



Shifting Sands: Zionism & American Jewry

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The current willingness of major American Jewish organizations and leaders to dismiss the threat from white supremacists in the name of supporting Israel represents a new stage in the shifting relationship of U.S. Jews toward Zionism. In the first stage, during the late nineteenth and early twentieth centuries, the majority of U.S. Jews did not take to Zionism, as its goals seemed antithetical to their aspirations to join mainstream American society. In a second stage, attitudes toward Zionism grew more positive as conditions for European Jews worsened, and Jewish settlement in Palestine grew substantially. Following Israeli statehood in 1948, U.S. Jews began gradually to support Israel. Jewish groups and leaders increasingly characterized criticism of Zionism as inherently anti-Semitic and attacked Israel's critics. In a third and most recent stage, many major Jewish organizations and leaders have subordinated the traditional U.S. Jewish interest in combatting white supremacy and bigotry when it comes into conflict with support for Israel and Zionism.

IN NOVEMBER 2017, the Judiciary Committee of the United States House of Representatives held a hearing to consider the Anti-Semitism Awareness Act, a bill that would categorize speech that is critical of Israel as anti-Semitic under Title VI of the 1964 Civil Rights Act, which addresses institutions that receive federal funding, such as universities. Gathered in support of the Anti-Semitism Awareness Act were leaders of major Jewish organizations and a Christian Zionist group, who argued that mounting criticisms of Israel by pro-Palestinian student groups were creating an unsafe atmosphere for Jewish college students. Opposed to it stood professors of Jewish studies and free speech advocates, who testified that backers of the bill were mischaracterizing the extent of anti-Semitism on college campuses and expressed fears that the legislation would suppress constitutionally protected speech and academic debate.¹ Although the issue of the rising physical threats to Jews from white supremacists was mentioned in the hearing, it was largely sidelined by the bill's supporters, who focused instead on the alleged danger posed by supporters of Palestinian rights.

This current willingness of major Jewish organizations in the United States—such as the Anti-Defamation League (ADL), the American Israel Public Affairs Committee (AIPAC), the American Jewish Committee (AJC), and the Simon Wiesenthal Center—and leaders to overlook or dismiss white supremacy in the name of supporting Israel represents a new stage in the shifting relationship

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of U.S. Jews toward Zionism. In the first stage, that of the late nineteenth and early twentieth centuries, the vast majority of Jews in the United States initially either ignored Zionism or reacted to it disparagingly, as its goals seemed antithetical to their aspirations to join mainstream American society. In the second stage, attitudes toward Zionism grew more positive after World War I, as conditions for Jews worsened in Europe, and Jewish settlement in Palestine grew substantially. Following Israeli statehood in 1948, U.S. Jews first gradually and then wholeheartedly began to show their support for Israel. Over time, most Jewish groups and leaders began to characterize criticism of Zionism as intrinsically anti-Semitic, and successfully shored up U.S. support for Israel. In the third and most recent stage, we see a near inversion of the first, as many major Jewish organizations and leaders have subordinated the traditional American Jewish interest in combatting white supremacy and bigotry when it comes into conflict with demonstrating support for Israel and Zionism.

First Stage: Zionism and American Jewry at Odds

In its formative period, Zionism was very much at odds with the aspirations of American Jewry. Zionism had begun at the end of the nineteenth century in Europe as part of an extensive and variegated shift toward nationalism among Jews who were responding to rising anti-Jewish violence across the continent. Its delayed emergence—in comparison to most other nationalist movements in Europe—was in part on account of Jews' wide dispersion across Europe, which resulted in the lack of any one territory that Jews identified as their "homeland" and any one common language that they shared. Although Jewish nationalism embodied many different ideological stances that were often in sharp conflict with one another, Zionists of all stripes were united in their rejection of Jews' assimilation into the national identities of the larger societies in which they lived, and favored a renewed assertion of Jewish self-determination. As anti-Semitism grew in western Europe, increasing numbers of Jews began to embrace the Zionist vision put forward by Theodor Herzl, who advocated for establishing a Jewish state at the first Zionist Congress in 1897. Following Herzl's death in 1904, the Zionist Congress movement that he founded united to pursue the goal of establishing a Jewish homeland in Ottoman-held Palestine.

