

ISSUE BRIEF JUNE 2018

A RECORD OF BIGOTRY AND HATE: DONALD TRUMP'S LONG HISTORY OF ANTI-MUSLIM ANIMUS

In December 2015, then-candidate Donald Trump told an enthusiastic crowd of supporters at a campaign rally in South Carolina that he was "calling for a total and complete shutdown of Muslims entering the United States." This campaign platform followed years of documented anti-Muslim statements made by Trump and laid the groundwork for his repeated attempts to enact a Muslim ban that began just one week after his inauguration in January 2017.²

Each iteration of President Trump's signature Muslim ban policy has since been blocked by federal courts, but the Supreme Court in December 2017 allowed the current version to go into full effect while lower appellate courts considered the merits of several ongoing legal challenges thereto.³ In April 2018, the Supreme Court itself heard oral argument on the ban's legality,⁴ and its decision is expected this coming June. Even before the ban went into full effect, however, President Trump's attempts to put one in place, along with his cuts to the refugee program and implementation of various "extreme vetting" measures, had already resulted in a significant decline in Muslims entering the United States.⁵

As a private citizen, as a candidate, and as President, Trump has continued to make an unbroken chain of anti-Muslim statements—many of which amount to a long-term effort aimed at linking Islam and Muslims with terrorism at any available opportunity. These statements form a clear record of the religious animus that has driven the policies Trump has pursued from the Oval Office. Trump has made this animus clear through his rhetoric as a private citizen and presidential candidate, his defense of the Muslim ban and related policies, the manner and form of his use of the phrase "radical Islamic terrorism" and variations thereof, and his promotion of false and incendiary anti-Muslim propaganda from his Twitter account. This issue brief collects many of these statements into a single record that underscores the sustained, demonstrable nature of the President's anti-Muslim sentiments and the alarming degree to which those sentiments have driven his policies.

Campaign Trail and Presidential Statements

Though Donald Trump has been President of the United States for less than two years, he has spent decades in the public eye – first as a real estate mogul, then as a presidential candidate. As such, his words have been part of the public record long before they could dictate policy. In retrospect, they act as a compass, pointing out the direction in which President Trump would seek to steer the country when eventually given the chance. His disdain for Muslims during this pre-Presidential period was clear. During a 2011 interview with *CBN*'s *The Brody File*, for example, Trump recounted a conversation he had with disgraced former *Fox News* figurehead Bill O'Reilly, explaining that "O'Reilly asked me is there a Muslim problem? And I said

absolutely, yes."⁶ Trump justified this response by declaring that "you have to speak the truth;" he then went on to discuss Islam's holy book, opining that "[t]he Koran is very interesting...there's something there that teaches some very negative vibe...there's tremendous hatred out there that I've never seen anything like it."⁷ After launching his bid for the presidency, Trump made such anti-Muslim bigotry a hallmark of his campaign.⁸ Indeed, as Trump made his pitch to the American public, he called for the surveillance and closure of mosques, he creation of a national Muslim registry, and the profiling of Muslim people on the basis of their religion. He has persistently refused to walk back his proposal to enact a ban on Muslims entering the country. He also repeatedly made public comments that were blatantly anti-Muslim in nature. In March 2016, for example, he declared his belief that "Islam hates us," that Muslims harbor "unbelievable hatred," and that it is "very hard" to demarcate the boundary between "radical Islam" and the religion as a whole. ¹³

Once he became President, Trump immediately began putting this prejudice into action. Less than one week after taking office, he issued the first iteration of his Muslim ban, ¹⁴ the most well-known provisions of which sought to ban the entry of travelers from seven overwhelmingly Muslim countries ¹⁵ and suspend the admission of all refugees into the United States. ¹⁶ In the midst of multiple legal challenges, two subsequent versions of the ban have since been enacted. ¹⁷ While the government's lawyers have argued that the bans should be distanced from President Trump's record of anti-Muslim rhetoric, Trump himself has continued, as President, to make clear that each iteration of the ban has been aimed at achieving his original intent: to ban Muslims from entering the United States.

Thus far, federal courts have repeatedly struck down major provisions of each version of President Trump's Muslim ban. ¹⁸ Judges in multiple courts have pointed to the voluminous record of anti-Muslim statements, including explicit calls for a ban on Muslim entry into the country, that were made by Mr. Trump during and prior to his candidacy. ¹⁹ In ruling on the second Muslim ban in *IRAP v. Trump*, for example, the Fourth Circuit Court of Appeals noted that "[t]hese statements are the exact type of 'readily discoverable fact[s]' that we use in determining a government action's primary purpose." ²⁰ Looked at in context, the Court found that President Trump's ban in fact "drips with religious intolerance, animus, and discrimination." ²¹

Some commentators have taken issue with such reasoning, complaining that judges have saddled President Trump with a "forever taint" that will "infect *every* Establishment Clause challenge ever brought against the President concerning Islam [emphasis in original]."²² Others have questioned whether a court's "reliance on candidates' campaign statements poses an unacceptable risk to First Amendment interests."²³ Unsurprisingly, Trump administration lawyers have also admonished the courts to ignore the President's campaign trail comments as the judicial system considers the legality of the Muslim ban.²⁴ But as the Fourth Circuit recently noted in its February 2018 decision finding the third Muslim ban unconstitutional, Mr. Trump's anti-Muslim statements continued well beyond his inauguration as President, and he has never disavowed those claims. As the Court observed, "President Trump could have removed the taint of his prior troubling statements," but "instead...President Trump continued to disparage Muslims and the Islamic faith" throughout his ongoing term in office.²⁵ Indeed, not only has he failed to repudiate his previous comments, but he has also continued time and again to reiterate

the same anti-Muslim talking points that he has been inserting into public political discourse for years. President Trump, for example, did not even make it through the signature ceremony of his first Muslim ban Executive Order – entitled "Protecting the Nation from Foreign Terrorist Entry in the United States" – without reading its title aloud and remarking, "we all know what that means." In the context of President Trump's then-recent inauguration and repeated calls for a Muslim ban, there is no plausible explanation for this comment but for its role as a verbal "wink" to his expectant supporters.

