

## ISLAMOPHOBIA IN THE WESTERN MEDIA: GEERT WILDER'S MOHAMMAD CARTOON CONTROVERSY IN HOLLAND'S HATE SPEECH PROVISIONS

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### ABSTRACT

*“Islamophobia” in the western world is not only considered as a fear and disliking towards Muslims but also a concept that involves the complete erasure of Muslims by western society. The international media is considered a major collaborator in keeping Islamophobia the most prevalent issue in the western culture by directly attacking Muslim sentiments through state-based hate speeches or indirectly by projecting only the negative news of Muslims. Holland’s Mohammad Cartoon Competition once again processed a continuing conflict between the right of free speech and hate speech. The aim of this article is to analyse the Muhammad Cartoon Competition 2018 and Geert Wilders comments in the light of Holland’s hate speech provisions. The Holland cartoon contest will also be examined in light of past examples of racial and religious discrimination in Holland’s media against Islam in the name of free speech. The study intends to answer whether the Mohammad Cartoon Contest organized by Geert Wilders and his comments constitute hate speech according to the Dutch penal codes of Article 137c and 137d? The study uses the Methodology of Content analysis and an analysis of the Mohammad Cartoon Contest, Geert Wilder’s comments regarding it were made. In addition, a comparative analysis of the past cases of these legal violations in Holland was made in the study to draw up the results. Findings of the analysis suggest that most of the Geert Wilders comments and his organized cartoon contest qualify as hate speech according to all the clauses of article 137c and 137d of hate speech. However, keeping in consideration the previous trials against Geert Wilders and him not being convicted renders Dutch hate speech laws questionable. This brings us to conclude that there is a dire need to clarify and amend Holland’s hate speech laws.*

**Keywords:** Islamophobia, caricatures, international media, hate speech, freedom of speech, Muslims, Holland.

### Introduction

Islamophobia is the fear and disliking towards Muslims and Muslims look like people in western societies. It is considered as an advanced form of racism that entails a sense of hatred towards the Muslims’ race (Gottschalk & Greenberg, 2008). However, Beydoun (2018) defines Islamophobia as not only the fear and disliking towards Muslims, but also a concept that involves the complete erasure of Muslims from western society. The history of Islamophobia traces way back as Islamophobia started as soon as Islam started spreading in the seventh century. However, Allen (2016) in his book writes that one of the first traces of Islamophobia in international media appeared in 1991 when an American print media periodical named ‘insight’ used this term to refer to the typical stereotypes the western world holds about Muslims.

International media and state politics are considered major propagators of the concept of Islamophobia. Allen (2016), in his book “Islamophobia”, writes that high-rank politicians see Muslims

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as whining maniacs who are considered a hindrance towards civilization. There is so much negativity against Muslims even in this advanced age of civilization that on some extreme political fronts it is believed that Muslims will build an Islamic empire in London in the near future if not controlled and laying the foundation of the 'Super Mosque' in East London is considered as evidence of that.

The events that unfolded in the twentieth century, like the Danish Cartoon controversy, Gulf War 1991, the Rushdie affair, terrorist attacks in London, New York, Madrid and other regions of the world have once again brought forward decades-old fears and stereotypes against Islam. They have also put Muslims at the front of western society by constantly reinforcing Islamophobic stereotypes through international media and state policies (Beydoun, 2018). Sheehi (2011) in his book "Islamophobia: The Ideological Campaign against Muslims", sees Islamophobia as the ideological formation of western culture and it is different from the concepts of Racism, Orientalism and Aerophobia although considerably influenced by them. Sheehi considers the 9/11 incident to be a turning point, particularly in American history, that stirred hate crimes and violence against Muslims.

### **Cartoon Crisis**

According to Bonde & Shehata (2007), Caricatures or Satirical Cartoons have always been an important part of political news. However, international media caricatures are also being used to spread Islamophobic stereotypes against Muslims that further aggravates the idea that Muslims are intolerant and hurts their religious sentiments. Many past incidents can be taken into consideration where satirical cartoons were drawn and published in international media that stirred controversies, religious debates and international conflicts; the main popular one is the Danish Cartoon Controversy.

