

Blurred Lines: The New ‘Domestic’ Terrorism

by Gregory D. Miller

Abstract

The apparent growth of lone wolf violence, combined with the increased use of social media to recruit new members, contributes to a blurring of the line between domestic and international terrorism. Where a relatively simple distinction used to suffice for scholars, we are seeing more frequent attacks, traditionally classified as domestic terrorism, but that receive inspiration from a foreign ideology or global movement. This article examines some of these trends related to social media and solo perpetrators, and suggests the use of the term “transnational terrorism”, to account for the growing incidence of terrorist attacks that do not fit properly into either existing category.

Keywords: domestic terrorism, transnational terrorism, lone wolf, self-radicalization

Introduction

Research on political violence often distinguishes between two categories of terrorism: domestic and international. For example, the International Terrorism: Attributes of Terrorist Events (ITERATE) dataset focuses exclusively on international attacks between 1968 and 2015,[1] while the Terrorism in Western Europe: Events Data (TWEED) focuses on domestic attacks in just one region, between 1950 and 2004.[2] Scholars use these, and similar databases, to study relationships between terrorism and a variety of other factors, sometimes to explain the causes of terrorism and other times to examine its consequences. Because domestic and international terrorism often involve different types of actors, different motivations and goals, and even different tactics, it is important to capture the characteristics that are unique to each category of terrorism.

The problem is that while the nature of terrorism remains enduring, several elements are working together to alter its character, including how terrorist groups recruit individuals and then use them to carry out attacks. Because of this change, the line between domestic and international terrorism is becoming blurrier, and it is insufficient to think of terrorism only in terms of this dichotomy. There is a danger for both academics and law enforcement in not recognizing changes in the separation between domestic and international terrorism or the existence of a separate, third category. If scholars fail to capture the real divisions between categories, research that relies on those typologies will lead to flawed results. For law enforcement, several government agencies distinguish between domestic and international terrorism, yet these distinctions may no longer be valid. Also, because courts often treat violent acts differently according to the perpetrator’s citizenship, as well as their pathway to radicalization, we need to understand how these categories are evolving.

The purpose of this article is to generate discussion on the challenges associated with the changing character of terrorism. In particular, with the growth of social media and the internet, as well as what some refer to as lone wolf terrorism, the line between domestic and international terrorism is growing thinner. If the distinction is still relevant, and evidence suggests it is, scholars need to rethink how they define a domestic attack, and develop other labels for attacks that are neither clearly domestic nor international. This article suggests “transnational terrorism” as a label to occupy that blurry middle ground. In an era of terrorism where ideologies appear more global, where groups can recruit and individuals can radicalize online, and where an organization is less important for carrying out an attack, our understanding of terrorism must grow to account for these changing characteristics.

The remainder of this article is organized into five sections. The first discusses some of the existing scholarship that makes use of the distinction between domestic and international terrorism, highlighting some of the problems with that simple approach. The next two sections focus on trends that suggest the character of terrorism is changing. One of these trends is the increase of attacks by individual perpetrators; the other is the growth of social media use by terrorist groups. The next section examines three illustrations of these trends that also

highlight the problems that arise from using a simple distinction between domestic and international terrorism. The final section provides some conclusions and implications, for scholars and for policymakers.

Domestic versus International Terrorism

Typologies often help explain variations in a phenomenon, though not all typologies are equally useful. Joseph Young and Michael Findley make a case for distinguishing between domestic and international terrorism, by suggesting these events are the result of two different processes.[3] While domestic terrorism should be a function of variables within the state where an attack occurs, international terrorism can be the result of factors in both the target state and the originating state. If the two categories of terrorism arise for different reasons, that is important for scholarship in its own right. In addition, if the causes of domestic and international terrorism are different, then the best policies to counter each category should also vary. Even that understanding is an oversimplification of terrorism, because conditions outside the state where an attack took place increasingly inspire many of the acts typically labelled as domestic terrorism. The burden is on scholars to have a complete and accurate understanding of what constitutes domestic versus international terrorism. Otherwise, mislabeling attacks could lead to poor theories, and to even worse policy recommendations.

A common method to distinguish domestic from international terrorism relies on three variables: the nationality of the perpetrator; the nationality of the victim; and the location of the attack. When all three of these variables are the same, scholars typically label that a domestic attack. All other cases, they classify as international. For example, the Oklahoma City bombing in 1995, which Timothy McVeigh intended to start a war against the U.S. government, occurred in the U.S., perpetrated by U.S. citizens, and directed against other U.S. citizens. That is the prototypical domestic terrorist attack.

If the attacker is not a citizen of the country in which an attack took place, but the location and victim nationality are the same (for example, the 9/11 attacks), common sense suggests that is an act of international terrorism. If the distinction between domestic and international terrorism is so important, do those differences arise simply by changing the perpetrator's nationality, without any consideration for their motivation? What about attacks where all three variables are different, such as when a member of Germany's Bader Meinhoff Gang joined with the Popular Front for the Liberation of Palestine in December 1975, to attack an OPEC meeting in Vienna, Austria?[4] That too is international terrorism, but why does variation across all three variables not lead to its own label?

All of these questions indicate the possibility of several different categories of terrorism, beyond the simple dichotomy of domestic versus international, and should be part of a larger discussion. This article focuses primarily on instances when all three variables are the same, suggesting domestic terrorism, but the motivation for the attack is based on a goal or motivation that is global rather than national. These types of attacks, which scholars typically label domestic terrorism, are foreign-inspired and so, they represent something distinct from domestic terrorism. One example is the 7 July 2005 London attacks. Three of the four perpetrators were British-born, while the fourth was born in Jamaica, but was a British citizen since the age of five. Given the nationality of the attackers, most databases would identify it as a domestic event—British citizens attacking other British citizens, in London. Yet the motivation for the attack has more in common with 9/11 than it does with domestic incidents, like Oklahoma City.

Distinguishing between domestic and international terrorism in practice is less straightforward than it might appear. The ITERATE and TWEED datasets differ on their definition of domestic terrorism. TWEED defines it in terms of the perpetrator's nationality, as long as the act occurred in Western Europe,[5] making victim nationality less relevant than in ITERATE and in other databases. As a result, some of the incidents listed in TWEED as domestic terrorism, appear in ITERATE as international terrorism, many of which might be more accurately included in a separate, third category, referred to here as transnational terrorism.

Because of these challenges in defining the categories and the fact that many databases only focus on one category, one of the biggest weaknesses of statistical scholarship on terrorism is when scholars use only one category in testing their theories, without controlling for the possible effects of the other category. Jacob Ravndal

uses TWEED to develop a typology of right-wing terrorism in Western Europe.[6] Using TWEED restricts his findings to only domestic actors, but since right-wing causes are typically national, this is unlikely to be a significant problem for his results. A more significant issue for scholars using TWEED is that some events in the database are not truly domestic terrorism if they are foreign-inspired.