As successive iterations of the ban have been prevented by federal courts from going into full effect, President Trump has repeatedly lamented what he sees as the injection of "political correctness" into his exclusionary policy. Such comments include, for example, calling Muslim ban 2.0 "a watered down version of the first order" and stating his desire to "go all the way" and do "what [he] wanted to do in the first place." The President has continued to make these kinds of statements, declaring, for instance, in September 2017, that "[t]he travel ban into the United States should be far larger, tougher and more specific," but that such a policy "stupidly...would not be politically correct!" In context, President Trump's juxtaposition of a ban that is both "larger" and "more specific" points with little subtlety to the fact that he would like to openly ban adherents of Islam, rather than being forced to craft a policy that targets Muslims through the proxy of their countries of origin.

Much of President Trump's anti-Muslim rhetoric—from his support for a Muslim registry to his justification for the Muslim ban—simultaneously draws on and perpetuates a narrative that falsely presents Islam and Muslims across the board as legitimate national security threats that warrant discriminatory treatment of the sort the President has proposed and enacted. Indeed, many of Trump's comments point to his ongoing desire to reify this narrative and draw connections between Islam, Muslims, and terrorism whenever possible. As a candidate and as President, Trump's inclinations in this regard frequently included his use of and reverence for the term "radical Islamic terrorism." As discussed below, Trump's use of this term and its variants is driven by anti-Muslim animus, and serves as a tool to be used in generating both hostility towards Muslims and support for the President's discriminatory policies.

"Radical Islamic Terrorism"

The phrase "radical Islamic terrorism" has been in use for several decades.²⁹ In recent years, however, its use has generated significant controversy, and it is often deployed as a veiled way of invoking the manifestly false idea³⁰ that Islam and Muslims are particularly prone to violence and terrorism. For example, a number of politicians and public commentators have demanded that leaders use the term and have asserted that the inability of U.S. presidents thus far to defeat terrorism stems in some significant part from their failure to focus on or use the term "radical Islam." For years, Trump has been a prominent supporter of this idea. In the aftermath of the Pulse Nightclub shooting in June 2016, for example, Trump lambasted then-President Obama for not using the phrase as he responded to the tragedy, and suggested that Obama should resign immediately as a result.³² Despite such enthusiasm for its use, however, many experts and analysts consider the phrase to be counterproductive from a national security standpoint.³³ More importantly, many have noted the false synonymy between "Islam" and "terrorism" that use of this phrase may create—a false equivalence that President Trump appears hopeful to reinforce.

As Richard Jackson, terrorism scholar and editor-in-chief of the academic journal *Critical Studies on Terrorism*, has explained, the use of terminology like "Islamic terrorism" is "highly misleading" because it lumps together all practitioners of Islam under the same violent umbrella, serving to "identif[y] Islam and Muslims as a source of terrorism, extremism, and threat."³⁴ As others have noted, while the phrase "does not explicitly say there is an intrinsic link between terrorism and Islam," it does "sugges[t] religion is the core issue...[and] that any adherent can be suspect on grounds that are unclear and open to interpretation."³⁵ In the current political climate, when anti-Muslim rhetoric has become commonplace from politicians and public commentators alike, so too has it become "particularly easy to interpret 'radical Islam' as a summation of Islam in general."³⁶

This was particularly the case during the 2015-16 presidential campaign, for example, during which Donald Trump repeatedly proposed and voiced support for discriminatory and anti-Muslim policies. As he spoke about such measures – many of which would apply to all Muslims - he also invoked the phrase "radical Islamic terrorism." For example, during a June 2016 interview, Trump spoke of "big problems...coming out of radical Islamic – the radical Islamic groups," before going on to advocate for the surveillance of mosques and the profiling of Muslims in the United States.³⁷ In another interview earlier that month, after being asked if he would rescind his call for a Muslim ban, Trump responded that he would not back down because "[w]e have a problem in this country. We have a radical Islamic terrorism problem in this country," and around the world. 38 The use of this language, rather than serving a legitimate security-related purpose, instead seems designed to reinforce the false and prejudicial narrative that Islam as a faith and its adherents as a whole are intrinsically dangerous. Rather than allowing the government to "solve [the] problem" by simply "stat[ing] what the problem is," as President Trump has contended, he and other anti-Muslim figures in the United States have continued to utilize the discourse of "radical Islam" in order to further a politics of fear that they then use to legitimize policies that brazenly discriminate against Muslim individuals on the basis of their religion.

Both as a private citizen and as a presidential candidate, Trump repeatedly resorted to the vocabulary of "radical Islam." Since taking office, he has doubled down on the phrase, using it on more than two dozen separate occasions,³⁹ often pairing it with and using it to advance his trademark anti-Muslim policy initiatives. Indeed, as he signed his first Muslim ban into effect on January 27, 2017, Trump declared that the measures were being enacted in order to "keep radical Islamic terrorists out of the United States...We only want to admit those into our country who will support our country, and love, deeply, our people." One month later, President Trump made similar comments during his Joint Address to Congress, referring to the ban as a "strong" measure that had been taken "to protect our nation from radical Islamic terrorism." He then reiterated that "[t]hose given the high honor of admission to the United States should support this country and love its people and its values." Consistently, President Trump has used the phrase "radical Islam" to justify and explain policy initiatives that target large numbers of Muslims indiscriminately, while simultaneously painting adherents of the Muslim faith as potential terrorists who are unable to adequately love the United States.