In 2007, a Danish Newspaper published 12 cartoons of Muhammad, which led to boycotting of Danish products in the Muslim world, burning down the embassies and demanding the US to intervene as it was clearly the case of spreading hate speech on the façade of free speech. However, the defenders of freedom of expression and Islamophobes regard this outrage of the Muslim world as ridiculous and uncalled for here. They took Muslim reactions as an opportunity to strengthen the Islamophobic stereotype that Muslims are intolerant and they do not understand the meaning of freedom of expression. The publication of these cartoons led to public and political debate in Denmark where the politicians in the parliament declared Muslims as a plague on Danish society (Lægaard, 2009).

### **The debate between Free speech and hate speech**

The western world used to defend such hate speeches against minorities, more specifically against Muslims, by using the term freedom of speech, time and again. One of the well-known journalists also said that Muslims want special treatment when it comes to respecting their religious beliefs. However, Christians are modern, secular and believe in freedom of expression (Mchangama, 2015). Noorloos (2014) also argues that the use of freedom of expression in public debate is asymmetrical where the majority put forward whatever they think but do not grant the same freedom of expression to minorities, mainly Muslims. Noorloos in his article writes about the hate speech laws of Holland, which particularly became functional after the 1970's. These laws are Dutch penal codes; 137 c Criminal Codes (group insult), which was added to the Dutch penal code in 1934. The laws declare these acts a public crime to express oneself in an offensive manner towards a group of people belonging to the Dutch population and the 137d Criminal Code was related to incitement/provocation towards hatred, which became functional mainly to regulate several kinds of speeches, mainly political speeches, and at that time politicians who criticized immigrations were occasionally prosecuted.

Article 137c and Article 137d have been part of Dutch criminal penal codes since 1971 and are in force as well in Holland (Vrieling, 2016). The debate on the implementation of hate speech laws in Holland gained momentum after the murder of Theo van Gogh, who was a standard known film director and columnist in Holland by a Muslim named Mohammad Bouyeri. The reason for the murder was Theo's film Submission, which he about "the mistreatment of Muslim women" openly ridiculing Islam. After this murder, free speech and hate speech gained momentum in Holland, where most anti-Islam forces were saying that this murder was an attack on freedom of expression and there is a dire need to devise and implement some hate speech laws in Holland (Temperman, 2011).

### **Trials related to the hate speeches of Holland politician 'Geert Wilders'**

The debate on the development of hate speech laws in Holland in the 21st century would be incomplete without discussing the trial of Geert Wilders. This politician is well known for his hate and the anti-Islamic ideological party, i-e Party for Freedom, which he founded in 2006. His first trial started in 2011 because of his various anti-Islamic expressions as he compared the Quran with Hitler's Mein

Kampf; he was against Muslim immigrants and repeatedly in his speech said that no more immigrants should be entertained and also because of his controversial film against Islam named 'fitna'. The debate about prosecuting Wilders started in 2008. After several complaints, Holland's Muslims demanded that Wilders should be prosecuted under the criminal codes 137c and 137d but the case wasn't put forward because the prosecution policy declared that the comments he made were completely in terms of political debate and, as per article 137c were never meant for a particular group of people but directed towards Islam only. However, a group of Muslim organizations lodged complaints against this refusal and, surprisingly, their complaints were responded to positively and the trial against Wilders started. Although the trial against Wilders started and the court listened to many arguments but declared Wilders not guilty (Rostbøll, 2010).

Moreover, the party members of Wilders also requested to remove article 137c altogether, but their suggestion was not pondered upon in court. The court gave the final verdict that Geert Wilders' speech was right within the legal borders as he did not 'mean' to incite hatred against Muslims. Geert Wilders was also convicted again in 2014 due to racist comments regarding the Moroccan race, but he was not pleaded guilty in the end by the Dutch court. Wilder was just acquitted but no legal penalty was given as the judge stated that a well-reputed politician who had convictions against him was a much greater punishment for him (O'Donnell, 2003).