In the United States, Jews came to Zionism later still. There, anti-Semitism was considerably weaker than in Europe during those same decades, which diminished Zionism's original *raison d'être*. The first significant wave of Jewish migrants to the United States arrived from German-speaking regions of Europe in the middle decades of the nineteenth century. The preexisting legal, economic, and social divisions that separated whites from people of color provided opportunities for these Jews to find their place in the United States' then-majority-white society. They quickly established themselves within the U.S. "mainstream," in part by taking deliberate steps to stress their allegiance to the country and by rejecting any forms of Jewish difference other than religious ones. A prominent example is the 1885 proclamation by rabbinical leaders affiliated with the Reform movement, which consciously rejected Jewish nationalism as antithetical to a Judaism that corresponded to the values of the modern world. The fifth point (of eight) states:

We recognize, in the modern era of universal culture of heart and intellect, the approaching of the realization of Israel's great Messianic hope for the establishment of the kingdom of truth, justice,

and peace among all men. We consider ourselves no longer a nation, but a religious community, and therefore expect neither a return to Palestine, nor a sacrificial worship under the sons of Aaron, nor the restoration of any of the laws concerning the Jewish state.²

For the next half century, what became known as the Pittsburgh Platform remained a core principle of Reform Judaism and of many major Jewish organizations and leaders who believed, in the words of Rabbi Kaufmann Kohler, that the United States and Judaism together “spell[ed] the triumph of the world’s two greatest principles and ideals, . . . the highest moral and spiritual and the highest political and social aim of humanity.”³ Their faith in the United States led most Jewish leaders to reject the Zionist movement as contrary to U.S. values of tolerance and pluralism. Rather, U.S. Jews focused much of their political energy on defending their place within the United States and safeguarding equal rights for all. This impulse is exemplified in the 1913 founding of the ADL, which was established amid the anti-Semitic trial (and subsequent extrajudicial lynching) of Leo Frank in Georgia. In its founding charter, the ADL proclaimed its primary goal as follows: “The immediate object of the League is to stop, by appeals to reason and conscience, and if necessary, by appeals to law, the defamation of the Jewish people. Its ultimate purpose is to secure justice and fair treatment to all citizens alike and to put an end forever to unjust and unfair discrimination against and ridicule of any sect or body of citizens.”⁴

Zionism became a stronger force among Jews in Europe following the 1917 declaration by Lord Balfour in which Britain signaled its support for a Jewish national homeland in Palestine. In the decade after World War I, 120,000 European Jews migrated to Palestine—joining a Jewish population of 60,000—after it came under British control as a League of Nations mandate. This had the further effect of sharpening the goals of the Zionist movement in favor of achieving an independent Jewish homeland. The Bolshevik seizure of power in Russia and the post-war realignment of Europe drew more Jews to the Zionist cause. The movement grew in stature to such an extent that the Zionist Congress leadership (which was by then based primarily in London) sought to position itself as *the* representative of Jewish interests worldwide. Many major American Jewish leaders resisted these assertions, and sharp tensions at times rose between some American Jewish leaders and their counterparts in Europe.

However, the immigration of approximately two million Jews who had come to the United States since the 1880s changed the Jewish ideological landscape in the country considerably. Arriving from eastern Europe, and in much greater numbers than had German Jews a generation before, these newcomers tended to be slower to assimilate into white America. Like other migrants from southern and eastern Europe, they retained their ethnic and linguistic differences longer, settled in cities, and filled the ranks of the working classes. Many also brought with them political ideologies of socialism, communism, anarchism, and also Jewish nationalism. They tended to be closer to Jewish traditions and were less quick to focus their efforts on establishing themselves within the American social framework. These two factors—the expanding Jewish quasi-state Palestine and a larger, more assertive American Jewish community—laid the groundwork for a reevaluation of the Zionist cause.

Second Stage: Zionism and U.S. Judaism United

After Hitler's ascension to power in Germany in 1933, the Zionist movement grew stronger still. An additional 250,000 Jews settled in Palestine over the next six years on account of the worsening situation for Jews across Europe and tightening border restrictions in the United States and other countries of possible refuge. In the United States, a new generation of Jewish activists rose to the fore in response to the crisis facing German Jewry. Many new groups, most prominently the pro-Zionist American Jewish Congress, agitated for a more assertive U.S. stance against Nazi Germany and held street protests and public rallies, in part to force President Franklin Roosevelt's hand. This put them in opposition to more established Jewish organizations, such as the staid AJC, which favored a less visible approach to lobbying out of concern for losing the limited access they had to the Roosevelt administration. By the later 1930s, support for Zionism, at least as a solution for endangered European Jews, had grown to such an extent that many of its former opponents now accepted its premises regarding the unity of Jewish peoplehood and the necessity for a Jewish homeland in Palestine. A 1937 gathering of Reform rabbis in Columbus, Ohio repudiated the 1885 Pittsburgh Platform and agreed to a new set of principles, which included a significantly different fifth point (of nine):