Trump has also sought to connect Muslims and Islam with terrorism by promoting hateful, conspiratorial, and abundantly deceitful stories that present the adherents of Islam in the United States and around the world as endangering American lives and threatening Western values. Indeed, he has made use of the phrase "radical Islamic terrorism" to advance such demonstrably false and inflammatory propaganda, a fact that further dispels the notion that Trump uses this terminology out of genuine concern for national security. In other instances, he has—to name a few—seemingly fabricated stories that portray Muslims as celebrating acts of terror, condoned acts of violence against Muslims accused of terrorism, drawn selectively from government reports so as to suggest a correlation between Muslim residents in an area and increased crime rates, and promoted internet-based content purporting to show Muslims engaging in acts of violence. Along the way, the President has used the tremendous power of his office to amplify the voices of fringe ideologues with extensive and disturbing records of anti-Muslim behavior. Such conduct adds yet another layer to the mound of evidence showing that Trump's personal animus toward Muslims and Islam has influenced his words and actions as President.

Promoting Conspiracy Theories and Lifting Up Anti-Muslim Voices

On several occasions before and since taking office, President Trump has promoted false, misleading, and highly provocative anti-Muslim propaganda. In particular, Trump has repeatedly used his Twitter account – which at the time of this writing has over 52 million followers – to spread such misinformation, both through his own statements and by sharing inflammatory content posted by others. In this way, he has provided a platform for and contributed to the spread of anti-Muslim conspiracy theories; he has also provided legitimacy to hate groups and to virulent anti-Muslim attitudes more broadly. President Trump's pattern of peddling such conspiracy theories both predates his time in the Oval Office and has continued since his inauguration.

On November 21, 2015, shortly after formally announcing his presidential candidacy, Trump falsely claimed to have "watched in Jersey City, New Jersey, where thousands and thousands of people were cheering" as the buildings of the World Trade Center collapsed on September 11, 2001.⁴³ Even though this assertion was quickly and widely discredited, ⁴⁴ Trump continued to repeat it. The next day, on November 22, he again stated that people "were cheering on the other side of New Jersey, where you have large Arab populations." On November 23, Trump claimed that he "saw people getting together and, in fairly large numbers, celebrating as the World Trade Center was coming down." After one day's silence on the subject, Trump on November 25 tweeted "Credible Source on 9-11 Muslim Celebrations: FBI" and shared the link to an article in which a retired FBI agent reportedly referred to Mr. Trump's assertions as "plausible." Given the deeply emotional and traumatic nature of 9/11 in the country's collective memory, Trump's promulgation of a false story suggesting American Muslims greeted the attack with glee is profoundly offensive and incendiary. The episode also serves to illustrate his eagerness to share stories that paint Muslims in a negative light and his refusal to recant stories even when they are proven to be false.

A particularly disturbing example came on August 15, 2017, as President Trump made a series of statements on Twitter in response to a terror attack that had recently taken place in

Barcelona. In one of those statements, the President implored the public to "Study what General Pershing of the United States did to terrorists when caught. There was no more Radical Islamic Terror for 35 years!"48 With this tweet, President Trump revived⁴⁹ a long-debunked⁵⁰ myth claiming U.S. Army General John J. Pershing, who served for several years as the military governor of a province in the southern Philippines following the American invasion and occupation of the archipelago around the turn of the 19th century, 51 once subdued a Muslim insurgency in the region by executing scores of prisoners using bullets dipped in pigs' blood. That President Trump saw virtue in a tale describing the extrajudicial execution of dozens of Muslim prisoners followed by the desecration of their bodies illustrates the level of disrespect he has for Islam and its followers. The use of pigs and pork products in attempts to intimidate Muslims across the United States is well-documented,⁵² and the President's celebration of such an expression of anti-Muslim hate is direct evidence of the religious animus he harbors against Muslims. Furthermore, while the particular fable about General Pershing to which Trump referred has been disproven, there is evidence suggesting that Pershing's contemporaries in the U.S. military had indeed "publicly buried [deceased Muslim insurgents] in the same grave with a dead pig"53 on at least one occasion. This disturbing kernel of truth buried within the President's misguided and misinformed statement only adds to the shocking nature of his suggestion that such practices be looked to for guidance in the present day.

President Trump again misled the public and promoted anti-Muslim sentiment on October 20, 2017, when he stated on Twitter, "Just out report: 'United Kingdom crime rises 13% annually amid spread of Radical Islamic terror.' No good, we must keep America safe!"⁵⁴ As news reports observed at the time, "Trump's use of quotation marks suggest[ed] he [was] directly citing a passage from a recently released report."⁵⁵ However, President Trump failed in his tweets to include the source of his statistical data, and the White House remained equally silent on the matter thereafter. Nonetheless, it seems clear that the President was referring to a bulletin released one day earlier by the British Office for National Statistics (BONS),⁵⁶ which estimated that there had been a 13% rise in "police recorded crime" between June 2016 and June 2017.⁵⁷ The bulletin itself is completely devoid of any suggestion that this statistical rise in reported crimes was related to terror attacks committed by Muslims.⁵⁸

In fact, the report's findings do not even break terrorism out as a subcategory of crimes, grouping it instead under the umbrella of "violence against the person." The recorded increase of crimes within this category, according to the report, was driven not by terrorism but by "increases in the subcategories of 'violence without injury'...and 'stalking and harassment." By ignoring these details, President Trump once again blended fact and fiction to encourage anti-Muslim sentiment in the American public. By referencing an estimated double-digit rise in crime in a European country and tying that crime to "[r]adical Islamic terror," President Trump pushed several anti-Muslim buttons at once; in particular, he played on the rabid fears of anti-Muslim commentators that Europe – or "Eurabia," as some have dubbed it – has become a lawless wasteland robbed by Muslim immigrants of its culture and former glory. Such claims about Europe also fuel anti-Muslim bigotry in the United States, and President Trump's misrepresentation of the October BONS report only added fuel to the fire.

