# IT DIDN'T BEGIN IN HATE: WHY A HATE CRIMES FRAMEWORK CAN'T TAKE US TO ABOLITION

Sherene H. Razack

Submission date: 01 December 2021; Acceptance date: 01 March 2022; Publication date: 16 February 2024.

**Copyright:** © 2024, Sharene H. Razack. This is an open-access article distributed under the terms of the Creative Commons Attribution Licence (CC BY) 4.0 https://creativecommons.org/licenses/by/4.0/, which permits unrestricted use, distribution and reproduction in any medium, provided the original author and source are credited.

Abstract: Hate, naturalized as a universal human emotion, is an increasingly popular analytical container in which to put terrible crimes of violence, crimes that are ineluctably racial. Hate as analytic does not offer a promising path towards understanding the oppressive systems and structures, war-making, race-making and colonial projects that produce and require considerable violence. There is, however, obvious political capital to be gained by employing hate as analytic, capital related to the work hate performs in turning our gaze away from the structural and from historical injustice and towards the psychosocial and even the biological. Through a focus on exceptional perpetrators with unique characteristics, hate as analytic establishes the innocence of the state and of dominant collectivities. Significantly, those contesting colonial dispossession can be deemed hateful, as Palestinians protesting the occupation of Palestine have been considered. Hate as analytic achieves its finest political utility when it provides the rails along which liberal solutions travel. If the hateful few are the problem, then empathy and tolerance are the answer, a "corrective liberalism" that takes us far away from the abolition of unjust systems.

Keywords: hate; liberal reform; Muslims; Palestinians.

### Introduction

Genocide must always be thinkable, Mahmood Mamdani observed when he sought to explain the Rwandan genocide in terms of Rwanda's colonial history, a

Distinguished Professor and Penny Kanner Endowed Chair in Gender Studies, University of California in Los Angeles.

Produced and distributed by Pluto Journals



The Nation, 14 April 2023.

talking back to the journalists who insisted that some primordial human instinct had somehow been responsible for the genocide, some evil lurking in human consciousness (Mamdani 2001). Hate is often described as an emotion forever lurking in human consciousness and ready to morph into genocide. As an analytic, it discourages the thinking that is required to make sense of the high numbers of murdered Indigenous women, police shootings of Black people, and a range of historical atrocities such as the Holocaust, settler colonial massacres and violent dispossession. Importantly, individuals hate while institutions and collectivities do not. It goes without saying that hate does not explain state violence. Whenever hate is offered as the main analytic, race and coloniality seem to disappear and all that remains is a strange vapour that rises and envelops us all, as the ad in *The Nation* suggests, an evil mist that drives men to climb the walls of the Capitol building with murder on their minds.

There is obvious political capital to be gained by employing hate as analytic, capital related to the work hate performs in turning our gaze away from the structural and from historical injustice and towards the psychosocial and even the biological. The men who climbed the walls of the Capitol building can be deemed pathological extremists, for instance, and not men emerging from the histories and colonial present of a formerly slave-owning society. Their violence can become cordoned off and disconnected from "ordinary" Americans and from the everyday rages that are produced in and sustained in a white settler society (Razack 2022). Through a focus on exceptional perpetrators with unique characteristics, hate as analytic establishes the innocence of the state and of dominant collectivities. Significantly, confining the violence to extremists means that those who would

contest the hegemonic story of white settler innocence, insisting for example that we connect those who climbed the walls of the Capitol building to the racial, political and economic operationalities that mobilized them, can themselves be labelled as hateful and discriminatory. Such critics are seen as targeting innocent ordinary white people, as critical race theorists have been accused of doing by Presidential candidate Governor Ron Desantis of Florida and the Republican party; the charge then invites sanctions as evidenced by the banning of critical race theory in the curriculum in Florida and elsewhere. Without the broader racial and historical context, those contesting colonial dispossession can also be deemed hateful, as Palestinians protesting the occupation of Palestine have been considered. Finally, hate as analytic achieves its finest political utility when it provides the rails along which liberal solutions travel. If the hateful few are the problem, then empathy and tolerance are the answer, a "corrective liberalism" in which academics and educators have important roles to play (Rodriguez 2023). We cannot get to the abolition of unjust systems when we travel the route of merely improving them and leaving their foundations untouched. In sum, it is these troubling features of hate as an analytic—the confinement of violence to the exceptional, the obscuring of state violence, the concealment of political and economic gains, the targeting of those who would protest racism and dispossession, and the emphasis on psychosocial liberal solutions—that prompt this article.

