

HOLOCAUST DENIAL IS A FORM OF HATE SPEECH

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Introduction

Recently Facebook confirmed that it has disabled a group called ‘I Hate Muslims in Oz.’ Barry Schnitt explained: “We disabled the ‘I Hate Muslims in Oz’ group... because it contained an explicit statement of hate. Where Holocaust-denial groups have done this and been reported, we’ve taken the same action”.¹

Facebook distinguishes between ‘explicit statement of hate’ and Holocaust denial. Its directors believe that Holocaust denial is not hateful *per se* and does not therefore contravene the company’s terms of service. The terms of service say: “You will not post content that is hateful, threatening, pornographic, or that contains nudity or graphic or gratuitous violence”.² Schnitt said: “We’re always discussing and evaluating our policies on reported content, but have no plans to change this policy at this time. In addition to discussing it internally, we continue to engage with third-party experts on the issue”.³

In this short piece I wish to take issue with the assertion that Holocaust denial is not hateful *per se*. My aim is to show that it is, and therefore that Facebook should reconsider its position. All Internet providers and web-hosting companies whose terms of service disallow hateful messages on their servers should not host or provide forums for such hate-mongering. This is of urgent need as Holocaust denial is prevalent in Europe, the United States (USA) and across the Arab and Muslim parts of the world. Iran’s regime, under the disputed leadership of President Mahmoud Ahmadinejad, has made questioning the Holocaust one of the centerpieces of its radical

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¹ C. Matyszczyk, ‘Facebook disables ‘hate Muslims’ group’, *CNET News*, 10 June 2009, http://news.cnet.com/8301-17852_3-10262136-71.html (accessed on 31 July 2009).

² See <http://www.facebook.com/terms.php> (accessed on 31 July 2009).

³ C. Matyszczyk, ‘Facebook disables ‘hate Muslims’ group’, *CNET News*, 10 June 2009, http://news.cnet.com/8301-17852_3-10262136-71.html (accessed on 31 July 2009).

ideology, brazenly proclaiming falsehoods about one of the most thoroughly documented periods in history. In December 2006, he convened an 'International Conference Review of the Holocaust: Global Vision' designed to address the 'need' to establish whether the Holocaust actually happened.⁴ Ahmadinejad's Holocaust denial is accompanied by outrageous statements, such as Israel should be "wiped out from the map", and by controversial nuclear policy. Hateful words are part of a calculated strategy to denounce Israel and bring about a "World without Zionism".⁵

I. Holocaust Denial

What do we mean by 'Holocaust denial'? Why does this form of speech constitute hate? If you ask a person on the street what she knows about the Holocaust, and she answers that she has never heard of it, this cannot be considered as Holocaust denial. Ignorance or denying reality are not forms of hate. Even if the person seems to know, this is not necessarily a form of hate. We should always probe the content of the speech and the intention of the speaker.

Disputing certain historical facts is not a form of hate either, and I doubt whether it can be considered as Holocaust denial. If one argues that five million, not six million, were murdered during 1938-1945, based on a study of sorts done on Jewish demography in Europe, this is an issue that can and should be discussed in the open in order to discover a possible new facet of the truth.⁶ If one brings evidence showing that an alleged massacre did not happen, or happened on a different date, or more people were killed than we know, or that an alleged war criminal was not at an alleged place at the time, these are all issues that should be probed and discussed. All this does not constitute Holocaust denial, nor a form of hate.

Moreover, generally speaking, people are entitled to hold and express vilifying and outrageous views, to voice their dislike of other people, to use derogatory words and discriminatory adjectives against others. We do not enjoy it; we feel it is wrong, and we feel outraged confronting such statements. Still liberals believe that such speech is protected under the Free

⁴ See N. Fathi, 'Holocaust deniers and skeptics gather in Iran', *New York Times*, 11 December 2006, http://www.nytimes.com/2006/12/11/world/middleeast/11cnd-iran.html?_r=1 (accessed on 31 July 2009); see also 'Holocaust comments spark outrage', *BBC News*, 14 December 2005, http://news.bbc.co.uk/1/hi/world/middle_east/4529198.stm (accessed on 31 July 2009).

⁵ 'Iranian leader: Wipe out Israel', *CNN.com*, 27 October 2005, <http://edition.cnn.com/2005/WORLD/meast/10/26/ahmadinejad/index.html> (accessed on 31 July 2009).

