

## Counter-Narratives and the Unrehearsed Stories Counter-Terrorists Unwittingly Produce.

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# Perspectives on Terrorism

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### **Table of Contents:**

Letter from the Editor3
Counter-Narratives and the Unrehearsed Stories Counter- Terrorists Unwittingly Produce
Terrorist Drop-outs: One Way of Promoting a
Counter-Narrative
Understanding al-Qaeda's Ideology for Counter- Narrative Work
Winning the Battle but Losing the War?
Book Reviews30
Peter R. Neumann. <i>Old &amp; New Terrorism. Late Modernity, Globalization and the Transformation of Political Violence</i> . Cambridge, Polity, 2009. 218 pp. ISBN-13: 978-0-7456-4376-2 Reviewed by Alex P. Schmid
Ana S. Trbovich. <i>A Legal Geography of Yugoslavia's Disintegration</i> . Oxford, UK: Oxford University Press, 2008. 522 pp. ISBN 978-0-19-533343-5
Reviewed by Dipak Gupta
Ruediger Lohlker. <i>Dschihadismus Materialien</i> [Jihadism Materials]. Vienna, Facultas WUV, 2009. 248 pp. ISBN 978-3-8252-3132-3 Reviewed by Alex P. Schmid
Conference Calendar (Sept. – Dec. 2009)39 by Michael Cheek

# Counter-Narratives and the Unrehearsed Stories Counter-Terrorists Unwittingly Produce [1]

by Beatrice de Graaf

'All counter-terrorism is a stage, and all counter-terrorists merely players' (paraphrasing Shakespeare)

#### Abstract

Governments produce both deliberate and involuntary (and less conscious) narratives when countering terrorism. The thesis of this article is that such unintended messages can be much more powerful and consequential than is realized; in fact, they can completely contradict the intended official 'counter-narrative'. To substantiate this hypothesis, the author looks at the experience of the German Federal Republic in the 1970s and beyond when state and society were confronted with the Red Army Faction (RAF) and similar left-wing "revolutionaries" like those of the 2nd of June Movement or the Red Zora.

## Chancellor Helmut Schmidt's Social-Democratic Counter-narrative against Terrorism

The RAF was founded in 1970 by Andreas Baader, Gudrun Ensslin and the already well-known publicist Ulrike Meinhof.[2] Until 1974, West Germany's central government, headed by the Social- Democratic Party's leader, Chancellor Willy Brandt, was not very active in developing a counter-narrative. This was, in part, due to the fact that the Federal Republic had been divided by the victors of the Second World War into strong regional states which governed their internal affairs rather autonomously and also dealt with terrorist incidents on their territory the way they saw fit. It was also due to the fact that the left-liberal coalition, and especially Brandt, did not want to place domestic national security issues too high on their reformist agenda.[3]

The first to make an effort to instigate a form of national coordination on combating domestic terrorist violence was Horst Herold, director of the Federal Criminal Office (BKA) since 1971. He was the first in Europe to introduce computers and data-mining techniques in the investigation process. He also recognized the importance of conveying a message to the public at large, as many citizens felt intimidated by the militants of the RAF and affiliated organisations. Herold's response to the bombing, shooting and kidnapping campaign of the RAF was 'to demonstrate state power'. This meant, inter alia, the use of roadblocks, Most Wanted-posters and the massive and visible deployment of helicopters, police units and area searches. The wave of arrests in the Summer of 1972, when all the first generation RAF members were traced and apprehended, gave Horst Herold's approach credibility and gained widespread public support. It also earned him the nickname 'Kommissar Computer'.[4]

Only after Willy Brandt's successor in the German Chancellery, Helmut Schmidt, entered office in 1974, and especially after CDU politician Peter Lorenz was kidnapped in 1975, the central government took counterterrorist matters more firmly in its own hands.[5] At this point, a genuine and original political counter-narrative was being developed.

Helmut Schmidt, as a Social Democrat, was not keen to evoke the old sentiment of the 'War against

partisans and vandals', as many officials within the BKA, the security apparatus and the conservative parties (CDU & CSU) were eager to do. Rather than looking for support for his approach with the conservative hardliners, Schmidt stressed the value of the 'Gemeinsamkeit der Demokraten' ('communality of democrats'). His main concern - and the message he wanted to spread - referred to the protection of democracy and the rule of law. He therefore rigorously rejected all unconstitutional proposals that were made. While over 67 % of the population demanded the introduction of the death penalty, he refused to submit to such pressure. There were even more radical proposals, e.g. a police union proposing to issue rewards of 50.000 German Marks for anyone who killed a terrorist.[6] Others, such as the Bavarian president of the CSU, Franz-Josef Strauss, even called for reprisals against RAF prisoners and their relatives. 'Not with me', was Helmut Schmidt's response to such proposals. He thought such emergency measures would result in 'morally cracking the people'.[7]

Schmidt consciously invoked the concept of a 'militant democracy', as elaborated by Karl Loewenstein and Karl Mannheim, a concept that was in line with a ruling of the West-German Constitutional Court.[8] By using such a framework, the Chancellor was able to indicate that the German Federal Republic was not involved in a battle of the revolutionary Left against a (neo-) Fascist Right, as the RAF suggested, but instead suffered an attack on the liberal democratic order, prompted by a marginal group of terrorists. All parties were targets and therefore all were required to repel these attacks collectively.[9]

This counter-narrative concept entailed the idea that the German Federal Republic was a constitutional democracy, that it had (and should have) the necessary power to combat any (perceived) threats to the democratic order[10] and that citizens took their duties and obligations seriously, as Prime Minister of Baden-Württemberg, Hans Filbinger, stated in the funeral speech for three police officers who had been killed during the abduction of Hans-Martin Schleyer, president of a powerful industrial association.[11] In a statement issued on 15 September 1977, the government appealed to all young West-Germans, calling upon them to respect democratic principles and asking them to 'acquire and internalize a democratic sense of citizenship within our society'.[12]

