
Countering Jihadi Radicals and Foreign Fighters in the United States and France:**Très Similaire****By: Dorle Hellmuth¹****Abstract:**

This article analyzes and compares French and U.S. domestic responses to Jihadi radicalization, placing particular attention on the similarities between the two. In view of the political and cultural differences between the United States and France, the parallels between U.S. and French approaches to homegrown Jihadi radicalization are remarkable. Both countries got off to a late start when formulating counterradicalization strategies. While the underlying reasons (related to, *inter alia*, the notion of American exceptionalism and the French version of secularism) for this differ, the U.S. introduced its first counterradicalization strategy in 2011, followed by France in 2014. More important, so-called “soft” measures (including phone hotlines, dialogues and workshops, vocational training, targeted interventions, or counseling and exit programs), adopted by most Western democracies in an effort to prevent vulnerable individuals from radicalizing and reintegrate foreign fighters and others who have become infected with the Jihadi virus, have taken a back seat to “hard” security measures (including surveillance, arrests, and prosecutions) in the two countries. These findings have important implications for policymakers. Understanding what responses have been formulated, and also why, can facilitate international cooperation and provide useful insights on the characteristics, strengths, as well as limits of U.S. and French approaches to Jihadi radicals and foreign fighters.

¹ Dorle Hellmuth is an assistant professor of politics at the Catholic University of America and serves as the academic director of the politics department’s parliamentary internship programs in Europe. She is also a research fellow at the German Institute on Radicalization and De-radicalization Studies (GIRDS)

American Exceptionalism & French Laïcité

The U.S. Perspective

The 2004 and 2005 terrorist attacks in Madrid and London were remarkably different from the 9/11 attacks in the sense that they were carried out by immigrants that had spent significant time in Spain, or, in the British case, by British citizens who were born and raised in the United Kingdom. Similarly, Mohammed Bouyeri, responsible for killing the prominent Dutch filmmaker Theo van Gogh in 2004, was born and raised in Amsterdam. In response, various European countries launched national counterradicalization plans, which combined hard security methods (surveillance, repression, prosecution, and administrative orders) with softer measures designed to prevent individuals from becoming radicalized and participating in violent actions, or rehabilitate and reintegrate them.¹

The response was different in the United States where government officials, like then-Secretary of Homeland Security, Michael Chertoff, sounded the alarm about the “possibility of Europe becoming a platform for a threat against the United States.”² According to this narrative, the more disenfranchised, discriminated, and marginalized Muslims of Europe were more likely to resort to terrorism, whereas the well-integrated, educated, and economically successful U.S. Muslims were unlikely to attack their homeland – as they were mainly occupied with their quest for the American dream, true to the manifestation of the melting pot and American exceptionalism. The notion of American exceptionalism, a term coined by Alexis de Tocqueville in the 19th century, speaks to the unique history, location, make-up, and liberal democratic values of the United States that set it apart from (and above) other countries in the world. Consequently, there was a general assumption that any terrorist threat came from outside the U.S. and that U.S. Muslims were immune to radical ideologies. A 2008 Senate report summarized that Jihadi radicalization

“has been less likely to occur in the United States than in other countries. Some attribute this to the unique cultural influence of the “American experience” and the general absence of a sympathetic audience in the United States. For the most part, America’s diverse Muslim communities are well integrated into our society and want to raise their families in safe and peaceful communities. And unlike some countries in Europe ..., the “longstanding tradition of absorbing varied diaspora populations has protected the United States and retarded the radicalization process at home.”³

The melting pot tale had real policy implications: It served as a central justification for stricter border security initiatives that became an integral element of a counterterrorism strategy focused on externalizing the terrorist threat and which include the sealing of U.S. borders and accumulation of data on foreign travelers. It also meant that U.S. authorities did not consider homegrown Jihadi terrorism a real threat until 2009. As Bergen and Hoffmann noted, “The American “melting pot” has not provided a firewall against the radicalization and recruitment of American citizens and residents, though it has arguably lulled us into a sense of complacency that homegrown terrorism couldn’t happen in the United States.” They further admonished that, “By stubbornly wrapping itself in this same false security blanket, the U.S. lost five years to learn from the British experience.”⁴

In 2011, the White House put forth its first Counterradicalization Strategy.⁵ This policy shift was due to a considerable spike in Jihadi terrorist plots and attacks in 2009 and 2010. Then-Deputy National Security Advisor, Denis McDonough, echoed Bergen and Hoffman’s critique when explaining that, “For a long time, many in the U.S. thought that our unique melting pot meant we were immune from this threat (Muslim radicalization)—this despite the history of violent extremists of all kinds in the United States. That was false hope, and false comfort. This threat is real, and it is serious.”⁶ More specifically, 2009 saw a record of eleven Jihadi-inspired attacks, plots, and overseas training missions, including the

Fort Hood, Texas, and Little Rock, Arkansas, shootings and a New York City subway bombing plot.⁷ The New America Foundation counted a total of forty-three terrorism-related arrests and indictments of U.S. citizens and residents.⁸

Similar to government officials and scholars in Europe, U.S. policymakers and academics found that radicals could not be profiled - that there is no one pathway to radicalization and that even well-educated, integrated, and wealthy U.S. citizens and residents could become radicalized. According to Bergen and Hoffman, “The only common denominator appears to be a newfound hatred for their native or adopted country, a degree of dangerous malleability, and a religious fervor justifying or legitimizing violence that impels these very impressionable and perhaps easily influenced individuals toward potentially lethal acts of violence.”⁹

The French Perspective

Like the United States, France also was off to a late start when addressing Jihadi radicalization. In fact, until 2014, the French did not consider radicalization a topic that ought to be dealt with or one that needed to be tackled by means of special intervention initiatives, assistance plans, or rehabilitation programs. The French approach was unique among European countries and can be attributed to 1) the French interpretation of secularism, *laïcité*, as well as 2) their unique counterterrorism arsenal.

For one thing, counterradicalization models drawn up by many other European countries undermine a key pillar and founding principle of the French republic: *laïcité*, France’s version of secularism, does not permit religion in the public domain. In other words, “For French counterterrorism officials, setting up formal partnerships with imams and community religious institutions is out of the question, just as it is difficult to imagine local police-mosque or police-Muslim association collaborations.”¹⁰ French authorities also

do not differentiate between ethnic or religious communities, as there can be only one 'French' community.¹¹

Second, French officials were able to rely on their preventive and tough counterterrorism regime which is particularly well equipped to quickly arrest and prosecute individuals for terrorism-related crimes.¹² From a French perspective, terrorism-related actions constituted a violation of law that was to be treated by means of repressive and judicial responses, and not be viewed as the "culmination of" a "radicalization process."¹³ True to this security-oriented approach, aspiring foreign fighters, their recruiters, and those returning from foreign battlefields have been placed under surveillance, arrests, or else been subject to interrogations, deportations, and jail time.¹⁴ Focusing on the security aspect of terrorism, so Marret also argues, allowed French authorities to sidestep debates about "the social-political conditions under which terrorism or political violence can take place."¹⁵ By doing so, however, France has maneuvered itself into a classic "Catch-22 situation."¹⁶ Even though terrorism conviction rates are high, and re-conviction rates considerable with almost 60% of all prisoners returning to jail within five years of their release,¹⁷ prison sentences only average seven years.¹⁸ That means there is a considerable number of Jihadi prisoners at all times, many of whom may be engaged in proselytizing and radicalizing others behind bars.

New Counterradicalization Strategies

The U.S. Approach

A Strategy for Countering Violent Extremism

Formulated in 2011, the White House counterradicalization strategy offers a three-pronged framework for the protection of the United States, and was supplemented by a Strategic Implementation Plan (SIP) a few months later.¹⁹ Titled, "Empowering Local

Partners to Prevent Violent Extremism in the United States,” the strategy emphasizes that government authorities can only counter and prevent radicalization in tandem with and by empowering Muslim American communities, who know their children, families, and neighbors best.²⁰ The focus is on engaging these communities at the grassroots level so they build resilience against violent extremism. Second, the strategy calls on the need to build government and law enforcement expertise on radicalization. Third, it talks about the need to counter radical propaganda, especially online and on social networking sites, by promoting U.S. ideals like pluralism and religious freedom. Among the federal government, the Department of Homeland Security (DHS), Department of Justice (DOJ), and Federal Bureau of Investigation (FBI) have been most involved in Muslim community engagement.

Based on the 2010 recommendations of the Homeland Security Advisory Council,²¹ and very much in line with the 2011 strategy, DHS Countering Violent Extremism (CVE) objectives have focused on a) supporting local communities, b) supporting local law enforcement, and c) understanding violent extremism. While DHS is careful to note that the department focuses on all forms of radical extremism, “regardless of ideology,”²² DHS engages American Arab, Muslim, South Asian, Middle Eastern, and Sikh communities in a number of ways. Under the umbrella of the Building Communities of Trust (BCOT)²³ initiative, and working at times together with the FBI, DHS has been setting up of new communication networks and regular community roundtables, to help educate community members about government policies and civil rights, while also taking note of community concerns and grievances. DHS community outreach is led by the Office for Civil Rights and Civil Liberties (CRCL). CRCL is also in charge of the Incident Communication Coordination Team (ICCT), a conference call mechanism for community leaders and federal officials in case of emergencies.²⁴ Together with the National Counterterrorism Center and local law enforcement and community leaders, DHS regularly stages

Community Resilience Exercises (CREX) that focus on violent extremist and foreign fighter scenarios.²⁵ Ongoing exchanges with vulnerable communities may also include discussion about foreign fighters, or how to support people in conflict zones without committing crimes.²⁶ As part of a second objective, DHS supports local law enforcement through training, workshops, curriculum development about CVE, community policing and public awareness campaigns, such as the Nationwide Suspicious Report Initiative. DHS is also working with state and urban area intelligence Fusion Centers; created as “analytic hubs,” they are designed to bring together local police, frontline personnel, and federal DHS and FBI detailees to analyze and share threat information.²⁷ Finally, DHS has been researching and compiling information about the radicalization process, community policing, as well as disseminating this expertise across all levels of government.²⁸ In early 2015, the White House further announced the appointment of a senior level, full-time CVE Coordinator at DHS.²⁹ CVE Coordinators have existed since 2010, but thus far served in dual-hatted, part-time positions. In June 2015, the Homeland Security Committee in the House of Representatives went a step further and introduced a bill to create an Office for Countering Violent Extremism inside DHS; however, the bill has little chance of passing.³⁰

