

Hate Crimes

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I. Introduction and Definition

The world is getting smaller and social mobility causes the encountering of people of different origins. As the diversity in the society increases, for some people it is difficult to develop tolerance towards people who are somehow different.

As the borders between the countries become less definite, identity borders in peoples' minds become more prominent¹. As a result of globalization and the development in the communication technology, caricatures published in a Danish newspaper create enormous negative reactions and hate speeches in many Islamic Countries². This is referred to as "cyberhate". In fact the Internet causes the hate movement to multiply. Electronic means such as blogs, news groups, social networks enable to disseminate views and bring people of same opinion together. Thus a collective identity is easily created and in time this leads to a "global racist subculture"³.

Characteristic of a hate crime is that it involves a violation of human rights and is contrary to fundamental social values that all human beings are equals.

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¹ Kenan ÇAYIR, "Nefret Söylemi ve Nefret Suçlarının Sosyolojik Arka Planı", **Güncel Hukuk**, June 2010, No. 6, p.36.

² ÇAYIR 37.

³ Barbara PERRY, "The more things change... post-9/11 trends in hate crime scholarship", in **Hate Crime**, ed. Neil Chakraborti, Willan Publishing, Oregon 2010, p.17.

It is very difficult to define hate crimes but several attempts have been made: for example OSCE (The Organization for Security and Cooperation in Europe) of the UN (United Nations) describes hate crimes as, “Crimes motivated by intolerance towards certain groups in society” OR “any criminal offence, including offences against persons or property, where the victim, premises or target of the offence are selected because of their real or perceived connection, attachment, affiliation, support or membership with a group. A group may be based upon their real or perceived race, national or ethnic origin, language, colour, religion, sex, age, mental or physical disability, sexual orientation or other similar factor”⁴.

Hate crime is any incident committed against a person or property, which is motivated by the offender’s hatred of people who are seen as being different. This difference could originate from a person’s race, ethnic origin, religion, disability, gender, gender identity or sexual orientation⁵.

Hate crimes are criminal acts committed with a bias motive. It is this motive that makes hate crimes different from other crimes. A hate crime is not one particular offence. It could be an act of intimidation, threats, property damage, assault, murder or any other criminal offence.

The term “hate crime” or “bias crime” therefore describes a type of crime, rather than a specific offence within a penal code. A person may commit a hate crime in a country where there is no specific criminal sanction on account of bias or prejudice. The term describes a concept, rather than a legal definition⁶.

⁴ OSCE, Office for Democratic Institutions and Human Rights (ODIHR), *Hate Crime Laws: A Practical Guide*, 2008, p. 16.

⁵ www.stonewallcymru.org.uk

⁶ OSCE, p. 16.

II. Elements of Hate Crimes and Protected Value

A. Elements of Hate Crimes

Hate crimes always comprise two elements: a **criminal offence** committed with a **bias motive**.

1. A Criminal Offense Defined in the Criminal Law

The first element of a hate crime is that an act is committed which constitutes an offence under criminal law. This criminal act is called as the “base offence”. Because there are small variations in legal provisions from country to country, there are some divergences in the kind of conduct that amounts to a crime; but in general most countries criminalize the same type of violent acts. Hate crimes always require a base offence to have occurred. **If there is no base offence, there is no hate crime.** In other words if the base action is not a crime in a country’s Criminal Code, there is no hate crime too.

The base offence may include different kinds of actions and incidents such as:

- Physical attacks
- Threat of attack
- Verbal abuse or insults
- Graffiti
- Hate mail
- Name-calling
- Spitting
- Damage to property

These are all defined in the criminal codes as crimes and have special names such as homicide, assault and battery, threat, coercion, defamation and so on.

2. A Particular Motif: Bias

The second element of a hate crime is that the criminal act is committed with a particular motive, with “bias”. It is this element of bias motive, which differentiates hate crimes from ordinary crimes. This means that the perpetrator intentionally chooses the *target* of the crime because of some *protected characteristic*.

Hate crime is just like any other crime BUT with a prominent element of “hate” in it. But this is not hate we usually use, like “I hate insects”. It is prejudice, bias.

All these actions are individual crimes in almost all criminal codes. It is the oppression and marginalization of people and contains violence, motivated by social and political factors and targets victims because of their race, gender, sexual orientation, religious beliefs, etc... Thus the term referred to crimes of a xenophobic, anti-Semitic and homophobic nature at first, but then islamophobia⁷ and christianophobia⁸ came to being.

