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Contemporary Questions on Eco-Terrorism

A Conversation with Dr. Michael Loadenthal

Interviewed by FSR Staff

Dr. Michael Loadenthal, a Visiting Assistant Professor in the Department of Sociology & Social Justice Studies at Miami University of Oxford, discussed with FSR his extensive work on eco-terrorism. His research looks to provide nuance to the way eco-terrorism has been studied and written about, and how it is understood by government entities. He uses this perspective to assess the threat, or lack of threat, eco-terrorism poses today.

FSR: Your 2014 article, “Eco-Terrorism? Countering Dominant Narratives of Securitisation: A Critical, Qualitative History of the Earth Liberation Front (1996–2009),” aims to craft a more nuanced view of ‘eco-terrorists’ by providing quantitative evidence that they are not terrorists at all. Though their actions can be coded as political militancy, you argue that these actions “fall[s] short of what can reasonably be called ‘terrorism’ since there have been practically no deliberate deadly attacks on civilians that would warrant the use of such a loaded term.” Can you provide a summary of how you specifically drew these conclusions?

ML: Certainly. In short, I carried out a largescale, quantitative analysis of all known incidents of ‘eco-terrorism’ globally, generated a descriptive account of those trends, and then compared these findings to those of other, previous studies. To accomplish this, I first located all known incidents of ‘eco-terrorism’ and then used this ‘master dataset’ to construct smaller (sub)datasets that resembled those used by other studies for comparison.¹ For example, the commonly cited Leader and Probst study focuses only on attacks carried out by the Earth Liberation Front (ELF) occurring from 1996–2001.² Thus, in order to analyze this study in light of my own, I took the ‘master’ total set of incidents, and excluded all those attributed to groups other than the ELF, and all those occurring outside of the date range 1996–2001. I repeated this process to compare my results against several additional studies.

I did this because I hypothesized that the conclusions

offered in these studies were based on incomplete, myopic datasets which overrepresented largescale incidents (e.g., arson and explosives) while underreporting the more commonly deployed tactics (e.g., vandalism, sabotage, animal liberations). This was the primary thesis of the “Countering Dominant Narratives of Securitisation” article — the creation of complementary, comparable datasets for analysis. I will now describe the larger project (i.e., building the ‘master dataset’) that I developed while studying at the Centre for the Study of Terrorism and Political Violence at the University of St. Andrews which allowed me to do this comparative analysis.

To begin, I familiarized myself with the broader animal and earth liberation movement, its support networks (e.g., The Earth Liberation Front Press Office, Bite Back Magazine, etc.), and critics (e.g., Foundation for Biomedical Research, FBI, etc.), through what I’d call a community-based, embedded ethnography.³ These were already communities I was working in—social movements of proximity — so it was an easy maneuver. This process allowed me to locate a plethora of pro, anti, and ‘neutral’ sources which cataloged attacks. In total, I was able to identify more than 280 distinct data sources, 73 percent of which were primacy sources (e.g., an actual claim of responsibility), generating more than 27,100 incidents (i.e., attacks) over a 38-year period. After determining *where* to look, I spent a year locating attack information. I was careful to pull this information from a number of source types: police and intelligence agency reports and datasets, the animal industry and biotech advocacy sectors, academia, the media, and meticulous records kept by movement activists. These sources, what percentage of the total dataset they constituted, and other relevant details are included in the article’s appendix.⁴ The sum of these records was used to populate the dataset as well as to triangulate information and estimate (or mathematically average) findings when reporting diverged. From there, I coded each entry (i.e., an individual attack) for 22 variables including tactic, target, casualties, location, damage, the presence or absence of a communique, etc. Once the data set was



Animal Liberation Front graffiti in Washington D.C.
(Photo by Dr. Michael Loadenthal)

complete, I used a simplistic set of descriptive statistics to identify trends — both the typical and the atypical.

FSR: What push-back and/or counterarguments have you received from other experts on this position?