More recently, President Trump on November 29, 2017 used his Twitter account to share three separate anti-Muslim propaganda videos originally posted by a leading figure within an

extreme right-wing British organization known as Britain First. 62 The videos claim to depict: a "Muslim migrant" beating up a disabled boy in the Netherlands; an "Islamist mob" pushing a teenage boy off of a roof and "beat[ing] him to death;" and a Muslim man destroying a statue of the Virgin Mary. 63 None of the videos were verified, and one was almost immediately debunked. Tellingly, the source of the videos, Britain First, is a Southern Poverty Law Center-designated anti-Muslim hate group whose notoriety spiked in June 2016 after a British man reportedly inspired by the group's ideology murdered British Member of Parliament Jo Cox. 64

In recent years, Britain First has threatened to take "militant direct action" against elected Muslims, and has regularly used social media platforms like Facebook to stoke anti-Muslim sentiments among the public.⁶⁵ The group has even paid Facebook to promote its anti-Muslim content in users' news feeds. One such sponsored video included a clip of Britain First members "invad[ing] a halal slaughterhouse and accus[ing] the butchers of offering up animals to 'Satan'." Jayda Fransen, Britain First's deputy leader and the original source of the tweets President Trump shared on November 29, also has a long and public history of anti-Muslim activity. In November 2016, for example, Fransen was found guilty of religiously aggravated assault after an incident in a London park earlier that year in which she verbally abused a Muslim woman who was out with her four children. During legal proceedings, Fransen admitted to using a number of insults and slurs while shouting at the woman, including the claim that Muslim men "cannot control their sexual urges" and were "coming into my country raping women across the continent."67 In court, Fransen defended these abusive, anti-Muslim comments by stating that "[t]he reason I said them was because from everything I have studied. I understand them to be true."68 She later slammed the verdict as "a really clear display of Islamic appeasement."69

When President Trump shared the propaganda videos posted by Fransen, he elevated and lent legitimacy to an individual and an organization with a lengthy record of anti-Muslim hate. This was certainly not lost on Fransen, who posted a video that same day in which she addressed President Trump, telling him "how delighted I am that…you took the time to retweet three of my videos on Twitter today." Fransen then praised President Trump for having "shed light on my plight here in Britain," where she said the legal ramifications resulting from her anti-Muslim campaigning were "evidence that Britain has become Sharia compliant."

President Trump, meanwhile, was met with harsh criticism from lawmakers in both the United States and the United Kingdom for having shared these videos, one of which was rapidly discredited. The debunked video purporting to show a disabled boy being assaulted by a "Muslim migrant," for example, was highlighted by the Dutch government, which explained on Twitter that "the perpetrator…was born and raised in the Netherlands. He received and completed his sentence under Dutch law."

President Trump's willingness to promote content of such dubious provenance as a Britain First leader's Twitter page serves to further illustrate his desire to share "evidence" and amplify voices that reinforce his own prejudiced view of Muslims. The consequences of such actions are by no means limited to the rhetorical: a recent study conducted at the University of Warwick in the United Kingdom, for example, found that there may be a correlation between Mr. Trump's anti-Muslim comments on Twitter and spikes in reported hate crimes.⁷² Such

studies offer an important reminder of the ability of the President to influence the thoughts and actions of individuals across the United States and around the world—an ability that President Trump continues to use in a way that increases the uncertainty and danger facing American Muslims in their daily lives.

Conclusion

In his progression from private citizen to presidential candidate and ultimately to being the country's chief executive, President Trump has continued to demonstrate virulent anti-Muslim prejudice. As documented in this issue brief, Trump has regularly made—and continues to make—offensive and disparaging comments about Muslim individuals and the faith to which they adhere. Beyond making such statements, Trump as President has also proposed and enacted policies that target Muslim individuals, families, and communities directly – his Muslim ban being the principal case in point. President Trump has also used the immense power of his office to peddle anti-Muslim myths and propaganda materials that foment hate and distrust. As the Supreme Court prepares to rule on the third iteration of President Trump's Muslim ban at the end of June, the full measure of this record must be taken into account. And while this process should and undoubtedly will continue to include a focus on anti-Muslim statements the President made before taking office, the conversation must also emphasize that this behavior has not in any way been relegated to his past. Indeed, Donald Trump has thus far conducted a thoroughly anti-Muslim presidency, and has expressed that prejudice in explicit statements and in each of his various attempts to enact a "complete and total shutdown" on Muslims coming into the United States.

Endnotes

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¹ Jenna Johnson, "Trump calls for 'total and complete shutdown of Muslims entering the United States," *Washington Post*, Dec. 7, 2015, <a href="https://www.washingtonpost.com/news/post-politics/wp/2015/12/07/donald-trump-calls-for-total-and-complete-shutdown-of-muslims-entering-the-united-states/?utm_term=.2209a6529509.

² President Trump issued the first iteration of the Muslim Ban on January 27, 2017, in the form of Executive Order 13769; he signed the next version in March 6, 2017, in the form of Executive Order 13780. The third and most recent iteration of the Muslim Ban was issued on September 24, 2017, in the form of Presidential Proclamation 9645.

³ In one of these cases, *Iranian Alliances Across Borders v. Trump*, Muslim Advocates represents the plaintiffs. MA won a nationwide preliminary injunction at the district court level; on February 15, 2018, this ruling was upheld by the Fourth Circuit Court of Appeals.

⁴ "Trump v. Hawaii Oral Argument," *C-SPAN*, Apr. 25, 2018, https://www.c-span.org/video/?441663-1/supreme-court-hears-travel-ban-oral-argument. See also Adam Liptak, "Supreme Court Arguments on Trump's Travel Ban: Annotated Excerpts," *New York Times*, Apr. 25, 2018, https://www.nytimes.com/2018/04/25/us/politics/supreme-court-arguments-trumps-travel-ban-annotated-excerpts.html.

⁵ See, e.g., David Bier, "Muslim Ban? Fewer Muslim Refugees, Immigrants, and Travelers Enter U.S. in 2017," *Cato Institute*, Dec. 12, 2017, https://www.cato.org/blog/muslim-ban-fewer-muslim-refugees-immigrants-travelers-enter-us-2017-0. *See also* Nahal Toosi et al., "Foreign visas plunge under Trump," *POLITICO*, Apr. 3, 2018, https://www.politico.com/interactives/2018/trump-travel-ban-visas-decline/; Meredith Hoffman, "Trump Has Slowed Refugee Admissions to a Crawl," *POLITICO*, Feb. 26, 2018), https://www.politico.com/magazine/story/2018/02/26/refugee-resettlement-confusion-executive-orders-217038; Yeganeh Torbati and Mica Rosenberg, "State Dept. seeks tougher visa scrutiny, including social media checks," *Reuters*, May 4, 2017, <a href="https://www.reuters.com/article/us-usa-immigration-visa/state-dept-seeks-tougher-visa-scrutiny-including-social-media-checks-idUSKBN18020A.