Although the term and definition of hate crimes is new and the concept is contemporary, the phenomenon of racist violence and wars for religious causes go many centuries back to the Christian Crusades and Islamic Jihad. But where we are standing today, obliges us to deter such crimes, but HOW?

A. Protected Value

The protected value is a characteristic shared by a group, such as their “race”, language, religion, ethnicity, nationality, or other similar common factor.

Which characteristics should be included is a complex issue and each state’s own circumstances and history must be taken into consideration

⁷ In large numbers, especially after the 9/11 incidents in the US.

⁸ In Trabzon, a northern town of Turkey, Padre Santoro (an Italian Catholic priest) and in Istanbul, Hrant Dink a Turco-armenian journalist, editor of an Armenian newspaper published in Turkey.

by the legislators. Which protected groups to include should especially consider the divisions that run deep in the social history of a country.

Decisions about what characteristics to include will have an impact on how the law is used and what kinds of crimes are classified as hate crimes. If a hate crime law protects a long list of characteristics, it will be a very broad law and will apply to a wide range of situations and offences. It may become too general for the law to be effectively enforced. Conversely, if a hate crime law protects relatively few characteristics, it risks excluding groups that are commonly victims of hate crimes. Legislators therefore need to strike a balance between a comprehensive law and one that is too broad to be enforced effectively⁹.

All hate crime laws define protected characteristics, but different states protect different characteristics. Thus, all hate crime laws include “race” as a protected category. Some include categories such as “gender,” “sexual orientation¹⁰,” and “disability.” Less commonly, some hate crime laws protect such characteristics as “education” or “profession” or “political affiliation” or “ideology.” Religious beliefs and sects should also be included¹¹.

1. Immutable or Fundamental Characteristics

Hate crime is an identity crime. This is what renders it different from ordinary crimes. Hate crimes target an aspect of a person’s identity that is unchangeable or fundamental to a person’s sense of self. Such markers are usually evident, such as skin colour. But not all immutable (i.e. unchangeable) or fundamental characteristics are markers of group identity. When determining the protected characteristics to include in a hate crime law it is necessary to identify characteristics that function as a *marker of group identity*. For example, blue eyes may be described as an immutable characteristic, but blue-eyed people do not usually identify

⁹ OSCE 39-40.

¹⁰ For a detailed study see Fırat SÖYLE, “Nefret Söyleminin Cinsel Yönelim ve Cinsiyet Kimliğindeki Tezahürü, *Güncel Hukuk*, June 2010, No. 6, Pp. 42-43.

¹¹ OSCE, 37-38.

together as a group, nor do others see them as a cohesive group, and eye color is not typically a marker of group identity.

On the other hand, there are a few characteristics that are changeable but are nevertheless fundamental to a person's sense of self. For example, even though it is possible to change one's religion, it is a widely recognized marker of group identity, which a person should not be forced to surrender or conceal¹².

2. Social and Historical Context

The process of determining which characteristics to include requires an understanding of current social problems as well as potential historical oppression and discrimination. Characteristics that have been the basis for past attacks should be included, as should characteristics that are the basis for contemporary incidents. To return to the example of the previous paragraph, blue-eyed people have not experienced historical or contemporary subjugation. Because criminal law attempts to deal with social issues, a legislature considering enactment of a hate crime law must understand just what those issues are¹³.

3. The Most Commonly Protected Characteristics

Within the OSCE region, "race", national origin, and ethnicity are the most commonly protected characteristics, closely followed by religion. These characteristics were the ones recognized during the early period of hate crime lawmaking¹⁴.

4. Excluded Characteristics

Failing to include a particular characteristic in a hate crime law does not mean that there are no criminal sanctions. In most jurisdictions, at-

¹² OSCE, 38.

¹³ OSCE, 38-39.

¹⁴ OSCE 40-43.

tacks on police officers or members of the military are serious crimes. They just do not fall within the concept of hate crime. Similarly, the sexual assault of a child is punished more severely than the sexual assault of an adult. This does not mean that the former should be considered a hate crime¹⁵.

5. Rarely Protected Characteristics

Some of the less commonly protected categories include marital status, birth, wealth, class, property, social position, political affiliation or ideology, and military service.