ML: Some have remarked that I am ‘too close’ to the data and, in being honest with my politics, I am betraying my sympathies and in effect, toting something equivalent to a ‘party line.’ I fundamentally reject this accusation. As I have demonstrated, it is exceedingly rare for these studies I’m critiquing to offer anything close to a transparent discussion of method, let alone the source and scope of their data. When we read the commonly cited threat assessments and quantitative studies, there is nearly no discussion of *where* data was located or *how* the data was included/excluded and analyzed.⁵ This is precisely why I have spent a great deal of effort to provide exhaustively transparent methodological discussions. In a sense, I am seeking a way to document, track, and analyze incidents of political violence to allow the quantitative trends to make my points for me. For example, if an academic calls the ELF and Animal Liberation Front (ALF) a movement of ‘bomb throwing vegans,’ which is frequently the case, I can argue back and say that explosives were used in only X percent of cases, and thus challenge this portrayal. This was why I began this project in the first place: to

provide a quantitative basis for a rhetorical argument I was already making. I was open to the data proving me wrong, but quickly after I began amassing and sorting it, it became clear to me what the incident history revealed.

Furthermore, I take issue with the nature of this critique on another level. The accusation that my sympathies cloud my analytical ability presumes that other scholars act without such predilections, which is simply not true. I am reminded of the great work produced by scholars in Critical Terrorism Studies, who have argued that what we call objectivity is really only the asserting of the dominant world view.⁶ In other words, if I am said to be ‘biased,’ it is simply because my views are in tension with the contemporary hegemonic position — namely, that the vandalism and sabotage of animal/eco-industries is a form of ‘special interest’ terrorism. If this is the dominant, discursive position, which it is, to argue something else is seen as biased, yet to regurgitate the State’s accusations alongside a pie chart is seen as ‘objective.’ This ‘inside the Beltway’ bias is a constant in the field of Terrorism Studies — leading some to refer to it as the Terrorism Industry — and has been the primary motivation for scholars to promote a critical alternative (i.e., Critical Terrorism Studies, Critical Security Studies).



A fire caused by an ALF cell, the Oxford Arson Squad (Matt86C / Public Domain)

Finally, I think it is important to consider the role that (formal) social science plays in social change. In his work, *The Sociological Imagination*, the (in)famous sociologist C. Wright Mills argued that we should understand society for the purpose of changing it; that through better understanding the social, we could more completely move towards a better society for all.⁷ Mills advocated for transforming society not studying it from an unimpassioned position. I have done my best to carry forth Mills' charge, to be honest with my aims, and to strive for transparency, public accessibility and engagement, and a rigorous empirical inquiry.

FSR: Did any of this outside commentary inform your 2017 article on the topic, "Eco-Terrorism': An Incident-Driven History of Attack (1973–2010)"? How so?

ML: As indicated above, all of these quantitative investigations I've discussed are based on a central, master, dataset that I have spent years building, refining, and expanding. This particular article, "Eco-Terrorism': An Incident-Driven History of Attack (1973–2010)," is sort of my swan song on the matter — the results of my long journey to get all of my data out there. I expect that this will be as far as I will take the data. I've come to the point where to write more on this seems like — to employ a non-vegan image — beating a dead

horse. The goal of the project, beginning in 2009 and ending in 2017, was to create both a generalizable set of findings from a global analysis, as well as to develop and publish a method for such an event-attack analysis. The *Journal for the Study of Radicalism*, whose work I think is really great, was amenable to publishing not only the findings (i.e., the article), but the methodological design and data tables (i.e., the appendix) as well. During this period of data collection, analysis and writing (2009–2017), I produced a number of studies already discussed. These publications are all derived from the master dataset begun at St. Andrews, which was first offered for review and comment as a pre-thesis pilot study.⁸ This was further refined methodologically and with expanded sources, constituted my MLitt (i.e., British equivalent of an MA) thesis.⁹

In the end, I am confident in a number of key claims. First, that the 27,000-plus dataset I constructed is the largest academic or public source dataset in existence on the topic of eco-terrorism. Secondly, by publishing the methodology of this study, as well as the complete set of data tables in several publications, I have gone above and beyond the established standard for academic peer-review and transparency.¹⁰ I have also made these studies freely available — not behind restrictive pay walls — which I hope adds to their accessibility.¹¹ Final-

ly, based on this extensive review of the history of such attacks, it can be unequivocally stated that the radical (i.e., clandestine and illegal) animal and earth liberation movements are a network of cells and individuals who engage in symbolic and practical attacks on property to financially sabotage their opponents, *not* generate anxiety-inspiring, terror-inducing incidents designed to communicate threats to primary and secondary audiences. Therefore, it is inaccurate and misleading to describe these movements and networks as terroristic, as their use of terrorist tactics is exceedingly rare and outside of the strategic framework that terrorism relies upon.