The same Geert Wilders introduced, Mohammad Cartoon Competition once again spread, promoting Islamophobic beliefs, and his hatred towards Islam and Muslims. He announced on his twitter account that Bosch Fawstin would be the juror and the winner would win \$10,000 under the hash tag of #FreedomOfSpeech. The Dutch government took no responsibility for the contest and did not take any legal action for this contest cancellation. According to the Dutch government, the people of Holland have tremendous freedom of speech rights, but the government tried to distance itself from the competition by not taking responsibility at all, and Holland's prime minister 'Rutte' said that they couldn't stop Geert Wilders from organizing the contest. However, due to outrageous response from the Muslim world, Geert Wilders postponed the competition. Wilders said that although it is an attack on freedom of expression, he does not want to endanger his country and his people, as Muslims will again spread violence and bloodshed the same way they did in the past.

## **REVIEW OF LITERATURE**

The history is filled with caricature controversies where the debate between free speech and hate speech stirred many disputes among international actors. The most famous one is the Danish Cartoon Controversy, which went down in history as a case which shook the global village and stirred rage and disputes between the western and Islamic worlds. This controversy led to boycotting of Danish products in the Muslim world, bloodshed, burning down of embassies and demanding the US to intervene to declare it as hate speech and an attack on Islam and Muslims (Kunelius et al., 2007).

### **Islamophobic Caricature Controversies in the past**

There has been intensive research on previous cartoon controversies in various ways; Bleich (2012) in his paper investigated variables that included Denmark's Cartoon Contest under the legal jurisdiction of Europe by separating the opinions related to the Danish Cartoon Contest into 'three' codes and doing content analysis of European free speech laws to draw the results. The first code was of the Muslim clerics who declared the caricatures blasphemous and brought lawsuits against the Jyllands-Posten newspaper who published them. The second code was that of the hard-core liberals who could not disagree more with the Muslim clerics that the reaction was uncalled for and was an attack on free speech. Lastly, the third code was that of the multiculturalists, who thought that although it was unsuitable to publish the cartoons, it was not a criminal felony. Then, Bleich went ahead, discussed the European legal jurisdictions by comparing it with three codes, and declared in the end that 2 out of 12 cartoons potentially count as hate speech and Muslims that were given the first code demand legal action against the newspaper. Further, this was well integrated with the European jurisdictions because such offenses in the past were met with some serious legal repercussions. He declared that there was not a case of conviction, but the newspaper definitely crossed the ethical and legal line.

Similarly, Berkowitz and Eko (2007) investigated Denmark's cartoon controversy in terms of maintenance of journalistic ideology by doing textual analysis of the news coverage of two newspapers, i-e one American newspaper and one French newspaper, as how these newspapers represented their journalistic culture and undertook this maintenance work through their coverage. According to them,

the controversy really did not go away with time. However, it became a subject of discussion in the international media even after years of being surfaced. They found out that although these newspapers represent different journalistic paradigms and have different relationships with the Muslim world and Islam, their coverage of the Danish Cartoon Controversy apparently had the same motive and carried the same importance to cultural reporting standards.

### **Previous cases of hate speech implementation in Holland**

The discussion about the development of free speech and hate speech laws in European jurisdiction has been taking place for decades, and since 1990. Many laws related to hate speech and racial incitement have passed and were implemented as well. For example, 'Brigitte Bardot', a famous French actress, had 5 convictions of hate speech against her under the French law of hate speech which forbids discrimination, defamation and hatred against people due to their colour, religion, cast or creed. She published an article against Muslims declaring Muslims a menace and a potential threat to French society. Muslims filed a case against her hate speech because of which she was fined 10,000 Francs, a fine and was given warning for the next time. Similarly, the case of free speech and hate speech laws is developing in other European countries, like Holland (Bleich).