⁶ David Brody, "Brody File Exclusive: Donald Trump Says Something in Koran Teaches a 'Very Negative Vibe," *CBN News*, April 12, 2011, http://www1.cbn.com/thebrodyfile/archive/2011/04/12/brody-file-exclusive-donald-trump-says-something-in-koran-teaches.

⁷ Ibid.

⁸ See Brief of Amicus Curiae The Roderick and Solange MacArthur Justice Center in Support of Plaintiffs-Appellees and Affirmance, *Int'l Refugee Assistance Project v. Trump, Iranian Alliances Across Borders v. Trump, Zakzok v. Trump* (consolidated), Nos. 17-2231(L), 17-2232, 17-2233, 17-2240 (Fourth Circuit Court of Appeals filed November 15, 2017).

⁹ On October 21, 2015, Trump stated during an interview on Fox Business that he would "certainly look at" closing mosques in the United States as part of a plan to fight the so-called Islamic State (Sarah Pulliam Bailey, "Donald Trump says he would consider closing down some mosques in the U.S.," Washington Post, Oct. 21, 2015, https://www.washingtonpost.com/news/acts-of-faith/wp/2015/10/21/donald-trump-says-he-would-consider-closingdown-some-mosques-in-the-u-s/?utm_term=.388246c13353). On November 16, 2015, Trump stated that he would consider closing down mosques in the U.S., saying that "it's something that you're going to have to strongly consider because some of the ideas and some of the hatred – the absolute hatred – is coming from these areas" (Jenna Johnson, "Donald Trump would 'strongly consider' closing some mosques in the United States," Washington Post, Nov. 16, 2015, https://www.washingtonpost.com/news/post-politics/wp/2015/11/16/donald-trump-wouldstrongly-consider-closing-some-mosques-in-the-united-states/?utm_term=.7091395131b6); Also on November 16, 2015, Trump stated that "[v]ou're going to have to watch and study the mosques, because a lot of talk is going on at the mosques," before speaking in fond terms of "the old regime [when] we had tremendous surveillance going on in and around the mosques of New York City" (Jesse Byrnes, "Trump: You're going to have to watch and study the mosques," *The Hill*, Nov. 16, 2015, http://thehill.com/policy/national-security/260241-trump-youre-going-to-have- to-watch-and-study-the-mosques); On November 18, 2016, after being asked whether he would actually close down mosques, Trump stated that there was "absolutely no choice' in the matter" (Nick Gass, "Trump: 'Absolutely no choice' but to close mosques," POLITICO, Nov. 18, 2015, https://www.politico.com/story/2015/11/trump-closemosques-216008); On November 21, 2015, Trump stated, "just to set it clear: I want surveillance of these people," and "I want to surveil. I want surveillance of these people that are coming in, the Trojan Horse, I want to know who the hell they are" (Ali Vitali, "Donald Trump: 'I Want Surveillance of These People That Are Coming In," NBC News, Nov. 21, 2015, https://www.nbcnews.com/politics/2016-election/donald-trump-i-want-surveillance-thesepeople-are-coming-n467631); On December 8, 2015, Trump stated that "we have to look at mosques... We have no

choice...Man, there's anger. There's anger. And we have to know about it" ("Trump Calls for Ban on Muslims Entering the U.S.," *CNN Transcripts*, Dec. 8, 2015, http://www.cnn.com/TRANSCRIPTS/1512/08/es.02.html); On June 19, 2016, Trump again called for surveillance of mosques in the U.S., saying that "if you go to France right now,...they are closing down mosques" ("Face the Nation transcripts June 19, 2016: Trump, Lunch, LaPierre, Feinstein," *CBS News*, June 19, 2016, https://www.cbsnews.com/news/face-the-nation-transcripts-june-19-2016-trump-lynch-lapierre-feinstein/).

¹⁰ On November 19, 2015, Trump was asked in an interview is *Yahoo News* if he would consider requiring Muslims to "register in a database" or carry "a special identification that noted their religion," to which Trump responded, "We're going to have to look at a lot of things very closely" (Hunter Walker, "Donald Trump has big plans for 'radical Islamic' terrorists, 2016 and 'that communist' Bernie Sanders," Yahoo News, Nov. 19, 2015, https://www.yahoo.com/news/donald-trump-has-big-plans-1303117537878070.html); On November 2015, after being asked whether he would agree with the creation of a database that would track Muslims in the U.S., Trump responded, "I would certainly implement that. Absolutely" (Vaughn Hillyard, "Donald Trump's Plan for a Muslim Database Draws Comparison to Nazi Germany," NBC News, Nov. 20, 2015, https://www.nbcnews.com/ politics/2016-election/trump-says-he-would-certainly-implement-muslim-database-n466716); On November 21, 2015, Trump stated that he though the "database is okay, and watch list is okay, and surveillance is okay" (Aaron Blake. "Trump says we've known his Muslim ban and database plans 'all along.' But we still don't – not really." Washington Post, Dec. 21, 2016, https://www.washingtonpost.com/news/the-fix/wp/2016/11/17/the-evolution-ofdonald-trump-and-the-muslim-database/); On November 22, 2015, Trump was asked if he was "unequivocally now ruling out a database on all Muslims?" Trump responded, "No, not at all" (Lauren Carroll, "In Context: Donald Trump's comments on a database of American Muslims," Politifact, Nov. 24, 2017, http://www.politifact.com /truth-o-meter/article/2015/nov/24/donald-trumps-comments-database-american-muslims/); On November 23, 2015, Trump stated that "[w]e have to really be vigilant with respect to the Muslim population... we have to create lists; we have the refugees coming in and we have to create lists ("Donald Trump in Ohio: U.S. has become 'soft, weak,"" Dayton Daily News., Nov. 23, 2015, http://www.daytondailynews.com/news/national-govt--politics/donald-trumpohio-has-become-soft-weak/5ZOBQutE4XSjTxV2NjvFnJ/).