The Department of Justice has emphasized the role of the United States Attorneys, as “the nation’s principal litigators under the direction of the Attorney General,”³¹ in federal engagement efforts; interestingly, the SIP also assigns them a lead part as U.S. Attorneys are “well-placed to help shape and drive community engagement in the field.”³² Federal prosecutors have been meeting with Muslim, Sikh, and Arab communities regarding specific local situations and issues.³³ Because issues oftentimes involve civil rights and backlash-discrimination (defined as bias crimes against members of above mentioned minority groups), the department’s Civil Rights Division is in charge of bimonthly meetings that also include other federal agencies.³⁴ DOJ’s Community Relations Service has sent out

conflict resolution specialists in response to more than fifty backlash incidents. Between 2012 and 2014, according to then-Attorney General, Eric Holder, “U.S. Attorneys have held or attended more than 1,700 engagement-related events” in their respective jurisdictions.³⁵ Events may include “annual dinners, mosque openings, lectures and town hall meetings (and) conferences to promote cultural understanding between law enforcement and Arab, Muslim, and Sikh-Americans.”³⁶

In addition, the FBI has created community outreach programs for each field office, most of which also feature permanent Councils with community leaders, Community Relations Training Programs (CREST), and Adopt a School /Junior Special Agent programs,³⁷ where FBI agents partner with schools in often “tough” neighborhoods to teach them about becoming law abiding citizens.³⁸ The goal is to build trust and permanent communication channels. This is of particular interest because the FBI is arguably the agency with the largest presence in local communities, with fifty-six field offices and 104 Joint Terrorism Task Forces across the United States. FBI agents also join U.S. attorneys to “explain the legal implications of joining foreign conflicts.”³⁹ In addition, the FBI has set up a Specialized Community Outreach Team (SCOT) of language and culture experts who approach specific Muslim, South Asian, and Sikh communities for outreach, for example, cities with large numbers of al-Shabaab recruits.⁴⁰

Local police, especially those in cities and states with large Muslim concentrations (for example, New York City, NY, Dearborn, MI, Los Angeles, CA, Paterson, NJ, and Philadelphia, PA), also have specialized engagement units. Among the over 17,000 law enforcement agencies in the U.S. involved in counterterrorism,⁴¹ New York’s Police Department Intelligence Unit is considered particularly experienced in outreach, radicalization detection, and community policing, as is the County Sheriff Department’s Muslim Community Affairs Unit in Los Angeles.

In 2014, Eric Holder announced that the Department of Justice would partner with the White House, the Department of Homeland Security, and the National Counterterrorism Center to start a new set of CVE pilot programs across the United States.⁴² This initiative is of particular note because it represents an outreach effort involving the main federal actors in addition to various non-security community representatives at the local level, including “local government, law enforcement, mayor’s offices, the private sector, local service providers, academia, and many others.”⁴³ Boston, Los Angeles, and Minneapolis/St Paul were selected due to their prior experience with community engagement and radicalization. The three city pilot produced three distinct frameworks that were introduced in February 2015.⁴⁴ While it is unclear to which extent these frameworks will be implemented, Minnesota received a first federal grant in September; it will be administered and distributed by a local non-profit organization, and will be used, for example, to support mentoring and career services programs for young Somali Muslims.⁴⁵

The White House counterradicalization strategy has been criticized, *inter alia*, because the selection of Muslim partners - a critical element of the engagement pillar - remains flawed. Critics maintain that Muslim partners often are not representative of Muslim communities but leaders of organizations with a nation-wide presence; they are frequently self-appointed and have own agendas.⁴⁶ Others have warned of “significant challenges in the development of programs that foster substantive relationships rather than token discussions of community relations events.”⁴⁷ Yet others question whether either document resembles much of a strategy.⁴⁸ Most important, critics argue that local and federal efforts lack coordination. While the SIP references a loose DOJ- and DHS-led National Task Force that was created to help coordinate efforts at the national level, the Task Force includes *any and all* departments and agencies engaged in community

outreach.⁴⁹ However, there is no lead agency responsible for overseeing the strategy objectives and numerous SIP initiatives, to compare and share best practices, or track funding and the effectiveness of measures.⁵⁰ There is also no plan to “reduce redundancies and turf wars among various agencies, and provide accountability.”⁵¹ Apart from bureaucratic rivalries between the FBI and DHS and other federal actors, there are cultural differences between federal and local law enforcement agencies. In addition to coordination dilemmas and accountability vacuums, intergovernmental information sharing traditionally has been cumbersome. Some caution that there should not be one agency in charge, because “no organization within the U.S. government has all of the tools necessary to effectively counter radicalization.”⁵² There seems to be a lot of agreement over the need for a whole-of-nation approach at the grassroots level; the question remains whether there is a need for more centralized oversight and steering.

To be sure, the U.S. approach as represented in the strategy is decentralized and hands off, and does not go as far as the national plans many European countries have formulated, including France. The strategy is unclear about how the government will counter extremist ideas and narratives.⁵³ The SIP merely comments on the “nascent” efforts, which in 2010 focused on National Counterterrorism Center Community Awareness Briefings (CAB) about Jihadi recruitment methods and future research plans involving best counter-narrative practices and collaborations.⁵⁴

Research and community engagement (designed to empower local actors to help themselves guard against radicals) have represented the main bulk of U.S. soft measures, with a few recent exceptions. There is no national effort to deradicalize those with radical views and violent tendencies at the grassroots level or prevent radicalization from happening in the first place.⁵⁵ A Congressional Research Service (CRS) Report notes that, “there appears to be little federally driven guidance to community groups on how to

intervene with people vulnerable to radicalization.”⁵⁶ The report further comments that “the SIP itself does not offer any formal means for federal, state, or local enforcement to cope with radicalizing individuals outside their traditional areas of expertise - investigation, arrest, and prosecution,” and also does not provide any guidelines for handing them over to community intervention, so that police end up confronting radicalized individuals only once they turn to violence.⁵⁷ Similarly, the White House emphasized community-led intervention at the 2015 CRE summit, but defined it as an effort designed to disrupt “the radicalization process before an individual engages in *criminal activity*.”⁵⁸ (emphasis added)

According to the White House strategy, the United States also “must use a wide range of good governance programs - including those that promote immigrant integration and civic engagement, protect civil rights, and provide social services,” to prevent radicalization. “This necessitates a whole-of-government approach, based on the expertise of our traditional national security departments and agencies, as well as other parts of the government, including those with experience in addressing community safety issues.” The SIP adds that “agencies such as EDU (Department of Education) and HHS (Department of Health and Human Services), which have substantial expertise in engaging communities and delivering services, also play a role.”⁵⁹ This “whole-of-government” objective does not yet translate into a holistic approach in practice, however, as members of the law enforcement and/or judicial community remain the central actors involved in community outreach. A CRS report further draws attention to the fact that SIP efforts designed to improve radicalization expertise are security-centric, cautioning that “if the SIP’s efforts to improve law enforcement training mostly enhance the ability of police to detain suspects and provide no other means for coping with radicalization, then these elements of the strategy might be better described as counterterrorism in nature, not part of the nation’s counter-radicalization strategy.”⁶⁰ As much as there is a focus on community engagement

and trust-building, the key actors, the FBI, DHS, and local police, arguably represent security interests and are primarily concerned with collecting information to prevent acts of terrorism.⁶¹ It goes without saying that there is an inherent tension between community outreach and traditional law enforcement activities.⁶²

Deradicalization programs have played a prominent role in many Western states, such as Great Britain, the Netherlands, Denmark, or Germany. Targeted interventions, phone hotlines, vocational training and education, counseling and exit programs are considered vital instruments in reintegrating and rehabilitating individuals. They have also gained prominence in non-Western countries, including Saudi Arabia, Egypt, Pakistan, or Algeria, where “state-directed efforts to change “hearts and minds” have led convicted and suspected terrorists to express remorse, repent, recant their violent ideologies and re-enter mainstream politics, religion and society. Efforts include religious (re-)education by respected clerics, psychological counseling, community and family involvement, vocational training, and engagement...”⁶³ For the first time, the 2014 European Union 10-point action plan for countering radicalization and violent extremism recommended “dis-engagement and de-radicalisation support programmes ... (“exit strategies”)” for every EU country.⁶⁴ The British Channel program, implemented as part of the CONTEST strategy Prevent strand (preventing terrorism by addressing the factors that produce radicalization) first introduced in 2003 and subsequently revised in 2009, is among the most prominent. The local multi-agency program relies on community leaders and organizations, public authorities, and law enforcement to identify vulnerable individuals who are moving toward violence. It is coordinated by the police and stages local interventions which may involve religious leaders, family members and police, followed by long-term mentoring of youth workers.⁶⁵ Considered most ambitious in terms of its inclusiveness, the Danish city of Aarhus has created a program which rehabilitates returning foreign fighters by providing

employment and education opportunities, free psychological counseling and treatment for injuries.⁶⁶ In Germany, phone hotlines and family counseling centers are available at the state and federal levels. Various countries, including Norway, Sweden, and Germany, have introduced formal exit programs, which concentrate “on practical and economic assistance in connection with exit, on psychological counselling, as well as assistance with forming new social ties outside the extremist group.”⁶⁷ In comparison to non-Western programs in South Asia and the Middle East, European programs focus less on religious re-education and/or ideology.

In this context, a discussion of the varying definitions and understandings of radicalization appears in order. Is radicalization about words or actions, or the combination of both,⁶⁸ do the two always go together, are radical ideas and ideologies seen as a precursor for carrying out terrorist attacks? In 2011, Coolsaet referred to radicalization as “ill-defined, complex and controversial.”⁶⁹ Sedgwick called the concept of radicalization a “source of confusion,”⁷⁰ due to the many definitions that exist and its context specificity, as the concept may be used in the security, integration and foreign policy realm, all of which come with different agendas.

