America” as a complicated subject. They suggest that the core ideas of America’s Liberal Democratic system are “equal protection under the law, equal freedom in the law, and neutrality of the state” when it comes to a person’s core ideas and religion. They explain that each citizen has the right to live as they sit fit. They place responsibility for political behavior on the individual citizen, stating that a “good citizen will refrain from allowing religious reasons to be determinative when deciding and/or debating political issues”.⁷⁴ They then point out that “the citizen” is a product of social learning influenced by one’s core beliefs, including their religious beliefs. If using religion as a compass for decision making is part of “living how one sees fit”, then barring religion from political decision-making is a violation of citizen’s rights.⁷⁵ Research has indicated that, aside from the argument put forth by Audi, et al., voters do not disregard their religious beliefs when making political decisions anyway.⁷⁶ In fact, according to the research of Leigh Bradberry, voter’s religious self-identification, and frequency of attendance to religious services were both significant factors in their voting preferences. Bradberry begins by focusing research on the 2008 and 2012 United States Primary elections. Bradberry aimed to eliminate the partisan factor by researching voter preferences in the primary elections as opposed to the general elections, since during the primaries voters will be making decisions within their self-identified political parties. Bradberry found that voters who more regularly attend religious services were more likely to vote for a candidate who made explicit references to religion, and explicitly discussed political

⁷⁴ Robert Audi and Nicolas Wolterstorff, *Religion in the Public Square*. London, England: Rowman & Littlefield Publishers, 1997.

⁷⁵Ibid.

⁷⁶Leigh A Bradberry, "The Effect of Religion on Candidate Preference in the 2008 and 2012 Republican Presidential Primaries." *PLoS ONE* 11, no. 4, E0152037.

issues that are connected to religious beliefs (such as same-sex marriage).⁷⁷ These findings indicate that voters do not separate themselves from their personal religious beliefs when making political decisions. It is thus unlikely possible to genuinely separate religion and government in the decision making of voters, and furthermore unlikely possible to genuinely separate government from religious influence.

Politicians have framed the public relations of both electoral campaigns, and subsequent political endeavors along religious lines. Though it is difficult to empirically demonstrate motivation, it may be inferred that explicitly religious language is used by political leaders in the United States purposefully to gain votes and support for particular political actions. Explicit religious language and self-identification has been used multiple times in U.S. history by potential presidential candidates lobbying for votes, most recently including George W. Bush Sr. and Richard Nixon. The second President Bush, George W. Bush Jr.'s claim of being "a born again Christian" focused his campaign toward the 40 percent of the electorate with religious inclinations.⁷⁸ During the 1999 Republican Primary debate, when asked which political philosopher he most identified with, George W. Bush answered, "Christ, because he changed my heart". In 2000, newly elected President Bush received almost 80 percent of white evangelical votes.⁷⁹ Coe and Domke explain that when religiously charged language is used, it sends signals that connect a political leader with a voter's personal values and core beliefs. With this connection already made, people invest less time in researching politics because their key concerns have already been addressed by presumed religious

⁷⁷ Ibid.

⁷⁸ Kevin Phillips, *American Theocracy* (London, England: Viking Penguin, 2006).

⁷⁹ Kevin Coe and David Domke, *The God Strategy*. (New York, New York: Oxford University Press, 2010).

principles.⁸⁰ By 2004, religion had become the key deciding factor on how Americans vote for Presidents.⁸¹ John Green, author of *The Faith Factor: How Religion Influences American Elections*, suggested that the 2004 Presidential election of George W. Bush was largely due to Bush's ability to win votes from Protestants and Roman Catholics. However the 2008 election, he then speculated, would likely be less influenced by the vote of the religious populations.⁸² The following elections did show a decline in the importance of the strength of the candidates religious beliefs. In 2000, 70 percent of registered voters agreed that it is "important for a president to have strong religious beliefs". That number remained the same in 2004, declined slightly to 69 percent in 2007, rose slightly to 71 percent in 2008, and then declined from 67 percent in 2012 to 62 percent in 2016.⁸³ Though the percentage of voters who claim that it is important to them that a president have strong religious beliefs has declined, it is important to note that the majority of registered voters in the United States still do.

The religious atmosphere that contributed to George W. Bush's election still surrounded the nation during the 2002-2003 escalation to the War in Iraq. President Bush used religiously charged language while addressing the American people, asking them to support the war in Iraq, and also to justify the war itself. He stated that it is "America's commitment to uphold liberty". He spoke of "hills to climb" and "seeing the valley below" allusions to the Judeo-Christian Bible story of the Israelite's escape from slavery.⁸⁴ He spoke of overcoming the losses of war "through hope, steadfastness,

⁸⁰ Ibid.

⁸¹ Kevin Phillips, *American Theocracy* (London, England: Viking Penguin, 2006).

⁸² "The Religion Factor in the 2008 Election," *Pew Research Center*, last modified December 4, 2007.

⁸³ "Religion in public life," *Pew Research Center*, last modified July 13, 2016, <http://www.pewforum.org/2016/07/13/2-religion-in-public-life/>

⁸⁴ Kevin Phillips, *American Theocracy* (London, England: Viking Penguin, 2006).

and faith”. He proclaimed the War in Iraq to be a “holy war” stating, “I believe that America is called to lead the cause of freedom in a new century” and justifying “holy war” by saying, “I believe freedom is not America’s gift to the world. It is the Almighty’s gift to every man and woman”.⁸⁵ In 2002, the Bush administration circulated images of Saddam Hussein as the biblical tyrant Nebuchadnezzar and Baghdad as “a second Babylon”.⁸⁶ This religious language connected “a just cause for war” with the Christian populations of the U.S., and combined with post 9/11 fear, influenced large amounts of the American populace to support American involvement with conflict in the Middle East.⁸⁷ Gershkoff and Kushner found in their analysis of the George W. Bush administration’s rhetoric, that the Bush administration juxtaposed Islam and freedom by consistently connecting 9/11 and Iraq. This was a deliberate action to gain public support for the War in Iraq⁸⁸. After September 11th 2001, evangelicals showed an increase in votes for the Republican Party, and in 2004 the majority of Catholics supported the Republican party for the first time in U.S. history.⁸⁹ Coe and Domke point out that throughout American history, presidents have used religious language during military conflict, stating, “invocations of God and faith could have done much to mobilize U.S. public opinion, justify the conflict, and buoy the nation in these periods”.⁹⁰

⁸⁵ Ibid.

⁸⁶ Ibid.

⁸⁷ Ibid.

⁸⁸ Amy Gershkoff and Shana Kushner. "Shaping Public Opinion: The 9/11-Iraq Connection in the Bush Administrations Rhetoric." *Perspectives on Politics* 3, no. 3 (2005): 525-37.

⁸⁹ Kevin Coe and David Domke, *The God Strategy*. (New York, New York. Oxford University Press, 2010).

⁹⁰ Ibid.

Bayoumi discusses how political conflicts contribute to what he calls “the racialization of religion” or the treatment of a religion, specifically Islam, as a homogenous group similar to a race instead of as a religion practiced by people of all different backgrounds.⁹¹ Bayoumi cites relevant nationalization hearings in the United States, beginning with the 1942 case of a Yemeni Muslim immigrant named Ahmed Hassan. He points out the court’s emphasis not only on skin color but also on religious affiliation in Hassan’s case, as well as other Muslim or phenotypically Arab’s cases. He points out that the religion of the applicants was specifically noted along with detailed descriptions of their skin color. Hassan was denied nationalization on the basis that he would be unable to naturalize in the dominantly Christian United States due to both his skin color and religion. The judge specifically stated, “Apart from the dark skin of the Arabs, it is well known that they are part of the Mohammedan world and that a wide gulf separates their culture from that of the predominantly Christian people of Europe. It cannot be expected that as a class they would readily intermarry with our population and be assimilated into our civilization”.⁹²

This legalized exclusion regrettably continued in the post 9/11 United States as evidenced by The Bush Administration’s National Security Entry-Exit Registration System (NSEERS). The system, commonly referred to as “special registration” was designed to help fight the “war on terror” and mandated all nonimmigrant males over the age of 16 that are either citizens or nationals from certain countries to be interviewed, fingerprinted, photographed, and registered by the Department of Justice. The endeavor initially focused on men from Iran, Iraq, Lybia, Sudan, and Syria, but was

⁹¹ Moustafa Bayoumi. "Racing Religion." *CR: The New Centennial Review* 6, no. 2 (2006): 267-93.

⁹² Moustafa Bayoumi. "Racing Religion." *CR: The New Centennial Review* 6, no. 2 (2006): 267-93.

extended across 25 other countries in North and East Africa, West Asia, South Asia, Southeast Asia, and East Asia⁹³. It did not include Cuba, one of the seven countries that are listed by the U.S. State Department as a state-sponsor of terrorism. It did include, however, Iraq and Afghanistan which were both invaded by the U.S., and a multitude of U.S. allies. Bayoumi suggests that this proves something other than “enemy nationality” was the deciding factor in which countries of origin were included in the registration act. He then points out that “little unites the disparate group of special registration countries but that they are all Muslim majority nations”.⁹⁴ The fact that al-Qaeda activity had been discovered in France, the Philippines, Spain, Germany, and Britain, and that these countries were not included in special registration, “reinscribed, through a legal mechanism, the cultural assumption that a terrorist is foreign-born, an alien to the United States, and a Muslim, and that all Muslim men who fit this profile are potential terrorists”.⁹⁵ The exemption of the majority Christian Armenians from special registration, whose country of origin is within the Middle East, is further evidence of religion’s central role in defining the enemy in the war on terrorism. Deputy undersecretary for defense Lieutenant General William Boykin expressed a clearly religious rationale behind the war on terror claiming that “my God is a real God and a Muslim’s God is an idol and the United States must attack radical Islamists in the name of Jesus”.⁹⁶ Bayoumi states that when political policies connect terrorism with Islam and with Muslim people, “political policy and cultural attitudes bleed into each other” and “when government actions impact Muslim populations so visibly, the public

⁹³ Ibid.

⁹⁴ Ibid.

⁹⁵ Moustafa Bayoumi. "Racing Religion." *CR: The New Centennial Review* 6, no. 2 (2006): 267-93.

⁹⁶ Ibid.

understands what is politically acceptable behavior”.⁹⁷ This suggests that legal, and therefore legitimate, islamophobic polices suggest to the public that islamophobia is socially acceptable.

Statistics on Anti-Islamic Sentiments and Behaviors in the United States

Islamophobia is a modern problem that is at a current peak. Though the terrorist attacks on September 11, 2001 sparked special registration and an increased islamophobic, and pro-war on terror political rhetoric that may have communicated the social acceptability of anti-Islamic opinions among the general population, Islamophobia is not a post 9/11 phenomenon.⁹⁸ Though researchers are uncertain of the exact origins of Islamophobia in the U.S., they have found that Islamophobia first significantly emerging in the media during the 1960s Arab Israeli War, throughout the 1970s oil embargo, and during the Iranian Revolution in 1979.⁹⁹ These instances were significant in shaping the Islamophobic viewpoints of Muslims in the United States because the representation of Islam alongside these occurrences positioned Islam as a harbinger of violence and American vulnerability.¹⁰⁰ Some researchers have found evidence of Islamophobia even earlier than the 1960s and argue that fear of Islam was used as a unifying concept in defining the early U.S. identity, and used as an “othering” technique to differentiate black Muslims from white slave owners as a justification for the trans-Atlantic slave trade.¹⁰¹

⁹⁷ Ibid.

⁹⁸ Ibid.

⁹⁹ Salim Yaaqub, “Imperfect Strangers,” (New York, New York: Cornell University Press, 2016).

¹⁰⁰ Ibid.

¹⁰¹ Manaf Bashir, Christine Ogan, Rosemary Pennington, and Lars Willnat. “The rise of anti-Muslim prejudice: Media and Islamophobia in Europe and the United States,” *The international Communication Gazette*. Vol 76, Issue 1, (2014): pp. 27 – 46, doi: 10.1177/1748048513504048

Regardless of the exact origins of Islamophobia in the U.S., Muslims have been and are currently viewed by Americans as “culturally, politically, and theologically ‘different’ or ‘unusual’ and exist in good measure outside of the mainstream of American life” and “because of this they have suffered political discrimination, verbal attack, and physical abuse in the United States”.¹⁰² This outsider discrimination may be explained by Taifel and Turner’ Social Identity Theory, which was developed in an effort to help explain inter-group hostility.¹⁰³ According to Social Identity Theory, individuals’ self-concept is derived from membership to certain social groups. It is a three process theory that begins with social categorization, which is the act of mentally assigning people into social groups that are usually based on phenotypical identifiers, occupations, and religious beliefs. This large scale social grouping alleviates time constraints associated with gathering information relevant to decision making.¹⁰⁴ This is a practice that is often used in politics to make time sensitive policy decisions.¹⁰⁵ In the social identification stage, people self-identify to the groups in which they consider themselves members. In the social comparison stage, individuals compare their own social group to that of others thus creating “us” groups and “them” groups which can differentiate between groups that are included and those that are excluded. Research has indicated that focusing on what makes groups different instead of similar can exacerbate those differences, especially in times of political turmoil.¹⁰⁶ Research has also indicated that “us” and “them” social grouping may create pressure to view members of opposing

¹⁰² James M Penning, "Americans' Views of Muslims and Mormons: A Social Identity Theory Approach", *Politics and Religion* 2, no. 2 (2009): 277-302.

¹⁰³ Ibid.

¹⁰⁴ James M Penning, "Americans' Views of Muslims and Mormons: A Social Identity Theory Approach", *Politics and Religion* 2, no. 2 (2009): 277-302.

¹⁰⁵ Ibid.

¹⁰⁶ Ibid.

groups as hostile, aggressive, and antithetical to one's own group. There is evidence that this process of social comparison has significant political consequences because political decisions may reflect in-group biases.¹⁰⁷

These in-group biases may also impact social behavior, specifically the prevalence and intensity of Islamophobia according to the results of public opinion polls and hate crime statistics. According to a poll conducted in April 2011, 66 percent of Americans expressed an unfavorable opinion of Islam. A 2015 poll reveals little to no improvement in American public opinion, with 61 percent of participants still expressing unfavorable views of Islam.¹⁰⁸

Anti-Islamic hate crimes, including physical violence and intimidation spiked post 9/11. In 2001, there were a total of 546 incidents of anti-Islamic violence including 27 aggravated assaults, 66 simple assaults, and 296 instances of intimidation.¹⁰⁹ In 2002 these numbers decreased drastically, with a total of 155 incidents of anti-Islamic violence including 12 aggravated assaults, 22 simple assaults, and 66 instances of intimidation.¹¹⁰ Between 2002 and 2011, the number of anti-Islamic hate crimes fluctuated between the low 100s and mid 100s¹¹¹. In 2012, there were 130 total anti-Islamic hate crimes in the United States. In 2013, that number rose to 135 total anti-Islamic hate crimes. In 2014, that number rose further to 154 total anti-Islamic hate crimes¹¹². The number of anti-Islamic hate crimes then skyrocketed back up toward post 9/11 numbers in 2015, with 301 total incidents, 27 incidents of aggravated assault, 64

¹⁰⁷ Ibid.

¹⁰⁸ Shibley Telhami, "What Americans Really Think about Muslims and Islam," *Brookings Institute*, last modified 2015.

¹⁰⁹ "Hate Crime Statistics, 2001", Federal Bureau of Investigations, <https://ucr.fbi.gov/hate-crime/2001>

¹¹⁰ "Hate Crime Statistics, 2002", Federal Bureau of Investigations, <https://ucr.fbi.gov/hate-crime/2002>

¹¹¹ "Hate Crime Statistics", Federal Bureau of Investigations, <https://ucr.fbi.gov/hate-crime>

¹¹² Ibid.

simple assaults and 120 incidents of intimidation.¹¹³ The number of physical assaults against Muslims in 2015 reached post 9/11 number after a 13-year decrease.¹¹⁴ In 2016, the number of anti-Islamic hate crimes continued to rise, with a total of 307 total incidents¹¹⁵.

Being Muslim in the United States

According to a 2017 Pew Research study, 75 percent of Muslims stated they believe there is a lot of discrimination against Muslims in the U.S. Sixty-two percent stated they believe Americans do not think Islam is a part of American mainstream society. Fifty percent stated it has gotten more difficult to be Muslim in the U.S. in the last few years¹¹⁶.

According to the same Pew Research surveys, there is a distinct difference between Muslim men and women in regards to feelings of security in the United States. In general, more women have a higher level of concern than men. Seventy percent of Muslim women believe that it is likely that the government is monitoring their phone calls and emails, where only 48 percent of Muslim men agree. Eighty-three percent of Muslim women believe there is a lot of discrimination toward Muslims in the U.S. while only 68 percent of Muslim men agree. This gender gap is consistent with survey participants' personal experiences with discrimination, being that 55 percent of Muslim women interviewed admitted to personally experiencing at least one instance of

¹¹³ Katayoun Kishi, "Anti-Muslim assaults reach 9/11-era levels, FBI data show." *Pew Research Center*, last modified 2016; "Hate Crime Statistics, 2015", Federal Bureau of Investigations, <https://ucr.fbi.gov/hate-crime/2015>

¹¹⁴ "Hate Crime Statistics, 2015", Federal Bureau of Investigations, <https://ucr.fbi.gov/hate-crime/2015>

¹¹⁵ "Hate Crime Statistics 2016", Federal Bureau of Investigations, <https://ucr.fbi.gov/hate-crime/2016>

¹¹⁶ Pew Research Center, "US Muslims Concerned about their place in society but continue to believe in the American dream," last modified 2017.

discrimination within the past year of the interview, and a comparatively lower 42 percent of men interviewed admitted personal experience with discrimination.¹¹⁷

Though Islamophobia is not a post 9/11 phenomenon, islamophobic mentalities represented by the aforementioned poll responses and hate crime statistics, have peaked consistently with the media spreading of anti-Islamic political rhetoric. Most recently, this has occurred during the 2011 Iraq War, during the 2015 build up to the 2017 Presidential election, and again immediately following the 2017 election of President Donald Trump.

Bashir, et al. found that favorable opinions of Muslims in The United States dropped from 47 percent in 2001 to 37 percent in 2010. Their research suggests that negative media portrayal of Islam as “a threat to security” could be responsible.¹¹⁸ Their research also suggests that anti-Islamic attitudes are linked to the conservative Republican party, of which 63 percent believe “Muslim values are not compatible with American values”. They point out that religiosity is highly correlated with membership to the Republican party, and suggest that religion may be a factor in Islamophobic attitudes that they have found to be linked to the Republican party.¹¹⁹ More Protestants (including both mainline and evangelical Protestants) identified as members of the Republican Party than the Democratic Party. The majority of Non-Judeo-Christian based religious practitioners (including Jewish, Buddhist, Hindu, and Muslim) reported identification with the Democratic party. The religious population that makes up the Republican party is less diverse and more exclusively Judeo-Christian than the

¹¹⁷ Ibid.