# **Hate and Knowledge Production**

Institutes dedicated to the study of hate define hate as an individual human emotion of mysterious provenance. The key question to be studied is "why do we hate each other?" In the burgeoning academic field, Hate Studies, and the institutes that are dedicated to it, hate is something we don't know much about. According to the Center for the Study of Hate at Gonzaga University, a small Catholic university, while hate crimes are often "acknowledged to be some of the most pressing problems confronting the global community," we don't know what causes hate, where it comes from and how and why it develops (Gonzaga University n.d.). Hate Studies, according to another institute, Bard University's Center for the Study of Hate, is defined as "[i]nquiries into the human capacity to define, and then dehumanize or demonize, an 'other,' and the processes which inform and give expression to, or can curtail, control, or combat, that capacity." (Bard Center for the Study of Hate n.d.) In order to study such a broad phenomenon as the human capacity to demonize, something "that's just part of the human condition," institutes for the study of hate propose to study hate where it lives: in the psyche and in the body, and to a lesser extent, in the social body. Researchers at the University of California, Los Angeles's (UCLA) Institute for the Study of Hate examine the hate that some individuals direct

towards homeless people, Asian Americans, LGBTQIA+ people and youth, among others. They study the relationship of hate to dehumanization in neurotypical individuals compared to those with frontotemporal dementia, and they also study the impact of youth exposure to conceptions of hate speech on social media (Wolf 2022). Hate, in this framework, has no origins other than in itself, and as such, any person can be the target of hate and all hate is interchangeable.

When hate is studied as a part of the human condition it need not be interrogated as an outcome of a political system. It is transformed into a private emotion that begins in an individual and remains mysterious even as it wends its way through the collectivity. The Attorney General for the District of Columbia explains hate this way:

Hate generally starts with bias that is left unchecked. Bias is a preference either for or against an individual or group that affects someone's ability to judge fairly. When that bias is left unchecked, it becomes normalized or accepted, and may even escalate into violence. When hate manifests against a person or group of people, it usually derives from ignorance, anger, fear, a sense of injury, or a perceived threat to the status quo. When the word "hate" is used in law, such as "hate crime law," it does not mean rage, anger, or general dislike. In this context, "hate" means bias against people or groups with specific characteristics. (Office of the Attorney General for the District of Columbia n.d.)

A seemingly innocent preference either for or against an individual of a minoritized group can impair judgement and morph, travelling a road that begins in bias and discrimination and that ends in genocide. In this explanation, hate directed at any minoritized group amounts to the same thing and if hate eventually can become something systemic, there are predictable challenges in theorizing the systemic. Principally, how do hateful individuals come to collectively hate and develop systems that carry that hate forward? Here hate studies institutes often point the finger at the internet and social media rather than state structures and social institutions.

### Hate Crime: the Most Hated and the Most Hateful

The category of hate crime is meant to take us closer to stronger punishment for exceptional perpetrators, but this comes at the cost of acknowledging the systemic, structural nature of the violence. Structurally supported hate requires solutions of an abolitionist rather than a carceral kind. While opening the door to a consideration of collective racial harm through a focus on group-based harm, hate as analytic invariably gravitates to a conception of racism that emphasizes the aberrant and the exceptional at the expense of the

structural and the systemic. As Evelyn Alsultany observes, hate crimes are typically seen as *exceptional* events committed by extremists who subscribe to views not shared by the general public (Alsultany 2022: 129). The conundrum is this: a hate crime is most often understood as an act committed by an extremist who is racially motivated but racial motivation is hard to understand if it is not historically contextualized. Importantly, how would it be possible to separate the crimes committed by extremists from those racially motivated crimes where there are no signs of extremism or where extremism is indistinguishable from views that are widely shared by the public and often sanctioned by the state? A telling example here would be police killing of Indigenous, Black and racialized peoples.

