

**OSCE Meeting on the Relationship Between Racist, Xenophobic
and Anti-Semitic Propaganda on the Internet and Hate Crimes**

**Paris, France
June 16 - 17, 2004**

**Regulating Hate Speech *Qua* Speech
is Not the Solution to the Epidemic of Hate on the Internet**

by Christopher Wolf

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I am deeply gratified that this important international conference is taking place. And I applaud the organizers for focusing on the powerful impact and powerful problems presented by the relationship between hate crimes, hate propaganda and the misuse of the Internet by hate groups.

As Chair of the Internet Policy Committee of the Anti-Defamation League, I am well aware of the means by which the Internet may be misused to disseminate messages of hate and violence. As a lawyer specializing in Internet law, I am also well aware of the challenges faced by legislators, law enforcement and national governments to keep up with the daily barrage of hate propaganda on the Internet. As an individual concerned about the growing misuse of the marvelous medium which is the Internet, I am particularly pleased to participate in this conference and discuss the ways in which law, technology, education and guidance may be used to positively affect the Internet without interfering with the free flow of ideas and information.

The Internet is now an entrenched presence in our society. We all know and appreciate that the Internet has transformed the ways in which we communicate, educate, inform and entertain. But there is a dark side to the Internet. Terrorists, anti-Semites, racists, homophobes and other haters have logged on and are online. The Internet has rapidly transformed the way people worldwide may communicate. The ability to send information instantaneously at any time for relatively little or no cost is truly revolutionary. But the possibilities to use this medium for unlawful activity has grown as well. Unfortunately, the Internet has become the new frontier in spreading hate.

From web sites spewing vitriolic message of hate and recruiting the young to join in the sponsor's organizations, to technology attacks, to the consummation of terrorist conspiracies through e-mail, bulletin boards, extranets and downloadable files with target coordinates and recipes for bombs, the Internet has become a potent tool for the spread of hate and violence. The Internet is an especially inviting host to spread the virus of hate. Instead of standing on a street corner and handing out mimeographed leaflets, hate mongers may now promote their causes at sites on the World Wide Web and in chat rooms. The Internet facilitates communication among like-minded bigots across borders and oceans and enhances their ability to promote and recruit for their causes anonymously and cheaply.

What can be done? In the United States, judges have struggled over the electronic dissemination of hate speech because although it is offensive and hurtful, the First Amendment to the United States Constitution protects such expression. When speech, however, contains a direct, credible threat against an identifiable individual, organization, or institution, it crosses the line to criminal conduct. Hate speech containing criminal threats is not protect by the First Amendment. And although criminal cases concerning hate speech on the Internet are few in

number, there is much to learn from the first few successful prosecutions of hate speech in the United States. Where do Courts draw the line? By looking at what has been done already and what can be prohibited online, we may gain an understanding of the limits to Internet hate speech, and the problems inherent in seeking only legal means to stop it. Just last week, a Federal jury in Idaho deadlocked over these very issues in a fascinating case which I will discuss in a moment.

Historically, American lawmakers have generally taken a “hands off” approach to hate on the Internet, recognizing the broad First Amendment protections. Internet legislation has largely focused on sexually explicit materials deemed harmful to minors, and much of that legislation has been struck down as overly-broad and violative of Constitutional free speech protections. Still, pre-Internet era laws prohibiting obscene materials, threats of imminent violence and violations of civil rights have been applied to the Internet, and have resisted challenge. The majority of the reported cases result from e-mail messages containing threats, such as a barrage of online anti-Asian epithets directed at Asian college students, which resulted in the successful prosecution of the sender. Or another college student who proclaimed to hate homosexuals and threatened to “shoot” them in the “back of the ... head” which resulted in the student being successfully enjoined from continuing to disseminate such hate speech.

U.S. Courts have been reluctant to draw a line for expressions of hate speech, as exhibited by the historic case in Skokie, Illinois, which allowed a “Nazi parade” to march through the streets of the predominantly Jewish town¹ The U.S. Supreme Court later confirmed its reluctance in permitting regulation of hate speech when it struck down a Minnesota city ordinance banning speech that “arouses anger, alarm or resentment in others on the basis of race,

¹ Nat'l Socialist Party v. Village of Skokie, 432 U.S. 43, 44 (1977).

color, creed, religion, or gender.” The Supreme Court noted that it shall not permit a government to impose special prohibitions on those who express disfavored views.