Other statistical studies attempt to link terrorism to political factors, but rely exclusively on either domestic or international terrorism, without controlling for the effects of both. Tony Addison and Syed Murshed tie international terrorism to internal conflict.[7] Brian Lai suggests that a state's inability to control its own territory leads to terrorism overseas, but relies exclusively on international events.[8] Similarly, Quan Li links international terrorism to domestic economic and political systems.[9] One might excuse such problems when there were no reliable datasets on domestic terrorism, as was the case before 1996.[10] Scholars now have that data. We just need a better understanding of the different categories of terrorism that exist, and to account for the possibility of additional categories.

The Global Terrorism Database (GTD) catalogs all incidents from 1970 to 2017, but does not clearly distinguish domestic from international attacks.[12] To illustrate, of the 77,312 attacks in GTD between 1970 and 2010, 65,591 involved at least one victim who was a citizen of the country where the attack took place. Ideally, we would also know the nationality of the perpetrator (or at least the home country of the attacking group) as well as the purpose of the attack (minimally whether it has local or global intent). But no such information exists in the current version of GTD.

Walter Enders, Todd Sandler, and Khusrav Gaibulloev propose a method to separate GTD data into domestic and international events. They then take this a step farther and use the distinction to draw relationships between the two categories.[13] They find that there are three to four times more domestic than international events in GTD, and that domestic terrorism can spill over into international terrorism. The problem is that an increasing number of those domestic events are the result of a global ideology, a trend that is ignored using the simple domestic versus international distinction.

There are other examples of scholars trying to distinguish between the two categories. Gary Lafree, Sue-Ming Yang, and Martha Crenshaw focus on 53 groups between 1970 and 2004 deemed dangerous for the U.S., but find that the vast majority of attacks were outside U.S. territory, and overwhelmingly against domestic rather than U.S. targets.[11]

Sandler, Daniel Arce, and Enders suggest domestic terrorism should be free of foreign involvement or sponsorship, but then their work does not address the role of foreign motivations.[14] Only in those cases of a location, perpetrator nationality, and victim nationality being the same, and the act being carried out for national purposes, is it purely domestic terrorism. Even when location, perpetrator nationality, and victim nationality are the same, if a foreign cause or global movement inspires the attack, then that is something other than domestic terrorism. In fact, I contend that the motivation for an attack is more critical than the citizenship of the perpetrator, for identifying an attack as domestic, international, or something else.

According to GTD, between 1970 and 2010, a U.S. victim was attacked on U.S. soil 1,961 times.[15] Of these, 664 were carried out by either unknown perpetrators or those whose motivations are unclear. For the remaining 1,297, GTD does not provide the citizenship of the perpetrators, but by my estimates, the attacks with foreign motivations include, very conservatively: 80 out of 461 attacks by revolutionary groups, 20 out of 279 attacks by national-separatist groups, 7 out of 106 attacks by reactionary groups, and 17 out of 84 attacks by religious groups.[16] In summary, about 123 of the 1,297 attacks are something other than purely domestic terrorism, given their link to a foreign cause or a global movement. That means at least 6.27% of attacks in the U.S., that would be coded as domestic terrorism, either have more in common with international terrorism or are a separate type of terrorism altogether. If that number holds across countries, then of the 65,591 attacks in GTD from 1970 to 2010, at least 4,114 incidents, traditionally considered domestic terrorism, are not really domestic if we account for global motivations.

One other issue is that scholars often use the terms transnational and international synonymously, even within

the same work,[17] but there is a difference between the terms. Robert Keohane and Joseph Nye refer to “transnational interactions” as those not involving state actors or agents of the state (e.g., NGOs and multinational corporations).[18] It makes sense, then, that we would refer to global ideologies crossing borders and radicalizing otherwise domestic actors as transnational. Only in cases where the perpetrator, victim, and location are of the same country, and where the motivation of the attack is national, would we have purely domestic terrorism.

The above issues relate to the larger problem that there is no agreed-upon definition of terrorism.[19] Many scholars stopped trying to create a common definition. The U.S. government does not have just one definition of terrorism, with the Departments of State and Defense, and the Federal Bureau of Investigations all adopting different definitions, essentially to help them fulfill their missions and responsibilities.[20] If different agencies in the U.S. government cannot use a common definition, it should not be surprising that states have different definitions and that there is no United Nations definition.[21] Acceptance of a transnational label that is separate from domestic and international terrorism does not solve the definitional problem, but if our categories of terrorism are more accurate depictions of the events and the processes that lead to those events, that at least reduces some of the challenges of not having a consensus definition.

The next two sections examine some of the ways that the character of terrorism is changing, blurring the distinction between domestic and international terrorism, and requiring a third category of terrorism. One is the perceived growth of lone wolf attacks. The other is the increased use of social media and the Internet by terrorist groups.

Lone Wolf Terrorism Isn't

Several scholars write about lone wolf terrorism, some even claiming that it represents the newest wave of modern terrorism.[22] Michael Becker suggests that lone wolf attacks are increasing and that there are identifiable patterns to their choice of targets.[23] Ramon Spaaij contends that lone wolf terrorism is more common in the U.S. than in any other country, and that a lone wolf often creates their own ideology.[24] Edwin Bakker and Beatrice de Graaf discuss the difficulty of preventing lone wolf attacks.[25] Clark McCauley, Sophia Moskalenko, and Benjamin Van Son argue that lone wolf attackers have certain traits in common with assassins and school attackers.[26] Spaaij and Mark Hamm also identify several issues plaguing current research on lone wolf terrorism, such as definitions and methodology.[27]

Other scholars oppose use of the term as a distinct category of terrorism. Bart Schuurman et al. criticize the use of the “lone wolf” label for several reasons.[28] Several authors point out the connection between a supposed lone wolf and larger networks.[29] Even Spaaij confirms that lone actors often draw on communities of belief and ideologies from extremist movements. If the perpetrator is part of a community of beliefs, then they cannot truly be a lone wolf. Moreover, if those communities of belief are foreign or based on a global ideology, then seemingly domestic attacks may have more in common with international terrorism.

The problem is not with the term itself, but in its overuse, especially in its application to events that either are not terrorism or are not the work of a solo actor. Although many solo-perpetrated attacks might appear to be domestic terrorism, much of what scholars and journalists classify as lone wolf terrorism does not qualify as terrorism, and probably is not an actor operating entirely on their own.

Many instances of lone wolf violence should not qualify as terrorism because they do not have the political motivation necessary to fit the definition. Terrorism is a result of an extreme belief in a philosophy or ideology that leads to violence, and should require at least one follower to subscribe to that same belief. One person acting on their own merely has an opinion or a delusion, so attacks carried out by that person are more accurately labeled as vigilantism or pathological violence. Joel Capellan contends that there is a difference between the lone wolf terrorist and someone who is mentally unstable.[30] But the distinction is more complicated than that, because a lone actor may be sane and violent for what seem to be political reasons to the perpetrator, but if he or she has no contact with others to voice opinions and share views, then that act is still pathological rather than political.