Noorloos (2014) in his paper analysed the Dutch hate speech laws in Holland. He discussed the lawful improvements that took place around hate speech and free speech laws in Holland in the 21st century and how the hate speech laws are being politicized in Holland, which is unable to protect minorities against racial discrimination and hatred.

According to Noorloos in Holland, the laws of hate speech were not taken seriously and were being neglected for years. These laws were politicized after the murder of Theo van Gogh, who was a well-known film director and columnist in Holland, by a Muslim named Mohammad Bouyeri. The reason for the murder was Theo's film *Submission*, in which he made on "the mistreatment of Muslim women", openly ridiculing Islam. After this murder, free speech and hate speech gained momentum in Holland, where most anti-Islam forces were saying that this murder was an attack on freedom of expression and there is dire need for hate speech laws and regulations in Holland. Noorloos in his article declared that it is very difficult to implement hate speech laws in a multicultural society that is trying its best to balance the hate speech provisions with the freedom of speech laws.

Moreover, Howard (2017) analysed the statements and expressions used by Geert Wilders that led to his conviction under article 137c and 137d. She did content analysis of Geert Wilder's expressions by keeping the European court laws of human rights as yardsticks and analysed how these fundamental human rights are essential but often contradict each other at times when they come under implementation. She provided a case study of Geert Wilders that shows his statements against Islam, the hatred of the movie against Muslims and his comparison of the Quran to *Mein Kampf* were within the legal grounds of the right of freedom of expression, but have legal repercussions under the law of freedom of religion. She concluded that in all the cases, even though Geert Wilders was prosecuted but had not ruled out any legal penalty, it showed the ineffectiveness of hate speech provisions in Holland.

Similarly, this research intends to follow the same method but, keeping Dutch penal criminal codes of article 137c and 137d as yardsticks instead of universal laws of free speech and freedom of religion and this study would examine the recent Mohammad Cartoon Controversy 2018 and Geert Wilder's comments who also organized this contest. He had some serious convictions against him in the past as well due to his hatred remarks against Muslims, Islam and other races. In this study the focus is on this side of the caricature controversy, about whether the Mohammad Cartoon Contest 2018, its banning and Geert Wilders comments/tweets around the contest qualify as hate speech under the Dutch penal codes of article 137c and article 137d or not, because Dutch courts use these doctrines for assessments in their courts.

### **Problem statement**

Satirical cartoons have been a controversial subject for religious debates in the International Media (Ashfaq and Shami, 2016). A wide number of caricatures against Islam have surfaced over time, with the aim of spreading Islamophobic stereotypes, the most prominent to be the Danish Cartoon Controversy (Modood et al., 2006). The incident of Holland's Mohammad Cartoon Competition by Geert Wilders once again caused a continuing conflict between the right of free speech and religious intolerance. The study will analyse the Holland's Mohammad Cartoon Contest and Geert Wilders comments in light of Holland's Hate Speech Provisions.

### **Research Question**

Q. Does the Mohammad Cartoon Contest organized by Geert Wilders and his comments constitute hate speech according to the Dutch penal codes of Article 137c and 137d?

### **Research Objectives**

- To explore whether the cartoon contest organized by Geert Wilders in Holland and its banning constitute hate speech or not.
- To analyse the effectiveness of Dutch hate speech provisions (Article 137c and 137d) in Holland in light of past incidents

### **METHODOLOGY**

The preferred methodology for this study will be "content analysis". The researcher will analyze the cartoons, comments/tweets of Geert Wilders in the time period of 2018 in reference to the Mohammad Cartoon Contest. Using the Content Analysis method, Geert Wilders' Twitter account is selected. The criteria selection for his Twitter account relies on his presence only on this social media platform. The account has a reach of up to 940 k followers. He communicates his party's and his own views only on Twitter, so that is why his statements from Twitter are selected. Moreover, he cancelled the Mohammad Cartoon Contest but he still posted two cartoons on his Twitter account as the competition series. Those two cartoons and Geert Wilders' tweets regarding the organizing and then banning of the Mohammad Cartoon Contest would be analysed and then would be compared with the statements of Holland's hate speech provisions of article 137c and article 137d to see whether they qualify as hate speech or not.