In theory, "group-based hate" includes all groups in its ambit but in practice, some groups are already marked as outside the frame and are categorized as more given to hate than are others. The question of who is likely to hate and who is likely to be hated is one that institutes for the study of hate often pre-emptively answer. For example, funded by an anonymous donor, UCLA created its Institute for the Study of Hate, inviting brain scientists, psychologists and sociologists, among others, to apply for funding to study hate. According to UCLA, the institute came about at a moment when there was "heightened student activism on campus regarding the Israeli-Palestinian conflict." (Inside Higher Education 2022) The activism on campus concerned a Palestinian rights organization, National Students for Justice in Palestine, who organized a conference to protest Israeli military violence and to argue for boycott against and divestment in Israel (BDS). The national student organization encountered significant pushback from UCLA administration and from Zionist student groups and others unaffiliated with UCLA (Daily Bruin 2023). In an Op-ed published in the Los Angeles Times, the chancellor of UCLA, Gene Block expressed his concern about what he viewed as the antisemitism of the call for a boycott against and divestment in Israel, which he considered to be a "demonization of the world's only Jewish state." (Block 2018) We may draw the conclusion, then, that at least at UCLA if not elsewhere, the impetus for an Institute for the Study of Hate originated in the belief that Palestinian rights advocates are fundamentally hateful (antisemitic) towards Jewish people simply by virtue of being critical of Israel's policies, policies that seek to control if not erase the Palestinian people. As reported by Sara Weissman of Inside Higher Ed, David Myers, the institute's director and the Sady and Ludwig Kahn Chair in Jewish History explained that he and the chancellor

wanted to address concerns about antisemitism at UCLA among the broader Jewish community by engaging in research on the issue, but they quickly realized

they were interested in a more comprehensive project, a multidisciplinary research effort "to understand more generally the phenomenon of group-based hate." (Inside Higher Education 2022)

In its commitment to "stop the defamation of Jewish people and to secure justice and fair treatment to all," the Anti-Defamation League (ADL) makes the claim that while Jews are 3 per cent of the population of the United States, Jews are the targets of nearly 70 per cent of hate crime. In this reckoning, Jews in the United States are positioned as the most hated group and on this basis the ADL claims moral leadership on all incidents of discrimination and hate crime. The problem, however, is not whether Jews are targets of antisemitic hate, which we know to be the case especially in the rising fascism in the United States. Rather, Palestinians (and often Muslims in general) who protest against the right of Israel to violate Palestinian life and who are pre-emptively categorized as constitutively given to hate Jews, become prime suspects of antisemitic hate. The reasoning is not accidental but is an effect of the ways in which discourses of hate are weaponized to support settler colonial states and institutions and deflect from ideological formations of racism.

A critical outcome of singling out Palestinians and all Muslims as especially hateful in this way is that anti-Muslim hate crimes become illegible. As I discuss elsewhere, the ADL's status on the landscape of hate crime positions the organization over and above other anti-discrimination organizations. When Muslim children were bullied in a San Diego School district, and in the wake of organized protests by White Christian parents and their accusations that Muslims were "terrorists" whose children were not being bullied, the school board, in response to the protests, replaced the Council on American-Islamic Relations, the group who had been assisting the schoolboard to develop an anti-bullying programme, with the ADL (Razack 2022). This development occurred in the context of sustained efforts by the ADL to depict all Muslims, and Palestinians in particular, as antisemitic and to declare any criticism of Israel as antisemitic (see Bail 2015: 55). As Mari Cohen and Alex Kane reported, ADL's CEO, Jonathan Goldblatt compared Palestinian rights groups to right-wing extremists (Cohen and Kane 2023). Goldblatt's position is one long associated with the ADL, as the organization #DropTheADL has documented. They show that

[t]hroughout the ADL's history, it [the ADL] has used the terms "extremist" and "fascist" to describe communists, Black liberationists, white supremacists, guerillas from Central America to Asia, Palestinian popular resistance movements, and US supporters of boycotting Israel—all of whom the ADL has opposed under the banner of championing civil rights. (#DropTheADL 2020)

As the largest non-governmental police trainer assisting police, the ADL's use of hate as analytic can go a long way towards persecution of the very groups who are often the targets of hate.