FSR: What place does ‘eco-terrorism,’ or rather the animal and earth liberation movement, have in the present discourse on terrorism and counterterrorism? Does the animal and earth liberation movement pose a significant threat today? Why or why not?

ML: Oddly enough, as ‘eco-terrorism’ has declined in the last decade or so, the FBI and other law enforcement and intelligence bodies have sustained their rhetoric and focus on these movements and networks. I have discussed this trend in a few places, but it has not been the focus of my research.¹² A FBI special agent in 2008 claimed that ‘eco-terrorists’ constitute a ‘number one threat,’ repeating a claim made frequently by the

agency in the early 2000s.¹³ To this day, ‘animal rights and environmental extremists’ remain listed within the FBI’s ‘domestic extremist ideologies’ taxonomy.¹⁴ Such threat-centric rhetoric has reemerged in the final months of 2017 and into 2018.

In times of decreased ‘eco-terrorist’ activity, we have seen some aggressive prosecutions, such as two Midwest activists (Kevin Johnson and Tyler Lang) who were prosecuted under the Animal Enterprise Terrorism Act (AETA) for releasing minks from an Illinois fur farm in 2013.¹⁵ In November 2017, the activists lost an appeal which challenged the constitutionality of the AETA, arguing that it served to further criminalize First Amendment activities and denied the defendants due process by labeling them as terrorists.¹⁶ I would argue that such a treatment demonstrates the persistence of the State’s focus on these movements. This is clearly at odds with the movement’s history of avoiding causalities and is increasingly apparent when viewed in light of a growing lethality from right-wing and jihadist movements.¹⁷ I would say that the animal and earth liberation movement should have little to no place in the current discourse on terrorism, as it is a social-political movement and should be understood as outside of the counter-terrorism and counter-insurgency logic used to target terror networks. However, the FBI maintains that the movement’s ideology is one of extremism, and thus



J. Edgar Hoover Building, the headquarters of the Federal Bureau of Investigation in Washington D.C. (Aude / CC BY-SA 4.0)

remains a persistent target within a counter-terrorism framework. For example, the FBI's countering violent extremism taxonomy still classifies 'animal rights and environmental extremists' as one of its six 'ideologies of domestic extremism' alongside anarchists (a portrayal I also take issue with), and rightist movements including those labeled sovereign citizen extremists, abortion extremists, militia extremists, and white supremacy extremists.

The question becomes, does the animal and earth liberation movement constitute a threat, and if so, to whom? Certainly, I could argue either position, but I believe that a fair assessment concludes that while the movement is a threat to *capital*, it is not a threat to life in the way that neo-Nazis, white supremacists, anti-abortion assassins, paramilitary militias, jihadists, and others are. As I have argued in the past — borrowing from, amongst others, Louis Althusser — a key function of the State is the protection of capital, and as such, threats to its accumulation are often treated as existential threats to the State itself.¹⁸ This is simply not true. In December 2017, a judge in Quebec drew such comparisons in the sentencing of two activists who locked themselves to a section of the Enbridge Line 9 oil pipeline.¹⁹ In his remarks, the judge compared the act of nonviolent civil disobedience and the Boston Marathon bombings and Islamic State attack on the Bataclan Theatre in Paris which killed 130. In his remarks, the judge said, "You were convinced that it [i.e., the lockdown] was correct... However the terrorists who placed bombs during the Boston Marathon, or the Bataclan shooters were convinced that they were doing the right thing. But that was not the case."²⁰

To cite a second example from the past few days, *The Hill*, a Washington, DC-based paper which focuses on political news, published an article on December 28, 2017 entitled, "Eco-terrorist attacks on energy infrastructure on tap for 2018," wherein the author calls activists who disrupted the Dakota Access Pipeline "Green Antifa," playing upon a defamatory framing applied to anti-fascists in the Trump era.²¹ The article ends with the warning, "But if...acts of sabotage already committed are any indication, eco-terrorism could also be coming our way. People working in, or living close to, the facilities being targeted could find themselves in harm's way."²²

In a third example, a Fall/Winter 2017 *Foreign Policy*

article, "The Next Wave of Extremists Will Be Green," the author places "radical environmentalism" as comparable to the actions of the Irish Republican Army (IRA), Basque separatists (e.g., ETA), and al-Qaeda.²³ The author notes that just as "Western intelligence services" were "blindsided" by the rise of right-wing violence, "Today, we are about to make the same mistake. We will not easily forgive ourselves if our attention is exclusively occupied by the Islamic State or the far-right when the coming wave of environmental radicalization hits."²⁴ The article contains the word terrorist(s)(ism) 13 times, including in its tags. The author discusses "green radicalization" as another target alongside "Islamist" and "far-right" radicalization.²⁵ The notion that there are equivalent underlying grievances motivating environmentalists, white nationalists, and jihadists is absurd and insulting.