In all lands where our people live, they assume and seek to share loyally the full duties and responsibilities of citizenship and to create seats of Jewish knowledge and religion. In the rehabilitation of Palestine, the land hallowed by memories and hopes, we behold the promise of renewed life for many of our brethren. We affirm the obligation of all Jewry to aid in its upbuilding as a Jewish homeland by endeavoring to make it not only a haven of refuge for the oppressed but also a center of Jewish culture and spiritual life.

Throughout the ages it has been Israel's mission to witness to the Divine in the face of every form of paganism and materialism. We regard it as our historic task to cooperate with all men in the establishment of the kingdom of God, of universal brotherhood, Justice, truth and peace on earth. This is our Messianic goal.⁵

This repudiation, known as the Columbus Platform, marked a major step in the consolidation of U.S. Judaism with the goals of Zionism. Another important moment occurred in the middle of World War II. In May 1942, an "extraordinary" meeting of world Zionist leaders gathered in New York's Biltmore Hotel, and in a repudiation of the 1939 British White Paper, which proposed new limits on Jewish immigration to Palestine; they called for the immediate establishment of a Jewish commonwealth in Palestine. The Biltmore Program's near-singular focus on the immediate task of founding a Jewish state in Palestine was widely hailed by Jewish organizations and leaders in the United States as a necessary act to protect European Jewish lives. It was rejected by some Jewish leaders, such as Henrietta Szold, the founder of the women's Zionist group Hadassah, and the Reform Jewish leader Judah Leon Magnes, who favored a binational solution for peaceful coexistence. In a sign of its continued ambivalence toward Zionism, the AJC severed its relationship with an ad hoc umbrella group of major Jewish organizations known as the American Jewish Conference after the Conference proclaimed its allegiance to the Biltmore Program, criticizing "the subordination of other Jewish issues to the problem of the political structure of Palestine."⁶

Following Israel's founding in 1948, U.S. Jews slowly but steadily grew to identify and align with Israel; and if they were not committed Zionists, they increasingly gave their financial and moral support to the nascent state. Many Jews who once opposed political Zionism, such as Magnes, switched their positions in favor of Israel—in spite of its ethnic cleansing of Palestinian Arabs. For the next two decades, U.S. Jews viewed Israel sympathetically, if not enthusiastically. Most accepted it, at minimum, as a form of compensation to European Jews for the Holocaust, but not necessarily as relevant to their own lives. The persistent (if still mild, in comparison to Europe) anti-Semitism in the United States acted as a reminder of Jewish difference, and Israel existed for many as a potential safe haven should anti-Semitism emerge as a much more powerful force. By contrast, many Jewish organizations began to aggressively consolidate Jewish American opinion in favor of Zionism. Among the first to feel their wrath was the American Council for Judaism, an organization formed by Reform rabbis in the wake of the Biltmore Program with the goal of reasserting the spirit of the 1885 principles that had disavowed Jewish nationalism. After 1948, the Council effectively saw itself blacklisted from most major Jewish organizational gatherings and its leaders regularly marginalized within Jewish communities. By the late 1950s, the ADL began attacking universities hosting Arab speakers and Arab student groups critical of Israel, arguing that they were advancing Soviet propaganda and were incompatible with U.S. interests.⁷

The importance of Israel to U.S. Jews grew substantially in the 1960s as a younger generation began to reevaluate its relationship to Judaism. Domestic events—such as the civil rights movement and growing opposition to the war in Vietnam—and international ones—including the trial of the Nazi leader Adolf Eichmann, Israel's victory in the June 1967 war, and the crisis of Soviet Jewish refuseniks in the early 1970s—helped give rise to a reinvigorated Jewish American identity. However, most U.S. Jews had distanced themselves too far from traditional Jewish customs, practices, and languages to “return” to a religious Judaism. In its place, identifying with Israel and commemorating Jews who were murdered in the Nazi Holocaust became central to renewed identities. For most Jews, the two went hand in hand: it was necessary to support and defend Israel *because* of the Holocaust, which was proof of the persistent threat of anti-Semitism. Over the next several decades, support for Israel became a central pillar of American Jewish communal identity, fundraising, and political activism. Although relatively few U.S. Jews immigrated to Israel, national, regional, and local organizations shored up financial and political support for Israel from both the American Jewish community and the government. Most Jewish groups, even the once-critical AJC, became ardently pro-Zionist, leaving those Jewish organizations opposing Zionism and Israel increasingly marginalized.