The 2008 European Commission Expert Group also took note of violent radicalization as a “context-bound phenomenon par excellence;”⁷¹ not all radicals engage in violent actions, some may simply condone violence.⁷² The few that do turn to violence belong to an “enabling environment” that shares a sense of injustice, in addition to personal experiences and ties that will trigger radicalization. The “gradual or phased process” of violent radicalization can be individual or involve a group setting.⁷³ In the context of group-level radicalization in Europe, Daalgard-Nielsen has drawn attention to social movement theory and network theory in an effort to explain political mobilization within groups and social networks leading to violent radicalization.⁷⁴ By contrast, psychodynamic, cognitive,

and identity forming approaches focus on attitudes, thoughts and character traits of individual radicalization.⁷⁵ Regarding individual-level motivations, various empirical case studies have produced highly detailed and nuanced accounts of radicalization processes.⁷⁶ Finally, sociological explanations focus on structural factors such as political, economic, and social grievances, as well as globalization leading to lost and confused identities that “struggle with modernity and life in Western democracies.”⁷⁷

While there is no doubt that radicalization is difficult to define, remains in the eye of the beholder, and is subject to different societal interpretations, values, and norms,⁷⁸ policymakers and scholars usually agree that it involves a process over time. Neumann summarized that “radicalization can be defined as the process whereby people become extremists.”⁷⁹ Ranstorp emphasizes the need to understand violent radicalization as a process and in context.⁸⁰ According to McCauley and Moskalkenko, radicalization is the “development of beliefs, feelings, and actions in support of any group or cause in conflict.”⁸¹ Daalgard-Nielsen defines it as a “process in which radical ideas are accompanied by the development of a willingness to directly support or engage in violent acts.”⁸² Bjelopera describes radicalization as “the process of acquiring and holding radical or extremist beliefs.”⁸³ The White House Counterradicalization Strategy refers to those individuals who become “radicalized to support or commit acts of ideologically-inspired violence.”⁸⁴ The French Parliamentary Commission Report on Deradicaliation defined radicalization as “the process of becoming more fundamental ... when ideology and violent actions are coupled.”⁸⁵ Prominent models designed to capture the evolutionary process include Moghadam’s staircase,⁸⁶ the NYPD’s four phases,⁸⁷ McCauley and Moskalkenko’s pyramid and pathways to violence,⁸⁸ or the various conveyor belt processes introduced by Glees and Pope⁸⁹ and Baran.⁹⁰

When comparing radicalization leading to violent as opposed to nonviolent behavior, Bartlett and Miller argue that the process is really about the adaptation of radical belief systems - however, not all radical thoughts will translate into radical actions.⁹¹ Horgan reminds us that there will always be “far more radicals than terrorists,” but not all violent extremists hold strong, extreme beliefs.⁹² Reinares et al. agree that “only a small number of radicals become terrorist extremists.”⁹³ Borum argues that “Most radicals did not (and do not) engage in terrorism, and many terrorists did not (and do not) “radicalize” in any traditional sense.”⁹⁴ The question of how people are radicalizing is just as important, therefore, as the question of why they are radicalizing. “Although it is agreed that not all radicals are terrorists,” Sedwick notes that the dynamic between radicalism and violence is also unclear. Specifically, can and should radicalism that does not lead to violence, or only indirectly, be considered a threat?⁹⁵ This question is very much related to the aforementioned relationship between radical ideas/ideologies and behaviors, and comes with important policy implications for France and the United States (discussed below). To provide another example, in various European countries it is connected to the question of whether political Salafists should be considered partners or closely watched. While German authorities have refused to work with political Salafists, arguing that they provide an ideological breeding ground for violent Jihadist radicalization, the British government until 2011 considered them important partners with “street credibility” in preventing violent radicalization.⁹⁶

The process of “disengagement” from terrorism, to add yet another ill-defined concept to this discussion, takes this distinction into account as well, if only indirectly. While deradicalization seeks to address and dispose of radical thoughts *and/or* violent behavior, and counterradicalization is looking to prevent radical ideas *and/or* violent actions from emerging in the first place, disengagement focuses on ceasing violent behavior -

without changing radical thoughts. Gunaratna et al. see disengagement as a necessary condition for ideological deradicalization. Horgan, by contrast, distinguishes between psychological and physical disengagement, while questioning its connection to and the validity of deradicalization altogether.⁹⁷ Omar Ashour refers to ideological, behavioral and organizational levels of deradicalization, which can be occur altogether or in different combinations.⁹⁸ The aforementioned European exit programs use behavioral disengagement as “key indicators of success.”⁹⁹

Summing up, the relationship between radical ideology and violent behavior is, at best, far from clear, highly complex, and also context- specific. Calling the relationship between ideology and behavior “untidy,” Snow’s discussion of ideology and the role it plays in the emergence of social movements and collective action frames is indicative of this as well.¹⁰⁰ Snow challenges the assumption that social movement activities are structured and fueled by ideology alone or even predominantly. According to Snow, ideologies are neither cohesive nor integrated sets of values or belief systems (but often represent contradictory or conflicting strands); the ideological diversity among participants is often underestimated (they come from all different backgrounds and motivations); corresponding ideologies and behaviors are overestimated (he refers to the discrepancy between ideological beliefs and real life practice); and collective action frames are not merely derived from ideologies (ideology may not play a role or work in tandem with other, e.g. cultural factors).¹⁰¹ Horgan goes further than most by arguing for a “clearer focus on behavior” rather than ideological change.¹⁰² Similarly, Borum postulates that “Adherence to radical beliefs is not irrelevant to countering terrorism... but fanatically embracing an ideology is neither a proxy for, nor a necessary precursor to, terrorism. Conflating the two concepts undermines our ability to effectively counter either of them.”¹⁰³ It would appear that it remains important to study both, in tandem and separately. While a causal relationship between radical views and

violent behavior has not been proven it does exist in a number of cases. At the same time, non-ideological pathways to violent radicalization warrant examination and attention.

When discussing soft measures aimed at deradicalization, a few recent U.S. efforts are of note. In January 2015, a Minnesota judge decided to send Abdullahi Yusuf, a teenager who attempted to join ISIS, to a halfway house during his sentencing phase. Yusuf could only leave the house to meet with attorneys, federal authorities, or religious scholars. He was supervised by a nonprofit civic engagement organization, Heartland democracy, and regularly met with a history teacher and mentor, who encouraged him to read and discuss handpicked articles, poems, and books on identity and values.¹⁰⁴ The test case was closely watched in other parts of the nation but appears to have gone awry, as Yusuf was sent back to prison due to security concerns. In the United States, a country considered more violent than many other Western nations,¹⁰⁵ judges and prosecutors are often elected on promises of tough justice and law and order measures; detention and long jail times are considered crucial for keeping law abiding citizen safe as well as deterring would-be criminals. Apart from security risks and litigation concerns, soft measures often include an ideological component that is also considered controversial in a country where the government, let alone law enforcement, does not interfere with religious matters and the first amendment (freedom of speech) remains untouchable. Be that as it may, local and federal authorities in the U.S. seem to have started looking for alternatives to long prison sentences,¹⁰⁶ as “the status quo for either doing nothing with radicalized individuals or locking them away for 25 years is untenable.”¹⁰⁷ In July 2015, the FBI’s Denver field office worked with religious leaders and the parents of Shannon Conley to prevent the teenager from joining ISIS.¹⁰⁸ These targeted interventions are still considered very much improvised, but may represent the beginning of a more mainstream trend. Interestingly, the Boston, Los Angeles and Twin City frameworks also talk about the need for intervention

programs.¹⁰⁹ However, “failure associated with ... (the Minnesota trial run),” so John Horgan cautions, “will inevitably be used to discourage future efforts.”¹¹⁰

Hard Security Measures

Tough measures against violent extremists in the United States include surveillance, repression, and prosecution, designed to put individuals behind bars as quickly as possible. This is facilitated by a law enforcement and domestic intelligence arsenal that was strengthened after 9/11, most notably the Patriot Act and Foreign Intelligence Surveillance Acts (FISA) reforms.¹¹¹ Some of the more prominent Patriot Act tools included and/or lowered the hurdles for so-called administrative subpoenas (without court approval) for the collection of “transactional data,” “sneak and peak” search warrants for businesses and homes with delayed notice, “roving wiretaps” (that apply to all communication devices of terror suspects), and access to tangible items (including documents, books, records, and papers) “in connection with” terrorist investigations. The legal requirements for FISA-authorized wiretap and search warrants were significantly lowered to facilitate domestic surveillance operations – the 4th amendment prohibits spying on Americans and requires either a criminal probable cause hurdle or else proof of a foreign intelligence/national security threat. Last but not least, the Patriot Act was designed to break down the “wall” between law enforcement and intelligence operations and information sharing. Since 2011, various NSA surveillance programs, at times bypassing warrant application procedures that involve the FISA court, have targeted domestic and international phone and internet communications of people inside the United States. Even though the U.S. does not have a domestic intelligence service, the FBI has been looking to change its ways to a more forward thinking, intelligence-oriented agency. It formed the National Security Branch and adopted the “preventive paradigm” starting in 2005, in an effort to improve evidence collection to

help uncover the next plot rather than close the next criminal case.¹¹² A range of charges have been used against individuals suspected of becoming foreign fighters, including the “Conspiracies within the United States to engage in violence against people or property overseas (18 U.S.C. § 956); Acts of terrorism and violence, including use of “destructive devices”, overseas (e.g. 18 U.S.C. § 2332a, 2332b, 2332f); ... (and) Receiving military-type training from a foreign terrorist organization (18 U.S.C. § 2339B).”¹¹³ In addition to these, the material support clause has arguably been most prominent and useful in prosecuting terrorist suspects. “Providing material support to commit or prepare for a range of specified violent and terrorist crimes,” (18 USC § 2339 A) as well as providing material support to a foreign terrorist organization are prohibited and punishable by law (18 USC § 2339 B).¹¹⁴ Material support or resources may refer to any property or service, illustrating a wide range of possible legal interpretations. According to former Attorney General Holder, the material support act “bars not only contributions of personnel, cash, weapons and other tangible aid to designated terrorist organizations, but also intangible means of support – such as training, service, and expert advice or assistance.”¹¹⁵ Prison sentences, especially when considering French jail terms averaging seven years, are comparatively long, with terrorist plotting and foreign fighter-related convictions carrying up to thirty-five and eleven year sentences respectively.¹¹⁶

Another prominent investigative tool involves the use of so-called Al Capone methods - arresting individuals on lesser, non-terrorism charges, such as tax, immigration, traffic violations, or lying to an FBI agent.¹¹⁷ Because U.S. law enforcement are restrained by freedom of speech protections, FBI agents are also proactively engaged in so-called sting operations: They serve as agent provocateurs who encourage terrorist suspects, including potential foreign fighters, into taking action in order to arrest and prosecute them. The focus on sting operations is representative of what Neumann has called the Anglo-Saxon

approach to radicalization, as opposed to the European practice that also pursues cognitive radicalization. While the French approach is more security-centric than that of other European countries, France has also started to embrace the European focus on countering radical ideas.¹¹⁸ Sting operations are a central element of the Anglo-Saxon school because the latter only targets behavioral radicalization. The European approach is more far reaching, as authorities directly go after ideological breeding grounds.