Three types of violent acts are often incorrectly labeled as lone wolf terrorism.[31] One involves a perpetrator

of violence who does not have a political motivation, and is better described as either a vigilante or mentally disturbed. Alex Schmid and Albert Jongman make the distinction between political violence and other forms of violence, including pathological and vigilante.[32] The September 2014 beheading of a woman in Moore, Oklahoma by Alton Nolen fits here. So too does the Alphabet Bomber, Muharem Kurbegovic, whom Jeffrey Simon considers a lone wolf terrorist “ahead of his time,” even though the book refers to Kurbegovic as “emotionally disturbed”.[33]

The second is violence orchestrated by someone who has a political cause in the broadest sense, but one that nobody else adheres to or follows; they operate entirely on their own. Ted Kaczynski, the Unabomber, falls into this category. Both of these types of violence are misapplications of the terrorism label. Both cases may be terroristic acts in that they cause fear and involve violence, but if the perpetrators are not motivated by a political goal, or are acting entirely without any supporters or followers, then it is not terrorism.

The third type is when a person carries out a politically-motivated attack on their own, but subscribes to an ideology or belief that is held by others, and (importantly) communicates with those others in-person or online. This person may be engaged in terrorism (if their activities fit the rest of the definition of terrorism) but they are not a lone wolf. Then the question becomes, if they are engaged in terrorism, is it domestic, international, or something else?

Lars Erik Berntzen and Sveinung Sandberg argue that lone wolf terrorists often act as part of larger social movements.[34] When true, is it valid to consider them lone wolves, or to lump them together with those who act entirely on their own? President Barack Obama used the term lone wolf to describe the married couple who carried out the 2 December 2015 San Bernardino attack, that killed 14 and injured 22.[35] If we are to consider an act carried out by two people as a lone wolf attack, then that label loses any value it might have had. More relevant for the argument in this article, concerns how we should classify this act. Was it domestic terrorism, since the husband was an American citizen born in Chicago, even though the perpetrators’ ideology grew out of the global, Islamic extremist movement?[36] The global nature of a perpetrator’s ideology often suggests a form of transnational, rather than domestic, terrorism.

Another problematic case for the lone wolf label is the 28 November 2014 attack on a federal courthouse in Austin, Texas, by Larry Steve McQuilliams. McQuilliams was a self-proclaimed “High Priest” of the Phineas Priesthood. If he were a member of the organization, had contact with other members, and carried out the attack because of those shared beliefs, then this should not qualify as a lone wolf act. On the other hand, if he simply claimed to belong to the organization, but had no real contact with its members, then he would be a lone wolf, but then it would not be terrorism. Because the Phineas Priesthood is a domestic group in the U.S., then if it is terrorism this attack would be considered domestic terrorism. The standard methodology classifies both above examples as domestic terrorism, yet McQuilliams’ domestic motivation should distinguish his attack from the San Bernardino attack, carried out for global reasons. Now we simply need to identify what this new type of “domestic” terrorism should be called.

One possibility is to use the term “homegrown terrorism.” The Heritage Foundation defines homegrown terrorism as having one or more actors who are “American citizens, legal residents, or visitors radicalized predominantly in the United States.”[37] The “homegrown” label is imperfect, because while it implies someone radicalized at home, it often refers to attacks carried out elsewhere.[38] For instance, sources often attach the “homegrown” label to someone radicalized in the U.S. who went to fight for al-Qa’ida, even if there is no evidence they attempted to carry out an attack on American soil. It is not clear to me that “homegrown” is a separate category of terrorism as much as it is a separate pathway to radicalization, radicalizing in one’s home country rather than in a foreign terrorist training camp. An example of this is Muhanad Mahmoud Al Farekh, a U.S. citizen who joined al-Qa’ida, helped in a January 2009 attack against a U.S. Army base in Afghanistan, and was convicted in 2017.[39] Considering this attack took place in a location different from the nationality of both the perpetrator and the victims, we would already label this international terrorism. So using the term “homegrown” to apply also to foreign-inspired, domestic acts only adds to the confusion.

A similar label is “self-radicalized” terrorism, which Rodger Bates uses.[40] He contends that this type of vio-

lence is most common among right-wing and jihadist terrorists, though we see examples of self-radicalization in Marxist-Leninist and national-separatist groups as well. In other words, self-radicalization is not exclusive to domestic action, to Islamic extremism, or to actors operating on their own, and is one element contributing to the changing character of terrorism, discussed more below. This is also an imperfect term both because it describes a pathway, and because it implies no contact to a larger organization or movement, which is either unlikely or if true would make the act something other than terrorism.

This article contends that to engage in terrorism requires at least some sharing of ideology, thoughts, and intentions with others, even if the actors only interact digitally. Although a true lone wolf cannot be a terrorist by this definition, many of the solo-perpetrator attacks are still terrorism because many of these “lone wolves” are not truly acting on their own. Ultimately, the label we use is less important than the fact that we identify the need for a category that distinguishes these types of attacks from domestic and international acts. I suggest the transnational label because of its common connection to the terms domestic and international, but other labels can be just as effective at making the point and improving research results.

This gets us to the role of social media and cyber activities, as it pertains to the ability of groups to recruit members globally, and then how that affects our understanding of domestic and international terrorism.

Social Media and Global Recruitment

Several scholars draw links between the growing technological interconnectedness of the world and political violence.[41] Regardless of whether or not technological changes lead to more terrorism, some terrorists are heavy adopters of social media and the internet because it provides them with significant advantages.[42] The Islamic State of Iraq and Syria's (ISIS) Twitter use is well documented,[43] but even before ISIS, al-Qa'ida used the internet to recruit, provide training videos, and communicate with members of the organization all over the world.[44] Other Islamic extremist groups use various tools to spread their ideology, like al-Qa'ida of the Arabian Peninsula's *Inspire* Magazine.[45] And an earlier example of terrorist use of technology is the Liberation Tigers of Tamil Eelam's (LTTE) cyber unit, which used the internet back in the 1990s to raise funds, provide information about their cause, and disrupt government systems.[46]

This article makes two arguments about the increasing role of social media and then ties it back into the larger issue of defining domestic and international terrorism. First, because of the nature of the internet and social media, many solo attackers are mislabeled as lone wolves. Many of them are linked to an organization or ideological movement; their connections are simply digital rather than physical. Even if they carry out a solo attack, they are not alone in their beliefs. Second, because of the ability of groups to communicate and operate digitally, combined with the global nature of some ideologies, an increasing number of domestic events are motivated by global rather than national causes. This is not new, nor is it only about Islamic extremism. Global movements motivated some Cold War attacks carried out by Social Revolutionary groups, though many of these groups focused on domestic issues, like the Weather Underground's fight against the U.S. involvement in Vietnam as well as social injustice.