Cartoons and tweets from the time period of September 2018 to November 2018, around the time of the cartoon controversy and tweets with, most likes and retweets are selected for analyzing. The researchers, after analysing the tweets, have identified the predominant themes of: 'Muslims', 'Islam', 'Terror', 'Jihadis', 'Violence', 'violent' and 'Deislamize' to further study the content.

#### **Cartoons**

Even though Geert Wilders cancelled the Mohammad Cartoon Contest in response to the huge protests from the Muslim community, he still posted two cartoons on his Twitter account showing the imagery of the Prophet Mohammad.

#### **Geert Wilders Statements**

Following are the tweets of Geert Wilders around the organizing and banning of Mohammad Cartoon Contest 2018 that will be analysed as per article 137 c and 137 d of Holland's penal codes from the time period of September 2018 to November 2018. These tweets are selected based on the most likes and retweets on Geert Wilders' account:

- "Muslims can be offended to death. That is not the problem. Muslims MURDERING over cartoons is the problem. And that has to be defied by drawing Mohammad."
- "We must have the courage of freedom of speech against violent Islam every day."
- "Islam is a 'fascist and violent ideology' and that the 'Islamization' of Holland should be stopped. We must deislamize."
- "Freedom of speech is threatened, especially by Islamic critics. We should never accept that violence. Freedom of speech is our most important freedom."
- "Islam is violent and deadly. We must deislamize."
- "To avoid the risk of victims of Islamic violence, I have decided not to let the cartoon contest go ahead"
- "Muslims showed their true face once again with death threats, terror, fatwas and violence. However, the safety and security of my fellow countrymen comes first."
- "The contest is not meant to provoke violent Muslims, but to show that we do not haggle for our freedom."
- "The cartoon contest proved once again that Islam and freedom are incompatible. We use the pen, they use the sword. We draw cartoons and they threaten us with violence and terror. Islam doesn't belong to us. We must deislamize in order to stay free".
- "Thousands of jihadis/ Muslims roam freely in Europe and hundreds in Holland. So: Deislamize, lock the rig and close the boundaries!"

#### **Article 137 c**

1. "Any person who in public, either verbally or in writing or through images, intentionally makes an insulting statement about a group of persons because of their race, religion or beliefs, their

hetero or homosexual orientation, or their physical, mental or intellectual disability, shall be liable to a term of imprisonment not exceeding one year or a fine of the third category.”

2. If the offence is committed by a person who makes a profession or habit of it or by two or more persons in concert, a term of imprisonment not exceeding two years or a fine of the fourth category shall be imposed.”

**Article 137d**

“Any person who publicly, either verbally or in writing or through images, incites hatred of or discrimination against persons or violence against their person or property because of their race, religion or beliefs or their sex, shall be liable to a term of imprisonment not exceeding one year or a fine of the third category”. The Dutch penal code book further mentions the cumulative criterion as per article 137c and 137d to see whether the alleged person falls under the category of hate speech or not:

1. Was the comment insulting? (Does the comment attack someone’s race, religion, ethnic origin, disability, or sexual orientation in a negative way?)
2. What is the context of the insulting comment? (Is the comment made in the context of some offensive history towards a particular group?)
3. Was the comment unnecessarily offensive?
4. In reference to the above-mentioned Articles 137c and 137d, the researcher will analyse the cartoons and tweets to decide which one falls under Hate Speech.