The dawn of hate on the internet has wreaked havoc on American society with a marked increase in hate crimes. Online recruiting has aided many hate groups linked to violence against Jews, African-Americans, and homosexuals increase their membership. In fact, Don Black, former Grand Dragon of the Ku Klux Klan, noted that, “as far as recruiting, [the internet has] been the biggest breakthrough I’ve seen in the 30 years I’ve been involved in [white nationalism].”² Moreover, perpetrators of Internet hate crimes are not hampered by existence of national or international boundaries, because information can be easily transmitted worldwide through communications and data networks. Even though connections may be of short duration, most computers are physically located in identifiable places. Of course, computers can be accessed remotely, regardless of the location of the persons who post, send, view, or receive information online.

The leading case that sought to establish the line with respect to hate speech online³ involved Neal Horsley, in conjunction with the American Coalition of Life Activists (the “ACLA”), who created an anti-abortion site known as “The Nuremberg Files.” The ACLA Web site offered extensive personal information about abortion providers: pictures; addresses and phone numbers; license-plate numbers; Social Security numbers; names and birth dates of spouses and children. Viewers were exhorted to send photos, videotapes and data on “the abortionist, their car, their house, friends, and anything else of interest.”

² *Id.* (citing Andrew Backover, “Hate Sets up Shop on Internet,” Denver Post, Nov. 8, 1999, at E-01)

³ 23 F. Supp. 2d 1182 (D. Or. 1999); 41 F. Supp. 2d 1130 (D. Or. 1999)(vacated and remanded); 244 F.3d 1007 (9th Cir. 2001)(reh’d en banc granted); 268 F.3d 908 (9th Cir. 2001)(affirmed in part, vacated in part and remanded); 290 F.3d. 1058 (9th Cir. 2002).

The ACLA Web site said that the information garnered would be used to prosecute abortion providers when abortion becomes illegal, just as Nazi leaders were prosecuted after the Second World War. The list of abortion providers at The Nuremberg Files site read like a list of targets for assassination. Names listed in plain black lettering were of doctors still "working"; those printed in "Greyed-out" letters were "wounded"; and those names that were crossed out ("Strikethrough") indicated doctors who had been murdered ("fatality").

The "Nuremberg Files" trial court wrestled with the issue of whether the Web site constituted protected speech under the First Amendment or qualified as a "true threat."⁴ At trial the jury found that the ACLA Web site was a threat to plaintiffs and ordered the Web site owners and operators to pay plaintiffs over \$100 million in damages. The court then issued a permanent injunction to prevent the defendants from providing additional information to the "Nuremberg Files" Web site.⁵

The Appellate Court unanimously reversed, holding that the defendants' Web site was a lawful expression of views protected by the First Amendment. On appeal, the Court concluded that "unless [defendants] threatened that its members would themselves assault the doctors, the First Amendment protects its speech."⁶ The court later decided to rehear the case *en banc* and in an 8-3 decision held that the Web site constituted a true "threat of force" and was not protected by the First Amendment.⁷

⁴ ACLA, 23 F. Supp. 2d at 1188.

⁵ 41 F. Supp. 2d 1130, 1153 (D. Or. 1999).

⁶ Id. at 1015.

⁷ 290 F. 3d 1058, 1063 (9th Cir. 2002) (Hon. Alex Kozinsky, judge who rendered opinion below, joined in the dissent).

Thus the Appellate ruling found that a true threat, that is, one where a reasonable person would foresee that the listener would believe he would be subject to physical violence upon his person, is unprotected under the First Amendment. Responding to arguments made by *amicus* (the ACLU) asking the court to adopt a subjective test, the Appellate Court stated that it is not necessary for the defendant to intend to, or be able to carry out his threat. Rather, “[t]he only intent requirement is that the defendant intentionally or knowingly communicate the threat.” “The Nuremberg Files go beyond merely offensive or provocative speech. . . . As a result, we cannot say that it is clear as a matter of law...[these] are purely protected, political speech.”