¹¹ Emily Stephenson, "Trump says U.S. should mull more racial profiling after Orlando shooting," *Reuters*, June 19, 2016, https://www.reuters.com/article/us-usa-election-trump/trump-says-u-s-should-mull-more-racial-profiling-after-orlando-shooting-idUSKCN0Z50PV; Aaron Blake, "Donald Trump doesn't call his position racial profiling. It is." *Washington Post*, Sept. 20, 2016, https://www.washingtonpost.com/news/the-fix/wp/2016/09/20/donald-trump-doesnt-call-his-position-racial-profiling-it-is/?utm term=.f804de289826.

The solution of the solution of the solution of the sample, host John Dickerson asked Trump if he would be "backing down on those promises [for a Muslim ban]," to which Trump responded, "No, I'm not backing down. We have to do something. We have a problem in this country. We have a radical Islamic terrorism problem in this country." ("Face the Nation transcripts June 5, 2016: Trump," CBS News, June 5, 2016, https://www.cbsnews.com/news/face-the-nation-transcripts-june-5-2016-trump/.) In a July 2016 interview on NBC's Meet the Press, Trump pushed back against reports that he had rolled back his Muslim ban proposal, saying "Our Constitution is great, but it doesn't necessarily give us the right to commit suicide, okay? Now we have a religious — you know, everybody wants to be protected. And that's great...I view it differently. Why are we committing suicide? Why are we doing that?" ("Meet the Press — July 24, 2016," NBC News, July 24, 2016, https://www.nbcnews.com/meet-the-press/meet-press-july-24-2016-n615706). On April 30, 2018—just days after his record of anti-Muslim statements featured prominently as the U.S. Supreme Court heard oral arguments in the Muslim ban case Trump v. Hawaii—President Trump again refused to apologize for his campaign promise, saying that "[t]here's nothing to apologize for. We have to have strong immigration laws to protect our country." (Jeremy Diamond, "Trump says 'there's no reason to apologize' for his Muslim ban call," CNN, Apr. 30, 2018, https://www.cnn.com/2018/04/30/politics/trump-immigration-laws/index.html.

13 Theodore Schleifer, Donald Trump: "I think Islam hates us," CNN, Mar. 10, 2016, https://www.cnn.com/2016/03/09/politics/donald-trump-islam-hates-us/index.html. There are numerous additional examples of such comments. During a September 2015 campaign rally in New Hampshire, for instance, an audience member asked Trump when the United States "can get rid of" Muslims; Trump responded by saying "We're going to be looking at a lot of different things. You know, a lot of people are saying that, and a lot of people are saying that bad things are happening out there. We're going to be looking at that and plenty of other things" (Jenna Johnson, "Trump doesn't correct rally attendee who says Obama is Muslim and 'not even an American," Washington Post, Sept. 17, 2015, https://www.washingtonpost.com/news/post-politics/wp/2015/09/17/trump-doesnt-correct-rally-attendee-who-says-obama-is-muslim-and-not-even-an-american/?utm_term=.b250fa58a704). At another New Hampshire campaign rally in September 2015, Trump referred to Syrian refugees, the majority of whom are Muslim, as a potential Trojan

horse (Jenna Johnson, "Donald Trump: Syrian refugees might be a terrorist army in disguise," Washington Post, Sept. 30, 2015, https://www.washingtonpost.com/news/post-politics/wp/2015/09/30/donald-trump-syrian-refugeesmight-be-a-terrorist-army-in-disguise/?utm term=.7635ef838dc1). During a November 30, 2015 interview on MSNBC, Trump was asked if he thought Islam was inherently peaceful or inherently violent; he responded by saying "Well, all I can say...there's something going on. You know, there's definitely something going on. I don't know that that question can be answered" ("Trump: 'We are not loved by many Muslims." MSNBC, Nov. 30, 2015. video, 8:37). Trump also claimed during this interview that "We are not exactly loved by many Muslims" (Ibid., 1:15). On December 13, 2015, Trump was asked on Fox News why he was calling for a ban on all Muslims entering the United States; Trump responded that "They're sick people. There's sickness going on" (Dan Friedman, "Trump cites 'sickness' in defense of Muslim immigration ban proposal," Washington Examiner, Dec. 13, 2015, http://www.foxnews.com/politics/2015/12/13/trump-cites-sickness-in-defense-muslim-immigration-banproposal.html. During a March 29, 2016 town hall in Wisconsin, Trump was asked if he "trust[s] Muslims in America;" he responded by saying "Many of them I do, and some, I guess, we don't...We have a problem, and we can try and be very politically correct and pretend we don't have a problem, but, Anderson, we have a major, major problem. This is, in a sense, a war" ("Full Rush Transcript: Donald Trump, CNN Milwaukee Republican Presidential Town Hall," CNN Transcripts, Mar. 29, 2016, http://cnnpressroom.blogs.cnn.com/2016/03/29/full-rushtranscript-donald-trump-cnn-milwaukee-republican-presidential-town-hall/).

¹⁴ Executive Order No. 13769, 82 C.F.R. 8977 (2017), available at: https://www.whitehouse.gov/presidential-actions/executive-order-protecting-nation-foreign-terrorist-entry-united-states/.

¹⁵ The first iteration of the Muslim Ban targeted nationals from Iran, Iraq, Libya, Somalia, Sudan, Syria, and Yemen. ¹⁶ "Fact Sheet: Executive Order Restricting Muslim Entry to the United States," *Muslim Advocates* and *Penn State Law Center for Immigrants' Rights Clinic*, Jan. 27, 2017, https://www.muslimadvocates.org/wpcontent/uploads/FINAL-Fact-sheet-Jan-2017-re-EO.pdf.