Central to the consolidation of American Jewry's stance on Zionism has been its ability to smear critics of Israel with the accusation of anti-Semitism. As the logic goes, since Israel is essential for Jewish survival after the Holocaust, any criticisms of Israel—be they of its policies against Palestinians or of its establishment as a Jewish national state—are an attack on the right of Jewish self-determination, and therefore a form of anti-Semitism. Once Zionism became a cornerstone of American Jewish identity, criticisms of it became an attack on Judaism itself.

This strategy of instrumentalizing anti-Semitism as a means of countering criticism of Israel first appeared in the United States during the civil rights movement in the 1960s. In spite of a disproportionately high level of Jewish participation in civil rights activism during the early part

of that decade (as many as two-thirds of white participants in the 1964 Freedom Summer project were Jews), a minority of Jewish intellectuals and leaders (mostly on the Right) were questioning whether this alliance was “good for the Jews,” since (they argued) Jewish Americans’ interests more rationally aligned with those of other middle-class whites. By the later 1960s, as many civil rights leaders and groups began to espouse the more particularistic ideology of Black Power and argue for group remedies to bring equality to African Americans, increasing numbers of Jews distanced themselves from civil rights work. To justify their shifting stance, many Jewish leaders argued that civil rights groups were infused with anti-Semites, and they began to equate civil rights work with being anti-Semitic. When some civil rights leaders started linking the oppression of blacks in the United States to that of other peoples, including Palestinians living in the territories occupied by Israel in the June 1967 war, it only seemed to confirm this equation. Jewish support for civil rights work waned (leading groups such as the ADL to oppose racial quotas and group remedies under Affirmative Action legislation in the 1970s and 1980s), and most Jewish political activity narrowed to what was perceived as being strictly in Jewish communal interests.⁸

In more recent decades, the accusation of anti-Semitism has proven to be a highly effective means to silence and punish critics of Israel. In particular, it has been levied against academics and civil rights activists calling attention to the plight of Palestinians. Setting aside First Amendment protections on political speech and standards of academic freedom, and in spite of the fact that a consistent majority of U.S. Jews have been critical of Israel’s occupation of territories seized in 1967, major Jewish organizations in the United States regularly seek to squelch critical discussions of Israel. The scholars Norman Finkelstein and Stephen Salaita saw their academic careers ended on account of pressure by pro-Israel organizations and leaders who characterized their work as anti-Semitic. Other notable targets of intense criticism since 2000 include, among many others, Barnard College’s Nadia Abu El-Haj, San Francisco State University’s Rabab Abdulhadi,⁹ and Columbia University’s Joseph Massad. The political scientists John J. Mearsheimer (University of Chicago) and Stephen Walt (Harvard) faced a barrage of criticism for their study uncovering the role of the “Israel Lobby” in shaping the United States’ Middle East policy. Also since 2000, a number of “watch lists,” such as the early S.H.I.T. (Self-Hating and/or Israel-Threatening) List, the more recent Campus Watch of the Middle East Forum, and the ongoing Canary Mission website, track scholars whose work or activity on behalf of Palestinian human rights they deem to be anti-Semitic. Condemnations of Israel from within the Jewish community—in recent years by groups such as Jewish Voice for Peace, J Street, Open Hillel, and IfNotNow—are scorned as expressions of either self-hatred or disloyalty.

Third Stage: Zionism Trumping Jewish American Interests

As Israel has become increasingly isolated on the world stage and Prime Minister Benjamin Netanyahu has gone to unprecedented lengths to ensure a permanent Jewish majority in Israel, Jewish organizations in the United States have likewise taken unprecedented steps to ensure continuing U.S. support for Israel. This has resulted in the emergence of a third stage in the relationship of American Jewry to Zionism, one in which many major Jewish organizations and leaders have subordinated the historic interests of U.S. Jews to the defense of Israel.