⁶ For discussion of J.S. Mill's Truth Principle and its importance in generating a tolerant atmosphere for unconventional expressions, see R. Cohen-Almagor, 'Why Tolerate? Reflections on the Millian Truth Principle', *Philosophia*, (Vol. 25, Nos. 1-4) 1997, pp. 131-152, and R. Cohen-Almagor, 'John Stuart Mill', in C. G. Christians and J. C. Merrill (eds.) *Ethical Communication: Five Moral Stances in Human Dialogue*, Columbia, MO.: University of Missouri Press 2009, pp. 25-32.

Speech Principle. The way to fight against such discriminating and damaging opinions is by more speech, not by silencing and censoring speech. This, indeed, is the essence of tolerance.

Having said that, Holocaust denial constitutes a special category of speech that does not necessarily merit protection, certainly not in all places. We should always bear in mind the given historical context and circumstances. Holocaust denial is far from being innocent. It is a propaganda movement that seeks to deny the reality of the Holocaust, the systematic mass murder of six million Jews and millions of others deemed ‘inferior’ by the Nazi regime. Misrepresenting their propaganda as ‘historical revisionism’, Holocaust deniers attempt to disseminate their extremist ideas by offering unsupported arguments against the well-established historical facts of the Holocaust. Their beliefs include accusations that Jews have falsified and exaggerated the tragic events of the Holocaust in order to exploit non-Jewish guilt. Holocaust denial groups have posted thousands of Web pages, filled with distortions and fabrications, designed to reinforce negative stereotypes.⁷ Among the most visited sites promoting Holocaust denial are the Institute for Historical Review, originally established for this purpose,⁸ Bradley Smith and his Committee for Open Debate of the Holocaust (focusing largely on U.S. college campuses),⁹ and sites sponsored by Arthur R. Butz,¹⁰ David Irving,¹¹ Ahmed Rami,¹² Ernst Zundel.¹³ All portray themselves as hubs, even paradigms, of unbiased, unorthodox, gutsy historical research.

Holocaust denial is a form of hate speech because it willfully promotes enmity against an identifiable group based on ethnicity and religion. It is designed to underestimate and justify murder, genocide, xenophobia and evil. Holocaust denial assumes a form of legitimacy to racism in its most evil manifestation to date, under the guise of pursuit of ‘truth’. It speaks of an international Jewish conspiracy to blackmail Germany and other nations, to exploit others and to create Israel. It depicts a picture by which Jews conspired to create the greatest hoax of all times. Adolf Hitler did not plan genocide for the Jews but wished instead to move them out of Europe. No gas chambers ever existed. This is an invention of the Jews to dramatise the mere ‘fact’ that in every war there are casualties; WWII was no different. People from many countries were killed. Many of them were Germans. And yes, Jews were killed. And also people from other religions.¹⁴

⁷ Anti-Defamation League, *Hate on the Internet*, Washington DC.: ADL 2003, p. 14.

⁸ <http://www.ihr.org/> (accessed on 31 July 2009).

⁹ <http://www.codoh.com/> (accessed on 31 July 2009).

¹⁰ <http://www.codoh.com/butz/> (accessed on 31 July 2009).

¹¹ <http://www.fpp.co.uk/>; www.fpp.co.uk/online/index.html ; <http://news.bbc.co.uk/1/hi/uk/4449948.stm> (accessed on 31 July 2009).

¹² <http://radioislam.org/islam/english/toread/jewslave.htm> ; <http://radioislam.org/adl/net.htm> ; http://www.adl.org/poisoning_web/rami.asp (accessed on 31 July 2009).

¹³ <http://www.zundel.org/> (accessed on 31 July 2009).

¹⁴ <http://www.hdot.org/en/learning/myth-fact> (accessed on 31 July 2009).

According to the deniers, the Holocaust is the product of partisan Jewish interests, serving Jewish greed and hunger for power. Some Jews disguised themselves as survivors, carved numbers on their arms and spread atrocious false stories about gas chambers and extermination machinery. It was not Germany that acted in a criminal way. Instead, the greatest criminals are the Jews. The Jews were so evil that they invented this horrific story to gain support around the world and to extort money from Germany. For their extortion and fabrication, for creating the greatest conspiracy of all times, they deserve punishment, possibly even death. Jews are demonic and crooked people who deserve to die for making up this unbelievable tragedy. In effect, argues Marvin Kurz, the ultimate purpose of Holocaust denial is to legitimise another Holocaust against Jews.¹⁵