¹¹⁸ Manaf Bashir, Christine Ogan, Rosemary Pennington, and Lars Willnat. “The rise of anti-Muslim prejudice: Media and Islamophobia in Europe and the United States,” *The international Communication Gazette*. Vol 76, Issue 1, (2014): pp. 27 – 46, doi: 10.1177/1748048513504048

¹¹⁹ Ibid.

Democratic party.¹²⁰ Because the current interpretation of separation of church and state favors the free exercise clause over the establishment clause and allows government entities to endorse religious practices and symbols as long as all religions are given the opportunity to be recognized, it could be considered biased in favor of the religious majority, which is Christianity.¹²¹ If decision makers are inclined to make decisions based on in-group biases, including political decisions, those decisions will favor Christianity.¹²² When one religion is favored over another, the practitioners of the other are disadvantaged, especially when the Republican political party that holds majority decision making power in all three branches of government is evidently biased against Islam.¹²³ Therefore, through the in-group biased decisions of the majority decision making political party, the modern interpretation of separation of church and state preferential treatment of the majority religion is creating a space for religious discrimination in the U.S. In that space, Islamophobia has flourished.

Current Islamophobia and The Trump Administration

However, the biases within the interpretation of separation of church and state is not the only factor that contributes to the perpetuation of Islamophobia in the U.S. Though the interpretation of separation of church and state has arguably created space for institutionalized religious bias, why has it affected Islam specifically? This question may be answered by, not only the history of Islam in the U.S., but by the rhetoric that surrounds it. When Islamophobic rhetoric is used by democratically elected leaders, and

¹²⁰ "Party Affiliation", Pew Research Center, last modified 2018.

¹²¹ Frederick Mark Gedicks, "Undoing Neutrality? From Church-State Separation to Judeo-Christian Tolerance," 46 *Willamette L. Rev.* 691 (2010).

¹²² James M Penning, "Americans' Views of Muslims and Mormons: A Social Identity Theory Approach", *Politics and Religion* 2, no. 2 (2009): 277-302.

¹²³ Manaf Bashir, Christine Ogan, Rosemary Pennington, and Lars Willnat, "The rise of anti-Muslim prejudice: Media and Islamophobia in Europe and the United States," *The international Communication Gazette*. Vol 76, Issue 1, (2014): pp. 27 – 46.

then spread through the media to the general population, it validates anti-Islam speech and action¹²⁴. The use and reference to the stereotypical representation of Islam exacerbates already existing in-group vs. out-group biases and stimulates Islamophobia on a national scale¹²⁵.

The 2018 current President of the United States Donald Trump gained support during his election and during the first year of his presidency while making openly islamophobic statements to the public, and signing islamophobic executive orders. The Washington Post published a timeline of President Trump's Islamophobic statements that includes 36 examples beginning in 2011 and extending through 2017. On December 7, 2015: Trump's campaign issued a statement saying: "Donald J. Trump is calling for a total and complete shutdown of Muslims entering the United States until our country's representatives can figure out what is going on".¹²⁶ Following the issue of the statement, Trump tweeted "Just put out a very important policy statement on the extraordinary influx of hatred & danger coming into our country. We must be vigilant!".¹²⁷ Trump later read this statement aloud at a rally in South Carolina.¹²⁸ The next day on CNN, Trump quoted a widely debunked poll that was spread by an anti-Islam activist organization which claimed that a quarter of all Muslims living in the United States agreed that violent action against Americans is justified as part of a global jihad. "We have people out there that want to do great destruction to our country,

¹²⁴ Moustafa Bayoumi. "Racing Religion." *CR: The New Centennial Review* 6, no. 2 (2006): 267-93

¹²⁵ James M Penning, "Americans' Views of Muslims and Mormons: A Social Identity Theory Approach", *Politics and Religion* 2, no. 2 (2009): 277-302.

¹²⁶ Abigail Hauslohner and Jenna Johnson, "'I think Islam hates us': A timeline of Trump's comments about Islam and Muslims," *Washington Post*, last modified 2017.

¹²⁷ Jenna Johnson, "Trump calls for 'total and complete shutdown of Muslims entering the United States'," *Washington Post* last modified 2015.

¹²⁸ Abigail Hauslohner and Jenna Johnson, "'I think Islam hates us': A timeline of Trump's comments about Islam and Muslims," *Washington Post*, last modified 2017.

whether it's 25 percent or 10 percent or 5 percent, it's too much,” Trump said. On March 22, 2016 Trump told Fox Business, “We're having problems with the Muslims, and we're having problems with Muslims coming into the country.” Trump called for surveillance of mosques in the United States, saying: “You have to deal with the mosques, whether we like it or not, I mean, you know, these attacks aren't coming out of — they're not done by Swedish people”.¹²⁹

Throughout numerous other examples Trump spoke of the general Muslim population as terrorists. This was done so often, the terms “Muslim” and “terrorist” were used almost synonymously. On June 13, 2016, following the mass shooting at an LGBTQ+ nightclub in Orlando, Florida, Trump declared during a speech in New Hampshire that “radical Islam is anti-woman, anti-gay and anti-American.” During the speech, he criticized Hillary Clinton for not using the specific term “radical Islam” and for making positive statements about Islam. He suggested that the immigration of refugees into the United States would mean opening the door to Islamic people, and therefore terrorists; “Hillary Clinton's catastrophic immigration plan will bring vastly more radical Islamic immigration into this country, threatening not only our society but our entire way of life. When it comes to radical Islamic terrorism, ignorance is not bliss. It's deadly — totally deadly”.¹³⁰ He stated multiple times that mosques should be closed down for security purposes, and suggested that “Islam hates us [the United States]”, and that the United States is “not loved” by Muslims who are “sick people, with a sickness”.¹³¹

¹²⁹ Ibid.

¹³⁰ Abigail Hauslohner and Jenna Johnson, “‘I think Islam hates us’: A timeline of Trump’s comments about Islam and Muslims,” *Washington Post*, last modified 2017.

¹³¹ Ibid.

In 2017, within a week of becoming President, Trump attempted to follow through on his campaign promise for “a total and complete shutdown of Muslims entering the United States” by signing an executive order that banned all Syrian refugees, and banned the citizens of seven Muslim majority countries from entering the United States. Presidential advisor, and the mayor of New York during the September 11, 2001 terrorist attacks, Rudolph Giuliani told Fox news that President Trump called the executive order the “Muslim Ban” when he first announced it and asked Giuliani “how to do it legally”.¹³²

Hate crimes against perceived Muslims reached post 9/11 numbers alongside Trump’s statements in 2015.¹³³ According to a study conducted by researchers at California State University San Bernardino, hate crimes against Muslims were up 78 percent in 2015, following Donald Trump’s islamophobic campaign rhetoric.¹³⁴ Brian Levin, the director for the Center for the Study of Hate and Extremism in San Bernardino commented on Trump’s call for immigration bans and for a national Muslim registry stating, “we’re seeing these stereotypes and derogative statements become part of the political discourse” and “the bottom line is we’re talking about a significant increase in these types of hate crimes”. He stated that the rise in hate crimes against perceived Muslims occurred immediately after some of Trump’s islamophobic statements. During some of the incidents, perpetrators even quoted Donald Trump. The Washington police released a video of a woman who poured an unspecified liquid on a Muslim woman while criticizing Islam and stating she would vote for Donald Trump

¹³² Abigail Hauslohner and Jenna Johnson, “‘I think Islam hates us’: A timeline of Trump’s comments about Islam and Muslims,” *Washington Post*, last modified 2017.

¹³³ Federal Bureau of Investigations, “Hate Crime Statistics 2015”.

¹³⁴ Eric Lichtblau, “Hate Crimes Against American Muslims Most Since Post-9/11 Era” *New York times*, last modified September 17, 2016.

because he would “send you all back to where you came from”.¹³⁵ Mark Potok, a Senior Fellow at the Southern Poverty Law Center stated, “I don’t have the slightest doubt that Trump’s campaign rhetoric has played a big part in the rising attacks”.¹³⁶ The Southern Poverty Law Center also reported an enormous 197 percent increase in anti-Islamic hate groups, which rose from 34 in 2015 to 101 in 2016 following the election of Donald Trump.¹³⁷ The Southern Poverty Law Center attributes this rise in hate groups in part to the “incendiary rhetoric” of Donald Trump, stating that some anti-Islamic hate groups may have been emboldened by Trump’s language. One known anti-Islamic hate group called “the Crusaders” were reportedly thwarted from detonating a bomb at a Kansas apartment complex housing 120 Somalian Muslim immigrants. The attack was reportedly scheduled for November 9th, 2015 the day after election day.¹³⁸

Trump’s anti-Islamic rhetoric and executive orders to block travel from seven Muslim majority countries have understandably created fear in the American Muslim community. Sixty-eight percent of Muslims stated Donald Trump made them feel worried. Only 12 percent of Muslims stated in 2017 that they believe Donald Trump is friendly toward their community, whereas 64 percent stated that they believed Obama was friendly toward their community in 2011. Despite the highly publicized controversial relationship between President Donald Trump and the American Muslim community, these statistics are not at an all-time high. Instead, they reflect similar statistics of Muslim public opinion of George W. Bush’s presidency. Only 15 percent of

¹³⁵ Ibid.

¹³⁶ Eric Lichtblau, “Hate Crimes Against American Muslims Most Since Post-9/11 Era”, *New York times*, last modified September 17, 2016.

¹³⁷ Mark Potock, “The Year in Hate and Extremism,” *Southern Poverty Law Center*, last modified February 15, 2017.

¹³⁸ Mark Potock, “The Year in Hate and Extremism,” *Southern Poverty Law Center*, last modified February 15, 2017.

Muslims approved of the way in which President George W. Bush handled his job in 2007 and only 19 percent of Muslims approve of the way Trump is handling the presidency, whereas 76 percent of Muslims approved of the way in which Obama handled his job in 2011.¹³⁹

The difference may be a reflection of the rhetoric used by the Presidents. While former President George W. Bush used pro-Christian and islamophobic rhetoric while promoting the war in Iraq, and President Donald Trump has used islamophobic language throughout his election campaign and presidency, former President Barack Obama refused to use the term “Islamic terrorist”.¹⁴⁰ Obama explained that the use of the term places responsibility for the actions of violent subgroups on the whole Muslim community. He stated, “there is no doubt, and I've said repeatedly, where we see terrorist organizations like al Qaeda or ISIL -- They have perverted and distorted and tried to claim the mantle of Islam for an excuse for basically barbarism and death. These are people who've killed children, killed Muslims, take sex slaves, there's no religious rationale that would justify in any way any of the things that they do," he said, "But what I have been careful about when I describe these issues is to make sure that we do not lump these murderers into the billion Muslims that exist around the world, including in this country, who are peaceful, who are responsible, who, in this country, are fellow troops and police officers and fire fighters and teachers and neighbors and friends".¹⁴¹

He went on to caution against the “danger of a president or people aspiring to become

¹³⁹ Pew Research Center, “US Muslims Concerned about their place in society but continue to believe in the American dream,” last modified 2017.

¹⁴⁰ Amy Gershkoff and Shana Kushner. "Shaping Public Opinion: The 911-Iraq Connection in the Bush Administrations Rhetoric." *Perspectives on Politics* 3, no. 3 (2005): 525-37; Abigail Hauslohner and Jenna Johnson, “‘I think Islam hates us’: A timeline of Trump’s comments about Islam and Muslims,” *Washington Post*, last modified 2017; Daniella Diaz, “Obama: Why I won’t say ‘Islamic Terrorism’,” *CNN*, last modified September 29, 2016.

¹⁴¹ *Ibid.*

president” using the term stating it “starts dividing us up as Americans”.¹⁴² The power of islamophobic language, even when coming from an influential political leader, would be nothing if not for its publication through mainstream and social media.

The Media and The Spread of Ideas

Mass media is a cornerstone of American culture because of its prevalence. The mass media spreads information through various channels, including print, television, and over the internet. News is also spread through social media, on public displays, and through word of mouth. Through these channels, Americans have multiple means of accessibility to mainstream news. Therefore, it is reasonable to believe that Americans generally obtain information regarding the world around them from the mass media. The collectives of knowledge formed by the influx of information spread by the media, form the general impressions the audience has of the world around them. These general impressions form individual’s perspectives of reality, which translate into world view. In other words, the information that a person surrounds themselves with becomes their reality, and that information is coming from the mass media. The mass media is a steward of knowledge, and may be the most powerful institution of influence in the world. Kimberly Powell simply suggests, that the media are the distributors of ideas themselves.¹⁴³

Because mass media is the steward of ideas, it is fundamental to discuss the public understanding of terrorism as a media contrived concept. Islam entered the American mainstream media by the way of international conflicts, the oil embargo, and

¹⁴² Daniella Diaz, “Obama: Why I won’t say ‘Islamic Terrorism’,” *CNN*, last modified September 29, 2016.

¹⁴³ Kimberly A. Powell, “Framing Islam: An Analysis of U.S. Media Coverage of Terrorism Since 9/11,” *Communication Studies*. Vol. 62, No. 1, January–March 2011, pp. 90–112

in connection to terrorism. International conflicts created a link between Islam and violence, while the oil embargo linked Islam to American vulnerability and as a threat to The United States as a whole. The link between Islam and terrorism surrounds incidents of extremist violence, and sensibly should remain a link between *terrorist violence* and *extremist groups*. However, the media has perpetuated a link between terrorism and the whole of Islam. The connections made between these occurrences and Islam created the foundation for the public's opinion of Islam. The populace began to view Islam as violent and threatening.¹⁴⁴

Powell suggests that after 9/11 the American media revealed a particular pattern in the depiction of Muslims, Arabs, and Islam. The media represented them as a demographic that is not only violent, but working together as an organized religious group unified against Christian America. Meanwhile, domestic extremist violence perpetuated by white people or Christians is depicted as a singular, rare, minor threat that is commonly linked to an isolated mental health issue and not to a larger cause or organization.¹⁴⁵ The media's emphasis on these separate representations of terrorism, including the use of the term terrorism itself, is significant in multiple ways. First, Powell suggest that the media has a toxic relationship with violence, especially violence that can be framed as an act of terrorism. Powell quotes Abraham Miller, who described the relationship between the media and terrorism as symbiotic, explaining that the media needs sensational events to remain relevant, while at the same time terrorist groups need the media to reach their greatest impacts. Terrorist organizations and vigilantes both need the attention of the media for public exposure before they can

¹⁴⁴ Salim Yaaqub, "Imperfect Strangers," (New York, New York: Cornell University Press, 2016)

¹⁴⁵ Kimberly A. Powell, "Framing Islam: An Analysis of U.S. Media Coverage of Terrorism Since 9/11," *Communication Studies*. Vol. 62, No. 1, January–March 2011, pp. 90–112

become relevant. By using sensational words like “terrorist” and “terrorism” to label violent events, the media draws longer lasting attention from the public. Without the label of “terrorist” the audience may read about an incident, consider it an isolated problem and a singular action, and then forget about it. With the label of “terrorist” the audience will remain attentive, expecting a continued story or future attacks that could result from a group-related act of purposeful violence.¹⁴⁶

Powell suggest that the media strategically frames events as “terrorism” when publishing information on violent acts committed by phenotypical Arabs, or anyone who can be connected with Islam. Powell analyzes the media coverage of terrorist events that occurred in the U.S. between 2001 and 2009. In her analysis she found that media agents actively sought to identify perpetrators as Muslims, and when they could do so, framed the coverage of incidents to depict the perpetrators as violent, radical, and religiously-motivated, with a larger goal of harming the U.S. as a whole. However, when the perpetrators could not be identified as Muslims, Arabs, or connected to al-Qaeda, the media focused its framing of the incident on mental health issues, personal histories of gentleness and kindness, family connection, and framed the occurrences as isolated events that were not linked to a greater cause.¹⁴⁷

Because media sources are widely viewed as the distributors of ideas, the media has the influential power to guide the beliefs of a nation.¹⁴⁸ As a result of this influential power, and the link between Islam and terrorism the media has published, islamophobic sentiments have been and continue to cultivate within the populace. Research has found an association between increased news exposure and anti-Muslim prejudice. The study

¹⁴⁶ Kimberly A. Powell, “Framing Islam: An Analysis of U.S. Media Coverage of Terrorism Since 9/11,” *Communication Studies*. Vol. 62, No. 1, January–March 2011, pp. 90–112

¹⁴⁷ Ibid.

¹⁴⁸ Ibid.

found that higher levels of exposure to news of Islamic extremism is associated with increased anger and reduced warmth toward Muslims.¹⁴⁹

Another study has found that the rise in popularity of social media may be linked to the prevalence of islamophobia. Nearly universal access to social media has created a space where xenophobic and racist attitudes and opinions can easily be spread throughout the public. The prevalence of these attitudes and opinions not only normalizes islamophobia, but pushes the boundaries on the kind of speech that is accepted by the public. The perpetrators of these attitudes and opinions are also easily linked to like-minded people, and have been able to form large networks of anti-Islam xenophobes. This network is often called the “counter-jihad”.¹⁵⁰ Deepa Kumar has called their practice of labeling Islam and Muslims as a threat to the security and values of the U.S. as the “manufacturing of the green scare”.¹⁵¹ The U.S. think tank Center for American Progress published one of the first attempts to identify the actors that are responsible for the islamophobic discourses circulating the media. They found that four types of political actors are responsible, the religious right, some Republican politicians, right-wing news media outlets, and grass-roots organizations.¹⁵² The spread of islamophobic attitudes from these groups has had a heavy impact on public opinion, especially during the 2016 U.S. presidential election, according to a report published in 2016.¹⁵³ According to Gentzkow the growth of online news prompted the fear that

¹⁴⁹ John Shaver, Chris Sibley, Danny Osborne, and Joseph Bulbulia, "News Exposure Predicts Anti-Muslim Prejudice", *PLoS One* 12, no. 3 (2017): E0174606.

¹⁵⁰ Mattias Ekman, "Online Islamophobia and the Politics of Fear: Manufacturing the Green Scare." 38, no. 11 (2015): 1986-2002.

¹⁵¹ *Ibid.*

¹⁵² *Ibid.*

¹⁵³ Matthew Gentzkow, "Social Media and Fake News in the 2016 Election", *The Journal of Economic Perspectives* 31, no. 2 (2017): 211-36.

“excess diversity of viewpoints would make it easier for like-minded citizens to create ‘echo-chambers’ or ‘filter-bubbles’ where they would be insulated from contrary perspectives”.¹⁵⁴ These “echo-chambers” may have facilitated the spread of unverified information, otherwise coined as “fake news” stories. Gentzkow found disturbing evidence that the majority of Americans obtain the majority of their information from unverified news sources circulated on social media by biased “echo-chamber” groups. According to Gentzkow’s research 1) sixty-two percent of Americans get their news from social media 2) popular fake news stories were shared more on Facebook than popular mainstream news stories 3) many people who see fake news stories report that they believe them 4) the most discussed fake news stories tended to favor Donald Trump over Hillary Clinton.¹⁵⁵ This information is meaningful for understanding how biases and false information is spread quickly and effectively throughout large populations of people, specifically anti-Islamic opinions.