The difference in approaches is directly connected to the question of how radicalization should be defined and understood, as discussed above. While the European school views radical thoughts and opinions as a threshold for government intervention, the Anglo-Saxon threshold is higher as it involves violent acts. According to Neumann, “from this perspective, freedom of speech is near absolute, and people’s political views—however extreme, anti-democratic, offensive or divisive—are none of the government’s business as long as they are expressed peacefully and do not inhibit others’ rights to do the same.”¹¹⁹ Accordingly, the White House Strategy makes reference to the U.S. constitution which “recognizes freedom of expression, even for individuals who espouse unpopular or even hateful views.”¹²⁰ It must also be noted that the “emphasis on illegal behavior ... helps the authorities to avoid any suspicion of political bias,”¹²¹ whereas a focus on radical opinions may be interpreted as wanting to suppress political dissent or infringing on freedom of speech. As it turns out, however, radical thoughts do become the government’s business in the U.S. context as well. It bears mentioning that the government does not merely stay put as law enforcement identifies those with radical views but instead encourages them to take further steps toward violent action. “From the FBI’s perspective, the lack of instruments for dealing with radicalization short of actual terrorist plotting, and the potential risk involved in allowing cognitively radicalized people to roam free, leaves law enforcement with no choice but to ‘create’ illegal behaviours where none had previously existed,”¹²² so they can

be arrested and prosecuted. This arguably controversial practice¹²³ typically involves undercover agents who pretend to be members of or connected to terrorist organizations and encourage them to put their radical ideas into practice by offering financial and material support. As counterradicalization becomes about preventing people from breaking the law, even if police have to provoke individuals into violent action, law enforcement becomes invaluable in stopping it, representing the default response. Countering radical ideas, however, is a job that cannot be done by law enforcement alone but requires non-security, political, and social efforts that are long-term and involve the whole society.¹²⁴

The French Approach to Jihadi Radicalization

The Counterterrorism Apparatus

Similar to the security-centric approach in the U.S., the French way of countering radicals emphasizes surveillance, repression, and prosecution. This is in large part due to the aforementioned counterterrorism regime, which prominently centers on the anti-terrorism magistrates (juge d'instruction) and their close relationship with the domestic intelligence service, the Directorate of Territorial Surveillance, DST (Direction de la Surveillance du Territoire)¹²⁵. As it is comparatively easy to arrest people preventively on terrorism-related charges and put them behind bars, radicalization until recently was not considered an issue that required separate attention, ideological debate, or the introduction of soft measures. French counterterrorism institutions date back to a 1986 reform, which centralized counterterrorism investigative powers in the hands of seven anti-terrorism judges. In theory tasked with conducting impartial investigations to determine whether judicial measures should be taken, in practice their authorities allowed them to “act like prosecutors but have the powers of judge.”¹²⁶ Their substantial counterterrorism arsenal includes the power to examine evidence, detain terrorist suspects, and authorize search

warrants, subpoenas, and wiretaps.¹²⁷ In order to utilize the wide range of tools at their disposal, the small office of magistrates teamed up with the sizable DST whose agents were eager to expand their standing and preventive arsenal. While terrorism offences come with more severe penalties and judicial procedures, the French regime was further strengthened by a 1996 act that criminalized the mere ‘conspiracy to commit a terrorist offense.’ This preventive mechanism enables the prosecution of criminal activities as terrorist acts and has been at the heart of the French counterterrorism effort, where the “barrier between prevention and punishment is not airtight.”¹²⁸

The French government continued strengthening and adjusting counterterrorism authorities and institutions after 9/11 as well, further enhancing data and intelligence collection, interagency coordination, and information sharing capacities. These reforms are all the more remarkable since the French already had a very potent counterterrorism apparatus, in fact, the anti-terrorism judges had even specialized in prosecuting Jihadi terrorists. In the decade following the 9/11 attacks, a total of five domestic security laws were passed. Many of the new counterterrorism provisions, similar to reforms in other Western countries, were designed to step up preventive powers, surveillance, and terrorism-related criminal law provisions, as judicial checks continued to decline. Many of the reforms were also representative of the French way of tackling possible terrorism-crime connections by going after ordinary criminals and delinquents.

The 2012 Toulouse, 2014 Brussels, and 2015 Paris attacks triggered three additional counterterrorism laws. Not surprisingly, the 2012 and 2014 acts targeted foreign fighters; France is home to the largest group of Western foreign fighters in Syria and Iraq, with more than 800 individuals having left between 2012 and mid-2015.¹²⁹ Among other things, the 2012 Security Act¹³⁰ increased punishment for the written, spoken, or pictorial incitement and glorification of terrorism. Visits to military or ideological training camps became

criminal offenses, as did the act of committing a terrorist offense abroad. Displaying a familiar pattern, the 2014 law introduced new repressive measures, seeking to prevent, counter, and punish foreign fighter travel, lone wolves, and internet recruitment.¹³¹ Specifically, the law authorized counterterrorism authorities to confiscate passports and identity cards of French nationals, if there was “serious reason” to believe they were going to join a terrorist group or engage in terrorist activities. For the first time, individuals could be prosecuted for terrorist activities, as the law no longer assumed “association with others.” Counterterrorism services could block Internet sites deemed responsible for inciting or glorifying terrorism, and without having to seek judicial approval. Also directed against lone wolves and online recruitment was a provision that criminalized the searching, attaining, and creating of materials that could be used in terrorist activities. As the latter two provisions illustrate, France not only targeted radical behavior but also cognitive radicalization.

Showing a familiar pattern and much in line with its security-oriented approach, the French government also boosted counterterrorism spending, personnel, and surveillance powers in the aftermath of the Charlie Hebdo attacks. According to Prime Minister Manuel Valls, counterterrorism funds will increase by 246 million euro in 2015 and an estimated total of 736 million euro by 2017. A total of 2,680 positions will be created, 1,400 of which in the Ministry of Interior, mostly in the area of domestic intelligence.¹³² Legislative reforms were implemented in May 2015, when the French parliament adopted a new administrative framework for intelligence collection involving wiretaps, keystroke logging, and internet and phone connection data.¹³³ The law also required that intelligence collection in prisons, e.g. the monitoring of prison communications, be handled by intelligence services and no longer remain the responsibility of the prison administration. A three-year national plan announced in April illustrated a further effort to go after cognitive radicalization. Based on the plan, among other things, racist and anti-Semitic behavior, hate

speech, and language on the Internet will be considered criminal offenses and trigger tougher prison sentences.¹³⁴

A Softer Approach

In January 2015 the French government also announced a few measures geared toward stopping and/or preventing Jihadi radicalization, mostly inside prisons. This was remarkable; not only did the French, as mentioned above, not recognize radicalization as a phenomenon that ought to be tackled separately, but they also did not invest in any soft measures until nine months earlier. The French approach to soft counterradicalization first started changing in 2013, with the White Paper on Defense and National Security citing the need to “develop government initiatives to combat radicalization,”¹³⁵ and then-Prime Minister Jean-Marc Ayrault calling for a discussion about the “prevention of radicalization phenomena.”¹³⁶ In response, the Interior Ministry presented its plan to “fight against radicalization” in spring 2014.¹³⁷ Designed to destroy recruitment networks and prevent French citizens from joining the conflict in Syria, many assumed that the strategy was a half-hearted attempt by the government to respond to public pressure about growing foreign fighter streams. Insiders argue, however, that the policy shift was triggered by the 2012 Merah attack.¹³⁸ Be that as it may, the 2014 plan was of note because it was the first nationwide effort to tackle the “process of radicalization” and the “passage” to violence by means of soft measures. While addressing radicalization at the earliest stages, it also included an experimental program for reintegration. Similar to soft counterradicalization initiatives in other European countries, the plan evolved around a new national phone hotline and internet portal for “endangered” individuals, their families, or community members who could call the helpline to seek advice, submit a written form via the web portal, notify authorities, and also take advantage of tailored assistance programs at the local level. Local

support structures include prosecutors, mayors, police, schools, religious leaders, family foundations, youth and employment services, and are geared toward reintegrating and re-socializing individuals, in particular teenagers.

The French phone hotline is arguably still security-oriented, especially when compared to its counterparts in countries such as Germany. A public-private partnership considered highly successful in reaching a large target group of affected families, the counseling network funded by the Federal Office for Migration and Refugee Affairs (BAMF) serves as an alternative to, and effectively replaced, the HATIF phone hotline run by the federal domestic intelligence service (the latter was considered ill-equipped to serve as a contact point for Muslim communities), although HATIF was designed as an individual deradicalization program and the BAMF counseling network focuses on the families of radicalized individuals. While the BAMF-run Counseling Center Radicalization represents the central point of contact for individuals in need, providing initial advising and screening, the cases are referred to one of four local NGOs responsible for professional counseling. Interventions at the family level are designed to have ideological, pragmatic, and emotional impact and lend support, by establishing counternarratives, breaking with behavioral activities, and offering emotional support systems.

In France, the ten staff members of the National Centre of Assistance and Prevention of Radicalisation, CNAPR (Centre National d'Assistance et de Prévention de la Radicalisation) are located at the Interior Ministry and receive training from Islam experts of the Anti-Terrorist Coordination Unit, UCLAT (Unité de Coordination de la Lutte Anti-Terroriste), which also runs the hotline; they are experienced National Police reservists, assisted by two in-service police officers in charge of information screening and analysis, and a psychologist.¹³⁹ Asked about the security approach to radicalization, UCLAT director Loïc Garnier emphasized that the hotline staff did not represent the police per se, but was

selected because of their many years of work and life experience, their “ability to listen and their emotional sensitivity.”¹⁴⁰ Interestingly, the much anticipated June 2015 parliamentary commission report on radicalization called the center “a breakthrough because it allows the management of the associates of radicalized people and identification of problematic situations requiring follow-ups by the authorities.”¹⁴¹

Countering Prison Radicalization

After the Charlie Hebdo attacks, the French government decided to focus on prison radicalization as well. The focus on prisons was not accidental: The radicalization trajectories of Mohamed Merah, Chérif Kouachi, and Amedy Coulibaly, the perpetrators of the 2012 Toulouse/Montauban and 2015 Paris attacks, were thought to have been significantly influenced by their prison experience. Chérif Kouachi met Coulibaly at the Fleury-Merogis prison, where the former was imprisoned from January 2005 to October 2006. While Coulibaly served a sentence for drug trafficking and robbery and became radicalized while in prison, Chérif’s Jihadi convictions apparently hardened while serving a prison sentence for attempting to travel to an Iraqi terrorist camp. Merah, who shot dead seven people during a week-long shooting spree in 2012, also became radicalized while behind bars. Finally, French national Mehdi Nemmouche, accused of shooting four people at a Jewish museum in Brussels, became radicalized when serving a prison sentence for robbery.