17 On March 2016, President Trump issued Executive Order 13780, making slight changes to the text of the order and dropping Iraq from the list of countries targeted (Executive Order No. 13780, 82 C.F.R. 13209 (2017), available at: https://www.whitehouse.gov/presidential-actions/executive-order-protecting-nation-foreign-terrorist-entry-united-states-2/). On September 24, 2017, President Trump issued Presidential Proclamation 9654 (Presidential Proclamation 9654, 82 F.R. 45161 (2017), available at: https://www.whitehouse.gov/presidentialactions/pr

¹⁸ Conor Finnegan, "A timeline of Trump's battle with the courts to keep his travel ban alive," *ABC News*, Oct. 19, 2017, http://abcnews.go.com/Politics/timeline-trumps-battle-courts-travel-ban-alive/story?id=50559798.

¹⁹ See, e.g., *Int'l Refugee Assistance Project v. Trump*, 857 F.3d (4th Cir. 2017); Julia Jacobo et al., "Appeals court blocks Trump bid to reinstate immigration order," *ABC News*, Feb. 9, 2017, http://abcnews.go.com/Politics/appeals-court-deliver-ruling-trump-executive-order/story?id=45386342; Joel Rose and Bill Chappell, "Federal Judge in Maryland Blocks Trump's Latest Travel Ban Attempt," *NPR*, Oct. 18, 2017, https://www.npr.org/sections/thetwo-way/2017/10/18/558501163/federal-judge-in-maryland-blocks-trumps-latest-travel-ban-attempt.">https://abcnews.go.com/Politics/appeals-court-deliver-ruling-trump-executive-order/story?id=45386342; Joel Rose and Bill Chappell, "Federal Judge in Maryland Blocks Trump's Latest Travel Ban Attempt," *NPR*, Oct. 18, 2017, https://www.npr.org/sections/thetwo-way/2017/10/18/558501163/federal-judge-in-maryland-blocks-trumps-latest-travel-ban-attempt.">https://www.npr.org/sections/thetwo-way/2017/10/18/558501163/federal-judge-in-maryland-blocks-trumps-latest-travel-ban-attempt.
²⁰ *Int'l Refugee Assistance Project v. Trump*, 857 F.3d 554 (4th Cir. 2017).

²¹ Amy Davidson Sorkin, "Trump's Travel Ban 'Drips With Intolerance' on its Way to the Supreme Court," *The New Yorker*, May 26, 2017, https://www.newyorker.com/news/amy-davidson/trumps-travel-ban-drips-with-intolerance-on-its-way-to-the-supreme-court.

²² Josh Blackman, "The Legality of the 3/6/17 Executive Order, Part III: The Establishment Clause," *Lawfare*, Mar. 15, 2017, https://lawfareblog.com/legality-3617-executive-order-part-iii-establishment-clause.

²³ Brief of the Public Policy Legal Institute and Center for Competitive Politics as Amici Curiae Supporting Petitioners, *Trump, et al. v. Int'l Refugee Assistance Project, et al.*, No. 16-1436 (USSC filed May 2017), at i, available at: http://www.ifs.org/wp-content/uploads/2017/06/Trump-v.-Intl-Regugee-Assistance-Amicus 6.9.17.pdf.
 ²⁴ Adam Liptak, "Appeals Court Will Not Reinstate Trump's Revised Travel Ban," *New York Times*, May 25, 2017, https://www.nytimes.com/2017/05/25/us/politics/trump-travel-ban-blocked.html. See also Joan Biskupic, "In travel ban test, Supreme Court may not hold Trump's words against him," CNN (Apr. 26, 2018), https://www.cnn.com/

2018/04/26/politics/trump-supreme-court-travel-ban-analysis/index.html.
²⁵ Int'l Refugee Assistance Project v. Trump, No. 17-2231, 2018 WL 894413, at *16 (4th Cir. Feb. 15, 2018), as amended (Feb. 28, 2018).

²⁶ "President Trump Signs Travel Ban Executive Order," *C-SPAN*, filmed Jan. 27, 2017 at the Pentagon, Washington, D.C., video, 6:34, https://www.c-span.org/video/?c4653134/president-trump-signs-travel-ban-executive-order.

33 President Trump's National Security Advisor, H.R. McMaster, is one such individual. See, e.g., Chas Danner, "In Break With Trump, National Security Adviser Pans the Use of 'Radical Islamic Terrorism,' *New York*, Feb. 25, 2017, http://nymag.com/daily/intelligencer/2017/02/mcmaster-pans-the-term-radical-islamic-terrorism.html. Similarly, Brookings Institution scholar Will McCants has stated that "[e]very bit of that phrase is analytically unhelpful" (Ishaan Tharoor, "Donald Trump's obsession with the phrase 'radical Islam' won't defeat terrorism," *Washington Post*, June 13, 2016, <a href="https://www.washingtonpost.com/news/worldviews/wp/2015/12/09/the-republican-obsession-with-radical-islam-is-a-smokescreen-for-something-else/?utm_term=.b0d68d7a03ab).

Terrorism scholar Richard Jackson has also argued that "[a]t a more practical level, it can also be argued that the 'Islamic terrorism' discourse is proving to be counter-productive in its effects on the broader counter-terrorism campaign of the war on terrorism...it seems obvious that the discourse assists certain militant groups in promoting their message that there is a fundamental conflict between Islam and the West...More broadly, there seems little doubt that Western counter-terrorism policies, based in large part on the productive categories of the 'Islamic terrorism discourse, are at least partly responsible for intensifying cycles of violence and instability" (Richard Jackson, "Constructing Enemies: 'Islamic Terrorism' in Political and Academic Discourse, *Government and Opposition* 42, no. 3 (2007): 424).

³⁸ "Face the Nation transcripts June 5, 2016: Trump," *CBS News*.

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²⁷ Jeremy Diamond, "Trump rails against court ruling blocking travel ban," *CNN*, Mar. 15, 2017, http://www.cnn.com/2017/03/15/politics/donald-trump-travel-ban-judge-ruling/index.html.