Thus, those who deny the Holocaust are anti-Jewish. It is demeaning to deny the Holocaust for it is to deny history, reality, and suffering. Holocaust denial might create a climate of xenophobia that is detrimental to democracy. It generates hate through the rewriting of history in a vicious way that portrays Jews as the anti-Christ, as destructive forces that work against civilisation. Hateful messages desensitise members of the public on very important issues. They build a sense of possible acceptability of hate and resentment of the other which might be more costly than the cost of curtailing speech. Hate speech, in its various forms, is harmful not only because it offends but because it potentially silences the members of target groups and interferes with their right to equal respect and treatment. Hateful remarks are so hurtful that they might reduce the target group member to speechlessness or shock them into silence. The notion of silencing and inequality suggests great injury, emotional upset, fear and insecurity that target group members might experience. Hate might undermine the individual's self-esteem and standing in the community.¹⁶

II. From Speech to Action

Furthermore, such free speech might lead to physical harm. Hate speech might lead to hate crimes. Hate sites can endanger human life by containing information on how to perform acts of terrorism, serving as recruiting fronts for terrorist organisations, or inciting violence.¹⁷ Consider, for instance, the National Socialist Movement (NSM) site.¹⁸ Inspired by Hitler, NSM directed hatred toward a variety of persons on its website. As part of its belief in the supremacy of the white race, NSM expressed a hatred for all nonwhites,

¹⁵ Interview with Marvin Kurz, National legal Counsel for Bnai Brith League for Human Rights, Toronto (15 July 2002).

¹⁶ R. Moon, *The Constitutional Protection of Freedom of Expression*, Toronto: University of Toronto Press 2000, p. 127; R. Cohen-Almagor, 'Harm Principle, Offense Principle, and Hate Speech', in R. Cohen-Almagor, *Speech, Media, and Ethics: The Limits of Free Expression*, Houndmills and New York: Palgrave-Macmillan 2005, pp. 3-23.

¹⁷ Z. Hellman, 'http://Web of Hatred', *The Jerusalem Report*, (Issue 6) 7 July 2008.

¹⁸ <http://www.nsm88.org/> (accessed on 31 July 2009).

disparagingly referred to as ‘muds’. Not only did NSM regard all nonwhites as being inferior to whites, the group suggested that they should not be allowed to migrate to, or remain living in, the USA. Indeed, the group went so far as to state that all nonwhites should be murdered at one point on its site. While most of NSM’s hatred for nonwhites was directed at blacks living in the USA, the group also made disparaging comments about people of colour from Mexico, China, India, Sri Lanka, and all of Asia and Africa.¹⁹

Extremely pro-Christian, NSM also expressed animosity toward Muslims and Jews. The group indicated its belief that Muslims pose a threat to the security of various Western countries, such as the United Kingdom. NSM directed most of its hatred against Jews, in particular Israeli and American Jews. The group stated that it believes Jews are generally dishonest and murderous persons who work tirelessly to destroy white Christians around the world and in the USA in particular. NSM claimed that Jews invented the Holocaust as a means of generating sympathy and stifling legitimate criticisms of their actions. The group also alleged that Jews are a generally murderous people, claiming that Jews helped cause, had prior knowledge of, and were pleased by 9/11. The group went so far as to state that all Jews should be killed, and provided links to pro-Nazi, anti-Jew, anti-Israel, and Holocaust denial websites.²⁰

The impact of such cruel websites should not be ignored or underestimated. Benjamin Smith and Richard Baumhammers are two Aryan supremacists who in 1999 and 2000 respectively went on racially motivated shooting sprees after being exposed to Internet racial propaganda. Smith regularly visited the World Church of the Creator website, a notorious racist and hateful organisation.²¹ He said: “It wasn’t really ‘til I got on the Internet, read some literature of these groups that... it really all came together.” He maintained: “It’s a slow, gradual process to become racially conscious.”²² Rabbi Abraham Cooper of the Wiesenthal Center argued that the Internet provided the

¹⁹ B. A. Barnett, *Untangling the Web of Hate: Are Online ‘Hate Sites’ Deserving of First Amendment Protection?*, Youngstown: Cambria 2007, p. 141.

²⁰ *Idem*, p. 142.