However influential both the mainstream media and social media may be, it is important to understand that these outlets act as the stewards of ideas, but are not the creators of those ideas. Both journalists and private individuals spread information based on information they learn, regardless of the legitimacy of the sources. Powell suggests that the mainstream media bases its frameworks for the depiction of Islam upon influential people and organizations within the U.S. government; “The media relies upon the framework of interpretation offered by public officials, security experts and military commentators, with news functioning ultimately to reinforce support for

¹⁵⁴ Matthew Gentzkow, "Social Media and Fake News in the 2016 Election", *The Journal of Economic Perspectives* 31, no. 2 (2017): 211-36.

¹⁵⁵ Ibid.

political leaders and the security policies they implement’’.¹⁵⁶ Gentzkow finds that information spread through social media is widely accepted as truth.¹⁵⁷ Because news consumers base their opinions, and ultimately their world view, on the information they obtain, Obama’s warning against trumps rhetoric is a legitimate concern.

Democratically elected leaders have a powerful influence over the public, especially when biased information is spread to their advantage on social media. Their influence is powerful not only because of their position’s legitimacy, but also because of their high media exposure. Therefore, when a person with legitimate authority and high media exposure makes islamophobic statements, the impact on public opinion is powerful.

The Integration of Islam

This environment of stereotypical media representation and negative rhetoric has made it difficult for Islam to successfully integrate into American society. To discuss this, it is important to establish a working definition of integration. Integration is distinctly different from assimilation, where individuals are expected to abandon cultural practices and to behave more closely to the mainstream of a society. Successful integration is evidenced by a population’s ability to safely practice one’s own cultural practices while still enjoying social acceptance. The level of the social acceptance of the unique expressions of a culture is indicative of the level of successful integration of that culture. The integration of Islam and Muslims in the U.S. can be measured by the intensity and prevalence of islamophobia. As previously mentioned, Muslims in the United States have expressed feelings of displacement, experienced discrimination, and been the victims of hate crimes. Muslims that are phenotypically Arab have experienced

¹⁵⁶ Kimberly A. Powell, “Framing Islam: An Analysis of U.S. Media Coverage of Terrorism Since 9/11”, *Communication Studies*. Vol. 62, No. 1, January–March 2011, pp. 90–112

¹⁵⁷ Matthew Gentzkow, "Social Media and Fake News in the 2016 Election", *The Journal of Economic Perspectives* 31, no. 2 (2017): 211-36.

a higher degree of discrimination. In one Pew Research study, 55 percent of Muslim women experienced discrimination while a comparatively lower 42 percent of Muslim men did. Instances of discrimination include people acting suspiciously toward them, being called offensive names, airport security and law enforcement singling them out, and physical assaults. More women than men experienced more discrimination over all, and more in each category of discrimination. In the same poll, 49 percent of Muslim women state there is something distinctly Muslim about their appearance while only 27 percent of men said the same. This research indicates that a perceivably “Muslim” outward appearance increased the likeliness that a Muslim person will experience discrimination.¹⁵⁸

There is also evidence of economic discrimination among Muslim populations in the U.S. Though Muslims have similar education levels as the general population, 40 percent of Muslims have a household income of \$30,000 per year, while only 32 percent of the general population falls in the same income level.

Another indicator of integration problems is the general population’s support for the Trump administrations “Muslim ban”. According to a January 2017 Gallup poll, 42 percent approved of the ban on travel from seven majority Muslim countries.¹⁵⁹ In a similar poll from Reuters, also conducted in January 2017, 43 percent agreed that “banning people from Muslim countries is necessary to prevent terrorism”.¹⁶⁰ The instances of religious based violence against Muslims, evidence of economic discrimination, the election of Donald Trump, public support for the travel ban on

¹⁵⁸ Matthew Gentzkow, "Social Media and Fake News in the 2016 Election", *The Journal of Economic Perspectives* 31, no. 2 (2017): 211-36.

¹⁵⁹ Frank Newport, “About Half of Americans Say Trump is Moving too Fast,” *Gallup*, last modified 2017.

¹⁶⁰ Ben Mathis-Lilley, “First Muslim Ban Poll Finds Americans Support Trump Order by 7 Point Margin”, last modified 2017.

Muslim countries, and the general populations expressed opinion that Islam is not a part of mainstream society in the United States are evidence that the American Muslim population has not been successfully integrated into general American society.

Conclusion

In the 1990's, the interpretation of separation of church and state shifted in favor of the free exercise clause, instead of absolute separation. This means that instead of barring all religion from government institutions, religion will be allowed as long as all religions enjoy equal opportunity to be represented. This has created favoritism for the majority religion, Christianity, because it is represented by the majority of decision makers. This has left minority religions disadvantaged, and has created a gap in equal treatment for minority religions. Islam is specifically adversely effected by this, because of the history of alleged Islam motivated violence, the political rhetoric surrounding Islam, and the representations of Islam that circulate in the media. Influential politicians have situated Islam as an anti-American "other" and used stereotypical images to pose Islam as a threat to American security and American culture. Because of the unique importance of Christianity to American identity, this posing of Islam as a threat to American identity has been successful. This representation was used to gain support for specific political actions, including the Bush administration's war in Iraq, and the Trump administration's Muslim ban. The media, especially social media, has participated in the spread of islamophobic ideas and have facilitated the perpetuation of islamophobia in the U.S. The prevalence and intensity of Islamophobia in the United States is made evident by public opinion polls and hate crime statistics, which demonstrate problems with the integration of Muslims into general American society.

Though Islamophobia is not a direct result of separation of church and state, the ambiguity of the relationship between religion and government in the United States has left space for interpretation in which the majority religion is favored, leaving minority religions disadvantaged. Therefore, separation of church and state as it is not a adequate to accommodate integration for other than Christian religious practitioners.

Chapter 2

A Case Study of Islamophobia in France

Under L'laïcité

Much like The United States, French history has been heavily influenced by the blending of religion and government, the trauma of which still influences French political decision making today. Currently, France is considered *Une Republique laïque* (a secular republic).¹⁶¹ Historically, Catholicism had a hegemonic role in French government where Catholic leaders enjoyed heavy influential power and shared the wealth of the aristocracy. The ideas of the Enlightenment, especially the idea that the believers themselves, and not only religious leaders, could interpret the teachings of the Christian Bible were important contributing factors in the French Revolution.¹⁶² The idea that people could have direct relationships with God, and not only relationships with God through high ranking religious leaders, undermined the political power of Catholicism in France. Empowered by these new ideologies, jaded by the abuses of the French bourgeoisie and the hegemonic role of the Catholic church, and motivated by starvation and inequality, the French public revolted against the French feudal system in 1789 in what became the French Revolution.¹⁶³ By the end of the French Revolution, the public successfully overthrew the Crown in a gruesome, blood-drenched, civil war that included the execution of tens of thousands of people during a time period known as “the reign of terror”.¹⁶⁴

¹⁶¹ Alec Hargeaves, John Kelsey, and Sumner Twiss, *Politics and Religion in France and The United States*. (Lanham, MD. Lexington Books, 2007).

¹⁶² Jonathan Laurence, Justin Vaisse, *Integrating Islam Political and Religious Challenges in Contemporary France*. (Washington, D.C. The Brookings Institution, 2006).

¹⁶³ Gemma Betros, “The French Revolution and the Catholic Church”, *History Review*. Issue 68 (2010), Accessed online at <http://www.historytoday.com/gemma-betros/french-revolution-and-catholic-church>

¹⁶⁴ Heinrich Von Sybel, *History of the French Revolution*. London: J. Murray, 1867.

Läicité (Secularism)

After centuries of religious based politics and religious warfare, France separated Church from State in 1905, establishing *laïcité* (secularism), a collection of policies that prevents any single religion from establishing a leadership role in France.¹⁶⁵ Though at first glance *laïcité* and the American concept of separation of church and state seem the same, there are fundamental differences.¹⁶⁶ Separation of church and state gives the rights to the individual so that he or she enjoys “freedom of conscience” and freedom of religious expression. *Laïcité* provides “freedom of conscience” through political power by keeping public space secular. Because of France’s history of religious wars, and as a means to prevent future religious wars, the common good of France has been redefined as “the welfare of society as a whole” and no longer to mean “the welfare of God”.¹⁶⁷ To facilitate *laïcité*, religion is understood as two separate concepts; religion, which refers to an individual’s personal relationship with God, and organized religion, or *le culte*, which involves religious ceremonies, buildings, and the teaching of religious principles.¹⁶⁸ Simply, *laïcité* in France aims to protect the public from unwanted religious influence through a strict socio-cultural norm that excludes religious expression from the public sphere.

Policy Vs. Behavior: Problems with Läicité and Multiculturalism

Conflicts of public religious expression did not noticeably arise until the late 1980s, when the need to freely participate in religious practices collided with the use of

¹⁶⁵ Alec Hargeaves, John Kelsey, and Sumner Twiss, *Politics and Religion in France and The United States*. (Lanham, MD. Lexington Books, 2007).

¹⁶⁶ J. R. Bowen, *Why the French don't like headscarves: Islam, the State, and public space*, (Princeton: Princeton University Press, 2007).

¹⁶⁷ Ibid.

¹⁶⁸ Ibid.

long term public services, specifically in the military, hospitals, schools, and prisons. Schools especially became a matter of public debate, in regard to religious apparel. The *Conseil d'État* officially ruled in 1989, in response to the Minister of Education's inquiry on the legality of removing students who came to school in religious clothing, that apparel must not be "ostentatious or assertive in nature, and would not constitute as an act of pressure, provocation, proselytism, or propaganda". This vague ruling left much to interpretation as made clear in the case of Muslim girls wearing hijabs, or veils, at school. Some French citizens believed the veil was specifically counter-feminist and oppressive, and others simply disapproved of wearing religious signs in public.¹⁶⁹ However according to Bowen, Muslims reject the idea that the veil is a "religious sign" because the decision of wearing it is understood as a personal commitment to faith, not a declaration to others, and therefore not in violation of the anti-proselytism rules of *laïcité*.¹⁷⁰ However, Bowen explains that *laïcité* is a concept that is nowhere defined exactly, but is understood to communicate that "the neutrality of public space permits the peaceful coexistence of different religions".¹⁷¹ Therefore, in 2003, parliament amended the aforementioned ruling, permitting the wearing of religious symbols in schools only if the symbols "are discrete such as pendants or medallions that are worn not to be seen". This made the wearing of veils by Muslim girls in school illegal. Many celebrated the decision as a victory for feminism, though it still deprived Muslim girls of the right to choose for themselves.¹⁷² However, the specifics of this ruling could be

¹⁶⁹ Alec Hargeaves, John Kelsey, and Sumner Twiss, *Politics and Religion in France and The United States*. (Lanham, MD. Lexington Books, 2007).

¹⁷⁰ J. R. Bowen, *Why the French don't like headscarves: Islam, the State, and public space*, (Princeton: Princeton University Press, 2007).

¹⁷¹ *Ibid.*

¹⁷² Alec Hargeaves, John Kelsey, and Sumner Twiss, *Politics and Religion in France and The United States*. (Lanham, MD. Lexington Books, 2007).

considered an example of anti-Islamic sentiments within French social policy. While common modern Christian apparel is discrete enough to appease this ruling, such as cross necklaces, the Muslim hijab that specifically prompted this change in legislature is not¹⁷³. Outside of school, a Catholic nun's habit is no less visible than a Muslim's veil, and should serve as an intense visual reminder of France's bloody religious political history, but it is only the hijab that is portrayed in the media as a harbinger of violence.¹⁷⁴ Furthermore, Plenel points out that French secularism was established not to exclude religious minorities, but to protect them. By illegalizing Muslim specific clothing, such as the niqab in public and the hijab in schools, while allowing priest's clothing and nun's habits to be worn in public, and allowing small Christian crosses at school under the guise of secularism, France is using the principles of *laïcité* in direct opposition to itself.¹⁷⁵

A law established in 1978 restricts official recordkeeping of religious data in France. Therefore, there is no official census data regarding self-identified religion in France after that date. However, public polls have since been collected regarding religious self-identification, and though it is not considered official state data, polls are widely accepted as authoritative information.¹⁷⁶ According to such polls, in 2006 only approximately 2.2 percent of French citizens identified as Protestants. In fact, only 10 percent (roughly more than four times fewer than The United States) of French citizens considered themselves "practicing Christians" in 2006. The practice of Christianity in France declined steadily between 1905 to 2006, as is it was most commonly considered

¹⁷³ J. R. Bowen, *Why the French don't like headscarves: Islam, the State, and public space*, (Princeton: Princeton University Press, 2007).

¹⁷⁴ *Ibid.*

¹⁷⁵ Edwy Plenel, *For the Muslims: Islamophobia in France*. (Brooklyn, NY. Verso., 2016).

¹⁷⁶ Jonathan Laurence, Justin Vaisse, *Integrating Islam Political and Religious Challenges in Contemporary France*. (Washington, D.C. The Brookings Institution, 2006).

“anti-modern” to practice Christianity.¹⁷⁷ According to the latest works by the Pew Research Center Global Religious Futures Project, religious affiliation in general has continued to decline, and is projected to decline further. In 2010, Pew Research estimated that 39,560,000 people in France (63 percent) identified as Christian. In the same year, only 4,710,000 people in France (7.5 percent) identified as Muslim, and 17,580,000 people (28 percent) identified as unaffiliated with a religion. Pew Research projects that by 2020, 37,940,000 people in France (58.1 percent) will identify as Christian and 5,430,000 people in France (8.3 percent) will identify as Muslim, while 20,830,000 people (31.9 percent) will identify as unaffiliated with a religion. According to this research Christianity is declining, along with affiliation with religion in general which is also declining, while Islam slowly increasing.¹⁷⁸

The explanation for the rise in Muslim practitioners in France during the decline of other religious affiliation is not only immigration, but also procreation. The Muslim population in Europe is both younger and has more children than the non-Muslim European population. In 2016, 50 percent of Muslims in Europe were under the age of 30, while only 32 percent of non-Muslim Europeans were under the age of 30. Also, Muslim women in Europe have an average birth rate of 2.6 children each, whereas non-Muslim Europeans have an average of only 1.6 children each.¹⁷⁹ Though the Muslim population is growing, the overall trend is a decline in religious affiliation. Although Muslim women are having presumably Muslim children at a higher rate than French

¹⁷⁷Kevin Phillips, *American Theocracy* (London, England: Viking Penguin, 2006).

¹⁷⁸“Pew Templeton Global Religious Futures Project France,” Pew Research Center, last modified 2016, http://www.globalreligiousfutures.org/countries/france/religious_demography#/?affiliations_religion_id=0&affiliations_year=2020

¹⁷⁹ Conrad Hackett, “5 Facts About the Muslim Population in Europe”, *Pew Research Center*, last modified 2017, <http://www.pewresearch.org/fact-tank/2017/11/29/5-facts-about-the-muslim-population-in-europe/>

women are having children, this is not significant evidence of eventual “Islamicization”. Laurence and Vaisse discuss the fear that France will become “Islamicized” due to Muslim immigration and that native Europeans will soon be facing “dhimmitude”, the majority status of Islamic tradition, in their own country.¹⁸⁰

Regardless of the overall trend of declining religious affiliation, Islam has become the second largest religion in France and has continued to grow.¹⁸¹ Because France has no official means of tracking the number of religious practitioners due to the 1978 law, local officials began investigating the size of Mosque congregations in October 2001, in a fearfully motivated response to the 9/11 terrorist attacks.¹⁸² Threatened by the rapid growth and fears of “Islamization”, the French State began adjusting the 1905 law of *laïcité* to allow some government funding for locations of various forms of worship, including Muslim mosques, and to pay for the training of religious leaders, including Muslim imams. This was in response to Muslim religious organizations practice of reaching outside the borders of France for funding, believing it to be safer and healthier to avoid foreign dependence.¹⁸³ Furthermore, in the hopes of integrating Islam into the French republic by establishing an Islam of France, the French government established the French Council of the Muslim Religion, and in doing so, established official representatives of the Muslim population on the basis of religion. The French government accepted the responsibility of providing Muslim citizens with respectable places to practice their faith in public institutions such as prisons and city

¹⁸⁰ Jonathan Laurence, Justin Vaisse, *Integrating Islam Political and Religious Challenges in Contemporary France*. (Washington, D.C. The Brookings Institution, 2006).

¹⁸¹ Alec Hargeaves, John Kelsey, and Sumner Twiss, *Politics and Religion in France and The United States*. (Lanham, MD. Lexington Books, 2007).

¹⁸² J. R. Bowen, *Why the French don't like headscarves: Islam, the State, and public space*, (Princeton: Princeton University Press, 2007).

¹⁸³ *Ibid.*

centers.¹⁸⁴ This change was a long time coming, and did not come without conflict. Muslim immigrants and their decedents, known as the *beurs*, fought for decades to be treated fairly as French citizens, some of which turned to violent means.¹⁸⁵ In just a few examples, radical Islamic groups cried support for Saddam Hussein during the first Gulf War in 1991, and claimed responsibility for bombings in Paris in 1995. The September 11, 2001 attacks only further damaged the image of Islam in France, as it only continued the discourse of a reputation already devastated by France's own history. Bashir, et al. found in their study of Islamophobia in eight-countries, that anti-Muslim attitudes in France are higher today than they were in the 1980s. While anti-Islamic mentalities in other European countries declined between 2004 and 2008, France remained steadily around 62 percent.¹⁸⁶

Despite the fact that *laïcité* attempts to regulate the importance of religious affiliation Islam continues to face social and political discrimination. In the instances of religious apparel in schools, and localizing funding for religious establishments, *laïcité* has been amended to facilitate a demographically changing France. Despite these changes, Islamophobia remains a prevalent problem in France. The prevalence and intensity of Islamophobia in France is measured by hate crime statistics and public opinion polls.

Statistics on anti-Islamic Sentiments and Behaviors in France

According to the Organization for Security and Co-operation in Europe (OSCE)

¹⁸⁴ Jonathan Laurence, Justin Vaisse, *Integrating Islam Political and Religious Challenges in Contemporary France*. (Washington, D.C. The Brookings Institution, 2006).

¹⁸⁵ Alec Hargeaves, John Kelsey, and Sumner Twiss, *Politics and Religion in France and The United States*. (Lanham, MD. Lexington Books, 2007).; J. R. Bowen, *Why the French don't like headscarves: Islam, the State, and public space*, (Princeton: Princeton University Press, 2007).

¹⁸⁶ Manaf Bashir, Christine Ogan, Rosemary Pennington, and Lars Willnat, "The rise of anti-Muslim prejudice: Media and Islamophobia in Europe and the United States," *The international Communication Gazette*. Vol 76, Issue 1, (2014): pp. 27 – 46.