Prime Minister Valls announced that to better counter radicalization inside French prisons “inmates who are deemed radicalized” would be isolated from common criminals and concentrated in special prisons.¹⁴² Separating radical prisoners from ordinary ones was already an option before, under the DPS (Détenu Particulièrement Signalé) procedure, but only implemented on an individual basis.¹⁴³ Based on a pilot project involving twenty-three

prisoners at the prison of Fresnes (Val-de-Marne) that started in November 2014, four other prisons would be designated for radical prisoners only.¹⁴⁴ In addition, fifty-five intelligence officers would join the prison bureaus. Prison intelligence offices (Bureau du Renseignement Penitentiaire) were first set up in 2003, in an effort to keep tabs on inmate behavior and detect and control those who showed signs of social withdrawal from mainstream prison populations. The 2012 Merah attacks triggered a first set of reforms, when the prison administration signed an information sharing protocol with the Directorate-General of Domestic Security, DGSJ (Direction Générale de la Sécurité Intérieure), responsible for domestic intelligence collection. The DGSJ also started training prison staff about “new issues of radical Islam.” After January 5, 2015, prison administration officials became detailed to the UCLAT and started participating in its weekly meetings.¹⁴⁵

The decision to isolate radical prisoners has been criticized because there is a risk it might lead to “prison universities:”¹⁴⁶ Increased group radicalization due to like-minded individuals located in the same space who will have opportunities to discuss their ideas, tactics, strategies, mistakes, and best practices.¹⁴⁷ Separating the radicals from petty criminals, so Khosrokhavar warns, may prevent them from influencing others, but “it strengthens the bonds they have with each other.”¹⁴⁸ They may also still indirectly influence “regular” prisoners who view them as victims. Moreover, petty criminals may also be radical, even if they have not been booked under terrorism charges, and still be able to proselytize, as the focus remains on those convicted on terrorism charges.¹⁴⁹ Even though Justice Minister Christine Taubira has insisted that the isolated prisoners are also kept separate from each other, individual isolation may pose practical challenges as well.¹⁵⁰ As is now well known, Djamel Beghal (while serving a ten year sentence for plotting to attack the U.S. embassy in Paris) played an important role in the prison radicalization of the Paris attackers, Chérif Kouachi and Amedy Coulibaly - even though Beghal was held in solitary

confinement when communicating with them between 2003 and 2006.¹⁵¹ Others have cautioned that prison isolation should represent an instrument of last resort and only apply to the most radical inmates, especially in view of the growing numbers of returning foreign fighters.¹⁵² Not all of them return as hardened jihadists, but, to the contrary, often resemble disillusioned or even traumatized teenagers.¹⁵³ Remarkably, the parliamentary commission on radicalization for the first time distinguished between three categories of returning fighters: the jihadist die-hards, requiring a judicial response and incarceration; the disillusioned and disappointed who did not commit any crimes, demanding de-indoctrination and reintegration programs; and those traumatized by war and violence, in need of psychological therapy.¹⁵⁴

The same report differentiates between three categories of prisoners that should come with different kinds of treatments: The radical converts, requiring isolation and regular transfers to “prevent further recruitment and dissemination of radical ideas on other prisoners;” for the radical non-converts, so the report notes, “it is conceivable to group them into dedicated areas by setting up dedicated de-radicalization programs;” regarding the potential radicals, “it is recommended to spread them among the common criminals in ordinary sections” and put them under special intelligence observation.¹⁵⁵ However, there is still a question as to whether those prisoners showing signs of radicalization should be held in the same prison structure or in isolation in various different institutions. The report presented lessons of the aforementioned pilot program in Fresnes, *inter alia*, which combined convicted prisoners and those charged with criminal conspiracy of committing terrorist offenses in a special prison wing. While the project helped stem proselytizing, the report acknowledges that “the experience of Fresnes must be rethought and improved,” especially with regard to the “choice of detainees, the combination of converts and

impressionable prisoners, the training of personnel, and the lack of deradicalization programs.”¹⁵⁶

While the decision to isolate radical prisoners after the Paris attacks, as well as task professional intelligence services with keeping tabs on prison populations, fits with the overall security approach to radicalization, a related government initiative is noteworthy. In order “...to be effective,” Prime Minister Valls noted, “the (prison) isolation must go hand in hand with ... a review of the conditions under which imams are recruited and trained.”¹⁵⁷ Not only is their training supposed to improve, but the number of prison imams to increase by sixty. This is done in an effort to prevent the spread of the Jihadi virus in the first place - a tremendous challenge since prison imams need to be qualified, modern enough to understand social media, and also willing and capable of engaging in political debates.¹⁵⁸ The focus on prison imams is all the more remarkable as it represents an effort to bolster the softer elements of the French counterradicalization campaign, thus far centered on the national phone helpline (in combination with local initiatives that are initiated through the hotline).

At least 50% of the 66,761¹⁵⁹ prison inmates in France are Muslim; they were assisted by a total of 182 imams in 2014, compared to 681 Catholic and 70 Jewish chaplains.¹⁶⁰ The lack of Muslim chaplains is thought to have created a vacuum that leaves room for self-appointed and self-taught imams and their radical ideas.¹⁶¹ France did increase the number of prison imams in 2009 and 2010, and introduced new vetting and training programs to ensure that imam teachings are compatible with French values, as imams “made in France” are considered the best way of spreading moderate Islam.¹⁶² The role of the prison imams was also scrutinized and discussed in the aftermath of both the 2012 and 2014 attacks¹⁶³ and a total of thirty were added in 2012 and 2013.¹⁶⁴ However, the status of the prison imams has not been elevated or professionalized, a fact that will continue to

undermine their overall caliber. In June 2014, Hassan el-Anoui Talibi, chief prison imam in France, called for an official status for prison chaplains, similar to that of hospital and military chaplains. Currently, prison imams are merely reimbursed for their travel expenses,¹⁶⁵ and even though the budget for Muslim chaplains will be doubled it will not cover salaries, pensions, or health benefits.¹⁶⁶ While these kinds of public benefits are not available for Catholic prison chaplains either, the latter collect financial aid through the Catholic Church, which is also responsible for their training. Finding qualified and moderate imams does not only represent financial challenges, however; the verification of imam qualifications remains problematic as Islam does not require a standardized education for its spiritual leaders. Prison imams are volunteers, but do not receive any mandatory training which would “provide status by professionalizing the function, as already exists in the army.”¹⁶⁷

Increasing the number of qualified prison imams is considered an essential step and so is the integration of other services as part of a holistic, interdisciplinary approach to radicalization. According to Ouisa Kies, prison administration director of the detection and supervision of radical inmates program, “new forms of radicalization cannot be dealt with unless a close cooperation is established between the various professionals involved in the prison administration (prison counselors and probation officers, intelligence officers, schools, doctors, psychologists, etc.).”¹⁶⁸ A system-wide, interdisciplinary approach becomes imperative also due to the unique French perspective on *laïcité*: Kies explains that “chaplains are essential partners in the administration, but we cannot imagine a secular republic meeting a social problem only by means of religion.”¹⁶⁹

Tres Similaire: Comparing French and U.S. Approaches

The preceding analysis of French and U.S. counterradicalization strategies and programs illustrates important similarities. These come as somewhat of a surprise, as the two Western democracies represent distinctly different political systems and cultures. The U.S. separation of power and federal system is designed to restrain executive power, whereas the French semi-presidential system facilitates and concentrates power in the hands of the French President and in Paris. While the French counterterrorism regime has been studied and admired by many U.S. scholars and policymakers, this praise typically comes with the caveat that most of the French methods would not be feasible or acceptable by American legal standards, such as “granting highly intrusive powers to ... (an) internal security service ... and to ... counterterrorist investigative magistrates,” thereby combining the “powers of prevention, deterrence and punishment in one individual.”¹⁷⁰

Yet, similarities abound. Both countries got a late start on counterradicalization. The reasons for this are different, but in both cases the shifts in perspective were triggered by an increase in Jihadi violence. The Obama administration started changing the U.S. approach in response to an increase in Jihadi plots and attacks in 2009; the Hollande government began addressing radicalization after the 2012 Merah attacks and in the context of the growing number of French foreign fighters leaving for Syria and Iraq.

Most strikingly, both countries adopted a security-centric approach to counterradicalization; they have focused on repressive and judicial measures, which are facilitated by potent and preventive counterterrorism tools and supported by conspiracy and material support clauses. Neither France nor the U.S. reintegrate returning foreign fighters who either are taken directly into custody and prosecuted, or else put under surveillance and arrested at a later point.¹⁷¹ Softer counter- and deradicalization measures have remained on the backburner. They are still vague, improvised, and sporadic in the

U.S., where there has been a focus on research and community engagement. They are still marginalized in France, where the number of prison imams remains small, their status unchanged, and the UCLAT in charge of the national helpline. However, in both countries they are slowly increasing in number and scope.

To be sure, French and U.S. responses differ as well. The French approach to counterradicalization goes further, as France's national phone helpline allows for deradicalization and prevention at the grassroots level. In France, there is also more of a multi-disciplinary focus and emphasis on involving other, non-security oriented government agencies, "while in the United States even the debate on the matter (involving segments of government other than law enforcement) is very much law enforcement-based,"¹⁷² since violent extremism involves violent crimes that need to be stopped.¹⁷³ The U.S. stopped short of an actual national plan, and while the emphasis has been on building trust, engaging and supporting local communities so they can help themselves against radicals, there is no concrete, nation-wide mechanisms for deradicalization or preventive intervention (unless individuals are turning to violence). Recently, however, attempts at deradicalization have begun taking shape at the local level, as the examples in Minnesota and Colorado illustrate.

In addition, France has a very different take on cognitive radicalization and passed various laws that tackle radical language, speech, and images. As this would be unthinkable due to U.S. constitutional freedom of speech protections, the U.S. government focuses on violent actions, behaviors and uses FBI-orchestrated agent provocateurs. The official U.S. term for counterradicalization, "countering violent extremism," is representative of this actionable focus as well.¹⁷⁴ Contrary to the French and other European countries, the U.S. government does not seek to counter radicalization per se but violent extremism, which places the focus on unlawful action as opposed to radical thinking.

The choice of terminology and hands-off approach evinced in the U.S. strategy are indicative of other factors. It is precisely, as the strategy also notes, because “the American social fabric continues to weave together waves of immigrants to the United States and people from all backgrounds and walks of life,”¹⁷⁵ that an ideological debate addressing the root causes of Jihadi radicalization has not taken place. According to Pandith, the “U.S. government has struggled to wage a “war of ideas”” and is still missing this very important “soft power” dimension.¹⁷⁶ In a nation of immigrants of all races, ethnicities, and religions, there is a heightened cultural sensitivity, a reluctance to single out particular groups or segments of society, and an emphasis on political correctness and inclusiveness (the latter, ironically, ends up undermining the very notion of freedom of speech). In fact, domestic criticism has been growing that the media and congressional focus on Jihadi violence is exaggerated, also because right-wing terrorists have killed more people in the United States since 9/11 than Jihadists.¹⁷⁷ Because Jihadi radicalization is connected to a particular religion, this further raises questions of how the government can and should get involved; the U.S. version of secularism, the separation of church and state concept, prohibits government interference in all religious affairs.