In her study of Muslim/Middle Eastern background Germans, a group routinely accused of importing new forms of antisemitism, Esra Özyürek examines Holocaust education and antisemitism prevention programmes designed specifically for Muslim-background immigrants and refugees by federal and local governments as well as NGOs. These initiatives ignore that 90 per cent of antisemitic crimes are committed by right-wing Germans (Özyürek 2023: 2, 73). Özyürek notes that Palestinians hold a special place in Muslim antisemitism discourse in Germany, a position that intensified in 2019 when the German government passed a resolution that condemned the Boycott–Divestment–Sanctions campaign (BDS) as antisemitic. She observes that "[o]nce it is discursively established that Muslims are antisemitic—or worse, that they do not atone for their antisemitism—it becomes difficult to recognize their position as victims in relation to European racism." (ibid.: 102) Conversely, once anti-Zionist critique and criticism of Israel becomes discursively established as antisemitic hate speech, Jews, namely Zionist Jews, then become identified as targets of hate. Furthermore, this movement obfuscates the recognition that Israeli Jews can be oppressors in a colonial enterprise. If Zionist groups such as the ADL have been insisting for some time that there is no colonial situation in Israel/Palestine, we understand the ideological importance of the very mention of it is to be deemed antisemitic and consequently a hate crime.

When, in May 2023, law student Fatima Mohammed delivered a valedictorian address to her graduating class in which she criticized Israel for indiscriminately raining "bullets and bombs on worshipers, murdering the old and the young, attacking even funerals and graveyards," (all the events she referred to were widely reported in Israel and abroad) a media storm of condemnation ensued two weeks later. A number of organizations, including the ADL, politicians, and the trustees and chancellor of the City University of New York (CUNY), called her words hate speech (Bartlett 2023; City University of New York 2023). Other organizations, and notably the CUNY School of Law Jewish Law Students Association supported Fatima Mohammed and commented on the Palestine exception to free speech (CUNY School of Law Jewish Law Students Association 2023). The disturbing impact of marking Muslims (Palestinians, Kurds, Syrians, Lebanese and all others connected to Muslim states and populations) as especially hateful and antisemitic is that hate crimes committed by white extremist groups against Muslims and racial/colonial state violence committed against them are authorized. Muslims become marked as "ontologically different," (Shalhoub Kevorkian 2023) a group seen not only as undeserving of civil rights such as the right to free speech

but also as rightfully targeted for violence. The bombs and bullets of which Fatima Mohammed spoke, and the dead and the injured they produce do not feature on this ontological landscape; they are simply necessities in a state besieged by those who are held in the thrall of antisemitic hate. In calls for sanctions against Fatima Mohammed for hate crime, we see the crucial connection between hate as analytic and the legitimacy granted to colonial violence.