4. Characteristics of the Perpetrators and the Victims

There is no precise answer as to which characteristics should be included, but they are usually ones that are apparent or noticeable to others and thus more easily targeted by offenders

Some opponents of hate crime laws claim that they protect some groups more than others, and are therefore discriminatory. This is not the case. Although hate crimes are most often committed against members of minority communities, they can also occur against majority communities too.

It is claimed that, the prominent characteristics of the parts to the hate crime is that, the victim has a minority position and that the offender has a majority position in society¹⁶, but not always. Sometimes

- The perpetrators may come from a minority group.
- The target may be selected because they are part of a majority group.

¹⁵ OSCE 39-40.

¹⁶ Klara KLINGSPOR/Jennie WIGERHOLT, "Producing hate crime statistics in Sweden", Bra (Paper Presented at the 2007 Stockholm Criminology Symposium and e mailed by the authors, to whom I am thankful).

- Both perpetrator and target may be members of different minority groups.

Everyone is equal before the law. Therefore, hate crime laws do not and should not protect one group over another. For instance, if a hate crime law includes ethnicity as a characteristic, it does not specify a particular one; under such a law a victim could be of any ethnicity, including a majority one.

Hate crime perpetrators and victims have distinctive characteristics. We have to underline these first, so that how to combat hate crimes becomes more organized.

A. Perpetrators

Who are the offenders of hate crimes? Are they ordinary people like us?

Are they strangers or familiar to their victims? As Chakraborti says, there is no “one size fits all” definition¹⁷

In a study on racial violence and racial harassment in London, Sibbitt tried to explain why certain people commit racially motivated crimes: She explains that racist behaviour is linked to crime in general. The factors that cause criminal and antisocial behaviour will also cause racist behaviour. Also if there is prejudice in the community against a minority group, a group within this community will “cross the line” and demonstrate their prejudice in a physical form such as harassment and violence. Thus he/she is expressing the feelings of the larger community¹⁸.

The environment and the psychology that creates racist offences have some special characteristics:

¹⁷ Neil CHAKRABORTI, “Future developments for hate Crime thinking” in **Hate Crime**, ed. CHAKRABORTI, Willan Publishing, Oregon, 2010, Pp. 4-5.

¹⁸ Nathan HALL, *Hate Crime*, Willan Publishing, 2005, p.80.

1. People have witnessed periods of significant demographic change and deteriorating social conditions. They considered “invading” ethnic minorities as the reason.
2. Attitudes of elders, and deeply effect the racist tendencies of the adults, who grew up listening to their elders. As a result they associate all their problems, such as unemployment, housing and these people think hate crime is a tool for what they consider, “correcting the inappropriate” (Barbara Perry).
3. The third category of offenders’ prominent characteristic is the “problem family”. They have several problems such as poor health, aggressive tendencies, and consider themselves as rejected by the society.
4. 15-18 year olds, who are subject to their elders’ views, had connection with older youths with racist tendencies.
5. 4-10 year olds, racist views and language stemming from their upbringing. They engage in bullying at school¹⁹.

Another study is from the U.S.²⁰. Taking into consideration the motivation, the authors found 4 categories:

1. The majority (66%) are motivated by a desire of **thrill**, seeking some form of excitement. They are not committed to their hatred as a significant factor. They are not committed to their prejudice either.
2. Motivation 25%, as being **defensive**. Committed against people who are considered as “outsiders”, “intruders” for protecting their territory. Sending a message to the victim or the victim’s group that they are unwelcome and that they should leave.
3. Motivation of 8% is **retaliation**. Retaliatory offences are not a reaction to the presence of a particular individual or group, but a reaction to a particular hate offence that has already occurred (eg. offences committed against Muslims after 9.11).

¹⁹ HALL 81-83.

²⁰ McDEVITT/LEVIN/BENNET(2002), in HALL 83-85 and especially the table on p. 86.

4. 1% is the **mission** offender, who is totally committed to his/her hate and thinks that the object of the hate is to be removed from the world.

On the other hand four distinct motivations were found **in bias crimes against sexual minorities**. These are Self-Defense, Ideology, Thrill Seeking, and Peer Dynamics.