Office for Democratic Institutions and Human Rights (ODIHR) anti-Muslim hate crimes have fluctuated between 2012 and 2016. In 2012 there were a total of 287 reported hate crimes against Muslims or Islam. This number includes 54 physical assaults, 149 cases of threats and 84 cases of damage to mosques or cemeteries. In 2013, there were 301 reported hate crimes against Muslims or Islam. This number includes 62 physical assaults, 9 cases of desecration to a cemetery, 66 cases of damage to mosques, and 164 threats. In 2014, there were 133 reported hate crimes against Muslims or Islam. This number includes 55 physical assaults, and 78 threats. In 2015, there were 336 reported hate crimes against Muslims or Islam. This number includes 29 physical assaults, 18 arson attacks, 74 cases of damage to property, 174 incidents of vandalism and 40 cases of threat. In 2016, there were 53 reported hate crimes against Muslims or Islam. This number includes 26 attacks on property, 10 threats, and 17 physical assaults.¹⁸⁷ The number of incidents declined to 133 in 2014, but spiked back up drastically to 336 in 2015, following multiple terrorist attacks in France that were perpetrated by extremist groups. While the number of violent incidents peaked, there were also 419 reported incidents of discrimination in 2015.¹⁸⁸

A 2016 Pew Global Research Study found 29 percent of French people have unfavorable views of Muslims.¹⁸⁹ This represents an increase in unfavorable opinions from the previous years, where 28 percent of polled participants represent an unfavorable view of Muslims in 2014 and 24 percent in 2015.¹⁹⁰ This number represents

¹⁸⁷ "Hate Crime Reporting: France," OSCE ODIHR, <http://hatecrime.osce.org/france?year=2016>

¹⁸⁸ "Number of Racist Incidents in France Plummets", *France 24*, <http://www.france24.com/en/20170201-number-racist-incidents-france-plummets>

¹⁸⁹ Richard Wike, "Negative Views of Minorities, Refugees common in the EU," *Pew Research Center*, 2016, <http://www.pewglobal.org/2016/07/11/negative-views-of-minorities-refugees-common-in-eu/>

¹⁹⁰ Richard Wike, "Ratings of Muslims rise in France after Charlie Hebdo, just as in U.S. after 9/11," *Pew Research Center*, 2015, <http://www.pewresearch.org/fact-tank/2015/06/03/ratings-of-muslims-in-france-and-us/>

a significant thirteen-point age gap between ages 50 and older and ages 18-34, indicating that the younger demographic in France has more favorable views of Muslims. There is also a significant eleven-point educational gap, where more people with post-secondary educations have a favorable view of Muslims, and more people with a secondary education or less have an unfavorable view of Muslims.¹⁹¹

The most significant divide in all European countries is between political parties. In France, 21 percent of the left reported unfavorable views of Muslims, and 26 percent of the center reported unfavorable views of Muslims, whereas 39 percent of the right reported unfavorable views of Muslims. This represents an 18 percent difference between the left and the right in their views on Muslims. These differences emerge consistently into partisan divides, where supporters of the anti-immigrant National Front political party are 32 percentage points more negative toward Muslims than those who identify with the Socialist Party.¹⁹²

The statistics indicate that Islamophobia is more prevalent among less educated people 50 years old and above, who support far right National Front party politics. Political issues may be an important driving force for Islamophobia in France. The most important influential political factors that could be driving Islamophobia are issues of immigration and economics, which in France are closely related, exacerbated by *laïcité*, and specifically impactful for Muslims. These issues are discussed in the following section.

¹⁹¹ Ibid.

¹⁹² Ibid.

Economics and Immigration

The post-World War II period in France, from approximately 1960 until the mid-1970s, was a time of rapid economic growth in France. On average, the gross domestic product (GDP) increased by nearly 6 percent each year.¹⁹³ This period is known as *Les Trente Glorieuses* (“thirty years of glory”), named by French economist Jean Fourastié.¹⁹⁴

The rapid economic boom incentivized mass migration into France. The majority of immigrants were Algerian and Moroccan Muslims (called Meghrebis) seeking the economic opportunities promised by France. Immigrant workers benefited greatly from the booming French economy during *Les Trente Glorieuses* but in the mid-1970s, following the first oil shock of 1973, the economy began to decline. As a result of the declining economy, and in response to a later flawed cost-benefit analysis of immigration (conducted by the French government) stating that immigrants cost more money than they contribute, the French government suspended any further economic immigration in 1974. This meant that people could no longer immigrate to France for the purpose of obtaining employment. This decision also prevented the reunification of countless Meghrebi families. Immigrants that relocated during the economic boom were reluctant to return to their countries of origin because they had established families, homes, and children in France. Deindustrialization led to large scale immigrant lay-offs and therefore massive poverty within immigrant communities. Meghrebi immigrant families were forced into the abandoned slums of France.

¹⁹³ Francois Bernard, John Tuppen, “France”, *Encyclopedia Britannica*, last updated January 5, 2017, Accessed March 6, 2017. <https://www.britannica.com/place/France/Economy>

¹⁹⁴ Jean Fourastié, “*Les trente glorieuses : ou, La Révolution invisible de 1946 à 1975*”, Ed. Revue Et Mise à Jour.. ed. Livre De Poche. Collection Pluriel. Paris: Fayard, 1979.

Today, immigrants have the potential to significantly contribute to the French economy, if given opportunities for employment.¹⁹⁵ Hundreds of thousands of refugees are currently migrating across the Mediterranean Sea, but most seem to prefer settlements in Germany, Sweden, and the United Kingdom, because of the difficulty that immigrants have finding jobs in France. Migration specialist François Gemene at Science Po's Center for International Research argues that France should be more concerned that they are no longer attractive to people seeking opportunity or sanctuary, and should do more to welcome refugees. Economists predict refugees will stimulate economic boosts across the Eurozone, which is much needed for the French economy.¹⁹⁶

Joblessness is a major concern for the Muslim immigrant population in France. Fifty-two percent of French Muslims state they are worried about unemployment among Muslim populations specifically, and 32 percent agree they are somewhat concerned. Unemployment is a more serious concern for Muslim people in France than the general French population, which is evidence of Islamophobia in France.¹⁹⁷

Hargreaves, et. al provide further evidence of the prevalence of Islamophobia in France. They discuss that the lack of economic opportunity has contributed to a rise in violence within Meghrebis-French communities, and attributes this phenomenon to failed integration and marginalization. The research of Adida, et. al reveals discrimination against Muslims in the French labor market. Their research found that a

¹⁹⁵ "Immigrants Contribute More Than They Cost, OECD Report Finds". *RFI*. Last Modified, June 14, 2013, <http://en.rfi.fr/africa/20130614-immigrants-contribute-more-they-cost-oecd-reports-finds>

¹⁹⁶ Ben McPartland, "Refugees Offer Chance to Boost French Economy", *The Local FR*. Last Modified 2015, <https://www.thelocal.fr/20150916/refugees-offer-chance-for-france-to-boost-economy>

¹⁹⁷ Jodie Allen, "The French-Muslim Connection: Is France Doing a Better Job at Integration than its Critics?", *Pew Research Center*, Last Modified 2006, <http://www.pewresearch.org/2006/08/17/the-frenchmuslim-connection/>

Muslim is 2.5 times less likely to be chosen for a job compared to a Christian applicant.¹⁹⁸

It is challenging to separate the factor of religion from other various socio-cultural factors such as family income, education, etc. In an effort to separate the religion variable from other cultural factors, Claire Adida, et. al conducted a research study comparing the experiences of Senegalese Muslims and Senegalese Christians who immigrated to France around the same time period. After interviewing 511 immigrants, the researched found four trends. First, Muslim immigrants experience discrimination in the job market precisely because of their religion. When employers were presented with matching CV applications, differing only in religious preference, Muslim candidates were 2.5 times less likely to be granted an interview.¹⁹⁹ Second, Senegalese Muslims claim to be more attached to their region of origin than Senegalese Christians claimed. They are more likely to visit Africa, own homes in Africa, and to send remittances back to family or friends in Africa. Third, they are less attached to their host country than their Christian counterparts. They express less sympathy for French people, and are less likely to believe they share much in common with French people. This is in part because Senegalese Muslims are less secular than Senegalese Christians, a vital integration factor in a France that defines itself by *laïcité*. Lastly, the researchers found that the separations between the attitudes and norms of Senegalese Muslim immigrants and French nationals perpetuate throughout time and persist to second, and third

¹⁹⁸ Claire Aida, David Laitin, and Marie-Anne Valfort, "Identifying Barriers to Muslim Integration in France", *Proceedings of the National Academy of Sciences of the United States of America*. 107(52), 2010.

¹⁹⁹ Claire Aida, David Laitin, and Marie-Anne Valfort, "The Muslim effect on immigrant integration in France", *The Washington Post*. Last Modified September, 30, 2014, https://www.washingtonpost.com/news/monkey-cage/wp/2014/09/30/the-muslim-effect-on-immigrant-integration-in-france-2/?noredirect=on&utm_term=.6aff28477932

generation Senegalese Muslim immigrants.²⁰⁰ This very evident discrimination against Muslims in the job market is central evidence that Islamophobia is a prevalent problem in France, and that Muslim immigrants struggle to successfully integrate in France specifically because of their religion.

The Social Problem

Despite the economic factors present the Muslim immigrant population, after years of economic misfortune, began to recognize their own marginalization as a social and not economic problem. Marked by unemployment, unequal educational opportunities, poor living conditions, and difficulty with police, Muslim immigrants and their decedents still struggle with the same issues today that they struggled with in the post-economic boom of the 1970s. Hargeaves, et al. attribute this problem to a failure of integration. The very expressions of Muslim culture, which consolidated Meghrebis immigrant communities, set them apart from French citizens due to the socio-cultural French norm of *laïcité* that excludes religious expression from the public sphere. Outward expressions of the Muslim faith including the hijab, public prayers, and the requirement of special halal butcher shops are offensive in secular France.²⁰¹ Aida, et al. suggest that the French general population and Muslims in France act negatively toward one another in a way that mutually reinforces distaste. They describe this phenomenon as the “discriminatory equilibrium”. They show evidence that many employers are less inclined to hire Muslims because some Muslim immigrants have needs that make them less desirable on the labor market. Some needs of devout Muslims could be

²⁰⁰ Claire Aida, David Laitin, and Marie-Anne Valfort, “The Muslim effect on immigrant integration in France”, *The Washington Post*. Last Modified September, 30, 2014, https://www.washingtonpost.com/news/monkey-cage/wp/2014/09/30/the-muslim-effect-on-immigrant-integration-in-france-2/?noredirect=on&utm_term=.6aff28477932

²⁰¹ J. R. Bowen, *Why the French don't like headscarves: Islam, the State, and public space*, (Princeton: Princeton University Press, 2007).

inconvenient for the employer and problematic in the workplace, such as requiring prayer breaks, requiring special meals that may have to be provided by some employers, fasting that could lead to physical weakness and dangerous situations in some fields, and particular clothing that may not match with dress codes or uniforms. Aida, et al calls this “rational Islamophobia”. They then show evidence that “taste-based non-rational Islamophobia”, which they define as simple, personal, distaste for Muslims, also feeds into discrimination on the job market. Then, Muslim perceptions of this religious-based hostility and discrimination causes a deeper divide between Muslim populations and the general French population.²⁰²

Nora Fellag suggests that this is not a problem of integration, but with identification. She states that Muslim immigrants are identified primarily as “Muslims” instead of primarily as “French.”²⁰³ According to Plenel, Muslims in France have currently taken the place previously occupied by the Jewish community, as the scapegoats for resentment. Plenel suggest that “for leaders such as Marine Le Pen, and Donald Trump, Islamophobia today fulfills the cultural function that fell yesterday to anti-Semitism, in the last crisis of Western modernity: to impose the ideological hegemony of a national identity of exclusion and rejection, intolerant toward minorities”.²⁰⁴ This suggests not only a pattern of scapegoating minorities, but that the scapegoating minorities has become a central part of the French identity.

Aside from scapegoating, Adida et al. suggest that because of France has a Christian heritage, Islam is perceived as a threat to the future of the French identity.

²⁰² Claire Aida, David Laitin, Marie-Anne Valfort, *Why Muslim integration fails in Christian Heritage Societies*. (Cambridge, Massachusetts. Harvard University Press, 2016).

²⁰³ Norah Fellag, ” The Muslim Label: how French North Africans Have Become “Muslims” and not “Citizens”, *Journal on Ethnopolitics and Minority Issues in Europe*, 13 (4), (2014) 1-25.

²⁰⁴ Edwy Plenel, *For the Muslims: Islamophobia in France*. (Brooklyn, NY. Verso., 2016).

That is to say, that because French people have historically been Christians, Christianity remains central to the French identity, and the growth of Islam in France threatens to change that identity²⁰⁵. They argue that despite *laïcité*, the general French population relies heavily on religion when making choices, specifically when choosing a leader. Adida, et al. conducted a research study in which participants were placed in groups of eight along with either two Christian participants or Muslim participants. The religion of the participants was not openly discussed, but all participants wore name tags, and were given the opportunity to observe each other's mannerisms, dress, and speech. Participants did not wear religious clothing or jewelry that indicated religious affiliation, except for one participant who wore a headscarf, indicating her affiliation with Islam. The participants engaged in a "speed chatting" game that mimicked short, every day, interactions with strangers. After meeting five participants, each participant was asked to select one as a group leader who would be given a 30-euro prize and the ability to divide the money between themselves and the rest of the group, or "electorate". The results showed that differences and similarities of religion between the voter and the candidate is the only significant variable regarding the voter's choice of candidate. Therefore, the behavior of the general French population is conditioned towards a person based on the religious heritage of that person, and is biased toward their own coreligionists²⁰⁶. When applied to everyday life, this research indicates that Christianity influences French society in a way that is harmful for the successful integration of non-Christian immigrants. Despite *laïcité* secularism, French society is

²⁰⁵ Claire Aida, David Laitin, Marie-Anne Valfort, *Why Muslim integration fails in Christian Heritage Societies*. (Cambridge, Massachusetts. Harvard University Press, 2016).

²⁰⁶ Claire Aida, David Laitin, Marie-Anne Valfort, *Why Muslim integration fails in Christian Heritage Societies*. (Cambridge, Massachusetts. Harvard University Press, 2016).

still influenced by religion. *Laïcité* may relieve the French from feeling obligated to discuss religion openly, but it does not remove religion from public society.²⁰⁷

This argument is consistent with the suggestion by Hargeaves, et al. that the issues with Islamophobia in France are problems of integration. However, the problem is not that French Muslims refuse to integrate or adopt French customs, as following research conducted by Pew Research will show, but that France will not accept anything short of assimilation, or a complete abandonment of Islamic customs, to be considered integrated.²⁰⁸ Plenel suggests that this is a product of a perceived hierarchy of power based on a culture that functions on the basis of exclusion and closure, that exists under the guise of secularism in France. Where yesterday the French identity was defined juxtaposed against the Jewish community, today it is defined juxtaposed against the Muslim community.

Marginalization and Unrest

The atmosphere of marginalization and discrimination that surrounds Muslim populations in France have led to massive unrest within their communities. A clear lack of economic opportunity specific to phenotypical Arabs and Muslims has sparked a disinterest in educational and career effort among Muslim youth.²⁰⁹ This lack of opportunity, combined with poverty, has led to frustration and ultimately violence. The second generation of Meghrebis immigrants, who instead self-identified as first generation French citizens, began protesting for equal rights and better living conditions in what was later called the *Beur* movement. The name *Beur* was coined according to the popular French slang practice of reorganizing the letters of a noun, in this case

²⁰⁷ Ibid.

²⁰⁸ Edwy Plenel, *For the Muslims: Islamophobia in France*. (Brooklyn, NY. Verso., 2016).

²⁰⁹ Jonathan Laurence, Justin Vaisse, *Integrating Islam Political and Religious Challenges in Contemporary France*. (Washington, D.C. The Brookings Institution, 2006).

Rebeau (Arab, or person of North African decent) is shortened and reorganized into *Beur*.²¹⁰

When the demands of the *Beurs* were ignored, their anger erupted into mass and widespread riots. On October 25, 2005 then Interior Minister Nicholas Sarkozy was pelted with rocks by protesters while visiting the *banlieues* of Paris. In response, Sarkozy publicly stated that the *banlieues* should be “cleaned with a power hose” and refers to the inhabitants as “rabble”. Two days later, in the atmosphere of disenfranchisement created by Sarkozy’s statements, teenagers Meghrebis Zyed Benna and Bouna Traore were electrocuted after climbing into an electrical sub-station in the Paris suburb of Clichy-sous-Bois while allegedly attempting to hide from police. The deaths of the teenagers triggered a violent reaction. Enraged arsonists began setting fire to random vehicles, and riots began. In response, Sarkozy proposed a zero tolerance policy, and sent police to stop the riots. The militarization of the police further angered the protesters, who then escalated violence to protests beyond Paris, burning hundreds of vehicles in Dijon, and spreading riots further to the east and west. The riots lasted approximately two weeks, resulting in the arson of thousands of cars, hundreds of arrests, and dozens of injured police.²¹¹

In response to the October 2005 riots, the French government declared a state of emergency, but did little to solve the cause of the outrage that incited the riots.²¹² The history of ethnic and religious-based inequality, exacerbated by the socio-economic

²¹⁰ Alec Hargeaves, John Kelsey, and Sumner Twiss, *Politics and Religion in France and The United States*. (Lanham, MD. Lexington Books, 2007).

²¹¹ “Timeline: French Riots”, *BBC News*, November 14, 2005, <http://news.bbc.co.uk/2/hi/europe/4413964.stm>; Yvonne Yazbeck Haddad, and Michael J. Balz. "The October Riots in France: A Failed Immigration Policy or the Empire Strikes Back?" *International Migration* 44, no. 2 (2006): 23-34; Alec Hargeaves, John Kelsey, and Sumner Twiss, *Politics and Religion in France and The United States*. (Lanham, MD. Lexington Books, 2007).