After the launch of the Boycott, Divestment and Sanctions (BDS) movement in 2004, the campaign for Palestinian human rights gained substantial support among the U.S. peace community, including many Jewish activist organizations that had long resisted equating Zionism with Judaism and anti-Zionism with anti-Semitism. Many scholarly organizations, labor unions, and religious organizations around the world have voiced support for BDS, and numerous artists, intellectuals, and political figures have endorsed the movement. Although BDS supports non-violent tactics and, at its core, calls for Israel to be compelled to adhere to international law, Israeli leaders, Zionist organizations, and their supporters have decried it as the most substantial existential threat to the Jewish State and a profound example of anti-Semitism.

Since Israel's supporters in the United States fear they are losing the battle over public opinion on a fair playing field of public debate, they have altered their tactics and are now trying to stop any debate from occurring at all. Rather than limit themselves to besmirching BDS as another form of anti-Semitism, groups such as the ADL, AIPAC, and the AJC have embarked on a widespread campaign to enact legislation at the state and federal levels that would punish its supporters. As of January 2019, twenty-six of the fifty-two states had passed laws that either condemned the BDS movement or compelled states to "boycott" or "divest" from organizations and businesses that supported BDS. Several times, Congress has tried to pass the so-called Anti-Semitism Awareness Act, which would sanction schools if their students engaged in speech critical of Israel. These legislative initiatives have been denounced by civil rights organizations as violations of free speech protections under the U.S. Constitution, which gives strong protections to political boycotts. When newly elected congressional representatives Rashida Tlaib (D-MI) and Ilhan Omar (D-MN) questioned whether backers of these bills were truly working on behalf of U.S. interests, they too were attacked in the press as anti-Semites.

The decision by most major Jewish organizations to pay near-singular attention to combatting criticism of Israel has led them to be increasingly dismissive of threats to Jews and other minority groups from white supremacists, which have risen sharply since the 2016 U.S. presidential election. As the *Washington Post* reported on 25 November 2018, "violence by white supremacists and other far-right attackers has been on the rise since Barack Obama's presidency—and has surged since President Trump took office."¹⁰ Following the election of Donald Trump, who was elected to office as part of a global rise in right-wing populism and ethno-nationalism, U.S. Jews have been continually alarmed by the president's willingness to engage in classic expressions of anti-Semitism. In his first year in office, Trump downplayed Jewish suffering in the Holocaust, refused to address attacks on Jewish cemeteries, and—following the August 2017 racial violence in Charlottesville, Virginia, in which one protester was murdered and Jewish worshippers in the city's historic Beth Israel synagogue were menaced by white supremacists—placed equal blame on the racists who marched and those who stood to oppose them. Although one of the president's closest advisers is his Orthodox Jewish son-in-law, Jared Kushner, and his own daughter has converted to Judaism, his initial chief strategist was Steve Bannon—a figure widely considered to have close ties to anti-Semitic groups in the United States. In response, the president has received only mild rebukes from major Jewish groups on account of his strong backing of Israel, which he has demonstrated by ending U.S. financial support for United Nations aid programs for Palestinian refugees, and by moving the U.S. embassy to Jerusalem in violation of international norms and prior government policy.

This acquiescence by major Jewish organizations in the United States to the demands of an extreme right-wing Israeli government reached what might be its most egregious expression in the days and weeks following the October 2018 massacre at the Tree of Life synagogue in Pittsburgh, Pennsylvania in which eleven congregants were murdered and seven were wounded. They had been targeted by a gunman who objected to the synagogue's work on behalf of the refugee aid group HIAS, which has been supporting Central American migrants fleeing persecution and hoping to find sanctuary in the United States. After the shooting, Jews and their allies were in a state of shock and many suggested that Trump bore a measure of responsibility because of his persistent attacks on immigrants and his public criticisms of the philanthropist and Democratic Party supporter George Soros, who is Jewish and has provided substantial resources for refugee assistance. The massacre concluded a brutal week that began with the murder of two African American shoppers at a grocery store in Kentucky by a white supremacist who tried unsuccessfully to break into a black church. When he was thwarted, he went to hunt down African Americans wherever he could find them. A few days later, prominent Democratic Party leaders and activists—including Soros—received pipe bombs at their homes and offices. Nevertheless, at vigils across the country, in press releases, and in speeches, the focus of most major Jewish organizations and many spiritual leaders was not on attacking white supremacist violence and those in government who enable it, but instead on decrying the BDS movement and its supporters. At the same time, countless elected officials across the country released statements denouncing the shooting and demonstrating their solidarity with U.S. Jews by pointing to their support of Israel and anti-BDS legislation. Two weeks after the shooting, both the prime minister and foreign minister of Israel restated their uncritical support of Trump, in spite of the fact that the president continued to make blatantly anti-Semitic comments about George Soros even *after* the Tree of Life shootings. Within weeks of the shooting, discussions of rising white supremacist activity among many leading Jewish organizations largely faded away and were replaced by attacks on leaders of the Women's March movement for their ties to Nation of Islam leader Louis Farrakhan and for their support of Palestinian human rights.