**FINDINGS**

Codes	Tweet 1	Tweet 2	Tweet 3	Tweet 4	Tweet 5	Tweet 6	Tweet 7	Tweet 8	Tweet 9	Tweet 10
Violence				✓		✓	✓		✓	
Violent		✓	✓		✓			✓		
Terror							✓		✓	
Jihadis										✓
Deislamize			✓	✓	✓				✓	✓
Muslims	✓						✓	✓	✓	
Islam		✓	✓	✓	✓	✓				✓

As per the above-mentioned table, the word violence is used in 4 tweets, violent in 4 tweets, terror in 2 tweets, jihadis in 1 tweet, deislamize in 5 tweets, Muslims in 4 tweets and Islam in 6 tweets out of 10 tweets. All of his tweets are about Muslims (4) and Islam (6) and the above-mentioned table shows that all of them made use of negative connoted words between Muslims and Islam that are counted as hate words. Further analysis is as follows:

**Cartoons Analysis**

As per the cartoons that Geert Wilders posted on his Twitter account, one of them shows a sketch of Mohammad with a sword and it was written “you can’t draw me” shown with angry expressions on the face and it was also written “that’s why I draw you” and the second caricature of a close-up shot again shown in angry expressions with blood dripping from the beard. Both of these caricatures were posted on his Twitter account as the series of the cartoon contest that Geert Wilder was organizing and later on cancelled. As per Holland’s hate speech provisions as stated above, Article 137 c, that any person who “publicly” and intentionally makes an insulting statement either verbally or in visual form about particular people because of their “religion” should be held in imprisonment as a part of the law. Muslims make the 2nd majority race after Christians in Holland and in Islam, it’s forbidden to draw the Prophet either in a good way or bad way. Geert Wilders knew that he still intentionally insulted and hurt Muslims' sentiments in the name of freedom of speech. Geert Wilders also fulfils the 2nd clause of article 137 c because Geert Wilders' twitter account is full of tweets against Islam and Muslims. Cartoons he posted also come under the incitement towards hatred in the form of visual images (Article 137 d) because he posted these caricatures on his “public” account and he made it his habit to post hate caricatures where other people also reposted the cartoons showing their hatred as well.

**Tweets/Comments Analysis**

- In the first tweet, he sounded very arrogant with complete disregard for Muslims' sentiments, which is clearly against the laws of hate speech provisions (article 137c and 137d), because he

disregarded and insulted Muslims at a public forum in front of the whole world too directly. He clearly insulted the second majority population of Holland, which is Muslims, in the name of Freedom of expression. As per the criteria, his comment is clearly offensive as he called Muslims murders in context with the protests against the contest worldwide.

- In the above-mentioned second, third, fourth and fifth tweet, Geert Wilders commented against the religion of Muslims. According to the statements of article 137c and 137d, these laws protect minorities if the comments are made against a group of people not against a particular religion and in these tweets Wilder called Islam deadly, a violent and fascist ideology and said that freedom of speech is threatened by Islam. Although it can be considered as hate speech because he is indirectly targeting Muslims, previously Geert Wilders used this as his defence that he didn't make any comments against Muslims. He just warned the people against the threats of Islam and he was not prosecuted under this defence in the past. So, keeping in mind the previous cases and explanation of these hate speech provisions, the above-mentioned tweets will not be considered as hate speeches as per Holland's penal codes.
- The same is the case with tweet no five. He cancelled the contest and gave the reason that he wanted to avoid Islamic violence victims. Here again he did not use the word Muslim, but Islam, because he was well aware that using the word Muslim could directly land him in some serious legal cases.
- In tweet Six, he directly attacked Muslims and said that Muslims showed their true faces and called them violent. This statement fulfils the standard for hate speech in accordance with both articles 137 c and 137d because he made derogatory comments against Muslims, hurt their sentiments and called them violent. It's just one tweet. His twitter account is filled with 1000's of hate tweets against Muslims.
- The second last tweet is the most retweeted post by Geert Wilders. He again targeted Islam, which is the religion of Muslims and said that Holland must "deislamize" in order to stay free, but again he did not use the word Muslims and article 137 c and 137 d give the benefit of the doubt to such cases, as the same happened in the past with Geert Wilders where he wasn't prosecuted.
- The last tweet clearly falls under the hate speech as Geert Wilders called Muslims Jihadis and asked them to close the borders to Muslims. It is clearly stated in both articles that anyone who publically makes insulting comments against a particular group of people is entitled to imprisonment.