Thus, after the Nuremberg Files case, it is clear that hateful content, when it knowingly and intentionally communicates a credible threat, will not be protected. The few other cases involving hate speech on the Internet in the United States have also wrestled with the issue of where to draw the line. The following four cases present start examples of vitriolic hate speech in which the sender was successfully prosecuted for the threatening content of his message. In each instance, a knowing and intentional threat was communicated via the Internet.

United States v. Machado

The case of *United States v. Machado* is one of the first examples of successful prosecution of hate online. Richard Machado, a 21-year-old expelled college student sent a threatening email message to 60 Asian students: “I personally will make it my life career [sic] to find and kill everyone one [sic] of you personally. OK?????? That’s how determined I am...” Machado’s first trial ended in a hung jury. A trial in 1998 resulted in Machado’s conviction for interference with federally protected activities in violation of a federal statute.⁸ He was

⁸ United States v. Machado, 195 F.3d 454 (9th Cir. 1999).

sentenced to one year in prison to be followed by a one-year period of supervised release.⁹

Machado appealed his conviction on grounds of preemptory challenges, however the appellate court rejected his argument.¹⁰

State v. Belanger

Casey Belanger, a 19-year-old freshmen student posted his resume on the university's computer network, which included a statement that he "dislike[d] fags." Later that same day, Belanger posted a message to student groups affiliated with gay and lesbian causes, which stated [expletives deleted]: "I hope that you dies screaming in hell...you'd [sic] better watch your...back you little...I'm [sic] gonna shoot you in the back of the...head...die screaming [name of student], burn in eternal...hell. I hate gay/lesbian/bisexuals, so...what..."¹¹ The State Attorney General brought an action against Belanger under the Main Civil Hate Crime Act seeking an injunction to require the student to cease from threatening any person because of the person's sexual orientation, race, color, religion, ancestry, sex, national origin, or physical or mental disability. The court issued a permanent injunction.

Commonwealth of Pennsylvania v. Alpha HQ

A year after the Belanger case, in 1998, Ryan Wilson, a white supremacist, started a Web site for his racist organization, ALPHA, depicting a bomb destroying the office of a fair housing specialist who regularly organized anti-hate activities. Next to her picture, the ALPHA Web site stated, "Traitors like this should beware, for in our day, they will be hung from the neck from the nearest tree or lamp post." Wilson was charged by the Pennsylvania Commonwealth's

⁹ Id. at 455.

¹⁰ Id. at 457.

¹¹ Anti-Defamation League, Investigating Hate Crimes on the Internet, 2003.

Attorney General with threats, harassment, and ethnic intimidation. Wilson did not contest the State's action under Pennsylvania's Civil Hate Crimes Act; the site was removed from the internet, and the Court issued an injunction against the defendant and his organizations barring them from displaying certain messages on the internet.

United States v. Kingman Quon

Kingman Quon, a college student, sent email messages to hundreds of Hispanic persons across the nation. The racially derogatory messages discussed Quon's hatred of Latinos, accused them of being "too stupid" to have been accepted at the university or have obtained employment without the help of affirmative action programs, and concluded that he intended to "come down and kill" them. In 1999, the U.S. Department of Justice charged the defendant with interfering with the students' Federal rights in violation of Federal Civil Rights law. Quon pled guilty and received a two-year prison sentence.

As the Machado, Belanger, White and Quon cases demonstrate, hate speech will be prosecuted and enjoined if a credible threat to an individual or group exists. However, the use of the Internet of send bias-motivated messages and threats is increasing. Internet use has increased exponentially in recent years. Approximately 533 million people now use the Internet to search for information, create material to share with large audiences, and to communicate with others throughout the world for little or no cost. Users in the United States are estimated at approximately 149 million. For the bias-motivated Internet user, the combination of limitless reach and lack of accountability is tantalizing. As the cases I've discussed make clear, some users have wrongly assumed that their apparent anonymity would shield them from prosecution.

And, racist maniacs like Benjamin Smith are a prime example of precisely why the Internet presents such difficult problems for lawmakers.