This does not mean all self-radicalized terrorists are international actors. The same medium that allows Islamic extremists to spread their ideology, is also used by single-issue and racist groups to recruit within their own countries. The Stormfront forum online is a haven for those sharing beliefs in white supremacist ideology. [47] Before the U.S. government shut it down, the Earth Liberation Front (ELF) website offered numerous examples of ways someone could carry out an ELF attack.[48] The point is not that the internet creates more international terrorism. The internet and social media enhance the ability of all terrorist groups to spread their message and potentially recruit on a global level. What the internet does is further blur the lines between domestic and international terrorism because more attacks can take place, carried out by perpetrators that never leave their home country, yet become radicalized online by a cause foreign to their home country. This is why it is increasingly important to understand the difference between truly domestic terrorism and terrorism that appears to be domestic based on just three variables, but is more accurately described as transnational because it is inspired by a foreign ideology or movement.

Cases of “Domestic” Terrorism

To illustrate some of the challenges presented above, involving the relevance of the lone wolf label and the role of technology, as well as a blurring of the distinction between domestic and international terrorism, this section examines three brief cases. While the first case involves racist terrorism, the other two involve religious terrorism. All three might be labeled lone-wolf terrorism, based on current methods for identifying the categories of terrorism, but the first two cases are about individuals who self-radicalized, while the third involves radicalization through physical contact with a terrorist organization, and therefore the U.S. government and courts treated it differently. Although all three cases fit the most common measures of domestic terrorism, only the first one qualifies as a purely domestic incident, since it is the only case with a national motivation. The second and third cases both involve a global ideology, and therefore are more accurately considered transnational terrorism.

Self-Radicalization with Domestic Goals

Dylann Roof was 21 years old when, on 17 June 2015, he killed nine people at the Emanuel African Methodist Episcopal Church in Charleston, South Carolina. He carried out the attack for racist reasons, and appears to have radicalized almost entirely online. This is an example of pure domestic terrorism, but is not a lone wolf attack because his digital interaction with others holding similar racist beliefs suggests that he was not alone.

Roof’s manifesto referred to the Council of Conservative Citizens website, which often cites black-on-white crime, to suggest that whites are under attack. In one passage, he wrote, “We [South Carolina] have no skin-heads, no real KKK, no one doing anything but talking on the internet. Well someone has to have the bravery to take it to the real world, and I guess that has to be me.” And, “this [the shooting of Trayvon Martin] prompted me to type in the words ‘black on White crime’ into Google, and I have never been the same since that day.”[49] The Southern Poverty Law Center also suggests that Roof was a reader and commenter on the white nationalist news website, *The Daily Stormer*. [50]

Roof confessed that he committed the shootings to ignite a race war.[51] There is little proof that he physically met others with the same beliefs, but evidence suggests that Roof self-radicalized because of the information he found online. Thus, while he carried out the attack alone, he should not be considered a lone wolf since it was merely one act in a larger movement. However, it does fit other key elements required for an attack to be terrorism—politically motivated violence, intended to generate fear in a wider audience. The fact that a solo actor carried out an attack may be important in comparative terms to attacks carried out by a group of people. Likewise, violence by a self-radicalized actor may be different from violence by those radicalized in person. More research should be conducted on these points, but neither of these variables is sufficient to label an act as lone wolf terrorism. Instead, this is a case of self-radicalized, domestic terrorism.

Self-Initiated Radicalization with Global Goals

On 15 April 2013, two pressure cooker bombs detonated near the finish line of the Boston Marathon, killing three people and injuring more than 200. Police killed the older of the two brothers responsible for the attack, Tamerlan Tsarnaev, during a shoot-out four days later. That same day, police arrested the younger brother, Dzhokhar. Despite being a U.S. citizen, several U.S. senators advocated for Tsarnaev to be tried as an enemy combatant.[52] For any members of the U.S. government to advocate such measures suggests a difference between this case and Roof’s. Even though Roof’s actions resulted in the death of more people, the global nature of Tsarnaev’s motivation differentiates it from Roof’s domestic-inspired attack.[53]

Tsarnaev’s case is similar to Roof’s in many ways. While Tsarnaev likely was influenced by his older brother’s radicalization, both brothers self-radicalized through interaction with radical Islamist documents.[54] According to the investigation, Tsarnaev’s laptop contained writings by radical clerics, copies of *Inspire* magazine, and audio clips and videos by the radical Yemeni cleric, Anwar al-Awlaki.[55]

Where the two cases are dissimilar is in the purpose of the attacks. Roof intended for his attack to start a race war in the U.S., while the goal of the Boston Marathon bombing was (at least in the brothers’ minds) to defend

Islam,[56] specifically retaliating for U.S. involvement in Iraq and Afghanistan. The important distinction for improving our understanding of terrorism's causes and intended effects is not based on skin color or religion, but rather the domestic vs. global inspiration of the attacker's motivations. The focus here is on the importance of this distinction for terrorism scholarship, but these differences are also important for law enforcement and for the courts.

Although U.S. laws define domestic terrorism and international terrorism separately, and although actors engaged in political violence can receive a terrorism enhancement as part of their sentence, there is no U.S. law for engaging in an act of domestic terrorism.[57] There are laws against providing material support to a designated foreign terrorist organization. But for law enforcement and prosecutors, if an individual is radicalized by a foreign movement, that has different implications for investigation and prosecution than for a person motivated by a domestic issue.[58] In other words, the perpetrators of acts that fit the definition of domestic terrorism are not tried as terrorists. This may explain some of the reluctance of U.S. law enforcement to apply the terrorism label in cases of domestic attacks.[59]

Foreign Radicalization with Global Goals

Then there is the U.S. citizen, Jose Padilla, who radicalized while out of the country and attempted to carry out an attack in the U.S. Authorities arrested Padilla in 2002 for plotting to detonate a dirty bomb in the U.S.[60] Born in New York, he traveled to Afghanistan and Pakistan in 2001-2002. He also traveled to Egypt, Saudi Arabia, and Iraq prior to returning to the U.S.[61]

Unlike the Tsarnaev and Roof cases, authorities arrested Padilla prior to an attack, so there were no casualties because of his actions. Yet the U.S. government held Padilla as an enemy combatant for more than three years before transferring him to a civilian jail and trying him in court.[62] Is this difference, even compared to the Tsarnaev case, solely because of his meetings and training with members of al-Qa'ida? Was it because of the nature of the attack? A dirty bomb is potentially more deadly than Roof's attack on the church, but also might not injure as many people as the pressure cooker bombs used by the Tsarnaev brothers. Therefore, something about the perpetrator's motivation and/or path to radicalization led the government to treat it differently, even though a successful attack would have met all the standard criteria for labelling it domestic terrorism.

The important aspect of the above cases is that scholars would traditionally code all three of them as domestic terrorism (or planned domestic terrorism in the Padilla case). Yet there are critical differences between the intent of Roof's attack and the intent of Tsarnaev and Padilla (beyond simply the Islamic extremist elements). All three were U.S. citizens, yet only the first two self-radicalized, and because of the global nature of the motivation in the Tsarnaev and Padilla cases, only the Roof case is truly domestic terrorism.