²¹ For information on ‘World Church of the Creator’, see <http://www.volksfront-usa.org/creator.shtml>; <http://www.nizkor.org/hweb/orgs/american/adl/cotc/>; <http://www.reed.edu/~gronkep/webofpolitics/fall2001/yagern/creator.html>; http://www.adl.org/poisoning_web/wcotc.asp;

<http://www.apologeticsindex.org/c171.html> (accessed on 31 July 2009); Prepared Statement of Howard Berkowitz, Hate Crime on the Internet, Hearing before the Committee on the Judiciary, United States Senate (Washington, 14 September 1999).

²² Christopher Wolf, ‘Regulating Hate Speech Qua Speech Is Not the Solution to the Epidemic of Hate on the Internet’, OSCE Meeting on the Relationship Between Racist, Xenophobic and Anti-Semitic Propaganda on the Internet and Hate Crimes (Paris, 16-17 June 2004).

theological justification for torching synagogues in Sacramento and the pseudo-intellectual basis for violent hate attacks in Illinois and Indiana.²³

On June 10, 2009, James von Brunn entered the U.S. Holocaust Memorial Museum in Washington DC and opened fire, killing Security Guard Stephen Tyrone Johns before he was stopped by other security guards. Von Brunn, a white supremacist anti-Semite, spewed hate online for decades. He ran a hate website called holywesternempire.org and had a long history of associations with prominent neo-Nazis and Holocaust deniers. For a period of time, he was employed by Noontide Press, a part of the Holocaust denying Institute of Historical Review, which was then run by Willis Carto, one of America's most prominent anti-Semites.²⁴

In his self-published book, *Kill the Best Gentiles*, von Brunn railed against a Jewish conspiracy to destroy the white gene pool, offering a plan to remove 'the cancer from our Cultural Organism'.²⁵ A raging anti-Semite, von Brunn blames 'The Jews' for the destruction of the West. I don't intend to quote in length from this hateful long tract. Suffice is to say that Jews, according to von Brunn, belong to "a dark and repulsive force". The Jews "are a nefarious and perverse sect". "Satan has prevailed upon them".²⁶ Among their many conspiracies that aim to gain control over the world was the invention of the Holocaust. Von Brunn dedicates a whole chapter (6) of his book to The 'Holocaust Hoax'. He writes in his distinct style, with capital letters, that "THERE WAS NO POLICY TO MASS MURDER JEWS. NO ORDER WAS GIVEN TO MASS MURDER JEWS. THERE WAS NO BUDGET TO CARRY OUT SUCH A POLICY. THERE WERE NO MEANS (GAS CHAMBERS, etc.) TO CARRY OUT MASS MURDERS". And: "Revisionist Historians have concluded that a total of about 300-thousand JEWS died of 'all causes' during WWII."²⁷

On June 10, 2009, this angry, 88 year-old man, possessed with hatred, decided to wage an attack on the Holocaust Museum. He was not interested to visit the museum and to see the thousands of documents that reveal the

²³ Statement of Abraham Cooper, *Hate Crime on the Internet*, Hearing before the Committee on the Judiciary, United States Senate (Washington, 14 September 1999). For further discussion, see R. Cohen-Almagor, *The Scope of Tolerance*, London: Routledge 2006: Conclusion, and R. Cohen-Almagor, 'In Internet's Way', in M. Fackler and R. S. Fortner (eds.), *Ethics and Evil in the Public Sphere: Media, Universal Values & Global Development*, Cresskill, NJ: Hampton Press 2009.

²⁴ H. Beirich, 'Holocaust Museum Shooter Had Close Ties to Prominent neo-Nazis', *Southern Poverty Law Center*, 10 June 2009, <http://www.splcenter.org/blog/2009/06/10/holocaust-museum-shooter-had-close-ties-to-prominent-neo-nazis/print/> (accessed on 31 July 2009).

²⁵ J. W. von Brunn, *"Kill the Best Gentiles!" or "Tob Shebbe Goyim Harog!"*, Easton, Md.: Holy Western Empire LLC 2002, p. 28.

²⁶ *Idem*, pp. 21-22.

²⁷ *Idem*, p. 166.

magnitude of the horror. Von Brunn was beyond the point of deliberation, exchanging of ideas, speech. He was boiling inside with poisonous rage. In his mind, it was time for violent action and the most appropriate place for the shooting was the museum that served the greatest hoax of all time.