Just so I'm not accused of being too selective, a fourth and final example can be seen in a January 2018 interview with Marc Morano, the former director of communications for the Senate Environment and Public Works Committee. During the height of the "Green Scare," this committee authored key congressional reports which framed eco-activists as terrorists.²⁶ In his interview, Morano was asked if it was "an exaggeration" to call "radical greens" the leaders of the "next wave of [domestic] terrorism." Morano responded:

No, I don't think so...["eco-terrorists"] see the success of groups like ISIS and how one individual who may not even be organized with a larger group, one individual act can cause chaos and draw attention to a cause... The attitude of many activists looking at the climate scare is that we must act alone because governments are not acting or are not acting enough or in many cases just acting to defy their concerns. So, I do think that the environmental movement is going to be using the climate campaign or the climate scare, if you will, to justify more extreme in the next 5-10 years.²⁷

The remainder of the interview is rife with rhetoric designed to justify the government's frame of activists as "eco-terrorists," and can be seen as a very clear, modern articulation of the "Green Scare" frame.

It is rhetoric like this which is persistent; the notion that there is even vague equivalence between those who would disable an oil pipeline through civil disobedience, vandalism, or sabotage, and those who would open



fire into crowds of civilians at a rock concert or place a bomb at a sports event is exaggerated and untrue. While all constitute criminal acts within a social movement, to draw additional similarities is fruitless. In sum, the animal and earth liberation movement has *never* presented a terroristic threat. It has never presented a threat to life. It has at times constituted a threat to capital, and while such incidents are on the decline, these actions still occur routinely. To cite a few examples of late, we can point to the liberation of two piglets announced in December 2017 in the UK.²⁸ Also in December 2017, activists rescued ducks in Chile and the Czech Republic, chicks in England, toppled hunting hides in Germany, and Sweden, and hacked a hunting federation website hosted in France.²⁹ If one considers the theft of piglets destined for slaughter as a terroristic threat, then we should expect to be terrorized far into the future.

FSR: Anything further you'd like to address that does not fit into one of the other questions.

ML: I firmly believe that what we call things matters. Calling something terrorism that is *not* terrorism matters. Calling an incendiary device (i.e., a Molotov cocktail) a "bomb" muddies one's ability to accurately understand the incident and also cements a discursive reality which Foucault would argue establishes a 'regime of truth.' In other words, language does far more than describe; it establishes realities, and this cannot be overestimated. The endless and boundless nature of the

Global War on Terrorism establishes a conflict with no end, against an enemy with no identifiable markings. The fostering of the 'neutral, objective, blank slate-of-a-scholar' is a myth, and the sooner we can all be honest about our theoretical presumptions the faster we can grow this field, and move beyond the quagmire of the continual recycling of the same arguments, from the same sources, and for the same audience.

¹ See for example: Helios Global, Inc., "Ecoterrorism: Environmental and Animal-Rights Militants in the United States" *Helios Global, Inc./U.S. Department of Homeland Security*, 2008.

² Stefan H. Leader and Peter Probst, "The Earth Liberation Front And Environmental Terrorism," *Terrorism and Political Violence* 15 (4) (2003): 37–58.

³ Bite Back magazine maintains an extensive repository of ALF and related communiques and is accessible at <http://directaction.info/>. Bite Back is a digital repository and republisher for animal liberation communiques; claims of responsibility for acts of vandalism, sabotage, animal release/removal, arson, etc. carried out by clandestine actors.

⁴ Michael Loadenthal, "Appendix: Methodology-Database Construction," *Journal for the Study of Radicalism* 11 (2) (Fall 2017): 46–51, 81–106.