The second and third cases, though having much in common with other Islamic extremist attacks, also do not quite fit common conceptions of international terrorism. They were carried out (planned in the Padilla case) by U.S. citizens, against U.S. citizens, on U.S. soil. The Tsarnaev case was self-radicalization but hardly lone wolf, not only because it involved brothers, but also because of the global ideology that inspired their attack. Likewise, although Padilla was operating alone at the time of his arrest, his previous contact with al-Qa'ida members challenges the validity of both the lone wolf and the domestic terrorism labels.

The best way to address these types of local attempts with global inspiration is to treat them separately from both domestic and international terrorism. The simplest option is to have a third category, made up of cases that are otherwise domestic terrorism but are inspired by a foreign cause or global movement.

Implications and Conclusions

Domestic terrorism is not just an attack where the perpetrator and victim nationality align with the location of the attack. The first step towards properly classifying an event is to identify the purpose of the attack. If it is based on national issues—racial divides, ethno-nationalism, a specific government policy or law—then it is appropriate to consider that act domestic in nature. If an attack is carried out in the name of a global belief or movement, then even if the attacker and victim nationality and location are the same, the domestic terrorism

label simply does not fit.

There is no reason to believe that future attacks will fall into simple categories of domestic and international, given the changing character of terrorist recruiting, particularly the global reach of terrorist movements and ideologies. Scholars must account for this in future research, if we hope to develop a better understanding of the various types of terrorism that exist. Specifically, scholars need a new label that captures these incidents and addresses the blurring of the line between domestic and international terrorism.

Some might view this as a purely academic argument, but there are real world implications to these labels being incomplete or flawed. Law enforcement officers and the court system behave differently towards someone who interacts with a foreign terrorist organization, compared to someone who has no foreign contacts. Since this has implications for due process and the legitimacy of a nation's rule of law, scholars need to develop a better understanding of the differences between these categories, as well as the value and challenges of incorporating additional labels.

There will still be gray areas, and additional challenges, such as identifying when a domestic ideology transforms into a global one. Several left-wing groups operating in Europe in the 1970s and 1980s were inspired by Marxist ideas, and perhaps even sponsored by the Soviet Union. But many of their activities were in response to national social and political issues. How should we categorize independence movements in one country, supported by a diaspora living elsewhere, such as Canadian Tamil supporting the LTTE in Sri Lanka? There are no simple solutions to these issues, but the purpose of this article is to highlight these challenges, and to suggest that a first step is to move beyond the simple dichotomy of domestic and international terrorism, because the line between the two categories is blurring.

About the Author: Gregory D. Miller is Associate Professor of Leadership Studies at the Air Command and Staff College (ACSC), Maxwell AFB, AL. Before joining ACSC he was Chair of the Strategy Department and taught a Terrorism Elective at the Joint Advanced Warfighting School, in Norfolk, VA. He received his Ph.D. in Political Science from The Ohio State University and is one of the Associate Editors of *Perspectives on Terrorism*.

The views expressed in this article are the author's alone and do not reflect the position or policy of the Air University, the Department of Defense, or the U.S. Government.

Notes

[1] Mickolus, Edward F.; Sandler, Todd; Murdock, Jean M.; Flemming, Peter A., 2013, "International Terrorism: Attributes of Terrorist Events (ITERATE), 1968-2015", <https://doi.org/10.7910/DVN/TH4ADJ>, Harvard Dataverse, V2, UNF:6:qOKbszOm-Kr4ZeL4qMlkKdw== [fileUNF].

[2] Jan Oskar Engene, "Five Decades of Terrorism in Europe: The TWEED Dataset," *Journal of Peace Research* 44:1 (2007), 109-121, <https://doi.org/10.1177%2F0022343307071497>.

[3] Although they use the term transnational rather than international, their argument about the distinctions with domestic terrorism are still valid. Joseph Young and Michael Findley, "Promise and Pitfalls of Terrorism Research," *International Studies Review* 13:3 (September 2011), 411-431, <https://doi.org/10.1111/j.1468-2486.2011.01015.x>.

[4] "Terrorism – Libya Public Diplomacy (07/17/1986) (2)," Judy Mandel Files, Box 91721, Ronald Reagan Presidential Library Digital Library Collections, <https://www.reaganlibrary.gov/sites/default/files/digitallibrary/smf/nsc-communicationsandinformation/mandel/91721/terrorism-libyapublicdiplomacy7-17-1986-2.pdf>. Other sources suggest German participation was through the Revolutionary Cells, a rival to Baader Meinhof. Martin Jander, "German Left Terrorism and Israel: Ethno-Nationalist, Religious-Fundamentalist, or Social-Revolutionary?" *Studies in Conflict & Terrorism* 38:6 (June 2015), 456-477, <https://doi.org/10.1080/1057610X.2015.1006451>.

[5] Engene, "Five Decades of Terrorism in Europe".

[6] Jacob Ravndal, "Thugs or Terrorists? A Typology of Right-Wing Terrorism and Violence in Western Europe," *Journal for Deradicalization* 3 (Summer 2015), 1-38.