²⁸ Trump, Donald J. Twitter Post. Sept. 15, 2017, 3:54 AM. https://twitter.com/realdonaldtrump/status/908645126146265090?lang=en.

²⁹ Engy Abdelkader, "The Origins, Evolution, and Impact of the term 'Radical Islam," *University of Pennsylvania Law School Global Affairs Blog*, https://www.law.upenn.edu/live/news/6593-the-origins-evolution-and-impact-of-the-term/news/international-blog.php.

³⁰ U.C.-Berekely Professor M. Steven Fish, for example, has found that countries with larger Muslim populations have, on average, a correspondingly lower murder rate relative to non-Muslim countries (M. Steven Fish, *Are Muslims Distinctive: A Look at the Evidence* (New York: Oxford University Press, 2011)).

³¹ In December 2015, for example, Texas Sen. Ted Cruz stated that "[t]he broader solution [to fighting ISIS] is a commander-in-chief willing to speak the truth, willing to name the enemy – radical Islamic terrorism – and willing to do whatever it takes to defeat radical Islamic terrorism" (Jon Greenberg, "War of words: The fight over 'radical Islamic terrorism," Politifact, Dec. 11, 2015, http://www.politifact.com/truth-ometer/article/2015/dec/11/warwords-fight-over-radical-islamic-terrorism/); also in December 2015, Florida Sen. Marco Rubio criticized then-President Obama "for continuing to bring up gun control, while still refusing to say that we're 'at war with radical Islam'" ("The Credibility of Baghdad Bob': Graham, Rubio, Huckabeee, Jeb Tear Apart Obama Address," Fox News, Dec. 7, 2015); in November 2015, Sen. Rubio again criticized those who refuse to use the term "radical Islam," declaring that saying the U.S. is not at war with "radical Islam" is "like saying we weren't at war with Nazis, because we were afraid to offend some Germans who may not have been members of the Nazi Party but weren't violent themselves" (Kyle Balluck, "Rubio: 'We are at war with radical Islam,'" The Hill, Nov. 15, 2015, http://thehill.com/blogs/ballot-box/presidential-races/260201-rubio-we-are-at-war-with-radical-islam). At the Republican National Convention in July 2016, Arkansas Sen. Tom Cotton declared that the U.S. needs "a commander-in-chief who calls the enemy by its name"; Wisconsin Rep. Sean Duffy lamented that "radical jihadists are killing Americans...[and Clinton and Obama] are fretting over whether to call it workplace violence or hate crime"; and Gold Star mother Karen Vaughn asked, "how can you defeat an enemy you cannot even name?" (Zack Beauchamp, "The RNC's 'Make America Safe Again' night turned foreign policy into culture war," Vox, July 19, 2016, https://www.vox.com/2016/7/19/12221296/republican-national-convention-2016-make-america-safe-again). ³² Jaclyn Reiss, "Trump calls for President Obama to resign after Orlando shooting," *Boston Globe*, June 12, 2016, https://www.bostonglobe.com/news/politics/2016/06/12/trump-calls-for-president-obama-resign-amid-orlandoshooting/sa0cTibFFBnRL83LkDwoyH/story.html.

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³⁶ John McWhorter, "The big problem with calling it 'radical Islam," *CNN*, July 11, 2016, https://www.cnn.com/2016/06/14/opinions/dont-call-it-radical-islam-john-mcwhorter/index.html.

³⁷ ("Face the Nation transcripts June 19, 2016: Trump, Lunch, LaPierre, Feinstein," *CBS News*, June 19, 2016, https://www.cbsnews.com/news/face-the-nation-transcripts-june-19-2016-trump-lynch-lapierre-feinstein/

⁴⁰ "Full text of Trump's executive order on 7-nation ban, refugee suspension," *CNN*, Jan. 28, 2017, http://www.cnn.com/2017/01/28/politics/text-of-trump-executive-order-nation-ban-refugees/index.html.

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 ⁴² Ibid.
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- ⁴⁹ This was not the first time Donald Trump invoked this myth about General Pershing. At a campaign rally in Charleston, South Carolina in February 2016, Trump told the crowd about General Pershing, saying that "he caught 50 terrorists who did tremendous damage and killed many people. And he took the 50 terrorists, and he took 50 men and he dipped 50 bullets in pigs' blood...And he had his men load his rifles, and he lined up the 50 people, and they shot 49 of those people...And for 25 years, there wasn't a problem" (Jenna Johnson and Jose A. DelReal, "Trump tells story about killing terrorists with bullets dipped in pigs' blood, though there's no proof of it," *Washington Post*, Feb. 20, 2016, <a href="https://www.washingtonpost.com/news/post-politics/wp/2016/02/20/trumps-story-about-killing-terrorists-with-bullets-dipped-in-pigs-blood-is-likely-not-true/?utm_term=.f54fe66808db.
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³⁹ Muslim Advocates has compiled a list of each time Trump has used the term "radical Islamic terrorism" since becoming President. For more information, contact Muslim Advocates at noban@muslimadvocates.org.

⁶¹ Daniel Horowitz, "America: Give us your ... huddled Islamists yearning for jihad?" Conservative Review, Nov. 2, 2017," https://www.conservativereview.com/articles/america-give-us-your-huddled-islamists-yearning-for-jihad.

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⁶³ Ibid.

⁶⁴ Jim Waterson, "Trump Retweeted Anti-Muslim Videos Posted By Far-Right Group Britain First," Buzzfeed, Nov. 29, 2017, https://www.buzzfeed.com/jimwaterson/donald-trump-retweets-vidoes-posted-by-far-rightgroup?utm term=.imz0mDqvK#.ulr6DMWxj.

⁶⁵ James Ball, "How 550 Facebook Users Spread Britain First Content To Hundreds Of Thousands Of People," Buzzfeed, Jan. 18, 2017, https://www.buzzfeed.com/jamesball/how-550-facebook-users-spread-britain-first-contentto-hundr?utm term=.wqn40wnmo#.vy9YK671z.

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