III. Historical and Cultural Context

The historical and cultural context is obviously of great significance. Propagating Holocaust denial in Zimbabwe is quite different from propagating this idea in Israel. We can assume that Jews will hardly be persuaded by such propaganda. Israeli authorities forbid it because it is considered highly offensive, especially to Holocaust survivors. Section 2 of the Denial of Holocaust (Prohibition) Law, 5746-1986 prescribes: “A person who, in writing or by word of mouth, publishes any statement denying or diminishing the proportions of acts committed in the period of the Nazi regime, which are crimes against the Jewish people or crimes against humanity, with intent to defend the perpetrators of those acts or to express sympathy or identification with them, shall be liable to imprisonment for a term of five years”.²⁸

Twelve European countries also made Holocaust denial illegal. Germany prohibits Holocaust denial due to its sensitivity to the horrors of the Nazi era. In 1994, it passed a law making Holocaust revisionism, in and of itself, a criminal offence. The German Constitutional Court ruled that freedom of speech was not a defense available to groups propagating the ‘Auschwitz lie’.²⁹ In 1995, a Berlin state court convicted a leader of Germany’s neo-nazi movement for spreading racial hatred and denigrating the state by telling people visiting the Auschwitz concentration camp that the Holocaust was a fiction.³⁰ France, another country that is highly sensitive to WWII, passed the Gayssot law (named after French MP J. C. Gayssot) in 1990. The law punishes by heavy fines or imprisonment any “public expression of denial of the Genocide perpetrated on the Jews by the Nazis during WWII.” This law was used to condemn the infamous denial academic, Robert Faurisson,³¹ as well as some of his followers, notably the philosopher Roger Garaudy, in 1999.³² In February 2006, British historian David Irving was found guilty in

²⁸<http://www.mfa.gov.il/MFA/Anti-Semitism+and+the+Holocaust/Documents+and+communiques/Denial+of+Holocaust+-Prohibition-+Law-+5746-1986-.htm> (accessed on 31 July 2009).

²⁹ Holocaust Denial Case 90 BVerfGE 241 (1994), translated in D. P. Kommers, *Constitutional Jurisprudence of the Federal Republic of Germany*, Durham, N.C.: Duke University Press 1997, pp. 382-387. See also E. T. Eberwine, ‘Sound and Fury Signify Nothing? Jurgen Bussow’s Battle against Hate-Speech on the Internet’, *New York Law School Law Review* (Vol. 49) 2004, pp. 353-410.

³⁰ A. Tsesis, *Destructive Messages*, NY and London: New York University Press 2002, p. 188.

³¹ See D. Goldberg, ‘Protecting Wider Purposes: Hate Speech, Communication, and the International Community’, in R. Cohen-Almagor (ed.), *Liberal Democracy and the Limits of Tolerance*, Ann Arbor: University of Michigan Press 2000, pp. 257-260.

³² Text of the law may be found in French in www.jura.uni-sb.de/france/Law-France/I90-615.htm; <http://www.phdn.org/negation/gayssot/> (accessed on 31 July 2009). For a useful

Vienna of denying the Holocaust of European Jewry and sentenced to three years in prison in accordance with the Austrian Federal Law on the prohibition of National Socialist activities (article 3h of the Verbotsgesetz, 'Prohibition Statute', 1947). Irving denied the existence of gas chambers in National Socialist concentration camps in several lectures held in Austria in 1989. Under the State Treaty of 1955 for the Re-establishment of an Independent and Democratic Austria, which Austria concluded with France, the United Kingdom, the USA and the USSR, Austria undertakes to prevent all Nazi propaganda. The Prohibition Statute forms part of the Austrian Constitution.³³ Other countries that made Holocaust denial illegal are: [Belgium](#) ([Belgian Negationism Law](#)), the [Czech Republic](#), Liechtenstein, [Lithuania](#), Poland, Portugal, [Romania](#), [Slovakia](#), and [Switzerland](#) (article 261bis of the Penal Code). Many of these countries also have broader laws against libel or inciting racial hatred.

While I see the need to legislate such a law in Israel, Germany and countries that aided the Nazis in the execution of the Holocaust, I am not convinced that the legal path is the right path to pursue in all places. In any event, legislation should be supported by backbones of socialisation processes. Legislation should not be enacted at the expense of such processes. Law should never be a shortcut for solving problems. It is the last resort, never the first, certainly not the only. Thus, I would like to see countries investing efforts in the powerful tools of education and legitimisation (or rather de-legitimisation). The Holocaust should be taught at all high schools across the world, explaining the reasons for that particular phenomenon in history. What brought a civilised country to legislate racist laws and to mobilise state resources for the destruction of certain people, why Germany and other nations did what they did, what brought them to see the Jews the way they did, why was Nazi Germany so successful in their extermination campaign, and how can we avoid the reoccurrence of such abominable actions? Educating people about why anti-Semitism has been part of our lives for so long, why it is so pernicious, and exposing its web of lies and hatred will have a far greater impact than any set of laws that any given country would care to draft.