- [7] Tony Addison and Syed Murshed, "Transnational Terrorism as a Spillover of Domestic Disputes in Other Countries," *Defence and Peace Economics* 16:2 (2002), 69-82, <https://doi.org/10.1080/10242690500070078>.
- [8] Brian Lai, "Draining the Swamp: An Empirical Examination of the Production of International Terrorism, 1968-1998," *Conflict Management and Peace Science* 24:4 (September 2007), 297-310, <https://doi.org/10.1080%2F07388940701643649>.
- [9] Quan Li, "Does Democracy Promote or Reduce Transnational Terrorist Incidents," *Journal of Conflict Resolution* 49:2 (April 2005), 278-297, <https://doi.org/10.1177%2F0022002704272830>; Quan Li and Drew Schaub, "Economic Globalization and Transnational Terrorism: A Pooled Time-Series Analysis," *Journal of Conflict Resolution* 48:2 (April 2004), 230-258, <https://doi.org/10.1177%2F0022002703262869>.
- [10] It was only after the 1995 Oklahoma City Bombing that governments and scholars began to pay more attention to domestic terrorism. Data collection on such events was spurred by the Memorial Institute for the Prevention of Terrorism, and its Terrorism Knowledge Base, most of which was later incorporated into databases at the University of Maryland's National Consortium for the Study of Terrorism and Responses to Terrorism (START).
- [11] Gary LaFree, Sue-Ming Yang, and Martha Crenshaw, "Trajectories of Terrorism: Attack Patterns of Foreign Groups that have Targeted the United States, 1970-2004," *Criminology and Public Policy* 8:3 (2009), 445-473, <https://doi.org/10.1111/j.1745-9133.2009.00570.x>.
- [12] GTD is one product from the University of Maryland's START Center. While GTD provides data on the location of the attack and the nationality of up to three victims, it does not provide the perpetrator's nationality, making it difficult to classify each attack as domestic or international. National Consortium for the Study of Terrorism and Responses to Terrorism (START). (2018). Global Terrorism Database [Data file]. Retrieved from <https://www.start.umd.edu/gtd>.
- [13] They offer a five-step solution for separating the GTD from ITERATE data, but even then it is unclear, without data on the nationality or motivation of the attacker, how many of those events listed as domestic incidents are truly about an issue local to the country in which the attack occurred. In other words, even if we accept their method for separating out the international events, what events remain may still fall into two separate categories: purely domestic and foreign-inspired, or what this article refers to as transnational. Walter Enders, Todd Sandler, and Khusrav Gaibulloev, "Domestic versus Transnational Terrorism: Data, Decomposition, and dynamics," *Journal of Peace Research* 48:3 (2011), 319-337, <https://doi.org/10.1177%2F0022343311398926>.
- [14] Todd Sandler, Daniel Arce, and Walter Enders, "Transnational Terrorism," CREATE Research Archive, Published Articles & Papers, Paper 139 (2008), 8, <http://create.usc.edu/research/publications/2729>.
- [15] GTD.
- [16] I classify all 367 single-issue attacks as domestic in nature. This data uses a motivation variable added to GTD, which identifies perpetrator goals according to five main types (national-separatist, revolutionary, reactionary, religious, and single-issue) and several sub-types within each category. Gregory D. Miller, "Exploring the Fourth Wave: Is the New Terrorism about Religion?" unpublished article.
- [17] See for example: Walter Enders and Todd Sandler, "Transnational Terrorism in the Post-Cold War Era," *International Studies Quarterly* 43, no. 1 (March 1999), 145-167; Audrey Kurth Cronin, "Behind the Curve: Globalization and International Terrorism," *International Security* 27, no. 3 (Winter 2002-03), 30-58; James Piazza, "Incubators of Terror: Do Failed and Failing States Promote Transnational Terrorism?" *International Studies Quarterly* 52, no. 3 (September 2008), 469-488, <https://doi.org/10.1111/j.1468-2478.2008.00511.x>.
- [18] Robert Keohane and Joseph Nye, "Transnational Relations and World Politics: An Introduction," *International Organization* 25:3 (Summer 1971), 329-349, <https://doi.org/10.1017/S0020818300026187>.
- [19] Alex Schmid and Albert Jongman counted 109 different definitions of terrorism. Alex Schmid, Albert Jongman, et al., *Political Terrorism: A New Guide to Actors, Authors, Concepts, Data Bases, Theories, and Literature* (New Brunswick, New Jersey: Transaction Books, 1988).
- [20] The Department of State's definition comes from 22 U.S. Code § 2656f(d)(2) "Annual Country Reports on Terrorism": "premeditated, politically motivated violence perpetrated against noncombatant targets by subnational groups or clandestine agents". The Department of Defense defines terrorism as, "the unlawful use of violence or threat of violence to instill fear and coerce governments or societies. Terrorism is often motivated by religious, political, or other ideological beliefs and committed in the pursuit of goals that are usually political." Joint Publication 3-07.2 Antiterrorism (14 March 2014). The Department of Justice derives its definition from 18 U.S. Code § 2331, which distinguishes between domestic and international terrorism primarily based on the location of the attack ("primarily within the territorial jurisdiction of the United States").

- [21] Various proposals for definitions have been made in the UN, but all failed to receive support because of the various interests of the member states. One of the biggest debates is over whether a definition should include or exclude acts committed by nationalist movements, like the Palestinians. In addition, some members want a definition that allows states to be defined as engaging in terrorism, while other members oppose any such definitions. The Security Council did propose a definition in Res. 1566 “On Threats to International Peace and Security Caused by Terrorist Acts” (8 October 2004), but that resolution lacks legal authority and is non-binding on member states. Alex Schmid, “The Revised Academic Consensus Definition of Terrorism,” *Perspectives on Terrorism* 6:2 (May 2012): 158-159.
- [22] Jerrold Post, “Terrorism and Right-Wing Extremism: The Changing Face of Terrorism and Political Violence in the 21st Century: The Virtual Community of Hatred,” *International Journal of Group Psychotherapy* 65:2 (April 2015): 242-271; Jeffrey Simon, *Lone Wolf Terrorism: Understanding the Growing Threat* (Amherst, NY: Prometheus Books, 2013). This idea of the new wave is based on David Rapoport’s theory regarding the waves of modern terrorism. We are currently in a Religious Wave, but depending on when that wave began (most scholars point to the 1979 Iranian Revolution or the end of the Cold War), it may be close to breaking, to be replaced by a new, Fifth Wave. David Rapoport “The Fourth Wave: September 11 in the History of Terrorism,” *Current History* 100:650 (December 2001).
- [23] Michael Becker, “Explaining Lone Wolf Target Selection in the United States,” *Studies in Conflict & Terrorism* 37:11 (November 2014), 959-978, <https://doi.org/10.1080/1057610X.2014.952261>.
- [24] Ramon Spaaij, “The Enigma of Lone Wolf Terrorism: An Assessment,” *Studies in Conflict & Terrorism* 33:9 (2010), 854-870, <https://doi.org/10.1080/1057610X.2010.501426>.
- [25] Edwin Bakker and Beatrice de Graaf, “Preventing Lone Wolf Terrorism: Some CT Approaches Addressed,” *Perspectives on Terrorism* 5:5-6 (December 2011), 43-50, <https://www.jstor.org/stable/26298538>.
- [26] Clark McCauley, Sophia Moskalenko, and Benjamin Van Son, “Characteristics of Lone-Wolf Violent Offenders: A Comparison of Assassins and School Attackers,” *Perspectives on Terrorism* 7:1 (February 2013), 4-24, <https://www.jstor.org/stable/26296906>.
- [27] Ramon Spaaij and Mark Hamm, “Key Issues and Research Agendas in Lone Wolf Terrorism,” *Studies in Conflict and Terrorism* 38:3 (2015), 167-178, <https://doi.org/10.1080/1057610X.2014.986979>.
- [28] Bart Schurrman, Lasse Lindekilde, Stefan Malthaner, Francis O’Connor, Paul Gill, and Noemie Bouhana, “End of the Lone Wolf: The Typology that should not Have Been,” *Studies in Conflict & Terrorism* (December 2017), <https://doi.org/10.1080/1057610X.2017.1419554>.
- [29] Daveed Gartenstein-Ross, “Lone Wolves No More: The Decline of a Myth,” *Foreign Affairs* (27 March 2017), <https://www.foreignaffairs.com/articles/united-kingdom/2017-03-27/lone-wolves-no-more>; Sam Mullins, “Lone-Actor vs. Remote-Controlled Jihadi Terrorism: Rethinking the Threat to the West,” *War on the Rocks*, 20 April 2017, <https://warontherocks.com/2017/04/lone-actor-vs-remote-controlled-jihadi-terrorism-rethinking-the-threat-to-the-west/>.
- [30] Joel Capellan, “Lone Wolf Terrorist or Deranged Shooter? A Study of Ideological Active Shooter Events in the United States, 1970-2014,” *Studies in Conflict & Terrorism* 38:6 (2015), 395-413, <https://doi.org/10.1080/1057610X.2015.1008341>.
- [31] Raffaello Pantucci offers an alternate typology, using four types of lone wolf terrorists in “A Typology of Lone Wolves: Preliminary Analysis of Lone Islamist Terrorists,” ICSR Paper, March 2011. See Raffaello Pantucci, “What Have We Learned about Lone Wolves from Anders Behring Breivik?” *Perspectives on Terrorism* 5:5-6 (December 2011), 27-42, <https://www.jstor.org/stable/26298537> for one application of that typology applied to a non-Islamic actor.
- [32] Schmid and Jongman, *Political Terrorism*.
- [33] Jeffrey Simon, *The Alphabet Bomber: A Lone Wolf Terrorist Ahead of His Time* (Lincoln, NE: Potomac Books, 2019).
- [34] Lars Erik Berntzen and Sveinung Sandberg, “The Collective Nature of Lone Wolf Terrorism: Anders Behring Breivik and the Anti-Islamic Social Movement,” *Terrorism and Political Violence* 26:5 (2014), 759-779, <https://doi.org/10.1080/09546553.2013.767245>.
- [35] President Obama drew a parallel between San Bernardino and the threat of lone-wolf actors in his weekly video address after the attack. Michael Memoli, “Obama: San Bernardino attack shows the threat of ‘lone-wolf actors,’” *Los Angeles Times*, 13 March 2016, <http://www.latimes.com/nation/politics/la-na-obama-terror-address-20151205-story.html>.
- [36] Jennifer Medina, Richard Perez-Pena, Michael Schmidt, and Laurie Goodstein, “San Bernardino Suspects Left Trail of Clues, but No Clear Motive,” *The New York Times*, 3 December 2015, http://www.nytimes.com/2015/12/04/us/san-bernardino-shooting.html?_r=0. Curiously, one page on the FBI website lists the San Bernardino attack as an example of international terrorism, because the perpetrators were “inspired by or associated with designated foreign terrorist organizations or nations,” <https://www.fbi.gov/investigate/terrorism>. Yet elsewhere, the FBI’s definition of domestic terrorism refers simply to acts within the United States or Puerto Rico, “without foreign direction”. U.S. Department of Justice, “Terrorism 2002-2005”, vi-v, https://www.fbi.gov/file-repository/stats-services-publications-terrorism-2002-2005-terror02_05.pdf.