## The Liberal Core of Hate as Analytic

On the liberal landscape of civil rights, where there are individuals who hate and discriminate but no system of white supremacy or settler colonialism that evicts the racialized from the category of the human altogether, in North America and Europe, the answer to the problem of hate is diversity. As the book cover of Against Hate, a prototypical example of the genre of books about hate proclaims, the book is "an impassioned call to fight intolerance and defend liberal ideas." (Emcke 2016) Its goal is to defend plurality and democracy, and the author makes the argument that "we can only preserve individual freedom and protect people's rights by cherishing and celebrating diversity." (ibid.) Hate, the argument in this book goes, is the emotion we direct at people who are different from us. As Seyla Benhabib, a philosopher and endorser of Against Hate put it on the book's dust jacket, Against Hate is necessary at a time when "groups have mobilized around hatred of strangers, foreigners, migrants and refugees." If hatred of difference is the problem, then diversity and inclusion is the answer. Explaining that in her native land, Germany, there is now a "new unbridled appetite for hatred," for anyone different (ibid.: xiv) Carolin Emcke, the book's author, affectively brackets the contemporary expression of hatred towards refugees and Muslims, the two examples that preoccupy her, to a few extremists and "fanatics." She also brackets Germany's implication in the Holocaust and announces that the new modern Germany has successfully transcended its own antisemitic past even as new immigrants usher in a new antisemitism. Devoting chapters to the example of hundreds of Germans blocking a bus full of refugees and demanding that they go back to where they care from, Emcke takes care to remind us that there are good Germans too, such as the workers who had prepared a welcome for the refugees on the bus. Emcke reminds us, too, of the hatred demonstrated by fundamentalists of all stripes, noting in particular the hatred of the "Islamic State," a hatred she describes as like the hatred that some Germans have for refugees.

Hate, naturalized as a universal human emotion, does not offer a promising path towards understanding the oppressive systems and structures, war-making, race-making and colonial projects that produce and require considerable violence. Significantly, we do not need to consider how the law itself "hates" and to what

ends it does so. Nazi regimes, settler colonial projects and slave states fade into history and we are left with only good and bad people, the latter held in thrall to hate. What is then leftover from the past is culture and thus the validity of psychosocial approaches to change. In their understanding of the mass psychology of fascism, German philosophers such as Herbert Marcuse, Erik Erikson and Wilhelm Reich understood the collective turn to hatred of Jews that fuelled the Holocaust as a problem of authoritarian fathers (Özyürek 2023: 12). The idea of fascism, understood as bound up with sexual domination and oppression, is easily transferred to Muslim men, who are considered as uber patriarchs given to sexual violence and terrorism and who require re-education if not incarceration, torture, surveillance and discipline (Razack 2022). Özyürek found that the educational programme that brought Muslim youth to Auschwitz in order to enable them to develop empathy for Jewish victims of the Holocaust, was closely linked to the programme "Heroes" that encouraged Muslim male youth to fight the oppression of women carried out in the name of honour. The logic of these interventions was as follows:

[b]y acknowledging their own responsibility in this oppression, leaving behind aspects of what they define as their "honor culture," and rebelling against their fathers in order to set themselves free, they are in effect declaring themselves ready to integrate into German society. (Özyürek 2023: 30)

Cast as having a democracy deficit, young Muslim men could overcome their early socialization, learn to respect women and Jews in one bound, and avoid the authoritarian tendencies of Germans of the Second World War. (Notably, Muslim girls, women and mothers are not of much interest to these initiatives.) It is noteworthy that whereas the left views Muslims as potentially able to accept such assistance into modernity, the right declares them as eternal threat and beyond redemption. Each position rests on the foundational gendered racial discourse of the inferiority of Muslim cultures and the superiority of German culture that has been able to transcend its antisemitic past.

### **Conclusion: Racial Hatred**

Hate as mysterious vapour is an increasingly popular analytical container in which to put terrible crimes of violence, crimes that are ineluctably racial. Yet hate is not so easily uncoupled from racial histories, as when a white nationalist 19-year-old white male shooter killed ten Black people in a supermarket in Buffalo, New York. At his sentencing hearing the killer offered his own connections between race and hate:

I did a terrible thing that day. I shot and killed people because they were Black. Looking back now, I can't believe I actually did it. I believed what I read online and acted out of hate. I know I can't take it back, but I wish I could, and I don't want anyone to be inspired by me and what I did. (Morales et al. 2023)