Educational measures should be accompanied by efforts to delegitimise Holocaust denial, denouncing its evil intentions and exposing the true motivations of those who spout such lies. In this context, universal declarations and international resolutions should not be underestimated. Here I would like to mention United Nations Resolution 60/7 of November

discussion on French historical revisionism, see P. Vidal-Naquet, A Paper Eichmann (1980) - Anatomy of a Lie, <http://www.anti-rev.org/textes/VidalNaquet92a/> (in English) (accessed on 31 July 2009).

³³ 'Holocaust denier Irving is jailed', *BBC News* (20 February 2006), <http://news.bbc.co.uk/2/hi/europe/4733820.stm> (accessed on 31 July 2009). See also D. E. Lipstadt, *Denying the Holocaust: the growing assault on truth and memory*, New York: Plume 1994; and D. E. Lipstadt, *History on Trial: my day in court with David Irving*, New York, N.Y: ECCO 2005.

1, 2005 was reaffirmed by the General Assembly in 2006 (A/61/53 Holocaust denial). It observes that remembrance of the Holocaust is critical to prevent further acts of genocide, and that, for this reason, rejects efforts to deny the Holocaust, which by ignoring the historical fact of those terrible events increases the risk they will be repeated. The Resolution noted that all people and States have a vital stake in a world free of genocide, and welcomed the establishment by the Secretary-General of a program of outreach on the subject of “the Holocaust and the United Nations”. It also welcomed the inclusion by Member States within their educational programs of measures to confront attempts to deny or minimise the importance of the Holocaust, The Resolution further condemns without any reservation any denial of the Holocaust, and urges all Member States unreservedly to reject any denial of the Holocaust as a historical event, either in full or in part, or any activities to this end.³⁴

The voluntary involvement of the Internet industry is also important in delegitimising Holocaust denial. ISPs and web-hosting companies should strike a balance between freedom of expression on the one hand, and principles of social responsibility on the other. At the very least, responsibility requires of them to adhere to their own terms of service. If their terms of service prohibit the posting of hateful and threatening content, then they should see that such content is not present on their servers.

Conclusion

On July 9, 2009 I Googled the term ‘Holocaust’. The search yielded 21,400,000 results. Some of the sites are not about the Holocaust; their aim, instead, is to deny the Holocaust. As the number of Holocaust survivors is becoming smaller and smaller, more people perceive the Holocaust in historical terms, and history is open to many interpretations.

People, especially young people, are open to challenge truisms, ask questions, raise concerns, refute and debate. The next generation may hold debates on the Holocaust as today we hold debates on the Armenian genocide/massacre, bringing different voices. Some will confirm there was a Holocaust, other will refute this statement. Young people may grow to think critically about the Holocaust. As some say there was a Holocaust while others say there was not, they might be inclined to think the truth is in the middle. Meaning, there were episodes of mass killings of Jews, but there was no systematic plan to execute all the Jews of the world. Downsizing the Holocaust is most probable. It is also most troubling. Of course, on this

³⁴ See

www.unwatch.org/site/apps/nl/content2.asp?c=bdKKISNqEmG&b=1355321&ct=3511153 (accessed on 31 July 2009).

issue, the natural logical tendency of seeking the middle ground is fundamentally mistaken.

Facebook, which hosts groups like ‘Holocaust: A Series of Lies’ and ‘Holohoax’, YouTube³⁵, and other Web-hosting and Internet Service Providers should reconsider their position on Holocaust denial as it often does violate their general terms of service. Don’t keep silent in the face of hate. We learnt that silence is conducive to the spread of hatred and bigotry, and that harmful words might lead to harmful action. There is a direct link between hate speech and hate crimes. Hate messages deserve our full attention. They should be condemned and delegitimised before they create ripe circumstances for murdering the targets of hate.

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³⁵ See <http://www.youtube.com/watch?v=XtWT4iog4Ok> (accessed on 31 July 2009).