- [37] Jessica Zuckerman et al., “60 Terrorist Plots since 9/11,” Special Report #137 on Terrorism, Heritage Foundation, 22 July 2013; Peter Olsson, *The Making of a Homegrown Terrorist: Brainwashing Rebels in Search of a Cause* (Santa Barbara, CA: Praeger, 2014), chapter 9.
- [38] Jerome Bjelopera, “American Jihadist Terrorism: Combating a Complex Threat,” Congressional Research Service (23 January 2013).
- [39] U.S. Department of Justice, “American Citizen Sentenced to 45 Years for Conspiring to Murder U.S. Nationals and Providing Material Support to Al-Qaeda,” Press Release Number 18-300, 13 March 2018, <https://www.justice.gov/opa/pr/american-citizen-sentenced-45-years-conspiring-murder-us-nationals-and-providing-material>; Counter Extremism Project, “Fact Sheet: Prosecuted Homegrown Radicals with Ties to Anwar al-Awlaki,” 20 January 2016, https://www.counterextremism.com/sites/default/files/factsheet_anwaral-awlaki_012016.pdf.
- [40] Rodger Bates, “Dancing with Wolves: Today’s Lone Wolf Terrorists,” *The Journal of Public and Professional Sociology* 4:1 (2012), 1-14.
- [41] Harry Cleaver, “The Zapatista Effect: The Internet and the Rise of an Alternative Political Fabric,” *Journal of International Affairs* 51:2 (Spring 1998), 20-39; Kelly Dampousse and Brent Smith, “The Internet: A Terrorism Medium for the 21st Century,” in Harvey Kushner, ed., *The Future of Terrorism: Violence in the New Millennium* (London: Sage Publications, 1998), 208-224; Anne Stenersen, “Bomb-Making for Beginners: Inside al Al-Qaeda E-Learning Course,” *Perspectives on Terrorism* 7:1 (February 2013), 25-37, <https://www.jstor.org/stable/26296907>.
- [42] Yariv Tsfati and Gabriel Weimann, “www.terrorism.com: Terror on the Internet,” *Studies in Conflict & Terrorism* 25:5 (2002), 317-332, <https://doi.org/10.1080/10576100290101214>; Maura Conway, “Terrorism and the Internet: New Media – New Threat?” *Parliamentary Affairs* 59:2 (2006), 283-298, <https://doi.org/10.1093/pa/gsl009>.
- [43] James Farwell, “The Media Strategy of ISIS,” *Survival* 56:6 (2014), 49-55; J.M. Berger and Jonathan Morgan, “The ISIS Twitter Census: Defining and Describing the Population of ISIS Supporters on Twitter,” Brookings Analysis paper No 20, March 2015, https://www.brookings.edu/wp-content/uploads/2016/06/isis_twitter_census_berger_morgan.pdf; Jytte Klausen, “Tweeting the Jihad: Social Media Networks of Western Foreign Fighters in Syria and Iraq,” *Studies in Conflict & Terrorism* 38:1 (2015), 1-22, <https://doi.org/10.1080/1057610X.2014.974948>; Elizabeth Bodine-Baron, Todd Helmus, Madeline Magnuson, and Zev Winkelman, *Examining ISIS Support and Opposition Networks on Twitter* (Santa Monica, CA: RAND Corporation, 2016).
- [44] Timothy Thomas, “Al Qaeda and the Internet: The Danger of ‘Cyberplanning,’” *Parameters* 23:1 (2013), 112-123, <https://apps.dtic.mil/dtic/tr/fulltext/u2/a485810.pdf>.
- [45] Anthony Lemieux, Jarret Brachman, Jason Levitt, and Jay Wood, “Inspire Magazine: A Critical Analysis of its Significant and Potential Impact through the Lens of the Information, Motivation, and Behavioral Skills Model,” *Terrorism and Political Violence* 26:2 (2014), 354-371, <https://doi.org/10.1080/09546553.2013.828604>; Klausen, “Tweeting the Jihad.”
- [46] Peter Chalk, “Liberation Tigers of Tamil Eelam’s (LTTE) International Organization and Operations: A Preliminary Analysis,” Commentary (Canadian Security Intelligence Service) 77 (1999); Dorothy Denning, *Information Warfare and Security* (Reading, MA: Addison-Wesley, 1999), 69; Daniel Cohen, “Cyber Terrorism: Case Studies,” 165-174 in Babak Akhgar, Andrew Staniforth, and Francesca Bosco, eds., *Cyber Crime and Cyber Terrorism Investigator’s Handbook* (Waltham, MA: Syngress, 2014).
- [47] Lorraine Bowman-Grieve, “Exploring ‘Stormfront’: A Virtual Community of the Radical Right,” *Studies in Conflict & Terrorism* 32:11 (November 2009), 989-1007.
- [48] Stefan Leader and Peter Probst, “The Earth Liberation Front and Environmental Terrorism,” *Terrorism and Political Violence* 15:4 (2003), 37-58, <https://doi.org/10.1080/09546550390449872>; Paul Joosse, “Leaderless Resistance and Ideological Inclusion: The Case of the Earth Liberation Front,” *Terrorism and Political Violence* 19:3 (2007), 351-368, <https://doi.org/10.1080/09546550701424042>.
- [49] The full text of the manifesto is available in several places, including Brendan O’Connor, “Here is What Appears to Be Dylann Roof’s Racist Manifesto,” *Gawker*, 20 June 2015, <http://gawker.com/unfortunately-it-s-clear-they-already-were-this-is-ju-1712775427>. Although there was initially some uncertainty, law enforcement confirmed that Roof authored the manifesto. Lenny Bernstein, Sari Horwitz, and Peter Holley, “Dylann Roof’s Racist Manifesto: ‘I have no choice,’” *The Washington Post*, 20 June 2015, https://www.washingtonpost.com/national/health-science/authorities-investigate-whether-racist-manifesto-was-written-by-sc-gunman/2015/06/20/f0bd3052-1762-11e5-9ddc-e3353542100c_story.html.
- [50] Keegan Hankes, “Dylann Roof May have Been a Regular Commenter at Neo-Nazi Website the Daily Stormer,” Southern Poverty Law Center, 21 June 2015, <https://www.splcenter.org/hatewatch/2015/06/22/dylann-roof-may-have-been-regular-commenter-neo-nazi-website-daily-stormer>.
- [51] Polly Mosendz, “Dylann Roof Confesses: Says he Wanted to Start ‘Race War,’” *Newsweek*, 19 June 2015, <http://www.newsweek.com/dylann-roof-confesses-church-shooting-says-he-wanted-start-race-war-344797>.
- [52] Richard Serrano, “Senators say Tsarnaev Should be Declared ‘Enemy Combatant,’” *Los Angeles Times*, 20 April 2013, <https://www.latimes.com/nation/la-xpm-2013-apr-20-la-na-nn-miranda-boston-bombing-suspect-20130420-story.html>.