After being named "Creator of the Year" in 1998 by the World Church of the Creator ("WCOTC"), Benjamin Smith went on a racially motivated shooting spree in Illinois and Indiana over the July 4, 1999 weekend. Targeting Jews, Blacks, and Asians, Smith killed two Indiana University students and wounded eight. As law enforcement officers prepared to apprehend him, Smith took his own life. "It wasn't really 'til I got on the Internet, read some literature of these groups that...it really all came together." Benjamin Smith told documentary filmmaker Beverly Peterson months before his spree. "It's a slow, gradual process to become racially conscious." The Webmaster for WCOTC at the time of the Smith rampage, Kelly Daniels, admitted that Smith had sent him "about five" E-mail messages "congratulating" him on his Web work, indicating that Smith regularly consulted WCOTC Web sites.

Like Smith, Pittsburgh gunman Richard Baumhammers murdered members of several minorities in April 200. He was convicted of killing five people and sentenced to death in May 2001. His victims were a Jewish woman, a Black man, two Asian-Americans, and two Indian men. Before his shooting spree, Baumhammers visited Tom Metzger's WAR Web site. (Metzger later characterized him as "a white man" who "decided to deliver Aryan justice in a down home way.") On the Web site for his fledgling "Free Market Party", Baumhammers called for an end to non-white immigration. He stated that "almost all" present day immigration "is non-European," and "the effect of such massive waves of immigration has been disastrous for Americans of European ancestry."

Baumhammers' icon, Tom Metzger, a television repairman from Fallbrook, California, has been a leader in organized bigotry for more than 25 years. Metzger preaches a fierce brand of

anti-Semitic, racist and anti-immigrant invective, combined with a leftist-leaning revolutionary ideology known as the "Third Position." He has been widely acknowledged as the principal mentor of the neo-Nazi skinhead movement since its appearance in America during the mid-1980s; in this connection, he attracted nationwide publicity in 1990, when an Oregon jury rendered a \$12.5 million judgment against him and his son, John, for inciting the murder of an Ethiopian immigrant by skinheads. Today, although still paying the judgment, Metzger continues to cultivate a following through his monthly newspaper, WAR - White Aryan Resistance, a Web site, a telephone hotline, an e-mail newsletter, and other media.

When one witnesses the anti-Semitic, racist, homophobic, and Holocaust-denying Web sites that are proliferating, and the hate mongers like Metzger and Baumhammers who are capitalizing on the Internet as a tool to spread their messages, a natural response is "There ought to be a law!" But the promulgation of new legal rules and further criminal penalties is not necessarily what is called for. As an Internet lawyer, I spend much of my professional life applying existing laws to online conduct. I worry about cheapening the legal process by enacting laws which cannot be enforced or from which prosecution is easily escaped. I am of the view that law is just one of the tools available to affect the Internet positively. Technology, education, and guidance are other relevant tools. As will be discussed at this OSCE Conference, ISPs, NGOs, governments and concerned citizens all have a role to play. Thus while I am well aware of the effective role the law can play in controlling misuse of the Internet, I also am aware of the law's limitations and its potentially harmful side-effects.

Moreover, despite successful individual prosecutions for Internet hate speech, it is widely recognized that the nature of the Internet is such that episodic, individual prosecution will do little to affect the overall presence of harmful online content. The Internet affords anonymity

and rapid mobility. If an offensive Web Site is shut down in Germany, it may pop up overnight in Sweden, and thus still be available worldwide on the Internet. Where countries have attempted to restrict access to the Internet through “official” portals or government-operated or –sanctioned Internet Service Providers, or “ISP’s”, end runs around those portals can be as simple as a long distance telephone call to a foreign ISP.

Some believe that the most efficacious way to control illegal or harmful Internet content is through regulation of the ISPs or the principal access points for the Internet. Yet, the International trend is against ISP regulation. In the EU, the proposed directive on electronic commerce removes potential ISP liability for hosting, transmitting, or failing to monitor the contents of information it hosts or for which it serves as a conduit. Likewise, in the United States, ISPs generally are absolved from liability (although in the case of copyright infringement, certain notice and take down obligations arise for those wishing to avail themselves of statutory protection).

The ISP industry, virtually non-existent a decade ago, has been extremely effective in organizing to ward off governmental regulation. In the U.S., for example, America Online developed a public policy advocacy team at the local, state and federal levels. One of the more potent arguments the ISP industry has advanced is that “self-regulation” and the adoption of Codes of Conduct are effective means to deal with misuse of the Internet. To the extent the Codes of conduct are memorialized in an ISP’s terms of service, they become contractual undertakings, enforceable as a matter of law. In this way, the law does assume a role in regulation, but only at the level of private contract enforcement. In the U.S., one case that is getting attention because of these very issues relating to providing access and assistance to hate

mongers is the Sami al-Hussayan case, which is particularly noteworthy because it is occurring in a post 9-11 landscape.