⁵ See for example: Leader and Probst, "The Earth Liberation Front And Environmental Terrorism;" Helios Global, Inc., "Ecoterrorism: Environmental and Animal-Rights Militants in the United States;" Gary A. Ackerman, "Beyond Arson? A Threat Assessment of the Earth Liberation Front," *Terrorism and Political Violence* 15 (4) (2003): 143–70; Bron Taylor, "Threat Assessments and Radical Environmentalism," *Terrorism and Political Violence* 15 (4) (2003): 173–82; Donald R. Liddick, *Eco-Terrorism: Radical Environmental and Animal Liberation Movements*, annotated edition (Santa Barbara: Praeger, 2006); Brian Jackson and David Frelinger, "Rifling Through the Terrorists' Arsenal: Exploring Groups' Weapon Choices and Technology Strategies," *Studies in Conflict & Terrorism* 31 (7) (2008), http://www.rand.org/pubs/working_papers/WR533.

⁶ Richard Jackson et al., *Terrorism: A Critical Introduction*, 1st ed. (New York: Palgrave Macmillan, 2011), chap. 1.1-1.2.

⁷ C. Wright Mills, *The Sociological Imagination* (Oxford: Oxford University Press, 1959), chap. 3.

⁸ Michael Loadenthal, "Superglue, Bolt Cutters & Homemade Incendiaries: A Targeting, Tactical & Communication Methods Analysis of the Earth Liberation Front's Attack History 1996-2009," *Centre for the Study of Terrorism and Political*

Violence, University of St. Andrews, 2010.

⁹ Michael Loadenthal, "Nor Hostages, Assassinations, or Hijackings, but Sabotage, Vandalism & Fire: 'Eco-Terrorism' as Political Violence Challenging the State and Capital," *Centre for the Study of Terrorism and Political Violence, University of St. Andrews*, 2010.

¹⁰ Loadenthal, "Superglue, Bolt Cutters & Homemade Incendiaries: A Targeting, Tactical & Communication Methods Analysis of the Earth Liberation Front's Attack History 1996-2009;" Loadenthal, "Nor Hostages, Assassinations, or Hijackings, but Sabotage, Vandalism & Fire: 'Eco-Terrorism' as Political Violence Challenging the State and Capital;" Michael Loadenthal, "Eco-Terrorism? Countering Dominant Narratives of Securitisation: A Critical, Quantitative History of the Earth Liberation Front (1996-2009)," *Perspectives on Terrorism*, (Center for Terrorism and Security Studies, Terrorism Research Initiative), 8 (3) (June 25, 2014): 16-50; Michael Loadenthal, "'Eco-Terrorism': An Incident-Driven History of Attack (1973-2010)," *Journal for the Study of Radicalism* 11 (2) (Fall 2017): 1-33; Loadenthal, "Appendix: Methodology-Database Construction."

¹¹ As practice, I post all of my work online for free. All of this work can be located at <https://gmu.academia.edu/MichaelLoadenthal>.

¹² Michael Loadenthal, "'The Green Scare' & 'Eco-Terrorism': The Development of US Counter-Terrorism Strategy Targeting Direct Action Activists," in Jason Del Gandio and Anthony Nocella, *The Terrorization of Dissent: Corporate Repression, Legal Corruption and the Animal Enterprise Terrorism Act* (New York: Lantern Books, 2014), 91-119; Michael Loadenthal, "Deconstructing 'eco-Terrorism': Rhetoric, Framing and Statecraft as Seen through the Insight Approach," in Harmonie Toros and Ioannis Tellidis, *Terrorism, Peace and Conflict Studies: Investigating the Crossroad* (London: Routledge, 2014), 92-117; Michael Loadenthal, "Leftist Political Violence: From Terrorism to Social Protest," in Kevin Borgeson and Robin Valeri, *Terrorism in America* (New York: Routledge, 2017), not yet paginated.

¹³ Fox News, "FBI: Eco-Terrorism Remains No. 1 Domestic Terror Threat," *Fox News*, March 31, 2008, <<http://www.foxnews.com/story/2008/03/31/fbi-eco-terrorism-remains-no-1-domestic-terror-threat.html>> accessed January 28, 2018.

¹⁴ Federal Bureau of Investigation, "What Are Known Violent Extremist Groups? - Domestic Extremist Ideologies," *Federal Bureau of Investigation*, 2016, <<https://cve.fbi.gov/whatare/state-domestic>> accessed January 28, 2018.