[53] There are, of course, those who see the difference as Roof being white, and therefore not a terrorist. Anthea Butler, "Shooters of Color are Called 'Terrorists' and 'Thugs.' Why are White Shooters Called 'Mentally Ill?'" *The Washington Post*, 18 June 2015, <https://www.washingtonpost.com/posteverything/wp/2015/06/18/call-the-charleston-church-shooting-what-it-is-terrorism/>. This issue is also influenced by the fact that attacks by Muslims receive more media coverage than other attacks. Erin Kearns, Allison Betus, and Anthony Lemieux, "Why Do Some Terrorist Attacks Receive More Media Attention than Others?" *Justice Quarterly* (2019), 1-24, <https://doi.org/10.1080/07418825.2018.1524507>.

[54] Denise Lavoie and Tom Hays, "Dzhokhar Tsarnaev, Boston Bombing Suspect, Was Influenced by Internet: Indictment" *Huffington Post*, 28 June 2013, http://www.huffingtonpost.com/2013/06/28/dzohkhar-tsarnaev-internet-indictment_n_3515432.htm.

[55] Ann O'Neill, "The 13th Juror: The Radicalization of Dzhokhar Tsarnaev," *CNN.com*, 30 March 2015, <http://www.cnn.com/2015/03/27/us/tsarnaev-13th-juror-jahar-radicalization/>; Counter Extremism Project, "Fact Sheet: Prosecuted Homegrown Radicals with Ties to Anwar al-Awlaki," 20 January 2016, https://www.counterextremism.com/sites/default/files/factsheet_anwaral-awlaki_012016.pdf.

[56] Scott Wilson, Greg Miller, and Sari Horwitz, "Boston Bombing Suspect Cites U.S. Wars as Motivation, Officials Say," *The Washington Post*, 23 April 2013, https://www.washingtonpost.com/national/boston-bombing-suspect-cites-us-wars-as-motivation-officials-say/2013/04/23/324b9cea-ac29-11e2-b6fd-ba6f5f26d70e_story.html.

[57] 18 U.S. Code § 2331. For a discussion of the legal issues, see Mary McCord, "It's Time for Congress to Make Domestic Terrorism a Federal Crime," *Lawfare*, 5 December 2018, <https://www.lawfareblog.com/its-time-congress-make-domestic-terrorism-federal-crime>. An example of the terrorism enhancement applied to domestic terrorism is the prosecution of the members of the Earth Liberation Front. See, Jeff Barnard, "Earth Liberation Front Arsonist Sentenced to 13 Years," *The Seattle Times*, 24 May 2007, <https://www.seattletimes.com/seattle-news/earth-liberation-front-arsonist-sentenced-to-13-years/>.

[58] Violence against abortion providers in the 1980s and 90s presented similar challenges to the government, because while many attacks were carried out by groups that could easily be classified as domestic terrorist groups, their actions did not fall under any domestic terrorism laws. Michele Wilson and John Lynxwiler examine this phenomenon, but conclude the FBI did not treat these acts as terrorism because of a focus on international terrorism or for political reasons, rather than the fact that no laws allowed prosecution for domestic terrorism. Michele Wilson and John Lynxwiler, "Abortion Clinic Violence as Terrorism," *Terrorism* 11:4 (January 1988), 263-273, <https://doi.org/10.1080/10576108808435717>.

[59] In January 2018, the U.S. Department of Justice and Department of Homeland Security released a report finding that 402 out of the 549 (73%) individuals convicted of international terrorism between 9/11 and the end of 2016 were foreign-born. The White House used that report to claim the immigration system is broken, but those numbers are more likely a function of more successfully applying terrorism laws to those who are not U.S. citizens, especially if they are captured outside of U.S. territory. Executive Order 13780: *Protecting the Nation From Foreign Terrorist Entry Into the United States* Initial Section 11 Report, January 2018, <https://www.hsdl.org/?abstract&did=807132>.

[60] James Risen and Philip Shenon, "U.S. Says it Halted Qaeda Plot to Use Radioactive Bomb," *The New York Times*, 10 June 2002, <http://www.nytimes.com/2002/06/10/national/10CND-TERROR.html>.

[61] Olsson, *The Making of a Homegrown Terrorist*.

[62] *Ex parte Quirin*. See, for example, Jennifer Elsea, "Detention of American Citizens as Enemy Combatants," CRS Report RL31724, 15 March 2004.