After September 11th people across the globe were forced to accept the threat posed by Muslim extremists and the benefits the Internet provides to achieve their plans. Al-Qaeda operatives relied heavily on the Internet in planning and coordinating the September 11th attacks. However, outside the use of the Internet to plot against other nations, hate groups spread extremist propaganda on the Internet. Many Web sites include articles that condemn Jews, contain biographies of Islamists killed in battle, and set forth biased accounts of the wars in Iraq and Afghanistan.¹²

Supporters of bin Laden and Al-Qaeda openly acknowledge the power of the Internet as a propaganda tool. For instance, the Assam Publications site stated that, “due to the advances of modern technology it is easy to spread news, information, articles and other information over the internet. We strongly urge Muslim Internet professionals to spread and disseminate news and information about the Jihad through e-mail lists, discussion groups, and their own Websites. If you fail to do this, and our site closes down before you have done this, we may hold you to account before Allah on the Day of Judgment.”¹³

In instances where a credible threat is sent to a targeted group, it is easy to understand why the prosecution of that type of hate speech was successful. In other instances, however, the precise connection between the message and the messenger may not be so clear, as the ongoing Sami Al-Hussayan case demonstrates. What if the defendant merely facilitated the spread of hate by providing technical assistance and creating web pages, but not providing content?

¹² Anti-Defamation League, Jihad Online: Islamic Terrorists and the Internet, p. 10-12 (2002).

¹³ Id.

Where do Courts draw the line? That very issue is playing out right now in this ground-breaking case in the U.S. which was under deliberation just last week by a Federal jury in Idaho.

The jury is considering charges against 34 year old Saudi national Sami Al-Hussayen – a computer science doctoral candidate at the University of Idaho – who has been accused by the U.S. government of supporting terrorism by using his online skills to create an Internet network that financed and recruited terrorists. Al-Hussayen is accused of allegedly conspiring with the Islamic Assembly of North America (“IANA”) to support terrorism by operating and maintaining a radical Islamic Web site.¹⁴ The Federal jury hearing the case just last Wednesday reached a verdict on some counts, but not on others.

Al-Hussayen presents a challenging dilemma, because the defendant is a well-educated, married, father of three who is publicly on record as denouncing the Sept. 11, 2001 East Coast terror attacks. Al-Hussayen, a member of a prominent Riyadh family whose education is being financed by the Saudi government, is in the U.S. studying for his doctorate in computer science. One of the Web sites registered by al-Hussayen on September 11, 2000, (www.alasr.ws) published an article entitled “Provision of Suicide Operations” written by a radical Saudi sheikh which included language of how a *Mujahid* (warrior) must kill himself and how this can be accomplished.

Labeled at times as “the case that goes too far” (because it appears on its face to be prosecuting a “Webmaster” for merely facilitating the spread of information, as opposed to advocating the content of the speech itself), the United States argued that Al-Hussayen’s Web sites contained content so subversive that it convinced people to finance terrorism or become part of it.

¹⁴ See Anita Ramasastry, “Is Being a Webmaster for Controversial Islamic Web sites a Crime? A USA Patriot Act Prosecution Raises the Issue”, <http://writ.findlaw.com/ramasastry/20040503.html>.

Al-Hussayen's case is particularly interesting in the post-9/11 landscape because under the Patriot Act, enacted one month after 9/11, a person within the United States or subject to the jurisdiction thereof who knowingly provides material support or resources to a foreign terrorist organization, or attempts to conspire to do so, which includes expert advice or assistance, may be prosecuted for conspiracy to support terrorism and imprisoned for up to 15 years.¹⁵ There is no First Amendment exception, thus even when assistance counts as free speech, or free association, it still may fall within the Act.¹⁶ Is Al-Hussayen simply a talented Webmaster who helped facilitate others? Or is he responsible for the content found on his numerous Web sites and web links?