Here again we might glimpse the scripted foregrounding of learning to hate on the internet and a disavowal of where a hatred of Black people collectively originates as well as what that hatred sustains. The collective hate that white people bear towards Black people in a society founded on white supremacy was not lost on the sisters of Katherine Massey who was killed by the Buffalo shooter. Adrienne Massey suggested to a *New York Times* reporter that the shooter's hatred for the Black people in the grocery store was the hatred that white people feel, a hatred she speculated was driven by a discomfort about their history. As Adrienne Masser put it, "[d]on't nobody give [expletive] that white people came and took us and took over everything and then act like you own everything." (Massey, quoted in Hughes 2023: 30) For Katherine Massey's sisters, hatred is not an abstract concept that begins in bias but an historical condition that has its origins in the slave state. It is this historical perspective that disappears when hate replaces race as analytic.

To conclude, I fear that we stay too long in liberal concepts that do not allow us to incorporate into our analysis settler colonialism, racial terror, and the everyday rages of white settlers. The liberal state reproduces itself through discourses of improvement, forever announcing itself as committed to fixing injustice and to making (minor) adjustments (Razack 2015). Examining the connection between the reparative and the carceral, where liberal reform leads to an expanding carcerality, Carmela Mudocca notes that the hate frame is similar to the reparative frame in that both emphasize a violence that stands outside of liberal civility and liberal reason, a violence that can be overcome. Each frame engages a "reparative juridic" and "seeks a path of corrective justice," a punishing of those who hate and a concealment of the state's own racial power and violence (Murdocca 2023). Reforming a system that thrives on "an acute logic of reform," Dylan Rodriguez reminds us, delays its abolition and feeds the violence that is its lifeblood (Rodriguez 2021: 3). Law just might be the worst place to pursue an anti-racist and anti-colonial analysis in lieu of hate as analytic, and the same might be true of scholarship, but the choice before us is one between complicity with the system and working to abolish it. We cannot utilize concepts such as bias, prejudice or hate without recognizing the ways that they contain the violence to a few aberrant individuals and turn our gaze away from the historical, the structural, the enduring violence that racial capitalism and settler colonialism require, produce and maintain.

### References

- Alsultany, E. (2022) *Broken: The Failed Promise of Muslim Inclusion*. New York, NY: New York University Press.
- Bail, C. (2015) Terrified: How Anti-Muslim Fringe Organizations Become Mainstream. Princeton, NJ: Princeton University Press.
- Bard Center for the Study of Hate (n.d.) Available online at: https://bcsh.bard.edu/hate-studies/ (accessed 11 November 2023).
- Bartlett, T. (2023) "A CUNY Law Graduate Criticized Israel at Commencement. Trustees Called Her Words 'Hate Speech,'" 1 June. Available online at: https://www.chronicle.com/article/a-cuny-law-graduate-criticized-israel-at-commencement-trustees-called-her-words-hate-speech?sra=true&cid=gen sign (accessed 11 November 2023).
- Block, G. D. (2018) "Op-Ed: The controversial Students for Justice in Palestine conference will go on at UCLA. Here's why," Los Angeles Times, 12 Nov. Available online at: https://www.latimes.com/ opinion/op-ed/la-oe-block-ucla-students-for-justice-in-palestine-conference-20181112-story.html (accessed 11 November 2023).
- Cohen, M. and Kane, A. (2023) "ADL Staffers Dissented After CEO compared Palestinian Rights Groups to Right-Wing Extremists, Leaked Audio Reveals," *Jewish Currents*, 8 March. Available online at: https://jewishcurrents.org/adl-staffers-dissented-after-ceo-compared-palestinian-rights-groups-to-right-wing-extremists-leaked-audio-reveals (accessed 11 November 2023).
- Daily Bruin (2023) "National Students for Justice in Palestine conference goes on despite on-campus protest," 12 June. Available online at: https://dailybruin.com/2018/11/18/national-students-forjustice-in-palestine-conference-goes-on-despite-on-campus-protest (accessed 11 November 2023).
- Emcke, C. (2016) Against Hate. Frankfurt, Germany: Gegen den Hass, Fischer Verlag GmbH. English edition (trans. Tony Crawford). Medford, MA: Polity Press.
- City University of New York (2023) "Statement from the Board of Trustees and Chancellor of the City University of New York," 30 May. Available online at:
- https://www1.cuny.edu/mu/forum/2023/05/30/statement-from-the-board-of-trustees-and-chancellor-of-the-city-university-of-new-york/?utm\_source=CUNY&utm\_medium=twitter&utm\_term=cuny&utm\_content=bdadb4e3-c7a1-4751-9762-a58996b406d6&utm\_campaign= (accessed 11 November 2023).
- City University of New York School of Law Jewish Law Students Association (2023) "JLSA Statement in Support of Fatima, 5.21.2023." Available online at: https://docs.google.com/document/d/1YuEmcjfra01kftXhi9Ui4Yb0-8v1uF9MO3asayp7rq0/edit (accessed 11 November 2023).
- Gonzaga University (n.d.) "Research and Education." Available online at: https://www.gonzaga.edu/academics/centers-institutes/institute-for-hate-studies/research-education (accessed 11 November 2023).
- Inside Higher Education (October 25, 2022) "Why Do We Hate Each Other?". Available online at: https://www.insidehighered.com/news/2022/10/26/ucla-launches-new-initiative-study-hate (accessed 11 November 2023).
- Hughes, J. (2023) "A Year After Buffalo: 'There's No Forgiveness for That. Ever," New York Times, 14 May. Available online at: https://www.nytimes.com/2023/05/10/magazine/buffalo-shooting-barbara-massey-mapps.html (accessed 11 November 2023).
- Mamdani, M. (2001) When Victims Become Killers. Princeton, NJ: Princeton University Press.
- Morales, M., Levenson, E., Ly, L. and Elamroussi, A. (2023) "Buffalo grocery store mass shooter apologizes for racist attack and receives sentence of life in prison," CNN, 15 February. Available online at: https://www.cnn.com/2023/02/15/us/buffalo-tops-grocery-shooting-payton-gendron-state-sentencing/index.html (accessed 11 November 2023).