Of course, the French interpretation of secularism also influences the French way of countering Jihadi radicalization. Because *laïcité* seeks to prevent religious encroachment into the public sphere and does not allow religious matters to dominate the policy response, there is a need for multi-disciplinary programs in the counterradicalization realm (even if they have been slow in coming). At the same time, the commitment to French republican secular values makes the consideration of other counterradicalization choices more challenging. A recent report by a former French government official emphasized the need to include moderate Muslim elites and especially religious ones as part of governmental counterradicalization efforts - to help prevent Muslim communities from feeling

stigmatized.¹⁷⁸ The report further criticized that the government office of organized religions (bureau centrale des cultes) remains part of the security-minded Interior Ministry, as Muslim representatives working with the government are often considered “deputy-sheriffs” by their community. “In the absence of a political response to growing islamist fundamentalism,” so the report summarized, “various administrations have opted for a security-focused response to its terrorist manifestation.”¹⁷⁹ However, the ideological debate in France is slowly emerging. While the government has proactively promoted French republication values for years, it recently invested in a more direct ideological exchange and war of ideas. A website, called “Stop-jihadism,” is supposed to give families and relatives of vulnerable individuals new tools and arguments for challenging the Jihadi ideology. The government platform posts documents and videos to offer a counter-narrative to the Jihadi perspective, mostly in an effort to prevent online recruitment of foreign fighters.¹⁸⁰ While the site has been accessed more than two million times since its creation in January 2015, it is not clear how effective it can be. At the very least, it “cannot be the sole response to the problem of media jihad” because the “voice of the state struggles” to be heard. “To be more effective,” so the parliamentary commission report notes, the dialogue must be led by “associations or respected public figures young people can relate to.”¹⁸¹ The commission thus called for the creation of a non-state foundation that can feature videos of victims and their families, former extremists, religious leaders, or well-known public figures as part of another website. They would be able to use more relevant, offbeat, and direct language, and, according to the commission, should also include religion as part of their dialogue. “The religious aspect should not be taboo or prohibited in the name of laïcité. ... we need a discourse on values and visions of our society and the world. The presence of theological aspects in the jihadist movement shows that there is need for a theological counterdiscourse” or narrative.¹⁸²

Furthermore of note, in September 2015 France announced a deradicalization pilot program that will start in the Alsace region and is based on the Danish Aarhus model. The program is subject to judicial oversight and attempts to reintegrate select individuals convicted of offenses connected to radical Islam (not involving terrorist acts). The integration process will be managed by “psychologists, educators and social workers.” It includes the restoring of social ties and ideological debate but no religious dimension,¹⁸³ as the “religious aspect” is not considered “central to the phenomenon of radicalization.”¹⁸⁴ According to the parliamentary commission, “the goal of a de-radicalization center would be to instill a vision of their religion compatible with the values of the Republic, to accompany them and help them reintegrate in society, permitting them to develop a personal and professional project.”¹⁸⁵ Similarly, the religious dimension is absent at the phone hotline center; it also relies on providing social and psychological support, as the “phenomenon of radicalization has nothing to do with religion,” according to Prefect Pierre N’Gahane, but everything with a sense of “failure,” experiencing a “break with the environment,” and “a search for meaning and identity. They could cling to anything” in these existential crises:¹⁸⁶ “a cult, suicide, army or drug.”¹⁸⁷ “The strength of the jihadist discourse is that it gives answers. ...It is our responsibility to offer them an alternative solution.”¹⁸⁸

In conclusion, it is important to note that counterradicalization strategies and (especially) deradicalization programs in France and the United States are not only comparatively new but also necessarily evolving and adjusting to an ever changing threat. The French parliamentary commission thus drew attention to the changing profile of the Syrian foreign fighters, which in 2012 and 2013 left to fight the Assad regime and are now departing “to achieve a prophecy, with eschatological dimensions.”¹⁸⁹ Even before the most recent Jihadi-inspired shootings in Garland, Texas, and Chattanooga, Tennessee, in May and July 2015,¹⁹⁰ the House of Representatives’ Homeland Security Committee held

nearly monthly hearings on violent extremism and foreign fighters in 2015. Highly publicized attacks in Toulouse and Brussels and unprecedented foreign fighter numbers led France to frame a first response to Jihadi radicalization in 2014, and further intensify these efforts after the Charlie Hebdo attacks in January 2015, which were followed by the June attack at a gas factory in Isère (leaving one person decapitated and two injured) and the August plot on a French commuter train. Calling repressive measures “insufficient” when countering the threat posed by religious radicalization,¹⁹¹ the parliamentary commission report contained thirty-seven concrete proposals devoted to deradicalization and softer measures. The report also emphasized that - since France was facing an unprecedented threat that “can strike anyone, anywhere and anytime” - it is essential to have a strong first response that builds on intelligence services and judicial counterterrorism capacities, but then noted that, “we are not only facing a security issue but rather a societal challenge. The answer must be holistic”¹⁹² and be part of a long-term approach. A non-issue until a few years ago, the challenges posed by homegrown Jihadi radicalization have become mainstream topics in both countries, and will arguably remain high on the political agendas in Paris and Washington DC.

Notes

¹ See, for example, Piotr Bakowski and Laura Puccio, “Foreign Fighters,” European Parliamentary Research Service (February 2015). The Dutch and British governments have been spearheading these efforts, see James Brandon, “The UK’s Experience in Counterradicalization,” *Combating Terrorism Center Sentinel* 1, 5 (April 2008); Lorenzo Vidino, “A Preliminary Assessment of Counterradicalization in the Netherlands,” *Combating Terrorism Center Sentinel* 1, 9 (August 2008).

² Kate Kelland, “Chertoff Says Europe Poses Terrorism Threat,” *Reuters*, January 16, 2008.

³ United States Senate Committee on Homeland Security and Governmental Affairs, “Violent Islamic Extremism, the Internet, and the Homegrown Terrorist Threat,” Majority and Minority Staff Report (May 2008), 4. The report cites Testimony of Mitchell Silber, a senior Intelligence Analyst at the New York Police Department, before the U.S. Senate, Committee on Homeland Security and Governmental Affairs, hearing on *The Role of Local Law Enforcement in Countering Violent Islamist Extremism*, October 30, 2007.

⁴ Peter Bergen and Bruce Hoffman, “Assessing the Terrorist Threat,” Bipartisan Policy Center (September 10, 2010), 16.

⁵ White House, *Empowering Local Partners to Prevent Violent Extremism in the United States* (August 2011). hereafter referred to as White House Strategy.

⁶ White House, Office of the Press Secretary, “Remarks of Denis McDonough, Deputy National Security Advisor to the President--As Prepared for Delivery,” March 6, 2011.

⁷ Bergen and Hoffman, “Assessing,” 4.

⁸ *Ibid.*, 36-37.

⁹ *Ibid.*, 31.

¹⁰ Francesco Ragazzi, “Towards ‘Policed Multiculturalism?’ Counter-radicalization in France, the Netherlands, and the United Kingdom” *Les Etudes du CERI* - n° 206 bis (September-December 2014), 10.

¹¹ Ragazzi, “Policed Multiculturalism,” 35.

¹² Jean-Luc Marret, “Prison De-Radicalization and Disengagement: The French Case,” *ICSR Project on De-radicalization in Jail* (October 20, 2009), 21. For a similar assessment, see also Soren Seelow, “Quelle politique de lutte contre la radicalisation?” *Le Monde*, January 19, 2015.

¹³ Marret, “Prison,” 15.

¹⁴ Seelow, “Quelle politique;” see also Lorenzo Vidino, “Foreign Fighters: An Overview of Responses in Eleven Countries,” Center for Security Studies, ETH Zurich (Zuerich: CSS, 2014), 10.

¹⁵ Marret, “Prison,” 16.

¹⁶ *Ibid.*, 21.

¹⁷ “Prison Overcrowding: Rare glimpse inside French Prison,” *BBC News Europe*, October 20, 2013.

¹⁸ Marret, “Prison,” 18.

¹⁹ Executive Office of the President of the United States, *Strategic Implementation Plan for Empowering Local Partners to Prevent Violent Extremism in the United States* (December 2011). Hereafter referred to as SIP.

²⁰ White House Strategy, Introduction.

²¹ Homeland Security Advisory Council, “Countering Violent Extremism (CVE) Working Group,” (Spring 2010), http://www.dhs.gov/xlibrary/assets/hsac_cve_working_group_recommendations.pdf (accessed July 30, 2015).

²² Department of Homeland Security, “Countering Violent Extremism,” <http://www.dhs.gov/topic/countering-violent-extremism> (accessed August 5, 2015).

²³ Department of Homeland Security, “Countering Violent Extremism: Background,” <http://www.dhs.gov/countering-violent-extremism-background> (accessed August 10, 2015).

²⁴ Department of Homeland Security, “Community Engagement,” <http://www.dhs.gov/community-engagement> (accessed August 5, 2015). For a detailed list of DHS, FBI, and local engagement activities see also Lorenzo Vidino “Counter-radicalization in the United States,” in Rik Coolsaet, ed., *Jihadi Terrorism and the Radicalisation Challenge* (Burlington, VT: Ashgate, 2011), 251.

²⁵ Nicholas Rasmussen, "Countering Violent Extremism: The Urgent Threat of Foreign Fighters and Homegrown Terror," Hearing before the U.S. House of Representatives Committee on Homeland Security, February 11, 2015.

²⁶ Vidino, "Foreign Fighters," 17.

²⁷ DHS, "The Role of Fusion Centers in Countering Violent Extremism,"

http://www.it.ojp.gov/documents/roleoffusioncentersincounteringviolentextremism_compliant.pdf (accessed July 30, 2015).

²⁸ DHS, "Countering Violent Extremism," accessed July 29, 2015.

²⁹ White House, Office of the Press Secretary, "Fact Sheet: The White House Summit on Countering Violent Extremism," February 18, 2015.

³⁰ The Countering Violent Extremism Act, HR 2899, 114th Congress, 1st session (June 25, 2015).

³¹ Department of Justice, Offices of the United States Attorneys, "Mission," accessed July 20, 2015.

³² SIP, 8.

³³ DOJ, "Ten Years Later: The Justice Department after 9/11, Partnering with the Muslim, Arab, and Sikh Communities," <http://www.justice.gov/archive/911/partnerships.html> (accessed July 30, 2015).

³⁴ Ibid.

³⁵ Department of Justice, Office of Public Affairs, "Attorney General Holder Urges International Effort to Confront Threat of Syrian Foreign Fighters," *Press Release* (July 8, 2014).

³⁶ DOJ, Office of Public Affairs, "Attorney General Holder Meets with Muslim Leaders in Portland," September 30, 2011, <http://www.justice.gov/opa/blog/attorney-general-holder-meets-muslim-leaders-portland> (accessed July 28, 2015).

³⁷ Vidino, "Counter-radicalization," 251.

³⁸ FBI, "Adopt-a-School-Program," <https://www.fbi.gov/news/stories/2015/january/adopt-a-school-program-part-2-becoming-a-junior-special-agent> (accessed July 30, 2015).

³⁹ Vidino, "Foreign Fighters," 17.

⁴⁰ See also Vidino, "Counter-radicalization," 252.

⁴¹ Jerome Bjelopera and Mark Randol, "American Jihadist Terrorism: Combating a Complex Threat," *Congressional Research Service Report* (December 2010).