¹⁵ Jonathan Stempel, "Animal Activists Who Freed 2,000 Minks Lose U.S. Appeal," *Reuters*, November 8, 2017, <<https://www.reuters.com/article/us-usa-animal-rights-minks/animal-activists-who-freed-2000-minks-lose-u-s-appeal-idUSKBN1D82Q1>> accessed January 28, 2018.

¹⁶ U.S. v. Johnson et al, 7th U.S. Circuit Court of Appeals, Nos. 16-1459, 16-1694; Jonathan Stempel, "Animal Activists Who Freed 2,000 Minks Lose U.S. Appeal."

¹⁷ William Parkin et al., "Threats of Violent Islamist and Far-Right Extremism: What Does the Research Say?" *National Consortium for the Study of Terrorism and Responses to Terrorism*, February 22, 2017, <<http://www.start.umd.edu/news/threats-violent-islamist-and-far-right-extremism-what-does-research-say>> accessed January 1, 2018.

¹⁸ See for example: Michael Loadenthal, "Activism, Terrorism, and Social

Movements: The 'Green Scare' as Monarchical Power," *Research in Social Movements, Conflicts and Change*, Narratives of Identity in Social Movements, Kent State University, 40 (1) (August 16, 2016): 189-226; Michael Loadenthal, "Professor Xavier Is a Gay Traitor! An Anti-Assimilationist Queer Framework for Interpreting Ideology, Power & Statecraft," *Journal of Feminist Scholarship*, Department of Women's and Gender Studies, University of Massachusetts Dartmouth, 6 (1) (Spring 2014): 13-46.

¹⁹ Danielle Rochette, "Quebec Judge Compares Pipeline Protester's Mindset to Terrorists in Paris - APTN News," *APTN News*, December 21, 2017, <<http://aptnnews.ca/2017/12/21/quebec-judge-compares-pipeline-protesters-mindset-to-terrorists-in-paris/>> accessed January 1, 2018.

²⁰ Ibid.

²¹ Bonner R. Cohen, "Eco-Terrorist Attacks on Energy Infrastructure on Tap for 2018," *The Hill*, December 28, 2017, <<http://thehill.com/opinion/energy-environment/366713-more-eco-terrorist-attacks-on-energy-infrastructure-on-tap-for>> accessed January 1, 2018.

²² Ibid.

²³ Jamie Bartlett, "The Next Wave of Extremists Will Be Green," *Foreign Policy*, September 1, 2017.

²⁴ Ibid.

²⁵ Ibid.

²⁶ Note on the "Green Scare": The "Green Scare" refers to the U.S. government's legal prosecution of environmental and animal rights activists as terrorists. The term was popularized by these activists; U.S. Senate, Committee on Environmental and Public Works, *Eco-Terrorism Specifically Examining Stop Huntingdon Animal Cruelty ('SHAC')*, 109th Cong., October 26, 2005 <<http://www.gpo.gov/fdsys/pkg/CHRG-109shrg39521/html/CHRG-109shrg39521.html>>; U.S. Senate, Committee on Environmental and Public Works, *Oversight on Eco-Terrorism Specifically Examining the Earth Liberation Front ('ELF') and the Animal Liberation Front ('ALF')*, 109th Cong., May 18, 2005 <http://epw.senate.gov/hearing_statements.cfm?id=237836>.

²⁷ Marc Morano, "Green Radicals are Ready to Kill for Their Cause - Ex-member of US Senate Environment Committee," (interview by Sophie Shevardnadze, Live TV interview, RT's SophieCo,) January 15, 2018, <<https://www.rt.com/shows/sophieco/415907-violence-protests-usa-terrorism/>> accessed January 19, 2018.

²⁸ Bite Back Online, <http://directaction.info/news_dec25_17.htm> accessed December 28, 2017.

²⁹ Bite Back Online, <http://directaction.info/news_dec19_17.htm> accessed December 28, 2017; Bite Back Online, <http://directaction.info/news_dec27_17.htm> accessed December 28, 2017; Bite Back Online, <http://directaction.info/news_dec21_17.htm> accessed December 28, 2017; Bite Back Online, <http://directaction.info/news_dec14_17.htm> and <http://directaction.info/news_dec20_17.htm> accessed December 28, 2017; Bite Back Online, <http://directaction.info/news_dec23_17.htm> accessed December 28, 2017; Bite Back Online, <http://directaction.info/news_dec26_17.htm> accessed December 28, 2017.

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