1. *Self-Defense* assailants typically claim they were responding to aggressive sexual propositions. Rather than fabricating these accounts of homosexual aggression, these assailants appear to interpret their victims' words and actions based on their belief that homosexuals are sexual predators.
2. In contrast, *Ideology* assailants report that they assaulted gay men and lesbians because of their negative beliefs and attitudes about homosexuality. These assailants view themselves as social norm enforcers who are punishing moral transgressions. They object not so much to homosexuality itself but to visible challenges to gender norms, such as male effeminacy or public flaunting of sexual deviance. The other two motivations, Thrill Seeking and Peer Dynamics, both stem from adolescent developmental needs.
3. *Thrill Seekers* commit assaults to alleviate boredom, to have fun and excitement, and to feel strong.
4. *Peer Dynamics* assailants commit assaults in order to prove their toughness and heterosexuality to friends. Both Thrill Seekers and Peer Dynamics assailants minimize their personal antagonism toward homosexuals, and either blame their friends for assaults or minimize the level of harm done²¹.

A characteristic of the offender is that he/she tries to justify the offence through some rationalizing and neutralization techniques:

²¹ Karen FRANKLIN, The Washington Institute for Mental Illness Research and Training, University of Washington, APA ONLINE, PUBLIC POLICY OFFICE

1. Denial of injury: no real harm is done to the victim. It was just harmless fun. The offender believes that it is an acceptable behaviour.
2. Denial of the victim: The victim is worthless; she/he deserved it.
3. Appeal to higher loyalties: A form of group bonding and loyalty to peers.
4. Condemnation of the condemners: Argue that those who condemn them are not better, share the same views and would act the same way in similar circumstances.
5. Denial of responsibility: they blame that the way they acted is caused by their upbringing²².

B. Victims

The perpetrator intentionally chooses the *target* of the crime because of some *protected characteristic*. These characteristics are mainly race, national or ethnic origin, language, colour, religion, sex, age, mental or physical disability, and sexual orientation. So victims become targets of hate crimes if they belong to a group that carries those protected characteristics. For example if they are foreigners, gay, Roman, Muslim, in a country where the majority are either Christian or Jewish and vice versa, and so on. The target, i.e. the victims may be one or more people, or it may be property associated with a group that shares a particular characteristic.

III. Turkish Legislation: Turkish Constitution and Criminal Code

The term is unknown in Turkey, but this does not mean that hate crimes are not committed in Turkey. There are hate crimes in Turkey, but statistically speaking, not very much. For example, belonging to a certain religious sect, gender is enough to be stigmatized by certain people,

²² BYERS et al (1999) in HALL, 89- 90.

generally by the less educated, lower class. Even during the Ottoman era people were more tolerant to differences. Especially when Mehmet the Conqueror conquered Istanbul in the 15th. Century, with the laws he issued, all the Greek and other population was declared to be free in their beliefs.

The Turkish Constitution regulates the principle of equality in art. 10:

“(1) All individuals are equal without any discrimination before the law, irrespective of **language, race, colour, sex, political opinion, philosophical belief, religion and sect, or any such considerations.**

(2) Men and women have equal rights. The State shall have the obligation to ensure that this equality exists in practice.

(3) No privilege shall be granted to any individual, family, group or class.

(4) State organs and administrative authorities shall act in compliance with the principle of equality before the law in all their proceedings”.

The Turkish Criminal Code stresses the importance of equality in article 3/2 stating that

“In application of Criminal Code there should not be any discrimination according to race, language, religion, creed, nationality, colour, sex, political or other opinions, philosophical beliefs, national or social roots, birth, economical and other social status, and no one can be considered privileged”.

On the other hand, harassment of any kind such as by post, by e-mail, by telephone, verbal, threatening, giving them humiliating names, writing graffiti on the walls, theft, robbery, rape, sexual assault, violence,

arson, threatening and harming the property; these are all singular crimes in the Turkish Criminal Code. But the hate motive is not taken into consideration as an aggravating circumstance.