²¹² "Forgotten in the Banlieues." *Economist* 23 Feb. 2013: 34+

problems in the Meghrebi-French *banlieues*, has created a cycle of mass unemployment, poverty, and violence that contributes to a cycle of disenfranchisement the Meghrebi can rarely overcome.²¹³ The French government has offered subsidies to aid poor families in the *banlieues*, but has not invested in the recovery of the areas. Because the French government refuses to invest in businesses within the *banlieues*, Qataris have taken the opportunity to do so in the hopes of financial returns while simultaneously supporting fellow members of the Muslim faith, fueling further disenfranchisement between the Meghrebi-French and the rest of France. Today, despite foreign investments and government subsidies, little has improved and the *banlieues* remain in a state of poverty.²¹⁴

Integration Efforts

Despite disenfranchisement and social exclusion, polls have revealed time and time again that Muslims in France desire integration. This is a distinctive trend among French Muslims as opposed to other European Muslims. Generally speaking, in 2006, 58 percent of French Muslims viewed the relationship between Muslims and Westerners as bad. However, far more French Muslims (41 percent) viewed this relationship as good than British Muslims and German Muslims.²¹⁵

This could be due to the fact that according to the same poll, French Muslims more closely agree with Western opinions than other European Muslims, including the Muslim populations in Spain, Germany, and Great Britain. For example, French

²¹³ Yvonne Yazbeck Haddad, and Michael J. Balz. "The October Riots in France: A Failed Immigration Policy or the Empire Strikes Back?" *International Migration* 44, no. 2 (2006): 23-34

²¹⁴ Angelique Chrisafis, "Nothing's changed": 10 years after French riots, banlieues remain in crisis", *The Guardian*, October 22, 2015, <https://www.theguardian.com/world/2015/oct/22/nothings-changed-10-years-after-french-riots-banlieues-remain-in-crisis>

²¹⁵ Jodie Allen, "The French-Muslim Connection: Is France Doing a Better Job at Integration than its Critics?" *Pew Research Center*, August 17, 2006, <http://www.pewresearch.org/2006/08/17/the-frenchmuslim-connection/>

Muslims were evenly split (44 percent good and 46 percent bad) when asked if the victory of the radical Hamas group in Palestine was good for Palestine. British Muslims responded decidedly in favor of the Hamas group victory, with 56 percent voting that it was good and 18 percent voting that it was bad, as did Spanish Muslims (57 percent voting that it was good and 22 percent voting it was bad). French Muslims were also heavily opposed (71 percent) to Iran's Nuclear weapons programs, whereas British Muslims were split evenly (40 vs. 41 percent). Ninety-three percent of French Muslims also expressed no confidence in Osama bin Laden compared to only 63 percent of British Muslims. More French Muslims have favorable views of Christians and Jews than other European Muslims and those in predominantly Muslim nations. Ninety-one percent of French Muslims reported a favorable view of Christians, and 71 percent reported a favorable view of Jews. Seventy-one percent of British Muslims reported a favorable view of Christians and only 32 percent reported a favorable view of Jews. A similar trend was found in German Muslims (69 percent reported a favorable view of Christians and 38 percent reported a favorable view of Jews) and in Spanish Muslims (82 percent reported a favorable view of Christians but only 28 percent reported a favorable view of Jews). More French Muslims not only reported favorable views of Christians than other European Muslims, but much more than Muslims majority nations such as Egypt (48 percent favorable of Christians and 2 percent favorable of Jews), Indonesia (64 percent favorable of Christians and 17 percent favorable of Jews), Pakistan (27 percent favorable of Christians and 6 percent favorable of Jews), Jordan (61 percent favorable of Christians and 1 percent favorable of Jews), and Turkey (16 percent favorable of Christians and 15 percent favorable of Jews). More French

Muslims reported favorable views of Christians than even the American general population (88 percent favorable of Christians but 77 percent favorable of Jews) and the general French population (87 percent favorable of Christians but 71 percent favorable of Jews).²¹⁶

French Muslims reported similar views toward religious groups and on important political issues as the general population of Western nation states. This indicates that many French Muslims share some central opinions as those shared in the West. This indicates that a mentality exists among Muslim immigrants that could facilitate integration in France.

In 2006, French Muslims reported that being both French and Muslim is not an issue, in contrast to indications that French Christians believe Islam is incompatible with the French identity²¹⁷. Seventy-two percent of French Muslims expressed no problem being both Muslim and French. In Great Britain however, British Muslims were split almost evenly on the issue (47 percent perceived a conflict in being both British and Muslim, while 49 percent did not) and only 35 percent of the general British population see no problem being devoted to both Britain and Islam in modern society. Furthermore, French Muslims were almost evenly split when asked if they considered themselves as a Muslim first or as a national citizen first (42 percent considered themselves national citizens first and 46 percent considered themselves Muslim first). This response was nearly identical to that of Americans, when asked if they identify as national citizens or as Christians first (48 percent identified as national citizens first, and 42 percent identified as Christians first). The nearly split response of French Muslims

²¹⁶ Jodie Allen, "The French-Muslim Connection: Is France Doing a Better Job at Integration than its Critics?" *Pew Research Center*, August 17, 2006, <http://www.pewresearch.org/2006/08/17/the-frenchmuslim-connection/>

²¹⁷ Edwy Plenel, *For the Muslims: Islamophobia in France*. (Brooklyn, NY: Verso., 2016).

was remarkably different from other European Muslims, such as British Muslims 81 percent of whom identify as Muslims before they identify as British. This is almost directly opposite of French Muslims, whom 83 percent of self-identify as French rather than Muslim. This is evidence that the majority of French Muslims are making efforts toward integration, desire to identify as French, and suggests the idea that Islam is incompatible with French values and the larger French society due to Muslim resistance is unfounded.

Despite the Pew Research public opinion polls indicating a growing national identity among the French Muslim population, there is some evidence of an increasing Islamic identity among younger French Muslims. Only 40 percent of French Muslims under 35 years old identified primarily as French while 51 percent identified first as Muslim and only 7 percent identified as both equally. Comparatively, 45 percent of French Muslims 35 years old and older self-identify as primarily French, 36 percent as primarily Muslim and 16 percent as both equally. All age groups reported a preference for adopting French customs (78 percent of French Muslims), while only 53 percent of Spanish Muslims, 41 percent of British Muslims, and 30 percent of German Muslims reported a preference for assimilation.²¹⁸ Across multiple indicators, Laurence and Vaisse find that a “French Islam” is rapidly replacing “Islam in France”. They report increased use of French language in the homes of Muslim immigrants, increased mixed marriages (between immigrants and French citizens), an increase in the number of Muslim immigrant women who work outside the home, and an increase in Muslim immigrants who state claim to have non-Muslim friends. Most significantly, they point

²¹⁸ Jodie Allen, “The French-Muslim Connection: Is France Doing a Better Job at Integration than its Critics?” *Pew Research Center*, August 17, 2006, <http://www.pewresearch.org/2006/08/17/the-frenchmuslim-connection/>

out that self-declared Muslims have expressed their desire to integrate in a multitude of polls. They point out that Islam is a constantly changing and adapting all over the world, and is not centrally one expression but what individual Muslims make of it.²¹⁹

According to these indicators, the idea that Islam is incompatible with the larger French society due to a lack of integration efforts is unfounded. Public opinion polls, and an increase in mixed marriages, employed Muslim women, and diversifying social circles among the French Muslim population all indicate that Muslims in France have been making substantial efforts to integrate themselves. These efforts have been met with social rejection and economic marginalization from the French general population, indicating that integration failures for French Muslims are not the products of effort from the Muslim population, but a product of inaccessibility within French society. One of the clearest examples of social rejection of Muslim population in France is the growth of The National Front political party.

The National Front

One of the most significant indicators of Islamophobia in France is the popularity of the National Front political party that has grown during the previous presidential election. The anti-immigration National Front party candidate Marine Le Pen specifically named Islam as an immigration and security issue. The current party is similar to its predecessor according to Plenel who suggests that “the rise in power of the National Front, beginning in 1984 as clearly anti-Semitic and returning today as clearly anti-Islamic”, has not only validated the xenophobic and racist images of Islam through its isolationist international policies, but has both fed, and fed upon, the fears of the

²¹⁹ Jonathan Laurence, Justin Vaisse, *Integrating Islam Political and Religious Challenges in Contemporary France*. (Washington, D.C. The Brookings Institution, 2006).

nation in light of the terrorist attacks in Paris and across France.²²⁰ Islamophobia has replaced anti-Semitism as a re-contextualizing agent for racist legislation, namely the use of fears of radical Islam as a legitimate argument against immigration that does not have legal ramifications.²²¹ Louis Aliot, Vice-President of the National Front stated that “neither immigration or Islam is a glass ceiling” that “de-demonizing only concerns anti-Semitism...it is only anti-Semitism that prevents people from voting for [the National Front]”.²²² Former Interior Minister (who became Prime Minister in 2014) Manuel Valls stated that France would face “three challenges over the next ten years” and he named those challenges, “immigration due to African demographics, the compatibility of Islam with Democracy, and the problems raised by immigrant workers being joined by their families”.²²³ All three of these problems are clear statements regarding the perceived “Muslim problem”, and were presented as the three most important current French issues. In 2010, Nicolas Sarkozy famously targeted “criminals of a foreign origin” in a speech delivered in Grenoble while pledging to remove the nationality of any specifically foreign born person who assaulted any person of public authority, but did not include domestically born citizens.²²⁴ As in the United States, the rhetoric used by political candidates and Democratically elected leaders in France would be powerless if it was not made significant by media exposure. Because islamophobic rhetoric used by these influential leaders is widely covered by the media, it then influences public opinion.

²²⁰ Edwy Plenel, *For the Muslims: Islamophobia in France*. (Brooklyn, NY. Verso., 2016).

²²¹ Edwy Plenel, *For the Muslims: Islamophobia in France*. (Brooklyn, NY. Verso., 2016).

²²² Ibid.

²²³ Ibid.

²²⁴ Ibid.

The Media

A meta-analysis of media coverage across Europe and The United States showed that both countries portrayed Muslims in a stereotypical fashion and as a threat to security.²²⁵ Aida, et al. discusses the existence of non-rational Islamophobia within French society, and describes it as a phenomenon inspired by “unfounded and exaggerated racist clichés perpetuated by conspiracy based theories within popular media that feed fear and distaste of Muslims in France”.²²⁶ Therefore, Anti-Muslim discrimination in France is first based on negative stereotypes that are spread by the media. The mass media plays a central role in the spread of stereotypes, and can therefore be considered responsible for the stereotypical representation of Islam and Muslims. Islam is often portrayed as a homogenous group of religious zealots that are misogynistic and irrationally violent.²²⁷

Plenel agrees that racism and xenophobia are not generated spontaneously, but are a direct result of the environment created by those with influential power. The National Consultative Commission on Human Rights (CNCDH) released a statement along with their 2014 national report stressing the importance of the language used regarding immigrants and minorities, and advocating strongly for the public to ardently defend minorities against racist statements and harshly correct the perpetrators of racist language.²²⁸ Plenel points out that the growth of Islamophobic propagation in the media is related to a growing tolerance for everyday racist speech and acts of discrimination.

²²⁵ Manaf Bashir, Christine Ogan, Rosemary Pennington, and Lars Willnat, “The rise of anti-Muslim prejudice: Media and Islamophobia in Europe and the United States,” *The International Communication Gazette*. Vol 76, Issue 1, (2014): pp. 27 – 46.

²²⁶ Claire Aida, David Laitin, Marie-Anne Valfort, *Why Muslim integration fails in Christian Heritage Societies*. (Cambridge, Massachusetts. Harvard University Press, 2016).

²²⁷ Saifuddin Ahmed, and Jörg Matthes, “Media representation of Muslims and Islam from 2000 to 2015: A meta-analysis”, *The International Communications Gazette*. Vol. 79(3)(2017), 219–244.

²²⁸ Edwy Plenel, *For the Muslims: Islamophobia in France*. (Brooklyn, NY. Verso., 2016).

While acknowledging the existence of both Islamophobia in the common daily acts of the public and in the language of the media, Plenel does not infer a specific directionality, but suggests that the spread and perpetuation of islamophobia is cyclical between influential people, the media, and the public.²²⁹ However, she does state that Islamophobia today is the result of perceptions of Islam that is “above all the responsibility of the mass media, which is where representations are spread in the form of obvious truths, stigmatizing a population of men, women, and children”.²³⁰ By stigmatizing Muslims into a general, violent, criminal, population the mass media has turned the Muslims of France into the ‘enemy within’ that is wholly responsible for the behavior of every person who identifies as Muslim or is phenotypically Arab.

A meta-analysis of 345 published studies focused on the media representation of Islam and Muslims found a worldwide negative reframing of Muslims after the September 11th 2001 attacks in New York. This included a shift in the common theme of representation of Muslims as ‘terrorists’, ‘extremists’, ‘fundamentalists’, ‘radicals’ and ‘fanatics’.²³¹ The findings also revealed a common association between Muslims and the term “terrorism” which has been fundamental in the development of Islamophobia. Studies also found that terrorist attacks were the events that caught the attention of national media outlets, and therefore shaped the public’s negative stance toward Islam. These events include the murder of Theo Van Gogh in 2004, the 7/7 terrorist attacks in London and the Glasgow International airport attacks in 2007, and the Charlie Hebdo attacks in Paris in 2014. While commanding the attention of the public as catalysts to the spread of global Islamophobia, these events also sparked

²²⁹ Ibid.

²³⁰ Ibid

²³¹ Saifuddin Ahmed, and Jörg Matthes, “Media representation of Muslims and Islam from 2000 to 2015: A meta-analysis”, *The International Communications Gazette*. Vol. 79(3)(2017), 219–244.

scholarly research.²³² The research study also observed that anti-Muslim prejudice has been increasingly associated with the anti-Muslim language in the media, and were specifically driven by perceived security threats, and threats to national identity. Finally, the study found that according to the 2016 European Islamophobia Report, Islamophobia has increased in every sphere of the research including political environment, media outlets, on the streets, and in business.²³³

Just as the research on the politic rhetoric and media connection found in The United States, when islamophobic language is used by influential political leaders that are widely covered by the media, the public perception of Islam and Muslims is negatively influenced. In the French case, there is direct evidence that anti-Islam prejudice increased following exposure to negative media information among French citizens. Just as in the United States, the media publicizes information but does not create information, meaning there is another source for Islamophobic language. Just as in the United States, that language comes from political leaders, whose influential power makes islamophobic language even more dangerous and impactful than it is on its own.

Conclusion

Laïcité in France is a policy of separation that attempts to protect the public sphere from proselytism and the influence of religion. This means the expression of religion in public is strictly prohibited by a socio-cultural norm so strong that it is central to the French identity itself. Though this policy has served to protect religious freedom in France by attempting to remove it from public view, it has not successfully

²³² Saifuddin Ahmed, and Jörg Matthes, “Media representation of Muslims and Islam from 2000 to 2015: A meta-analysis”, *The International Communications Gazette*. Vol. 79(3)(2017), 219–244.

²³³ *Ibid.*

protected all religions fairly. *Laïcité* as it is, specifically excludes Islam in France because of the inherent public nature of Islam, evidenced by religious clothing, halal butcher shops, and public prayers. Though the French government has made some attempts to include Islam in the French identity, it has done little to end the economic problems in the Muslim majority *banlieues* which have served to disenfranchise French Muslim immigrants. The marginalization of French Muslims is further exacerbated by social rejection from the French public who identify as a secular people under *laïcité*, furthering the disenfranchisement of Muslims and facilitating integration problems. The French case serves as further evidence that policies of separation, even policies that take completely different directions while attempting to separate government and religion, are unsuccessfully in treating all religions fairly under the law, and in creating environment in which cultural integration can succeed.

Chapter 3

A Case Study of Islamophobia in Canada

Under Multiculturalism

Canada has a religious history similar to the U.S. and France, in that it is heavily influenced by Christianity. Canada was originally colonized by the French in 1608, who brought with them their traditional Roman Catholicism. The British later colonized parts of Canada in 1670 bringing Protestantism, making these two forms of Christianity the majority religious affiliations.²³⁴ Adherence to either of these two forms of Christianity was historically broken down on linguistic lines, since the majority of British English speakers were protestant and the majority of French-speaking French colonizers practiced Catholicism.²³⁵ Christianity, more specifically Protestantism and Catholicism, remain the majority religions today.²³⁶ According to the Pew Research Center's overview of the changing religious landscape in Canada, in 1971 forty-one percent of Canadians identified as Protestant, 47 percent identified as Catholic, while only 4 percent identified as other than Christian and only 4 percent identified as religiously unaffiliated. By 2011, only 27 percent identified as Protestant, 39 percent identified as Catholic, 11 percent identified as other than Christian, and 24 percent identified as unaffiliated with religion. According to the Pew Research Center, 69 percent of Canadians identified as Christian in 2010, while less than 1 percent identified as Buddhist, 1.2 percent as affiliated with a Folk Religion, 1.4 percent Hindu, 1 percent

²³⁴ "Early History of Canada", *The Canada Guide*, 2018, <http://www.thecanadaguide.com/history/early-history/>

²³⁵ "Religion in Canada", *The Canada Guide*, 2018, <http://www.thecanadaguide.com/culture/religion/>

²³⁶ "Pew-Templeton Global Religious Futures Project Canada", *Pew Research Center*, last modified 2016, http://www.globalreligiousfutures.org/countries/canada/religious_demography#/?affiliations_religion_id=0&affiliations_year=2020

Jewish, 2.1 percent Muslim, less than 1 percent “other” religions, and 23.7 percent unaffiliated with any religion.²³⁷ Pew Research projects that by 2020, Christian affiliation will be reduced to 66.4 percent, Buddhism will grow to 1 percent, Folk religions will remain at 1.2 percent, Hinduism will rise to 1.7 percent, Jewish affiliation will increase to 1.1 percent, Muslims will grow to 2.8 percent, “other” religious affiliation will increase to 1.2 percent, and no affiliation with any religion will increase to 24.5 percent.²³⁸ Though Christianity is, and is projected to remain, the large religious majority, non-Christian religions, and affiliation with no religion are rising in Canada.

One explanation for the increasing popularity of non-Christian religions could be a shift in immigration trends, and with it the influx of more non-Christian religious practitioners. Approximately 20 percent of the total population in Canada is made up of immigrants born in another country. In the 1970s and 1980s, the immigrant population in Canada was smaller, mostly European, and dominantly Christian. In recent years, almost half of the immigrant population of Canada has come from Asia, Africa, and the Middle East. Immigrants in Canada from 1971-1980 were 20 percent unaffiliated with religion, 23 percent other than Christian, 32 percent Catholic, and 24 percent Protestant. From 2001-2011 immigrants in Canada were 21 percent unaffiliated with religion, 39 percent other than Christian, 22 percent Catholic, and 17 percent Protestant.²³⁹

Immigrants shifted from a Christian majority of 56 percent down to 39 percent, and the number of non-Christian immigrants rose from 23 percent to 39 percent. By 1991 Islam in Canada had grown by 158 percent, Hinduism by 126 percent, Sikhism by 118 percent

²³⁷ “Pew-Templeton Global Religious Futures Project Canada”, *Pew Research Center*, last modified 2016, http://www.globalreligiousfutures.org/countries/canada/religious_demography#/?affiliations_religion_id=0&affiliations_year=2010

²³⁸ *Ibid.*

²³⁹ “Canada’s Changing Religious Landscape”, *Pew Research Center Religion and Public Life*, last modified June 27, 2013, <http://www.pewforum.org/2013/06/27/canadas-changing-religious-landscape/>

and Buddhism by 215 percent.²⁴⁰ The most recent available census information on religion was collected in 2011, and indicates that Islam has grown in Canada. According to Statistics Canada 210,680 immigrants that relocated to Canada between 1991 to 2000 identified as Muslim. That number grew to 387,590 between 2001 to 2011, indicating that more immigrants self-identify as Muslim than before²⁴¹. The growth of Islam and non-Christian religions in Canada created an increasingly multicultural religious environment in Canada.²⁴² The diversifying religious landscape of Canada has and continues to call for a universal and inclusive national policy on religious and cultural diversity. To accommodate this continuously diversifying Canada, multicultural policy was established in the 1970s

Multiculturalism in Canada

Will Kymlicka describes multiculturalism as a framework for state-minority relations that increases the “internationalization” of the state.²⁴³ Kymlicka suggests that minority populations have been victimized by traditional Westphalian sovereignty, in that policies of assimilation and exclusion have been imposed upon them in the name of creating homogenous nation states.²⁴⁴ The Multicultural model is a collection of social integration practices used in many countries, including Sweden, The Netherlands, Australia, and New Zealand, among others, that focuses on the integration of unique

²⁴⁰ Roger O'Toole, "Religion in Canada: Its Development and Contemporary Situation," *Social Compass* 43, no. 1 (1996): 119-34.