⁴² Department of Justice, Office of Public Affairs, "Attorney General Holder Announces Pilot Program to Counter Violent Extremists," September 15, 2014.

⁴³ White House, "Fact Sheet."

⁴⁴ *A Framework for Prevention and Intervention Strategies*, February 2015, 3; 6-7; *The Los Angeles Framework for Countering Violent Extremism*, February 2015, 7-8; *Building Community Resilience Minneapolis-St. Paul Pilot Program*, February 2015, 5.

⁴⁵ Dina Temple Raston, "Minnesota Unveiling Plan to Counter Recruiting by ISIS," *NPR*, September 9, 2015.

⁴⁶ Jerome Bjelopera, "Countering Violent Extremism in the United States," *Congressional Research Service Report* (February 19, 2014), 12; Vidino, "Counter-radicalization," 253.

⁴⁷ Bjelopera, "Countering Violent Extremism," 9.

⁴⁸ See, for example, Vidino, "Explaining the Lack of an American Domestic Counter-radicalization Strategy," (2014) available at <http://www.mei.edu/content/article/understanding-deradicalization-pathways-enhance-transatlantic-common-perceptions-and-practices> (accessed August 5, 2015).

⁴⁹ SIP, 8.

⁵⁰ See SIP, 6; regarding budgetary questions and performance assessments, see also Bjelopera, "Countering Violent Extremism," 28.

⁵¹ Vidino, "Counter-radicalization," 254

⁵² Ibid., 255.

⁵³ White House Strategy, 6-7; Bjelopera, "Countering Violent Extremism," 24; 26-27.

⁵⁴ SIP, 18-20.

⁵⁵ Vidino, "Lack of Strategy."

⁵⁶ Bjelopera, "Countering Violent Extremism," 25

⁵⁷ Ibid., 17. See also SIP, 15-18.

⁵⁸ White House, "Fact Sheet."

⁵⁹ SIP, 4.

⁶⁰ Bjelopera, "Countering Violent Extremism," 17

⁶¹ This point has also been made by Vidino, "Counter-radicalization," 256.

⁶² Bjelopera, "Countering Violent Extremism," 9. See also Michael Price, "Community Outreach or Intelligence Gathering?" *Brennan Center for Justice at New York University School of Law* (January 29, 2015).

⁶³ Rohan Gunaratna, Jolene Jerard and Lawrence Rubin, *Terrorist Rehabilitation and Counter-Radicalisation* (New York: Routledge, 2011), 1.

⁶⁴ European Commission, "Strengthening the EU's response to radicalisation and violent extremism," Press Release, January 2014, http://europa.eu/rapid/press-release_IP-14-18_en.htm.

⁶⁵ Catrin Nye, "The Man Who is Being Deradicalized," *BBC News*, September 1, 2015; HM Government, *Prevent Strategy* (London: HM Stationery Office, June 2011).

⁶⁶ Anthonu Faiola and Souad Mekhennet, "Denmark Tries a Soft-handed Approach to Returned Islamist Fighters," *Washington Post*, October 19, 2014.

⁶⁷ Anja Daalgard-Nielsen, "Promoting Exit from Violent Extremism: Themes and Approaches," *Studies in Conflict and Terrorism*, 36 (2013), 100.

⁶⁸ Clark McCauley and Sophia Moskalenko, *Friction: How Radicalization Happens to Them and Us* (New York: Oxford University Press, 2011), 4.

⁶⁹ Rik Coolsaet, "Europe: Reinforcing Existing Trends," in Mohammed Ayoob and Etga Ugur, eds., *Assessing the War on Terror* (Boulder, CO: Lynne Rienner, 2013), 148.

⁷⁰ Mark Sedgwick, "The Concept of Radicalization as a Source of Confusion," *Terrorism and Political Violence* (September 2010).

⁷¹ European Commission's Expert Group on Violent Radicalization, "Radicalization Processes Leading to Acts of Terrorism," May 15, 2008, 7.

⁷² Expert Group, "Radicalization," 5.

⁷³ Ibid., 17.

⁷⁴ Anja Dalgaard-Nielsen, "Violent Radicalization in Europe: What We Know and What We Do Not Know," *Studies in Conflict and Terrorism* (August 16, 2010). The social movement and network schools have benefited from primary data of Quintan Wiktorowicz, "Introduction: Islamic Activism and Social Movement Theory," in *Islamic Activism: A Social Movement Theory Approach*, ed. Q. Wiktorowicz (Bloomington: Indiana University Press, 2004) and Mark Sageman, *Understanding Terror Networks* (Philadelphia: U Penn Press, 2004). See also Daalgard Nielsen, "Studying Violent Radicalization in Europe I," Danish Institute for International Studies (DIIS), Working Paper no. 2008/2, 9. Within SMT, three sub-theories exist: strains (imposed by repressive regimes and external economic, political, cultural and military pressures), resource mobilization and constraint (purposeful boosting of popular support by means of community institutions and networks; taking advantage of political opportunities) and framing (constructing and disseminating meaning by means of values and beliefs).

⁷⁵ Daalgard Nielsen, "Studying Violent Radicalization in Europe II," Danish Institute for International Studies (DIIS), Working Paper no. 2008/3, especially 12-13. Daalgard-Nielsen refers to the contributions of e.g. Jerrold Post and Erik Erikson.

⁷⁶ Daalgard Nielsen, "What We Know," 806. Daalgard-Nielsen points to the primary work of Petter Nesser, *Jihad in Europe* (Oslo: University of Oslo, 2004). See also Daniela Pisoii's empirical study, *Islamist Radicalization in Europe* (New York: Routledge, 2012).

⁷⁷ Daalgard Nielsen, "What We Know," 800. Kepel, Khosrokhavar and Roy must be mentioned as prominent members of the French school. See Gilles Kepel, *The War for Muslim Minds* (Cambridge, MA: Belknap Press, 2004); Farhad

Khosrokhavar, *Suicide Bombers* (London: Pluto Press, 2005); Olivier Roy, *Globalized Islam* (New York: Columbia University Press, 2006).

⁷⁸ On defining radicalization, see also Neumann, "Trouble," 876.

⁷⁹ Neumann, "Trouble," 874.

⁸⁰ Magnus Ranstorp, *Understanding Violent Radicalization* (London: Routledge, 2010).

⁸¹ McCauley and Moskalkenko, *Friction*, 4.

⁸² Daalgard Nielsen, "Violent Radicalization," 798.

⁸³ Bjelopera, "Countering Violent Extremism," 1.

⁸⁴ White House Strategy, 2.

⁸⁵ Sébastien Pietrasanta, "La déradicalisation, outil de lutte contre le terrorisme," Rapporteur du projet de loi relatif à la lutte contre le terrorisme (June 2015), 7. Hereafter referred to as Pietrasanta Report.

⁸⁶ Fathali M. Moghaddam, "The Staircase to Terrorism: A Psychological Exploration," *American Psychologist* 60, 2 (2005): 162–166.

⁸⁷ Mitchell Silber and Arvin Bhatt, "Radicalization in the West: The Homegrown Threat," New York Police Department (2007), 6-8.

⁸⁸ Clark McCauley and Sophia Moskalkenko, "Mechanisms of Political Radicalization: Pathways toward Terrorism," *Terrorism and Political Violence* (July 2008).

⁸⁹ Anthony Glees and Chris Pope, *When Students Turn to Terror: Terrorist and Extremist Activity on British Campuses* (London: Social Affairs Unit, 2005).

⁹⁰ Zeyno Baran, "Fighting the War of Ideas," *Foreign Affairs* (November/December 2005).

⁹¹ Jamie Bartlett and Miller, "The Edge of Violence: Towards Telling the Difference between Violent and Non-Violent Radicalization," *Terrorism and Political Violence* 24, 1 (January 2012).

⁹² John Horgan and Max Taylor, "Disengagement, De-radicalization and the Arc of Terrorism," in *Jihadi Terrorism and the Radicalization Challenge*, Rik Coolsaet, ed. (Burlington, VT: Ashgate, 2011), 174.

⁹³ Expert Group, "Radicalization Processes," 18.

⁹⁴ Randy Borum, "Radicalization into Violent Extremism I: A Review of Social Science Theories," *Journal of Strategic Security* 4, 4 (2011), 8.

⁹⁵ Sedgwick, "Concept," 484

⁹⁶ Robert Lambert, "Competing Counter-radicalization Models in the UK," in *Jihadi Terrorism*, 215.

⁹⁷ John Horgan, *Walking Away from Terrorism* (New York: Routledge, 2009), 31-39.

⁹⁸ Omar Ashour, *The De-Radicalization of Jihadists* (New York: Routledge, 2009), 5-6.

⁹⁹ Daalgard-Nielsen, "Exit," 100.

¹⁰⁰ David Snow, "Framing Processes, Ideology, and Discursive Fields," in *The Blackwell Companion to Social Movements*, David A. Snow, Sarah A. Soule und Hanspeter Kriesi, eds. (Oxford: Blackwell Publishing, 2004), 398.

¹⁰¹ Snow, "Framing Processes," 397-399.

¹⁰² Horgan and Taylor, "Disengagement," 186.

¹⁰³ Randy Borum, "Rethinking Radicalization," *Journal of Strategic Security* 4, 4 (2011), 2.

¹⁰⁴ Miriam Jordan and Tamara Audi, "A Test Case for Deradicalization," *Wall Street Journal*, May 6, 2015.

¹⁰⁵ See statistics in "Jailhouse Nation," *Economist*, June 20, 2015.

¹⁰⁶ See also Dina Temple-Raston, "Minnesota's Radical Experiment in Jihadi Rehab," *The New Yorker*, May 15, 2015; Mitch Smith, "Minnesota's Somali-Americans Urge New Treatment for Would-Be Terrorists," *New York Times*, July 8, 2015.

¹⁰⁷ Seamus Hughes, "The Rise of Radicalization: Is the U.S. Government Failing to Counter International and Domestic Terrorism?" Hearing before the U.S. House of Representatives Committee on Homeland Security, July 15, 2015.

¹⁰⁸ Lorenzo Vidino and Seamus Hughes, "Countering Violent Extremism in America: Program on Extremism," Center for Cyber & Homeland Security at The George Washington University, June 2015, 9.

¹⁰⁹ *Boston Framework*, 3; 6-7; *Los Angeles Framework*, 7-8; *Minneapolis-St. Paul Pilot Program*, 5.

¹¹⁰ Jordan and Audi, “Test Case.” See also Esme Murphy, “3 Men Charged in Terrorism Case to Remain in Jail,” *CBS Minnesota*, July 8, 2015.

¹¹¹ First passed in 1978, the Foreign Intelligence Surveillance Act (FISA) established an administrative FISA court responsible for authorizing search and wiretap warrants in the context of foreign intelligence investigations.