Murdocca, C. (2023) "Hate Crimes Panel Presentation," Annual Meeting of Law and Society, San Juan, Puerto Rico, 2 June.

- Office of the Attorney General for the District of Columbia (n.d.) "What is Hate?" Available online at: https://oag.dc.gov/the-people-v-hate/what-is-hate (accessed 11 November 2023).
- Özyürek, E. (2023) Subcontractors of Guilt: Holocaust Memory and Muslim Belonging in Postwar Germany. Palo Alto, CA: Stanford University Press.
- Razack, S. H. (2015) Dying from Improvement: Inquests and Inquiries into Indigenous Deaths in Custody. Toronto, Canada: University of Toronto Press).
- Razack, S. H. (2022) Nothing Has to Make Sense: Upholding White Supremacy through Anti-Muslim Racism. Minnesota, MN: Minnesota University Press.
- Rodriguez, D. (2021) White Reconstruction. Domestic Warfare and the Logics of Genocide. New York, NY: Fordham University Press.
- Rodriguez, D. (2023) "Hate Crimes Panel Presentation," *Annual Meeting of Law and Society*, San Juan, Puerto Rico, 2 June.
- Shalhoub Kevorkian, N. (2023) "Hate Crimes Panel Presentation," Annual Meeting of Law and Society, San Juan, Puerto Rico, 2 June.
- Wolf, J. (2022) "There's a lot of hate in the world. UCLA Scholars are asking why and what can be done," UCLA Newsroom, 12 October. Available online at: https://newsroom.ucla.edu/releases/ ucla-initiative-to-study-hate (accessed (accessed 11 November 2023).
- #DropTheADL, (2020) "The ADL Is Not An Ally. Why Communities say no to the Anti-Defamation League in our Schools, Coalitions and Movements." Available online at: https://nebula.wsimg. com/6561d1d00ca93a9dae1ecc2741873bca?AccessKeyId=7BB3DAA86ABC0388A877&disposi tion=0&alloworigin=1 (accessed 11 November 2023).