In this third and most insidious stage of the long relationship between Zionism and American Judaism, we have reached a moment when the tangible threats to Jewish safety that stem from white supremacists and their enablers in government are being dismissed or even excused in order to shore up Zionism and the State of Israel.

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About the Authors

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ENDNOTES

- 1 Among those testifying in opposition to the legislation was Barry Trachtenberg, coauthor of the present article.
- 2 Conference of Reform Rabbis, "The Pittsburgh Platform (1885)," in *The Jew in the Modern World: A Documentary History*, ed. Paul Mendes-Flohr and Jehuda Reinharz, 3rd ed. (Oxford: Oxford University Press, 2011), pp. 521–22.
- 3 Kaufmann Kohler, "The Concordance of Judaism and Americanism (1911)," in *The Jew in the Modern World*, pp. 525–26.
- 4 As quoted in Paul Finkelman, ed., *Encyclopedia of American Civil Liberties* (New York: Routledge, 2006), p. 69.
- 5 Conference of Reform Rabbis, "The Columbus Platform (1937)," in *The Jew in the Modern World*, pp. 575–76.
- 6 "American Jewish Committee Leaves American Jewish Conference; Zionist Members Resign," Jewish Telegraphic Agency, 26 October 1943, <https://www.jta.org/1943/10/26/archive/american-jewish-committee-leaves-american-jewish-conference-zionist-members-resign>.
- 7 See Geoffrey P. Levin, "Arab Students, American Jewish Insecurities, and the End of Pro-Arab Politics in Mainstream America, 1952–1973," *Arab Studies Journal* 25, No. 1 (Spring 2017): pp. 30–58.
- 8 The authors thank Eric Morgenson of the University at Albany, SUNY for sharing his ongoing dissertation research on this topic.
- 9 The attacks on Prof. Abdulhadi are ongoing and have been particularly vicious. As the target of a multiyear assault against her academic freedom by the Zionist Lawfare Project, Abdulhadi and San Francisco State University have been subjected to an ongoing legal attempt to silence her criticism of Israel. See Rabab Abdulhadi, "How and Why the Israel Lobby Is Suppressing Free Speech and Academic Freedom on College Campuses," *Washington Report on Middle East Affairs* 37, no. 3 (May 2018): pp. 29–36, <https://www.wrmea.org/018-may/how-and-why-the-israel-lobby-is-suppressing-free-speech-and-academic-freedom-on-college-campuses.html>. Assisting in her defense have been several scholars in Jewish studies, who filed an amicus curiae brief objecting to Lawfare's definition of anti-Semitism that is based in part upon a flawed definition adopted by the U.S. State Department. The State Department's definition, the scholars have argued, is overly expansive as it characterizes criticism of the State of Israel and its supporters as anti-Semitic. See "Prominent Jewish Studies Scholars Ask Court to Dismiss Case against SFSU and Prof. Abdulhadi," *Palestine Legal*, 7 June 2018, <https://palestinelegal.org/news/2018/6/7/jewish-scholars-court-dismiss>. For the full text of the amicus curiae brief, see: "Jewish Studies Scholars' Motion for Leave to File Amicus Curiae Brief: *Mandel v. Board of Trustees*; United States District Court, Northern District of California, Case No. 3:17-cv-03511-WHO," *Jewish Studies Scholars*, 18 May 2018, <http://tinyurl.com/y6wscb53>.
- 10 Wesley Lowery, Kimberly Kindy, and Andrew Ba Tran, "In the United States, Right-Wing Violence Is on the Rise," *Washington Post*, 25 November 2018, https://www.washingtonpost.com/national/in-the-united-states-right-wing-violence-is-on-the-rise/2018/11/25/61f7f24a-deb4-11e8-85df-7a6b4d25cfbb_story.html?noredirect=on&utm_term=.976d32d4126c.