As to the hate motive: There are scattered provisions in the Turkish Criminal Code, which might be used against those who commit hate crimes:

1. For example there is the crime of discrimination²³ (art. 122), which only has a limited scope. The article punishes discrimination performed during certain economic transactions.
2. Under section 3, there is another crime called “crimes against public peace”. The title of article 216²⁴ is “inciting the population to breed enmity or hatred or humiliation”. The protected values in this article are, **social class, race, religion, sect, gender or**

²³ **Section 7: Offences against liberty**

Discrimination

Article 122- (1) A person who by practicing discrimination on grounds of language, race, colour, gender, political ideas philosophical beliefs, religion, sect and other reasons;

- a) prevents the sale or transfer of personal property or real estate or the performance or enjoyment of a service or who makes the employment of a person contingent on one of the circumstances listed above,
 - b) withholds foodstuffs or refuses to provide a service supplied to the public,
 - c) prevents a person from carrying out an ordinary economic activity,
- shall be sentenced to imprisonment for a term of six months to one year or judicial fine.

²⁴ **CHAPTER 3: Offences against Society**

Section 5: Offences against Public Peace

Inciting the population to breed enmity or hatred or humiliation

ARTICLE 216- (1) A person who openly incites groups of the population to breed enmity or hatred towards one another based on social class, race, religion, sect or regional difference in a manner which might constitute a clear and imminent danger to public order shall be sentenced to imprisonment for a term of one to three years.

(2) A person who openly humiliates part of the population on grounds of social class, race, religion, sect, gender or regional differences shall be sentenced to imprisonment for a term of six months to one year.

(3) A person who openly humiliates the religious values of a part of the population shall be sentenced to imprisonment for a term of six months to one year in case the act is likely to distort public peace.

regional differences. Sexual orientation or disabilities are not mentioned in this article. It may be because hate crimes are not committed to gays and disabled. Somehow the Turkish society seems to be tolerant towards gays. Disabled people and elderly people are also treated with care and attention. So people in these two groups are rarely targets of hate crimes. If they happen to be victims of crime, the motive is not hate or bias.

In the past this article was often criticized and was considered as a major impediment for freedom of expression²⁵. So a phrase was added such as “in a manner, which might constitute a clear and imminent danger to public order”. However the present wording of the article is not efficient in terms of protecting the freedom of expression but are considered as to make its application for protecting minority groups from hate speech²⁶.

3. In article 76²⁷ of the Criminal Code genocide is defined. In fact the definition is based on the definition of genocide in the U.N. Agreement.

²⁵ Ulaş KARAN, Nefret Söylemi Kavramı ve Türkiye’de Mevcut Hukuki Durum”, **Güncel Hukuk**, June 2010, No. 6, p. 39.

²⁶ KARAN, p. 39.

²⁷ **Genocide**

ARTICLE 76- (1) The commission of any of the following acts against the members of any national, ethnic, racial, religious or other group determined by any features other than these with intent to destroy it in whole or in part through the execution of a plan shall constitute Genocide:

- a) Intentional homicide.
 - b) Causing serious bodily or mental harm to members of the group.
 - c) Forcing the group to live in such conditions that would cause its extinction bring as a whole or in part.
 - d) Imposing measures intended to prevent births within the group.
 - e) Forcibly transferring children of the group to another group.
- (2) The perpetrator of the offence of genocide shall be imposed the penalty of strict life imprisonment. However, for the deliberate homicide and deliberate wounding committed under genocide, actual conjunction of crimes shall be applied for the number of victims identified.
- (3) Legal entities shall also be imposed security measures for these offences.
- (4) There shall be no limitation period pertaining to these offences.

4. Article 77²⁸ defines crimes against humanity. This crime is committed with certain motives such as political, philosophical, racial or religious motives.
5. Article 78²⁹ of the TCC. punishes those who founded or directed organizations founded for committing the crimes of genocide and crimes against humanity.
6. Another article applicable for hate crimes and especially hate speeches is article 125 of the TCC³⁰, which regulates the crime

²⁸ **Other offences against humanity**

ARTICLE 77- (1) The performance of the below mentioned acts systematically against a civilian group of the population in line with a plan with political, philosophical, racial or religious motives shall constitute the crimes against humanity.

- a) intentional homicide.
- b) intentional wounding.
- c) torture or inhuman treatment or slavery.
- d) depriving one from his/her liberty.
- e) the subjecting of persons to biological experiments.
- f) sexual assault and sexual abuse of children.
- g) impregnation by force
- h) compelling to engage in prostitution.

(2) If the act in paragraph (a) of the first article is committed; the offender will be punished with strict life imprisonment: if the acts mentioned in other paragraphs are committed a penalty of not less than 8 years of imprisonment shall be imposed. However, for the acts of deliberate homicide and deliberate wounding defined in paragraphs (a) and (b) actual conjunction of crimes shall be applied for the number of victims identified.