²⁴¹ “2011 National Household Survey: Data Tables”, *Statistics Canada*. Last modified February 2, 2017, <http://www12.statcan.gc.ca/nhs-enm/2011/dp-pd/dt-td/Rp-eng.cfm?LANG=E&APATH=3&DETAIL=0&DIM=0&FL=A&FREE=0&GC=0&GID=0&GK=0&GRP=0&PID=105399&PRID=0&PTYPE=105277&S=0&SHOWALL=0&SUB=0&Temporal=2013&THEME=95&VID=0&VNAMEE=&VNAMEF=>

²⁴² Roger O'Toole, "Religion in Canada: Its Development and Contemporary Situation," *Social Compass* 43, no. 1 (1996): 119-34.

²⁴³ Will Kymlicka, *Multicultural Odysseys : Navigating the New International Politics of Diversity*. (Oxford, New York: Oxford University Press, 2007).

²⁴⁴ Will Kymlicka, *Multicultural Odysseys : Navigating the New International Politics of Diversity*. (Oxford, New York: Oxford University Press, 2007).

cultural practices into the general population and not on the assimilation of practices into a single, central, predetermined, identity. Multiculturalism “views diversity as an enduring reality and defining feature of the polity, and views tolerance as a core value”.²⁴⁵ Cultural assimilation, the predecessor to multiculturalism, took generations, often only showing results when early generation immigrants died off leaving their younger, localized, descendants to maintain practices and traditions from places in which many had never lived. Assimilation often only allowed certain parts of individual cultures to survive, such as language, leaving other traditional practices to fade into obscurity. Multiculturalism on the other hand, encourages the inclusion of all parts of individual culture in forming a new central national culture, instead of sacrificing practices and traditions to more closely imitate the status quo.²⁴⁶ Kymlicka and Banting identify eight policies that are most exemplary of immigration multiculturalism, and determine the multicultural level of states based on adherence to the following policies;

- (1) constitutional, legislative, or parliamentary affirmation of multiculturalism, at the central and/or regional and municipal levels
- (2) the adoption of multiculturalism in school curricula
- (3) the inclusion of ethnic representation/sensitivity in the mandate of public media or media licensing
- (4) exemptions from dress-codes, Sunday closing legislation etc.
- (5) allowing dual citizenship
- (6) the funding of ethnic group organizations to support cultural activities
- (7) the funding of bilingual education or mother-tongue instruction
- (8) affirmative action for disadvantaged immigrant groups²⁴⁷

²⁴⁵ Ibid.

²⁴⁶ Jatinder Mann. "The Introduction of Multiculturalism in Canada and Australia, 1960s–1970s." *Nations and Nationalism* 18, no. 3 (2012): 483-503.

²⁴⁷ Will Kymlicka, and Keith Banting, "Immigration, Multiculturalism, and the Welfare State", *Ethics & International Affairs* 20, no. 3 (2006): 281-304.

According to these parameters, Canada is considered strongly Multicultural (by adopting six or more of these policies), whereas the United States is modestly Multicultural (by adopting three to five policies) and France is in the majority of Western states that have strongly resisted the trend by adopting few if any of these policies.²⁴⁸ Multiculturalism is unique to each country that implements its practices, but Canada is perhaps one of the most dedicated to multiculturalism, in that Canada is one of the few countries that has included multiculturalism in its constitution.²⁴⁹ Section 27 of the Constitution Act of 1982 states, “This Charter shall be interpreted in a manner consistent with the preservation and enhancement of the multicultural heritage of Canadians”.²⁵⁰ This constitutional amendment has formed the foundation of how Canada approaches diversity.²⁵¹ In the 1960s, Canada began to shift its attitude toward the inclusion of different cultures by changing its immigration policies. Canada began to adopt a more multicultural conception of integrating immigrants by expecting them to celebrate their cultural diversities, an attitude that replaced prior assimilationist policies that expected immigrants to abandon their own customs and to adopt local customs instead. Canada went a step further by adopting a race-neutral immigration admissions and naturalization policy. The central government of Canada made the shift in attitude toward immigrants official when they declared multiculturalism to be the official policy.²⁵²

²⁴⁸ Will Kymlicka, *Multicultural Odysseys : Navigating the New International Politics of Diversity*. (Oxford, New York: Oxford University Press, 2007).

²⁴⁹ Will Kymlicka, "Canadian Multiculturalism in Historical and Comparative Perspective: Is Canada Unique?", *Constitutional Forum* 13, no. 1 (2003): 2003-1: 1-8.

²⁵⁰ CanLII, “The Constitution Act, 1982, Schedule B to the Canada Act 1982 (UK), 1982, c 11,” last modified April 17, 1985, <https://www.canlii.org/en/ca/laws/stat/schedule-b-to-the-canada-act-1982-uk-1982-c-11/latest/schedule-b-to-the-canada-act-1982-uk-1982-c-11.html>

²⁵¹ Will Kymlicka, "Canadian Multiculturalism in Historical and Comparative Perspective: Is Canada Unique?" *Constitutional Forum* 13, no. 1 (2003): 2003-1: 1-8.

²⁵² Will Kymlicka, "Canadian Multiculturalism in Historical and Comparative Perspective: Is Canada

The inclusion of multiculturalism in the constitution is a loud statement against discrimination. It is not only paramount for the inclusion and protection of minority communities, but paves the way for the creation of a successfully multicultural identity. However, the simple inclusion of multiculturalism in the nation's charter may not be as influential as its interpreted has been. In 1965 Prime Minister Lester Pearson called for a "new unhyphenated Canadianism" that is an identity all its own, and not French-Canadian or British-Canadian. To accomplish this new identity, a national cohesion needed to be established. Pearson stated "We must become increasingly proud of the composition and character of our people – the French part, the English part, and the third force (Canadians of neither British or French origin)".²⁵³ Mann describes this as a "groundbreaking statement" in that it was the first time a democratically elected leader described Canada as a multiracial society.²⁵⁴ The White Paper on Immigration Act was put into practice in 1967, shortly after this statement, which established the new non-discriminatory immigration points system. In the 1960s and early 1970s multiculturalism took the place of the new national identity that Pearson had been calling for when Pierre Trudeau replaced Pearson as Prime Minister in 1968 and began expanding multiculturalism. Trudeau stated that immigrants did not simply fit into French-Canadian or British-Canadian groups, but brought their own unique cultures with them to Canada, and that he was impressed by Canada's "precious opportunity to demonstrate the advantages of dissimilarity and the richness of variety".²⁵⁵ When Trudeau announced his government's decision to introduce a Multicultural policy, he

Unique?" *Constitutional Forum* 13, no. 1 (2003): 2003-1: 1-8.

²⁵³ Jatinder Mann. "The Introduction of Multiculturalism in Canada and Australia, 1960s–1970s." *Nations and Nationalism* 18, no. 3 (2012): 483-503.

²⁵⁴ Ibid.

²⁵⁵ Mann, Jatinder. "The Introduction of Multiculturalism in Canada and Australia, 1960s–1970s." *Nations and Nationalism* 18, no. 3 (2012): 483-503.

stated that, “National identity, if it is to mean anything in the deeply personal sense, must be founded on confidence in one’s own individual identity”.²⁵⁶ Thus, multiculturalism was established not only as a part of the Canadian constitution but as a central part of Canadian identity.

Mann points out that integration cannot be successful unless it is supported by both immigrants and the general population they will become a part of.²⁵⁷ In this sense, the inclusion of multiculturalist attitudes as a central part of national identity is almost obligatory to facilitate a successful and truly multicultural state. Currently, following the election of Donald Trump in the U.S., the near election of Marine le Pen in France, as well as other indicators, the West has experienced a rise in support for a stricter nationalism that is exclusive, and focuses the blame for national and even global problems on immigrants. Though that is a trend in many parts of the West, Canada remains dedicated to multiculturalism. Following the welcoming of 35, 000 Syrian Refugees, the Environics Institute conducted a poll in which 62 percent of Canadians disagree that “immigration levels are too high”.²⁵⁸ However, since the election of Donald Trump, Canadian opinion of the U.S. has plummeted, with only 44 percent of Canadians expressing favorable views of the U.S., a number that has declined from percentages in the 70s in 2012.²⁵⁹

Multiculturalism is clearly not without criticisms. This is made evident by the minority of Canadians who do believe immigration levels are too high.²⁶⁰ One of the

²⁵⁶ Ibid.

²⁵⁷ Ibid.

²⁵⁸ Environics Institute, “Focus Canada: Canadian Public Opinion About Immigration and the USA,” last modified May 13, 2017, <https://www.environicsinstitute.org/projects/project-details/focua-canada-canadian-public-opinion-about-immigration-and-the-usa>

²⁵⁹ Ibid.

²⁶⁰ Ibid.

most prevalent criticisms surrounds issues of national security, based on the argument that enemies of Canada may be allowed access to Canada more easily due to Multicultural immigration policies. This concern became especially prevalent in 2005 following public transportation bombings in London that were perpetrated by second generation immigrants.²⁶¹ In response, Kymlicka has several arguments. First, he argues that Canada is geographically fortunate, in that it is not physically attached to states that can be seen as enemies. Sheer physical distance is a protective factor for Canada. Canada implements a strenuous vetting process for immigrants and refugees that takes years, requires official United Nations refugee status (when applicable), includes multiple background checks, and face-to-face interviews.²⁶² While home grown terrorist cells have been found within states with strong multicultural policies, Kymlicka points out that they have been found in states with moderate multicultural policies like the United Kingdom and the United States, and also in states that are ideologically opposed to multiculturalism, like France.²⁶³

Comparatively, both the American and the French identities are centered around their historic traditions and policies that rely on the separation between religion and the State, which I have argued has created integration problems for other than Christian minority groups, specifically Muslims. Canada has centered its identity around a policy that is inclusive instead of separate and in doing so has superseded some of the social problems that come when integrating people who have different religious beliefs.

²⁶¹ Scott Poynting, and Barbara Perry, "Climates of Hate: Media and State Inspired Victimisation of Muslims in Canada and Australia Since 9/11," *Current Issues in Criminal Justice* 19, no. 2 (2007): 151-71.

²⁶² Government of Canada, "Information and Citizenship, last modified February 28, 2018, <https://www.canada.ca/en/services/immigration-citizenship.html>

²⁶³ Will Kymlicka, *Multicultural Odysseys : Navigating the New International Politics of Diversity*. (Oxford, New York: Oxford University Press, 2007).

Though it has been suggested that security issues have become a product of multiculturalism in Canada, the same security issues exist within states with very different policies as well. This suggests that factors other than multiculturalism are more likely responsible for security issues within those states.

Hate Crimes in Canada

However, Canadian multiculturalism has not entirely solved the social problem with integration. Though multiculturalism has shown success in reducing some inter-group inequality, it has not worked the same for every group.²⁶⁴ Since 9/11, immigrants from Arab or Muslim countries have faced unique discrimination and been pressured to hide their ethnic and religious identities in Canada as well as the U.S.²⁶⁵ Despite this, Kymlicka cites that studies have found lower levels of intolerance and better outcomes for immigrant youth in states with liberal multicultural policies that in states without them. These studies have also found that the states with the strongest multicultural policies, namely Canada and Australia, have the best record for the economic and political integration of immigrants of the last 30 years.²⁶⁶ The evidence from these studies has shown that multiculturalism tangibly improves the integration of immigrant minority groups, though race and religious based discrimination problems still arise in Canada. These problems are most evident through Canada's hate crime statistics.

In 2016 there were a total of 182 incidents of hate crimes against Muslims in Canada. One Hundred and thirty-nine of these incidents were reported by police to the OSCE ODIHR. This number includes threats, vandalism, disturbance of the peace, and physical assaults. Forty-three more incidents of hate crimes against Muslims were

²⁶⁴ Ibid.

²⁶⁵ Ibid.

²⁶⁶ Will Kymlicka, *Multicultural Odysseys : Navigating the New International Politics of Diversity*. (Oxford, New York: Oxford University Press, 2007).

collectively reported by civil society, international organizations, and the Holy See. This included 18 threats, 18 attacks on property, and 7 physical assaults.²⁶⁷ In 2015 there were a total of 184 incidents of hate crimes against Muslims in Canada. One hundred and forty-eight of these cases were reported by police. Thirty-six of these cases were reported by civil society, international organizations, and the Holy See, and included 19 attacks against property, 5 threats, and 12 physical assaults.²⁶⁸ In 2014 there were a total of 123 incidents of hate crimes against Muslims in Canada. Ninety-nine of these were reported by police, while 24 were reported by civil society, international organizations, and the Holy See. These 24 incidents included 18 attacks against property, 1 threat, and 5 physical assaults.²⁶⁹ This represents a steady increase in anti-Islamic hate crimes since 2012. There were a total of 51 Anti-Islamic hate crimes in Canada in 2012. This number rose to 76 the following year, 2013. The number of anti-Islamic hate crimes then increased to 133 in 2014²⁷⁰. Statistics Canada reports a 5 % increase in hate crimes in Canada between 2014 and 2015, which they report is largely due to an increase in incidents specifically targeting Muslims.

Police reported 469 Criminal Code incidents in 2015 that were motivated by hatred of religion in general, 40 more incidents than in 2014, and accounting for 35 percent of hate crimes in Canada in 2015. Police reported a 61 percent increase in hate crimes targeting Muslims in 2015, which accounted for 12 percent of hate crimes in Canada in 2015. Police also reported a 33 percent increase in hate crimes targeting Arab and West Asian populations in 2015. Police also reported an increase in hate crimes

²⁶⁷ OSCE ODHIR, "Hate Crime Reporting: Canada," <http://hatecrime.osce.org/canada>

²⁶⁸ OSCE ODHIR, "Hate Crime Reporting: Canada 2015," <http://hatecrime.osce.org/canada?year=2015>

²⁶⁹ OSCE ODHIR, "Hate Crime Reporting: Canada 2014," <http://hatecrime.osce.org/canada?year=2014>

²⁷⁰ OSCE ODHIR, "Hate Crime Reporting: Canada 2012," <http://hatecrime.osce.org/canada?year=2012>; OSCE ODHIR, "Hate Crime Reporting: Canada 2013," <http://hatecrime.osce.org/canada?year=2013>; OSCE ODHIR, "Hate Crime Reporting: Canada 2014," <http://hatecrime.osce.org/canada?year=2014>

against women in 2015 making women the majority victims, which went from 40% (of total hate crimes) in 2014 to 53 percent (of total hate crimes) in 2015. This was attributed to an increase in crimes against Muslim women, who are sometimes more easily identified as Muslim than men.²⁷¹ The large increase between 2014 and 2015 may be a significant jump, but it is not a variation in the overall pattern of islamophobic hate crimes in Canada over the last decade. The number of hate crimes targeting Muslims in Canada has more than tripled since 2012.²⁷²

Incidents of anti-Muslim hate crimes have been specifically significant in Quebec, according to Global News Canada's timeline of anti-Muslim hate crimes. Their account includes smashed windows and torched cars in a parking lot outside the Outaouais Islamic Centre in Gatineau in 2012, graffiti on the same centre depicting the star of David and the words, "Vive David" along with "Fuck Arab" and "Fuck Halal", and a threatening email received by the president of the Mosque of Aylmer in which the sender demanded that all Muslims leave Canada. In 2013 a mosque was splattered with pig's blood, a halal butcher shop was vandalized three times in seven months, including gunshots through its plate glass windows and signs reading "no to Islam" scattered inside. In 2014 the Centre Culturel Islamique de Quebec, and other mosques, received messages reading "Islam, get out of my home", and in 2016 someone left a giftwrapped decapitated pig's head outside the door of the same Centre Culturel.²⁷³

Though these hate crimes are severe and unacceptable, the overall islamophobic hate crime statistics in Canada are considerably lower than that of both the United

²⁷¹ Statistics Canada, "Police Reported Hate Crimes, 2011," last modified July 11, 2013, <http://www.statcan.gc.ca/daily-quotidien/130711/dq130711a-eng.htm>

²⁷² Amy Minsky, "Hate Crimes Against Muslims in Canada increase 253% over four years," *Global News*, June 13, 2017, <https://globalnews.ca/news/3523535/hate-crimes-canada-muslim/>

²⁷³ Jesse Ferreras, "Anti-Muslim Incidents in Quebec: a timeline," *Global News*, January 30, 2017, <https://globalnews.ca/news/3213346/anti-muslim-incidents-in-quebec-a-timeline/>

States and France over a five-year period. In a per capita comparison of the United States, France, and Canada, there were fewer anti-Islamic hate crimes in Canada every year between 2012 and 2016.

Year	United States	France	Canada
2012	4.140	4.371	1.467
2013	4.269	4.560	2.162
2014	4.834	2.005	3.461
2015	9.379	5.043	5.135
2016	9.500	7.923	5.018

This may indicate that multiculturalism, and the universal human rights culture it has helped develop, combined with the legal protections it provides, has significantly impacted the success of immigrant integration.²⁷⁴ The drastic difference between the instances of hate crimes against Muslims in the United States and France versus Canada could be explained by several causes including, the media exposure of Muslims, the rhetoric surrounding Muslims used by the democratically elected leaders in Canada, and the differences within the policies that govern the relationship between religions and the government in Canada.

Being Muslim in Canada: The Impact of Islamophobia

Though Canada often enjoys an international reputation of cultural acceptance and successful immigrant integration, not all immigrant groups in Canada feel the same. Since September 11, 2001 a multitude of issues surrounding Muslims have arisen, including the use of religious law in government courts (which was tried and denied by the Canadian government), concerns over homegrown terrorism (following the arrest of

²⁷⁴ Will Kymlicka, *Multicultural Odysseys : Navigating the New International Politics of Diversity*. (Oxford, New York: Oxford University Press, 2007).