The indictment against al-Hussayen charges that from at least October 1998, he engaged in computer Web site activities that far exceeded his course of study at the University of Idaho.¹⁷ These activities included those similar to an ISP, such as providing expert computer services, advice, assistance and support to organizations and individuals, including the IANA, in the form of Web site registration, management, administration and maintenance, including a number of sites that advocated violence against the United States. According to the government, al-Hussayen was either the registrant or the administrative contact for a number of sites that were linked to the IANA.

Al-Hussayen filed a motion to dismiss earlier in the case claiming that he has the right under the First Amendment to advocate for the use of force or the violation of the law,¹⁸ to

¹⁵ H.R. 3162, Title 8, §§805, 807 (2001).

¹⁶ See Anita Ramasastry, "Is Being a Webmaster for Controversial Islamic Web sites a Crime? A USA Patriot Act Prosecution Raises the Issue", <http://writ.findlaw.com/ramasastry/20040503.html>.

¹⁷ See attached copy of Indictment.

¹⁸ Brandenburg v. Ohio, 395 U.S. 444, 447-49 (1969).

advocate for illegal action at some indefinite time in the future,¹⁹ to advocate political goals of a terrorist organization, including praising such groups for using terrorism to achieve its objectives,²⁰ and even advocate for action that makes it more likely that someone will be harmed at some unknown time in the future by an unrelated third party.²¹

The US Government prevailed against Al-Hussayen's motion to dismiss stating that the defendant had mischaracterized his prosecution as an attempt to punish the publication of speech protected by the First Amendment.²² Rather, he is being charged with criminal conduct – financial support and services, communications equipment, expert advice and assistance, and personnel, in violation of specific statutes. In addition to the charges relating to creating a terrorist Internet network, the government has also charged Al-Hussayen with making false statements and visa fraud for allegedly trying to hide his association with the Michigan-based **IANA**.

Al-Hussayen's defense team is on record as claiming that he merely helped maintain the IANA Web sites in order to promote Islam generally. That "help", Al-Hussayen has argued, came in the form of facilitating the creation of Web sites from a technical level, not in the creation of content. The hateful and vitriolic content, they further argued, was not a reflection of Al-Hussayen's views, who has claimed that any radical or subversive material posted on the Islamic Assembly Web sites or linked to them did not represent his personal views and in any event would be constitutionally protected under the First Amendment if they did.

¹⁹ Hess v. Indiana, 414 U.S. 105, 108-09 (1973).

²⁰ Humanitarian Law Project v. Reno, 205 F.3d 1130, 133 (9th Cir. 2000), *affirmed*, 352 F.3d 382 (9th Cir. 2003).

²¹ Planned Parenthood of the Columbia/Willamette Inc. v. ACLA, 244 F.3d 1007, 1015 (9th Cir. 2001), *vacated on other grounds*, 290 F.3d 1058 (9th Cir. 2002)(*en banc*).

²² See attached copy of Memorandum in Opposition to Defendant's Motion to Dismiss.

It will be important to have the final outcome in this case, although it will most likely go all the way to the Supreme Court and the free speech immunity issues may not be fully resolved for some time.

To conclude, combating online extremism present enormous technological and legal difficulties. Even if it were electronically feasible to keep sites off the Internet, the international nature of the medium makes total legal regulation virtually impossible. Furthermore, in the United States, from which the vast majority of Internet content originates, the First Amendment guarantees the right of freedom of speech, even for those whose opinions are reprehensible. Consequently, governments, corporations and people of goodwill have looked for alternative ways to address the problem. Internet Service Providers (ISPs) based in the United States, as private actors, are not bound by the First Amendment, and they are not legally liable for the content of the sites they host.

Just as an ISP can remove a hate site from its servers, concerned individuals can undertake to remove such sites from their screens. Additionally, Internet users can let responsible authorities know about the threatening, hateful and violent materials they find online.

Finally, the Internet itself can be used as a powerful tool to promote tolerance and to combat hate. As a powerful technological tool that permits instantaneous communication between disparate populations across the globe, the Internet can promote cultural tolerance in a larger sense. It can help educate people, promote positive messages, spread truthful information and facilitate the exchange of ideas. The Web Site of the Anti-Defamation League, www.adl.org, is a prime example. The ADL believes that in the online world, as in the print world, the best antidote to hate speech is more speech. This Conference is a perfect example of that principle in action.