¹¹² See also, Charles Berger, “Evolution, Not Revolution, at the FBI,” *The National Interest* (February 4, 2014).

¹¹³ Vidino, “Foreign Fighters,” 16-7.

¹¹⁴ *Ibid.*

¹¹⁵ DOJ, “Attorney General Holder Urges International Effort.”

¹¹⁶ “Maximum Sentence for 2 Brothers in Terror Plot,” *Associated Press*, June 11, 2015; Matt Zapotosky, “11 Years for ISIS Activity by Teen,” *Washington Post*, August 29, 2015.

¹¹⁷ For concrete examples, see also Jerome Bjelopera, “American Jihadist Terrorism: Combating a Complex Threat,” *Congressional Research Service Report* (January 23, 2013), 48-49.

¹¹⁸ Peter Neumann, “The Trouble with Radicalization,” *International Affairs*, 89, 4 (2013), 885-7.

¹¹⁹ Neumann, “Trouble,” 885.

¹²⁰ White House Strategy, 1.

¹²¹ Neumann, “Trouble,” 886.

¹²² *Ibid.*, 891.

¹²³ See, for example, William Wan, “Sting underscores Muslims’ complex relationship with FBI,” *Washington Post*, October 28, 2010.

¹²⁴ Neumann, “Trouble,” 888.

¹²⁵ In 2008, the DST was merged into the DCRI (Central Directorate of Domestic Intelligence), renamed Central Directorate of Domestic Security (DGSI) in 2012. The DST’s relationship with the investigating judges was not affected by the reorganization.

¹²⁶ Jeremy Shapiro, “Detention of Terrorism Suspects in Britain and France,” Brookings Institution, July 15, 2008.

¹²⁷ For a detailed account of the 1986 reform and the anti-terrorism magistrates, see Jeremy Shapiro and Bénédicte Suzan, “The French Experience of Counter-Terrorism,” *Survival* 41, 1 (2003): 67-98.

¹²⁸ Dominique de Villepin, *Prevailing Against Terrorism: White Paper on Domestic Security Against Terrorism* (Paris: Documentation Française, 2006), 53.

¹²⁹ Pietrasanta Report, 9.

¹³⁰ For more information on the 2012 Security Act see Loi no. 2012-1432 du 21 décembre 2012 relative à la sécurité et à la lutte contre le terrorisme, *Journal Officiel* 298 (December 22, 2012).

¹³¹ For more information on the 2014 Reinforcing Counterterrorism Law see Loi n° 2014-1353 du 13 novembre 2014 renforçant les dispositions relatives à la lutte contre le terrorisme, *Journal Officiel* 263 (November 14, 2014): 19162.

¹³² David Revault d’Allonnes; Bastien Bonnefous, “Valls annonce la création de 2 680 postes pour lutter contre le terrorisme,” *Le Monde*, January 23, 2015.

¹³³ Mathilde Siraud, “Le projet de loi sur le renseignement adopté à une large majorité,” *Le Figaro*, May 5, 2015.

¹³⁴ Alissa Rubin and Aurelien Breeden, “France Announces Stronger Fight Against Racism and Anti-Semitism,” *New York Times*, April 17, 2015.

¹³⁵ Livre blanc, *Défense et la Sécurité Nationale* (Paris: Direction de l’information légale et administrative, 2013), 104.

¹³⁶ “Terrorisme: Ayrault demande ‘une réflexion sur les phénomènes de radicalisation,’” *Les Echo*, October 4, 2013.

¹³⁷ Le Ministre de l’intérieur, “Prevention de la radicalisation et accompagnement des familles,” April 29, 2014,

http://circulaire.legifrance.gouv.fr/pdf/2014/05/cir_38287.pdf

¹³⁸ Ragazzi, “Policed Multiculturalism,” 10.

¹³⁹ Marion Garreau, “Un numéro vert contre la radicalisation djihadiste,” *Le Monde*, February 12, 2015.

¹⁴⁰ *Ibid.*

¹⁴¹ Pietrasanta Report, 24.

-
- ¹⁴² “Fight against terrorism - Handling of the terrorist attacks of 7-9 January 2015 - Communiqué issued following the Council of Ministers’ meeting (excerpts),” January 13, 2015, <http://basedoc.diplomatie.gouv.fr/vues/Kiosque/FranceDiplomatie/kiosque.php?fichier=baen2015-01-15.html>
- ¹⁴³ Marret, “Prison,” 10-11.
- ¹⁴⁴ Villechenon, “Pour le personnel pénitentiaire.”
- ¹⁴⁵ Ministère de la Justice, “Lutte contre la radicalisation en prison: Les actions mises en place,” January 12, 2015, <http://www.justice.gouv.fr/la-garde-des-sceaux-10016/lutte-contre-la-radicalisation-en-prison-27787.html>
- ¹⁴⁶ On prison universities, see Clark McCauley and Sophia Moskalenko, *Friction: How Radicalization Happens to Them and Us* (New York: Oxford University Press, 2011), 106-108. See also comments by Sarah Dindo in Anna Villechenon, “Pour le personnel pénitentiaire, regrouper les détenus radicalisés’ n’est pas la solution” *Le Monde*, January 24, 2015; Emeline Cazi and Ariane Chemin, “Il faut au minimum un aumônier musulman par prison pour protéger les détenus des plus radicaux” *Le Monde*, February 4, 2015.
- ¹⁴⁷ McCauley and Moskalenko, *Friction*, 95; 103.
- ¹⁴⁸ Cécile Chambraud, “En regroupant les radicaux, on renforce leurs liens,” *Le Monde*, January 13, 2015.
- ¹⁴⁹ Henri Astier, “Paris Attacks: Prisons Provide Fertile Ground for Islamists,” *BBC News*, February 4, 2015.
- ¹⁵⁰ “Christiane Taubira: l’expérience de l’isolement des jihadistes en prison” doit être approfondie” *RTL*, February 26, 2015. See also Pierre Botton, “Les aumôniers musulmans sont plus utiles que l’isolement,” *Le Monde*, January 25, 2015.
- ¹⁵¹ Jacques Follorou, Simon Piel, and Matthew Suc, “Le prosélytisme carcéral, terreau de la radicalization,” *Le Monde*, January 29, 2015.
- ¹⁵² Cazi and Chemin, “Il faut au minimum.”
- ¹⁵³ Chambraud, “En regroupant les radicaux.” On this point, see also Daniel Byman and Jeremy Shapiro, “Be Afraid. Be a Little Afraid,” *Brookings Policy Paper* (November 2014), 26-7.
- ¹⁵⁴ Pietrasanta Report, 34.
- ¹⁵⁵ *Ibid.*, 47.
- ¹⁵⁶ *Ibid.*
- ¹⁵⁷ “Fight against terrorism - Handling of the terrorist attacks of 7-9 January 2015.”
- ¹⁵⁸ Harriet Alexander, “What’s going wrong in France’s prisons?” *The Telegraph*, January 17, 2015.
- ¹⁵⁹ This is the total prison population on April 1, 2015, see “France,” *International Centre for Prison Studies*, <http://www.prisonstudies.org/country/france> (accessed July 28, 2015).
- ¹⁶⁰ Villechenon, “Aumôniers musulmans.”
- ¹⁶¹ Anne Villechenon, “Aumôniers musulmans et surveillants démunis face à la radicalisation en prison,” *Le Monde*, January 23, 2015.
- ¹⁶² Marret, “Prison,” 21.
- ¹⁶³ See, for example, Pierre Botton, “Il manque 186 imams en prison,” *France Info Radio*, June 2, 2014.
- ¹⁶⁴ Ministère de la Justice, “Lutte contre la radicalisation en prison.”
- ¹⁶⁵ “Les aumôniers musulmans réclament un statut,” *Zaman France*, June 19, 2014, <http://www.zamanfrance.fr/article/aumoniers-musulmans-reclament-statut-10382.html> (accessed July 28, 2015); see also Cazi and Chemin.
- ¹⁶⁶ “Contre le terrorisme, des mesures déjà annoncées pour la plupart,” *Le Monde*, January 21, 2015.
- ¹⁶⁷ Kies, “Privilégions le travail social!”
- ¹⁶⁸ *Ibid.*
- ¹⁶⁹ *Ibid.*
- ¹⁷⁰ See, for example, Reuel Marc Gerecht and Gary Schmitt, “France: Europe’s Counterterrorist Powerhouse,” *American Enterprise Institute, European Outlook* No. 3 (November 2007), 2.
- ¹⁷¹ Adam Goldman, “An American Family Saved their Son from Joining the Islamic State: Now He Might Go to Prison,” *Washington Post*, September 6, 2015.
- ¹⁷² Vidino, “Counter-radicalization,” 257.
- ¹⁷³ See also Neumann, “Trouble,” 886.

¹⁷⁴ Neumann makes a similar point, *ibid.*

¹⁷⁵ White House Strategy, 1.

¹⁷⁶ Farah Pandith, "The Rise of Radicalization: Is the U.S. Government Failing to Counter International and Domestic Terrorism?" Hearing before the U.S. House of Representatives Committee on Homeland Security, July 15, 2015.

¹⁷⁷ See, for example, Scott Shane, "Homegrown Extremists Tied to Deadlier Toll Than Jihadists in the U.S. Since 9/11," *New York Times*, June 25, 2015. The New America Foundation has been counting the number of deadly homegrown attacks carried out by Jihadi versus Right Wing terrorists since 9/11, see

<http://securitydata.newamerica.net/extremists/deadly-attacks.html> (accessed August 7, 2015).

¹⁷⁸ Seelow, "Quelle politique."

¹⁷⁹ *Ibid.*

¹⁸⁰ "#Stopdjihadisme: le gouvernement s'attaque à la radicalisation djihadiste."

¹⁸¹ Pietrasanta Report, 56.

¹⁸² *Ibid.*, 57.

¹⁸³ "French Court Debuts De-Radicalization Program," *RFI*, September 9, 2015.

¹⁸⁴ "Il y a urgence à agir," *Le Parisien*, September 9, 2015.

¹⁸⁵ Pietrasanta Report, 46.

¹⁸⁶ Soren Seelow, "Le discours djihadiste, "un kit de solutions,"" *Le Monde*, March 26, 2015.

¹⁸⁷ Pietrasanta Report, 14.

¹⁸⁸ Seelow, "Le discours djihadiste."

¹⁸⁹ Pietrasanta Report, 33.

¹⁹⁰ Manny Fernandez, Richard Perez-Pena and Fernanda Santos, "Gunman in Texas Shooting was F.B.I. Supect in Jihad Inquiry," *New York Times*, May 4, 2015; Michael Schmidt and Judy Rudoren, "Chattanooga Gunman Researched Islamic Martyrdom, Officials Say," *New York Times*, July 21, 2015.

¹⁹¹ Pietrasanta Report, 7.

¹⁹² *Ibid.*, 61.