18 people in Toronto suspected of terrorist action), and the wearing of traditional Muslim clothing during the Canadian citizenship ceremony (which was tried in court and allowed).²⁷⁵ Steven Zhou points out that despite Canada's multicultural laws and identity, not every Canadian agrees with the policy. To exemplify this, Zhou compiled a list of six significant anti-Islamic hate groups in Canada including, ultra-Zionist group Never Again Canada, Far Right Zionist group Jewish Defense League Canada, anti-gay and anti-Muslim hate group Rise Canada, anti-Islam-alarmist group Canadian Coalition of Concerned Citizens, a Canadian Chapter of the German based anti-Islam group Pegida called Pegida Canada, and Soldiers of Oden Canada, a branch of a northern-European anti-immigration white supremacist group.²⁷⁶

An issue that may be driving biased opinion of Muslims is what Bayoumi calls "the racing of religion" in which Islam is treated like a single minority race, and mistreated as one, instead of recognized as a global religion that includes practitioners of all different races and from all different regions of the world.²⁷⁷ The Muslim communities in Canada include a plurality of South Asian people (36 percent) and Arabs (21 percent); but also include significant numbers that are West Asian (e.g., Persian), Black, and South East Asian Muslims as well.²⁷⁸ Despite the treatment of Muslims as a single, homogenous community, more Canadians that self-identify as Muslims indicate that their religion (84 percent) and nationality (81 percent) are "very important" parts of their identity, but fewer indicate that their ethnic backgrounds are

²⁷⁵ John McCoy, Anna Kirova, and W. Knight, "Gauging Social Integration among Canadian Muslims: A Sense of Belonging in an Age of Anxiety," *Canadian Ethnic Studies* 48, no. 2 (2016): 21-52.

²⁷⁶ Steven Zhou, "A Guide to Canada's Anti-Islamic Groups," *Now Toronto*, April 5, 2017, <https://nowtoronto.com/news/canada-islamophobic-groups/>

²⁷⁷ Moustafa Bayoumi. "Racing Religion." *CR: The New Centennial Review* 6, no. 2 (2006): 267-93

²⁷⁸ John McCoy, Anna Kirova, and W. Knight, "Gauging Social Integration among Canadian Muslims: A Sense of Belonging in an Age of Anxiety," *Canadian Ethnic Studies* 48, no. 2 (2016): 21-52.

“very important” (48 percent).²⁷⁹ This indicates that for the majority of Canadian Muslims, religion and nationality are important parts of their personal identities, but ethnic background is less so.

McCoy, Kirova, and Knight compiled quantitative data from the Environics Institute’s Survey of Muslims in Canada (conducted both in 2006 following debates over the implementation of Sharia Law in Ontario; and in 2016 following election debates over the acceptance of Syrian refugees in Canada) with qualitative data from Muslim community leaders, and qualitative data from the Ethnic Diversity Study (conducted in 2002 following the rise of Islamophobia after the 9/11 attacks).²⁸⁰ Their study found that Canada stands apart from the immigration, integration, and multicultural problems of other nations states because “the far right in Canada is relegated to the fringes of party politics and civil society and it is difficult to detect an explicit anti-immigrant discourse among the Canadian media and politicians”. Ambrose and Mudde suggest that the Canadian radical right has failed to gain political influence because of Canadian multiculturalism. They suggest that Canadian multiculturalism is unique because cultural cooperation is celebrated as a central part of Canadian identity. This, combined with government policies protecting the inclusion of minorities has stopped both the supply and demand of Canadians interested in right wing extremist politics²⁸¹.

McCoy, et al. also point out that social scientists credit Canada’s Multicultural policy with the success of integration. The authors quote social scientist Jeffrey Reitz

²⁷⁹ Ibid.

²⁸⁰ John McCoy, Anna Kirova, and W. Knight, "Gauging Social Integration among Canadian Muslims: A Sense of Belonging in an Age of Anxiety," *Canadian Ethnic Studies* 48, no. 2 (2016): 21-52.

²⁸¹ Emma Ambrose and Cas Mudde, “Canadian Multiculturalism and the Absence of the Far Right”, *Nationalism and Ethnic Politics* 21:2, 9, 2015): 213-236.

who stated, “In short, findings from public opinion and other survey research suggests that for most Canadians, support for multiculturalism is an expression of support for the idea of Canada as a country committed to immigration and its benefits... popular multiculturalism is a pro-immigration ideology”.²⁸² This idea is confirmed by Azar Syed, of the BC Muslim Association, believes the Canadian multicultural policy has made integration in Canada easier, stating, “I moved here in ‘73 and that time, if I compare it to the later years, the 70s were very hard for the immigrants, maybe because the multicultural philosophy had not taken hold.... But later on in the 1980s everything was very smooth, there was hardly any discrimination....”.²⁸³ They go on to explain that integration is a reciprocal process in which both the newcomers and the host society must adapt to coexist. Research has indicated that successful integration is marked by a sense of belonging, not only a sense of attachment for the host country, but also must include feelings of acceptance from the general population of the host country.²⁸⁴ According to Keith Banting, “Multiculturalism has helped nurture a more inclusive sense of national identity, one more capable of accommodating the diverse diversity of contemporary Canada”.²⁸⁵ Multiculturalism in Canada has created that foundation for social acceptance and reciprocity among the general population needed for successful immigrant integration.

Considering these explanations of the parameters and measurement of social integration, the research of McCoy, et al. indicates high levels of social integration

²⁸² John McCoy, Anna Kirova, and W. Knight, "Gauging Social Integration among Canadian Muslims: A Sense of Belonging in an Age of Anxiety," *Canadian Ethnic Studies* 48, no. 2 (2016): 21-52.

²⁸³ John McCoy, Anna Kirova, and W. Knight, "Gauging Social Integration among Canadian Muslims: A Sense of Belonging in an Age of Anxiety," *Canadian Ethnic Studies* 48, no. 2 (2016): 21-52.

²⁸⁴ Ibid.

²⁸⁵ Keith Banting, “Canada”. In *Immigrant Integration in Federal Countries*, eds. Christian Joppke and F.Leslie Seidle, 79-112. Montreal: McGill-Queen’s University Press, 2012.

among Muslims in Canada. When asked are they “satisfied with life” 49.3 percent of Canadian Muslims answered “very satisfied” while only 47.6 percent of the non-Muslim Canadian population answered the same. Seventy-one percent of Canadian Muslims reported a very strong sense of attachment to Canada along with 71 percent of Canadian Protestants, while only 65 percent of Hindus, 59 percent of Jews, and 55 percent of non-religious Canadians reported the same. The same amount of Canadian Muslims reported high levels of attachment to Canada as the majority status-quo Christian denomination, Canadian Protestants, did. Among Canadian Muslims, 32 percent reported experiencing “discrimination in the last 5 years” in comparison to 37 percent among Canadian Hindus, 31 percent among Canadian Buddhists and 23 percent among Jehovah’s Witnesses. Most significantly, of the 32 percent of Canadian Muslim respondents, only 34 percent reported religion as the reason for discrimination in comparison to 70 percent of Canadian Jews and 75 percent of Jehovah Witnesses.²⁸⁶

When asked, “Would you say you are very, somewhat, not very, or not at all proud to be a Canadian?” 83 percent of Canadian Muslims indicated they were “very proud” to be Canadian in 2016 (10 percentage points higher than responses from the 2006 survey). By comparison, only 73 percent of the “non-Muslim” sample group indicated that they were “very proud” to be Canadian. When respondents were asked to describe their sense of belonging to Canada as either “very strong, generally strong, generally weak or very weak” 55 percent of Canadian Muslims reported a very strong sense of belonging and 39 percent expressed a “generally strong” sense of belonging (only 3 percent identified themselves as having a “very weak” sense of belonging to Canada).

²⁸⁶ John McCoy, Anna Kirova, and W. Knight, "Gauging Social Integration among Canadian Muslims: A Sense of Belonging in an Age of Anxiety," *Canadian Ethnic Studies* 48, no. 2 (2016): 21-52.

Following the 2016 survey, 58 percent of Canadian Muslims reported that their sense of belonging has “become stronger” over the previous 5 years. Only 5 percent reported it had grown weaker.

The fact that Canadian Muslims report higher or similar levels of national belonging as their more established Protestant counterparts, and higher levels of attachment to Canada, are strong indicators of successful integration of Canadian Muslims. This may suggest that legitimate multicultural policy at the government level and inclusive rhetoric from influential political leaders are central factors in avoiding feelings of alienation among Muslim immigrant populations. In 2016, ninety-four percent of Canadian Muslims reported a “very” or generally high sense of belonging, a ten percentage point increase from 2006.²⁸⁷ It is especially significant that Muslims report consistent if not higher levels of attachment and belonging following controversial political incidents such as the 9/11 terrorist attacks and 2015 Syrian refugee crisis. This also indicates higher levels of integration for Muslims in Canada, but could also indicate that media representations of Muslims are more positive in Canada than in the United States or France. Canadians also report higher levels of support for immigrants in another important aspect of integration, economics. According to Ambrose and Mudde, Canadians are more likely to agree that immigrants make their country a better place to live and are good for the economy than other Western countries²⁸⁸. Despite this more positive perspective, economic discrimination against immigrants still exists in Canada.

²⁸⁷ John McCoy, Anna Kirova, and W. Knight, "Gauging Social Integration among Canadian Muslims: A Sense of Belonging in an Age of Anxiety," *Canadian Ethnic Studies* 48, no. 2 (2016): 21-52.

²⁸⁸ Emma Ambrose and Cas Mudde, "Canadian Multiculturalism and the Absence of the Far Right", *Nationalism and Ethnic Politics* 21:2, 92015): 213-236.

Economics

A study of immigration economics by Ehsan Latif, completed in 2015, dispelled the suggestion that immigrants cause unemployment among nationally born citizens²⁸⁹. His study found that immigration did not have a significant long term effect on the Canadian unemployment rate²⁹⁰. In a similar study Asadul Islam found no significant evidence that immigration effects unemployment in Canada “in the long run”. Islam’s research also yielded results that indicate a positive relationship among per-capita gross domestic product, immigration rate, and real wages, indicating that Canadian born workers benefit from immigration in the long run.²⁹¹ According to these research studies immigration is good for Canada’s economic growth.

However, Latif found evidence of discrimination in the Canadian job market. His study indicated that though Canada largely attracts skilled and educated immigrants, many employers do not recognize international education or job experience, creating problems for immigrants on the job market.²⁹² A study by Amanda Silliker published in 2011 found that applicants with traditionally English sounding names were more likely to received call backs for interviews than their Greek, Indian, or Chinese-sounding named counterparts. Silliker conducted her study in three of the most multicultural cities in Canada, Toronto, Montreal, and Vancouver. Silliker’s study found English-named people were 47 percent more likely to get a call back in Toronto, 39 percent

²⁸⁹ Ehsan Latif, "The Relationship between Immigration and Unemployment: Panel Data Evidence from Canada," *Economic Modelling* 50 (2015): 162-67.

²⁹⁰ Ehsan Latif, "The Relationship between Immigration and Unemployment: Panel Data Evidence from Canada," *Economic Modelling* 50 (2015): 162-67.

²⁹¹ Asadul Islam, "Immigration Unemployment Relationship: The Evidence from Canada," *Australian Economic Papers* 46, no. 1 (2007): 52-66.

²⁹² Ehsan Latif, "The Relationship between Immigration and Unemployment: Panel Data Evidence from Canada," *Economic Modelling* 50 (2015): 162-67.

more likely in Montreal, and 20 percent more likely in Vancouver.²⁹³ Phillip Oreopoulos conducted a similar study in 2009 which yielded similar results. In his study, changing only the name of an applicant from a traditionally English-sounding name to either an Indian, Pakistani, or Chinese name decreased the likelihood for a call-back by 28 percent. He took his research a step further, adding information on multiple language fluency, including English, on the applications to see if the bias could be explained by employers concern over English language proficiency. The inclusions of language skills did not increase call-back rates for foreign named applicants, suggesting that the name biases are not based on language proficiency, and are more likely based on racial discrimination.²⁹⁴

In 2018, labor market discrimination is still an issue for immigrants. Many skilled immigrants are unemployed, or working jobs they are over qualified for due to lack of opportunity. Discrimination, along with licensure and credential discrepancy issues, is largely explained by a lack of “Canadian experience”, meaning that employers favor candidates for jobs who have education or work experience in Canada. This leaves immigrants at a serious disadvantage. In 2015 Statistics Canada found that economic immigrants in Canada earned a mean annual income of \$42,000 while refugees earned a mean annual income of only \$28,000 in 2015.²⁹⁵ In comparison, the average for nationally born Canadians earned mean annual incomes between \$63,457

²⁹³ Amanda Silliker, "'Matthew, You're Hired. Good Luck next Time, Samir'," *Canadian HR Reporter* 24, no. 20 (2011): 1,20.

²⁹⁴ Philip Oreopoulos, “Why Do Skilled Immigrants Struggle in the Labor Market? A Field Experiment with Thirteen Thousand Resumes,” *American Economic Journal: Economic Policy* 3(4) (2011): 148-171

²⁹⁵ Trevor Dunn, “Skilled immigrants struggle to find jobs as government plans to welcome more,” *CBC News*, November 1, 2016, <http://www.cbc.ca/news/canada/toronto/immigration-employment-canada-1.3831468>

and \$70,336 in 2015.²⁹⁶ While Canada continues to accept refugees and immigrants, many of those that are accepted are still without adequate employment.²⁹⁷

Though there are problems with economic integration in Canada, specifically with discrimination in the job market, Canada's immigrant unemployment rate demonstrates more economic integration success than that of France. According to Statistics Canada, the overall unemployment rate for 2017 is 5.4. The overall unemployment rate for landed immigrants (those that have been granted the right to live in Canada permanently) is 6.4.²⁹⁸ Though it is higher for immigrants than for the general populations, this is a much smaller margin than the unemployment rates for immigrants in France. According to The Organisation for Economic Co-operation and Development (OECD) the unemployment rate for the general population of France was 9.2 percent in 2016, while the unemployment rate for immigrants in France was 17 percent in that same year.²⁹⁹ Comparatively, Canada has far more success for immigrant economic integration than France. This is evidence that integration in Canada is not only more socially successful, but economically successful as well.

Media

An important factor for Islamophobia in Canada is the role and behaviors of the media. Poynting and Perry suggest that the media facilitates the enabling of "climates of hostility" that surround groups, particularly Muslims and phenotypical Arabs.³⁰⁰ They

²⁹⁶ "Household Income in Canada: Key Results from 2016 Census", *Statistics Canada*, last modified September 13, 2017, <https://www.statcan.gc.ca/daily-quotidien/170913/dq170913a-eng.htm>

²⁹⁷ *Ibid.*

²⁹⁸ Government of Canada, "Labour force characteristics by immigrant status of population aged 25 to 54, and by educational attainment," *Statistics Canada*, last modified 2017, <http://www.statcan.gc.ca/tables-tableaux/sum-som/101/cst01/labor90a-eng.htm>

²⁹⁹ "Foreign Born Unemployment," *OECD*, last modified 2018, <https://data.oecd.org/migration/foreign-born-unemployment.htm#indicator-chart>

³⁰⁰ Scott Poynting, and Barbara Perry, "Climates of Hate: Media and State Inspired Victimisation of Muslims in Canada and Australia Since 9/11," *Current Issues in Criminal Justice* 19, no. 2 (2007): 151-71.

point out that “Muslim” and “Arab” are used interchangeably by the media, despite that fact that Islam is a religion practiced by people of all different racial and national backgrounds.³⁰¹ Poynting and Perry agree with Ahmed and Matthes, who discuss that Muslims and phenotypical Arabs are treated homogenously in the media and often linked to violent incidents such as the Arab-Israeli War, and terrorism.³⁰² This forces all Muslims, and even people who simply look Arab, into one single group that is perceived as a violent “other”.³⁰³ When an individual or a group is perceived as the “other” they are dehumanized and considered to be less deserving of fair treatment. Poynting and Perry argue that the media’s stereotypical representation of Islam and Muslims are more than insulting, but actually serve as a “guide to action” to the general population.³⁰⁴ They state that “almost invariably, the stereotypes are loaded with disparaging associations, suggesting inferiority, irresponsibility, immorality, and non-humanness. Consequently, they provide both motive and rationale for injurious verbal and physical assaults on minority groups. Acting upon these interpretations allows dominant group members to recreate whiteness as superiority, while castigating the Other for their presumed traits and behaviors. The active construction of whiteness, then, exploits stereotypes to legitimate violence”.³⁰⁵ The media is specifically complicit because they fuel fear and shape public perceptions.³⁰⁶

³⁰¹ Ibid.

³⁰² Scott Poynting, and Barbara Perry, "Climates of Hate: Media and State Inspired Victimisation of Muslims in Canada and Australia Since 9/11," *Current Issues in Criminal Justice* 19, no. 2 (2007): 151-71; Ahmed Saifuddin, and Jörg Matthes, "Media Representation of Muslims and Islam from 2000 to 2015: A Meta-analysis." *International Communication Gazette* 79, no. 3 (2017): 219-44.

³⁰³ Manaf Bashir, Christine Ogan, Rosemary Pennington, and Lars Willnat, “The rise of anti-Muslim prejudice: Media and Islamophobia in Europe and the United States,” *The international Communication Gazette*. Vol 76, Issue 1, (2014): pp. 27 – 46.

³⁰⁴ Scott Poynting, and Barbara Perry, "Climates of Hate: Media and State Inspired Victimisation of Muslims in Canada and Australia Since 9/11," *Current Issues in Criminal Justice* 19, no. 2 (2007): 151-71.

³⁰⁵ Ibid.

³⁰⁶ Ibid.

Though Islamophobic rhetoric exists within the Canadian media, its impact on the public may be less severe than in the United States and France. In a comparison between Islamophobia in Canada and Australia, Poynting and Perry describe the effect of media stereotyping as “muted” and “almost ambiguous” in Canada, and credit this to two reasons. The first is attributed to a smaller populist media culture, which they describe as fewer “populist crusades” on talk radio, in tabloids, sensationalist commercials, and current affairs television. Dr. Abdolmohammed Kazemipur suggests that Muslims in Canada have fewer issues with the media than Muslims in other countries.³⁰⁷

The second, is attributed to multiculturalism itself. The authors state that because of the Multiculturalism Act, there is a more established culture of cooperation regarding negotiations between pluralist cultures, and because of this, Canadian cultural and political life has been less vulnerable to and has suffered less from neo-conservative and right-wing populist attacks.³⁰⁸ Therefore, not only is multiculturalism facilitating cooperation between cultural groups among the populace, it also contributes to making the populace less vulnerable to sensationalist news or stereotyped perceptions of Muslims and Islam.