## **DISCUSSION**

The findings of the analysis highlighted that Geert Wilders cartoons and most of his tweets fulfil all the clauses of article 137c and 137d of Hate Speech that allow the Muslim Community to file a case against him. Janssen (2014) mentioned this criterion in his research that the Dutch court applied to Geert Wilders to look at his derogatory comment against the Moroccans back in 2014. Applying the same criterion on the current issue under consideration, it also fulfils all three stages, that are "the comments he made were clearly insulting, the context in which he said were also negative. Likewise, Lucardie and Voerman (2013) wrote in their research paper, Geert Wilders is the founding member of the PVV party whose sole purpose is to deislamize Holland, to ban the Quran, mosques and to stop Muslims from entering Holland and his Twitter account is evidence of his hatred against Muslims and Islam. Wilders himself said that the objective of organizing this contest is to show the real violent faces of Muslims who cannot respect freedom of speech. An argument on the third stage is not even necessary because his Twitter account is filled with hate speech against Muslims and Islam.

Poole (2012) in his article discussed that the Geert Wilders party PVV won votes solely based on its anti-Islamic ideology. His past is filled with many hate speech allegations, but he was never prosecuted, which renders the Dutch hate speech provision questionable. Geert Wilders' whole career is based on anti-Muslim and anti-Islam ideology. He has 800,000 followers on Twitter, where he publically humiliates Islam and Muslims and his hatred knows no boundaries as Islamophobes from all over the world follow him and help him spread Islamophobia. In my opinion, this cartoon contest was just to unite Islamophobes with his anti-Islamic ideology and to gain media attention hoping that it would eventually help him win some votes. Geert Wilders has always defended himself under the façade of freedom of speech, but ECHR article 9 of freedom of expression, which is practiced in Dutch codes,

grants freedom, but it also adds that one should avoid speech that offends shocks or disturbs any particular religious or ethnic group.

In November 2018, Turkish mosques in Holland filed a case against Geert Wilders and demanded to ban his Twitter account permanently under Dutch hate speech provisions (Article 137c and 137d) because he is continuously spreading hate speech against Muslims and Islam through text, images and other content. A trial has started against him in Dutch courts and the court has just heard the first hearing. Muslims all over the world are hoping that some serious action should be taken against him this time, unlike the previous two times where Wilders was declared not guilty as, according to the verdict, he didn't incite hatred against a particular group of people under article 137 d i-e Muslims but against Islam that too indirectly. This trial showed how the criminal penal codes of Holland can be interpreted in many ways and it made the penal codes 137c and 137d questionable and depicts the ineffectiveness of these hate speech provisions for the protection of different races in Holland.

## RECOMMENDATIONS

- After all these trials and Geert Wilders walking freely through all of them, there is a dire need to reconsider and amend the hate speech laws because targeting someone's religion also means hurting that particular group's sentiments and that's what Geert Wilders did in the past and recently done by organizing the cartoon contest. Geert Wilders targets Islam and Prophet Mohammad, all knowing that physical depiction of the prophet is strictly prohibited in Islam and hurts Muslims' sentiments.
- The international laws give politicians supposedly greater protection for their liberty of speech, as evident by Geert Wilders' past trials. However, it is notable that every freedom comes with great responsibility. Politicians must avoid such speeches that would offend or incite hatred towards any group and action should be taken against them more seriously than it would have taken against any normal person.
- Hatred and animosity in the façade of free speech have disproportionate effects on the minority races and they feel secluded and discriminated. The government and society as a whole should ensure that nobody considers himself as a victim of discrimination. Therefore, for that, it is necessary to clarify free speech laws for the modern age and draft clearly what free speech is.

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