(3) Legal entities shall also be imposed security measures for these offences

(4) There shall be no limitation period pertaining to these offences.

²⁹ **Organization**

ARTICLE 78- (1) The penalty of imprisonment for a term of ten to fifteen years shall be imposed on persons who found or direct an organization which is set up for the purpose of committing the offences referred to in above articles. Those who become members of these organizations shall be imprisoned from 5 to 10 years.

(2) Corporations shall also be responsible for these offences and there shall be security measures concerning them.

(3) There shall be no limitation period pertaining to these offences.

³⁰ **Offenses Against Honor: Defamation**

ARTICLE 125- (1) Any person who acts with the intention to harm the honor, reputation or dignity of another person through concrete performance or giving impression

of defamation. Especially the aggravating circumstances in paragraphs 3 and 4, the sentences for such cases is aggravated. In fact the number finalized cases are quite high³¹, but the data do not specify which of these cases are related to hate speech.

7. Karan also mentions article 301 of the TCC., insulting the Turkish Nation³² is closely related to freedom of expression. He criticizes that the article is only applied to protect people of Turkish ethnic origin and is not applied to other elements and minorities that constitute the Turkish Nation³³.

of intent, is sentenced to imprisonment from three months to two years or imposed punitive fine. In order to punish the offense committed in absentia of the victim, the act should be committed in presence of least three persons.

(2) The offender is subject to above stipulated punishment in case of commission of offense in writing or by use of audio or visual means directed to the aggrieved party.

(3) In case of commission of offense with defamatory intent;

a) Against a public officer,

b) Due to disclosure, change or attempt to spread religious, social, philosophical belief, opinion and convictions and to obey the orders and restriction of the one's religion,

c) By mentioning sacred values in view of the religion with which a person is connected,

the minimum limit of punishment may not be less than one year.

³¹ 2006.....33649

2007.....39194

2008.....53696 from KARAN, p. 39.

³² Article 301

Insulting the Turkish Nation, the Turkish Republic, the organs and institutions of the State

1. Any person who publicly denigrates the Turkish Nation, the Republic or the Grand National Assembly, of Turkey, the Turkish Government, the judiciary shall be sentenced to 6 months to 2 years of imprisonment.

2. Any person who publicly denigrates the military or the security organization shall be sentenced according to the previous paragraph.

3. Expression of thoughts intended to criticize shall not constitute a crime.

³³ KARAN, p. 39.

CONCLUSION

Any crime may be committed with hate motivation and this is not taken into consideration in many countries. In my opinion motivation should be explicitly recognized as a general aggravating circumstance that is applicable to all crimes so that a message is delivered to the victim, the offender and most important of all to the society at large so that the punishment has a deterrent effect. This would especially prevent the formation of cycles of violence and retaliation.

Existing provisions to deal with hate crimes are inefficient world-wide. There are different amounts of shortcomings in different countries. The most effective solution I can think of is that hate crimes must be explicitly defined as international crimes (like genocide and crimes against humanity) and must be within the jurisdiction of the International Criminal Court, because in some cases it is because of the elected governments that hate crimes are treated with a considerable tolerance.

BUT most important of all is the prevention of bias culture and hatred in a society starting from childhood. The significance of educative approach has to be stressed here. It is advised to integrate multicultural and ethnic material into the curriculum in order to reduce racial bias in children³⁴. In countries like United States where different ethnic groups live together, advocacy groups such as PAH³⁵ are formed for the prevention of bias and hate crimes. PAH suggests that only the curriculum change is not sufficient to effectively challenge prejudice. Besides curriculum reform, teacher training and retraining, desegregated schools, cooperative learning, conflict resolution and peer mediation and an education system where each student is respected as a participating citizen are also suggested.

There are less sophisticated programs in the UK., concerning the police liaison officers or local community groups³⁶.

These examples are only a few that can be done for the prevention of bias and hatred in a society.

³⁴ BIGLER (1999:p. 689) in HALL p. 225.

³⁵ PAH (Partners Against Hate), www.partnersagainsthate.org/educators/pag_2ed.pdf

³⁶ For detailed examples see HALL, Pp. 227-229.