Spokesperson for the National Council of Canadian Muslims Amira Elghawaby expresses deep concern regarding the increase in Islamophobic incidents reported to the organization in the last year. Despite the aforementioned research, she states that she has seen a spike in violent incidents against Muslims following Islamophobic rhetoric

³⁰⁷ Abdolmohammad Kazemipur, *The Muslim Question in Canada: A Story of Segmented Integration*, 2014.

³⁰⁸ Scott Poynting, and Barbara Perry, "Climates of Hate: Media and State Inspired Victimisation of Muslims in Canada and Australia Since 9/11," *Current Issues in Criminal Justice* 19, no. 2 (2007): 151-71.

during both Canada's election campaign and following the terrorist attacks in Paris in the fall of 2015. Though the Canadian populace may be less influenced by stereotypical and violent rhetoric against Muslims, they are not immune. She states that widespread use of the term "Islamic State" is impacting the perception of the whole Muslim community in Canada, and is specifically problematic.³⁰⁹

Political Rhetoric in Canada

McCoy, Kirova, and Knight pointed out that rhetoric practiced by political leaders in Canada is less severe toward Islam than in the U.S. or France. They state that the language of Canadian political leaders sets the example for both the media and the public, and could be a significant factor in the prevalence and intensity of Islamophobia in Canada.³¹⁰ Poynting and Perry also suggest that Canadian political life has been less influenced by right wing populism due to Canada's multicultural identity.³¹¹ However, islamophobic rhetoric from democratically elected leaders has been a problem in the past, most recently from former Prime Minister Stephen Harper who held office from 2006 until 2015. He caused problems within the Canadian Muslim community during his leadership after publicly siding Canada with Israel regarding conflicts in the Middle East, and making multiple public statements and appearances showing support for the Canadian Jewish community while neglecting to show similar support for Canada's Muslim citizens.³¹² According to Barry, this was part of a larger goal to gain votes from

³⁰⁹ Anna Mehler Paperny, "Hate Crimes against Muslim-Canadians more than doubled in 3-years," *Global News*, April 13, 2016, <https://globalnews.ca/news/2634032/hate-crimes-against-muslim-canadians-more-than-doubled-in-3-years/>

³¹⁰ John McCoy, Anna Kirova, and W. Knight, "Gauging Social Integration among Canadian Muslims: A Sense of Belonging in an Age of Anxiety," *Canadian Ethnic Studies* 48, no. 2 (2016): 21-52.

³¹¹ Scott Poynting, and Barbara Perry, "Climates of Hate: Media and State Inspired Victimisation of Muslims in Canada and Australia Since 9/11," *Current Issues in Criminal Justice* 19, no. 2 (2007): 151-71.

³¹² Donald Barry, "Canada and the Middle East Today: Electoral Politics and Foreign Policy", *Arab Studies Quarterly* 32, no. 4 (2010): 191-217.

the Jewish community, as opposed to the Muslim community, who were considered statistically less likely to vote.³¹³ Keenan points out other instances in which Harper used Islamophobic rhetoric, including his veiled reference to “barbaric Culture” in which he referenced stereotyped Islamic practices such as forced marriages and honor killings, stating that it was “fear mongering” with the express intention of gaining votes.³¹⁴ He states that Harper equating Syrian refugees to terrorists, and his campaign emphasis against the ban of Muslim traditional clothing, was done only for the purpose of vilifying Muslims. He suggests that revealing these attitudes against Muslims was done specifically following a public opinion poll which indicated that 82 percent of Canadians supported the ban on Muslim traditional clothing, and was therefore made to gain voter support.³¹⁵ Despite former Prime Minister Harper’s islamophobic rhetoric, the study by McCoy, et al. demonstrated a rise in Muslim Canadian’s feelings of acceptance in Canada, a rise that occurred during Harper’s administration.³¹⁶ This suggests that the general Canadian population has internalized multiculturalism as a part of their identity enough, that they had an opposite reaction to Harper’s rhetoric than he intended. By the end of Harper’s administration in 2015, the majority of Canadians agreed that immigration levels were not too high.³¹⁷ Compared to evidence of a positive correlation between leadership and public opinion in the U.S. and France, the Canadian

³¹³ Donald Barry, "Canada and the Middle East Today: Electoral Politics and Foreign Policy", *Arab Studies Quarterly* 32, no. 4 (2010): 191-217.

³¹⁴ Edward Keenan, “When Stephen Harper refers to “barbaric culture,” he means Islam — an anti-Muslim alarm that’s ugly and effective because it gets votes,” *The Star*, October 5, 2015, <https://www.thestar.com/news/canada/2015/10/05/when-stephen-harper-refers-to-barbaric-culture-he-means-islam-an-anti-muslim-alarm-thats-ugly-and-effective-because-it-gets-votes-edward-keenan.html>

³¹⁵ Ibid.

³¹⁶ John McCoy, Anna Kirova, and W. Knight, "Gauging Social Integration among Canadian Muslims: A Sense of Belonging in an Age of Anxiety," *Canadian Ethnic Studies* 48, no. 2 (2016): 21-52.

³¹⁷ Environics Institute, “Focus Canada: Canadian Public Opinion About Immigration and the USA,” last modified May 13, 2017, <https://www.environicsinstitute.org/projects/project-details/focua-canada-canadian-public-opinion-about-immigration-and-the-usa>

populace is influenced by the islamophobic or anti-multicultural rhetoric of leaders in the opposite direction.

The election of Justin Trudeau is significant evidence that multiculturalism and cultural integration in Canada has been successful. Trudeau voiced support for the Muslim Canadian community while running for office by criticizing Harper's stance on banning Muslim traditional clothing during Canadian citizenship ceremonies. Trudeau stated, "We are the one country in the world that has figured out how to be strong, not in spite of our differences but because of them. So, the prime minister of this country has a responsibility to bring people together in this country, not to divide us by pandering to some people's fears".³¹⁸ The Muslim community in turn helped Trudeau win the election, according to the envrionics institute who conducted a poll that found 65 percent of Muslims who voted, and agreed to reveal their choices, voted for Trudeau in 2015.³¹⁹ Since his election, Trudeau has voiced support for the Muslim Canadian community many times. Following the attack on a Quebec City mosque, Trudeau offered words of support and solidarity directly to Canadian Muslims stating, "We will grieve with you, we will defend you, we will love you and we will stand with you" as well as stating, "Know that we value you. You enrich our shared country in immeasurable ways. It is your home".³²⁰ During a convention he praised Canadian Muslims for their commitment to helping settle Syrian refugees and affirmed his commitment to them stating, "Canada is stronger because of the contributions of its

³¹⁸ Joan Bryden, "Justin Trudeau says Harper's pandering to fears about Muslims unworthy of a PM," *CBC News*, February 20, 2015, <http://www.cbc.ca/news/politics/justin-trudeau-says-harper-s-pandering-to-fears-about-muslims-unworthy-of-a-pm-1.2964466>

³¹⁹ Éric Grenier, "Liberals won over Muslims by huge margin in 2015, poll suggests," *CBC News*, April 29, 2016, <http://www.cbc.ca/news/politics/grenier-envrionics-muslims-politics-1.3555216>

³²⁰ Ryan Maloney, "Trudeau Tells Canadian Muslims: 'We Will Love You and We Will Stand With You'," *The Huffington Post Canada*, January 30, 2017, https://www.huffingtonpost.ca/2017/01/30/trudeau-muslims-quebec-mosque-shooting_n_14501104.html

Muslim community. We are stronger because of you. And that's why every day we just chose hope over fear and stand up to the politics of hate and division".³²¹ He also released a statement wishing the Muslim community a happy Ramadan.³²² Trudeau's administration has gone beyond words in their commitment to stopping Islamophobia in Canada by passing M-103 in the House of Commons, a non-binding motion that condemns Islamophobia and religious discrimination. The motion, authored by Liberal Parliament member Iqra Khalid, calls on the Canadian government to 1) condemn Islamophobia and all forms of systemic racism and religious discrimination 2) quell the increasing public climate of hate and fear 3) compel the Commons heritage committee to develop a government-wide approach for reducing or eliminating systemic racism and religious discrimination, including Islamophobia.³²³ The passing of M-103 is further evidence of Canada's commitment to multiculturalism, and commitment to the successful integration of Muslims specifically.

Conclusion

Trudeau's rhetoric surrounding Islam, his administration's actions to protect Muslims, and Canada's commitment to multiculturalism are staunchly different from the stances taken by the United States and France. The media coverage is different, the language of democratically elected leaders is different, but most importantly the root influential cause is different; multiculturalism. Multiculturalism as a policy that binds Canadian identity directly with cultural diversity. From the platform, political rhetoric is more acceptant of Islam, media coverage is more fair to Islam, and the public is more

³²¹ Dalit Halevi, "Trudeau praises Canada's Muslim community," *Israeli National News*, December 26, 2016, <http://www.israelnationalnews.com/News/News.aspx/222277>

³²² Justin Trudeau, Prime Minister of Canada, "Statement by the Prime Minister of Canada on Ramadan," May 26, 2017, <https://pm.gc.ca/eng/news/2017/05/26/statement-prime-minister-canada-ramadan>

³²³ CBC News. "House of Commons passes anti-Islamophobia motion," *CBC News*, March 23, 2017, <http://www.cbc.ca/news/politics/m-103-islamophobia-motion-vote-1.4038016>

committed to supporting cultural differences and less influenced by racist and xenophobic statements or opinions from politicians and the media. These factors indicate that multiculturalism, once rooted as legitimate policy, creates the foundation for a more culturally inclusive nation.

Conclusion

Religious Jurisprudence and Islamophobia

According to hate crime statistics and public opinion polls it is clear that Islamophobia is present in each of the three case studies analyzed in this research. Islamophobia varies in each nation-state in important ways, including the politics surrounding Islam and the way that Islam is presented to the public by political leaders and the media. Most importantly, Islamophobia varies in its intensity and prevalence between the United States, France, and Canada. In the United States, anti-Islam hate crimes have ranged between 4.140 crimes per capita per 100,000 people in 2012 and risen steadily to 9.500 crimes per capita per 100,000 people in 2016. In France, anti-Islam hate crimes were less constant, but at times higher than in the United States, with 4.371 crimes per capita per 100,000 people in 2012, only 2.005 crimes per 100,000 people in 2014, and then up to 7.923 crimes per capital per 100,000 people in 2016. In Canada, the statistics for anti-Islamic hate crimes were strikingly lower, ranging between only 1.467 crimes per capita per 100,000 people in 2012 and 5.018 crimes per capita per 100,000 people in 2016. The lower rates of crimes against Muslims in Canada is especially striking when those rates are controlled for population. This is because the significantly lower population in Canada compared to France and the United States may have accounted for the smaller number of hate crimes against Muslims, except that the number of hate crimes in Canada was still significantly lower when the comparison is controlled for population size. This suggests the presence of a factor that sets Canada apart from the United States and France regarding Islamophobia.

Public opinion polls regarding Islam and the presence of Islam in each of the states also reveals higher levels of tolerance and acceptance among the general Canadian population than those in the United States or France. Canadians are more likely than Americans or the French to agree that Islam enriches Canada, its culture, its economy, and its people, and that Muslims are welcome members of society. Canadians also express higher levels of tolerance for not only existing Muslim populations in Canada, but for the increase of those populations through immigration. This is a clear indication that factors are present that set Canada apart from the United States and France, in a way that creates a more culturally inclusive environment for Muslims.

I have argued that media representation and political rhetoric surrounding Islam is an important factor for the prevalence and intensity of Islamophobia in the three case studies. In the United States and in France, the media has consistently equated Islam with “terrorism”, a term that has become charged with the power to illicit “terror” among the populace within itself. The media in the United States and France has consistently circulated stereotypical images of Muslims and Islam. Some media outlets have been found to actively search for way to associate criminal acts with Muslims and with Islam in general. The consistent circulation of islamophobic media, and stereotypical representations of Islam has perpetuated negativity toward Muslims and Islam within the general populations of The United States and France. Though the media has had a central role in the spread of Islamophobia, Islamophobic rhetoric did not originate with the media. The media received information and rhetoric from influential political leaders.

In the United States and in France, violent crimes and acts of “terrorism” associated with Islam have been framed by democratically elected leaders and influential politicians to gain support for political endeavors and to influence the decisions of the populace. These incidents have been framed in specific ways by political leaders that have surrounded the image of Islam with violence, and Islamophobia has been spread throughout the general population by the media, but most significantly Islamophobia has been legitimized in the United States and in France because the general populations have agreed with its stereotypical representation.

Though negative images of Islam are created by political leaders and spread by the media in all three cases, there are fewer far right political news outlets in Canada, and arguably less negative media attention on Islam than there is in the United States or France. However, Islam has still been framed in a negative and stereotypical way by both political leaders and the media in Canada. The significant difference between Americans, the French, and Canadians may not only be the amount of islamophobic language circulated in each state, but the reaction to those images. Despite attempted politicization of Islamophobia in Canada, the presence of anti-Muslim, anti-Islam, and anti-immigrant hate groups in Canada, and some stereotypical and negative media presentations of Islam, the majority of the general population of Canada still expresses support and welcome to Canadian Muslims and Muslim immigrants. In the United States and in France, the public reaction to the politicizing of Islamophobia, islamophobic language from political leaders, and the circulation of islamophobic stereotypes in the media, has been a rise in Islamophobia. This is made evident by an increase in hate crimes against Muslims and Islam, public expressions of the rejection

of Muslims and Islam via public opinion polls, and the rise of far right anti-immigration and expressed anti-Muslim political parties such as the American Donald Trump administration and the near election of National Front leader Marine le Pen in France. Whereas in Canada Justin Trudeau, who has openly voiced support for Canada's Muslim population and the acceptance of increased numbers of refugees, was elected as Prime Minister. The public opinion polls, the apparent lack of effect of negative media portrayals, and the political choices of Canadians again suggests the presence of a factor that sets Canada apart from the United States and France regarding Islamophobia that is not explained by political rhetoric or the media.

What makes Islamophobia unique among other social justice issues, is that it surrounds a religion. Islam is not a phenotypical trait or necessarily made identifiable by apparel, or any other visible characteristic. It is a religion, and lifestyle, practice by people from different cultural backgrounds, with different physical appearances, and different levels of religiosity. Though Islamophobia is not the only religious based social justice issue it is important to point out why that distinction is important. Because Islamophobia is religious-based discrimination, the policies surrounding the relationship between religion and governments are central to the issue. In the United States, a country made up of generations of global immigration that protects religious freedom at the highest levels of governance, there is no clear and central policy regarding the regulation of religion and government. The absence of which, has put minority religions at a dangerous disadvantage that has deprived them of access to the legal protections and services that the government is duty-bound to provide. In France, there is a strikingly similar problem, in which the lack of a clear, functional, and fair policy

regulating the relationship between religion and government has left minority religions to at a dangerous legal and social disadvantaged. This absence of government protection has left Muslims in France without functional legal avenues to regulate issues of discrimination, and at socio-economic disadvantages from which they are denied opportunities for economic and social growth. In the United States, as well as in France, the relationship between state and religion is not governed by a specific policy, but is understood through interpretations of past judicial decisions. Decisions regarding the legality of behaviors involving both religion and government are left to the discretion of sitting courts. Their decisions are based on the interpretations of both previous courts, and their own interpretation of the decisions previously made. This research demonstrates the ways in which sitting court justices can significantly re-route the interpretation of previous decisions to serve their own agendas, as was done in the United States when Justice Rehnquist shifted the legal interpretation of the first amendment from his predecessor's favor of the Establishment Clause interpretation to his own favor for the Free Exercise Clause interpretation. This shift in interpretation, accomplished by a single sitting supreme court re-routed the legal interpretation of both current and future Separation of Church and State related legal decisions in a very significant way. Thus, the absence of a central policy regarding the relationship between the government and religion has created a space for debate and argument, one that has left minority religions vulnerable. Despite both American and French attempts to alter and amend those decisions to better protect all religions, the majority religion of Christianity is still favored over others simply because it is the majority religion. This

leaves minority religions, especially Islam that suffers both historic and current political and social scrutiny, at a disadvantage.

The successful integration of Islam in Canada under Canadian multicultural policy is evidence that a central policy regarding the relationship between government and religion is essential for both the legal protection of Muslims and the social integration of Muslims. The inclusion of multicultural policy in the Canadian charter leaves no room for doubt and dubious legal interpretation regarding religion and government because it serves as a clear and central statement that all legal decisions will be made in a way that is supportive to cultural difference. This means Islam, as well as other minority religions, is protected by the highest legal authority, the Canadian constitution. Therefore, the religious and cultural practices of Muslims are especially protected in Canada.

Furthermore, the social impact of multiculturalism is just as important as the structural and legal protections the policy provides. The presence of multicultural policy in the Canadian charter sends a powerful message to the general Canadian population that multiculturalism is important for Canada and the identity of Canadians. Because multiculturalism is thus central to Canadian identity, Canadians are more accepting and cooperative with minority religions and cultures and less influenced by stereotypical representations of those religions and cultures. This makes Canadians less vulnerable to fear based and religiously charged political campaigns, such as the George W. Bush administration's religiously charged wars in the Middle East, the Donald Trump administration's travel ban on Muslim majority countries, and the rise of the anti-immigration and anti-Muslim political party the National Front in France.

Though this research includes only a brief overview of the history of religion in the three case studies, it provides evidence that religious heritage is important to the culture and society of each nation state, and central to identity. Because religion is so significant to identity, policies regarding religion are resistant to change. Though significant socio-cultural change will be hard met, it is important to point out that the influential power this research has established to be held by political leaders and the media does not only function in one direction, but could be beneficial to the diminution of Islamophobia just as it has been significant for the rise and spread of Islamophobia.

As the world continues to globalize, it may be in the best interest of the general populations of the United States and France to adopt more multicultural policies, and especially to adopt a central policy regarding the relationship between religion and government that protects multiculturalism. If this is accomplished there will be less confusion regarding the place of Islam, as well as other minority identity groups, within the societies of those states. If the cultural and religious practices of Muslims are protected in the United States and France as they are in Canada, the comparison of these three case studies suggests that cultural cooperation may increase, as it has in Canada. An increase in cooperation can help unify the general populations of each nation state, and facilitate more harmonious interactions among the consistently diversifying religious populations of each. The successful integration of minority groups will not only serve to strengthen and better harmonize the general population, but could improve the economies of these states, and create foundations for improved international reputations and therefore improved international relations between these states and others. The inclusion of a central multicultural policy will not only benefit Muslims, or

even religious minorities, but could lay the foundation for the improvement of the legal protections and the social integration of other minority identity groups as well, including both racial minorities and sexual-orientation minorities. As the world continues to globalize, the successful integration of minority groups into general societies will become more and more important. The establishment of a central policy that protects multiculturalism while regulating the relationships between government and religion in a way that treats all religions equally under the law will help to harmonize the population, improve the functionality of the courts, and prepare the governments and populations of each nation-state for an evident and inevitable increase in cultural diversification.

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