#### **Successes and Failures**

This was a sensible and convincing message: it cut through the Left-Right divide, inviting people of all parties to join forces in defence of the democracy. It gave the government the necessary authority to defend the political system. However, there were also some drawbacks. First of all, it closed the political debate for all radical ideas and convictions. In other words, there was no political space left to vent and debate non-mainstream positions. This situation was made worse by the constitutional requirement that for a political party to enter parliament a minimum of 5% of all votes cast in an election had to be reached – a threshold that had been set after 1945 in the light of the Weimar experience. Secondly, it created a situation where citizens where viewed as being for or against democracy, with no room for manoeuvre, political abstinence, or any ideologically more differentiated position. This ideological closure had very real social consequences: through the 'Anti Radicals Decree' of 1972, persons who were not deemed to be loyal to the state and the democratic system could be excluded from a career in the civil service. Thousands of public employees were vetted, including school teachers, and many were disqualified from civil service – rulings which frustrated many careers and are still in force today.

Another weakness lay in the fact that the opposition did not accept the open invitation to join the 'communality of democrats'. Furthermore, it dismissed every nuanced tone in the political debate on radicalism as being 'soft on terrorism'. In those German states where the right-of-center CDU-CSU parties were in control of the government, the conservative parties dismissed professors who showed some degree of 'understanding' for the revolutionary radicalism of many young students. At the same time, members of the CDU-CSU kept attacking the ruling left-liberal coalition because of its allegedly soft stanced towards those who wanted to change society by violent actions. The Christian Democrats, notably CDU's party

leader Helmut Kohl, deliberately evoked associations of chaos and democratic weakness and blamed the government for its 'inability to govern'.[13] He painted the spectre of 'political vandalism' and a relapse into 'the bad period of the Weimar Republic'. Berlin's parliamentary CDU party chairman Heinrich Lummer spoke of a 'degeneration of democratic morals and principles'. Even the country's President, Karl Carstens (CDU), warned of a 'weak state that, like in 1933, could not defend itself against its enemies'. [14]

However, apart from this politicization of the debate on how to tackle terrorism, the most serious weaknesses of the ruling government's counter-narrative pertained not to its contents, but to the way the security forces, the regional authorities, the judiciary and the governing parties themselves were undermining their own narrative with actions that appeared to contradict completely their declaratory policy of adherence to democratic values and the rule of law.

#### **Signifiers and Legends**

In the context of counterterrorism politics the concept of 'signifier' refers to a variety of occurrences, happenstances, failures or situations where a certain meaning is attached to elements of government policy. [15] The term 'legends' indicates the collective meaning that is linked to the 'signifier' under consideration (as in 'urban legend'). It can relate to stories narrated and distributed in response to significant events, within the 'radical scene' itself, or within society at large. The signifiers can be real events. However, the (urban) legends – the significance attached to them – are often gross exaggerations or distortions of what really happened. Terrorists, their supporters or sympathisers, as 'entrepreneurs of violence' are prone to intentionally overemphasize certain elements in order to construct 'injustice frames' out of significant occurrences.[16]

What were the signifiers and legends surrounding German counterterrorism efforts in those years? A very important signifier was created from, and caused by, a police failure as early as 1967, when Benno Ohnesorg, a young student, was shot dead by a Berlin police officer named Karl Heinz Kurras during a demonstration against the visit of the Persian Shah and his wife.[17] Kurras was immediately cleared of all charges. At the time, the circumstances surrounding the shooting were never fully clarified. However, in May 2009, in an ironic twist of history, it surfaced that Kurras was, after all, not a 'Fascist cop', but a Stasi informer, working for the secret service of the German Democratic Republic.[18] The legend attached to this police killing is encapsulated in an exclamation, attributed to Gudrun Ensslin: 'The fascist state is back, they are out to kill us all, so we have to arm ourselves!'. One of the members of the 2nd JuneMovement - the organisation was founded on the 2nd of June 1972 - Ralf Reinders, explained why his group had opted for this name five years after the death of Benno Ohnesorg: 'Everyone knows what the 2nd of June means. By including this date in the name, people are forever reminded of the fact that they were the first to shoot!'[19]

Another series of signifiers were the new laws that were passed by parliament between 1974 and 1976. [20] Criminal Procedures were made more strict, the RAF defence team was downsized, while at the same time the conditions for prosecuting and sentencing terrorists were upgraded. In 1976, a new paragraph (Para.129a) was included in the German Penal Code, making 'forming a terrorist organisation' a punishable offence. As a result, not only the direct perpetrators, but also associates and accomplices providing logistical support could be prosecuted for terrorist crimes. In addition, the new law regarding 'Kontaktsperre' ('contact'- or 'communications-ban'), passed on the 30 September 1977, allowed police and judicial authorities to isolate jailed RAF members completely from the outside world, even banning them from communicating with lawyers and close relatives. "Terror against the judiciary or terror by the judiciary?" the Hamburg news magazine *Der Spiegel* asked ominously.[21] The imprisoned RAF members and their supporters made good use of these highly symbolic laws and engaged in hunger strikes to protest against their treatment, solitary confinement, alleged sensory deprivation and the whole system

of 'political justice' (a reproach associated with the Nazi period).[22] Through such efforts to portray the state as one that did not hesitate to engage in torture, a second generation of terrorists was created. New members were recruited through the solidarity committees which took up the cause of those imprisoned for 'political' reasons. Others came from among protest demonstrators supporting the imprisoned RAF leaders. They engaged in a new series of attacks, the culmination of which was the kidnapping of the industrialist H.-M. Schleyer and a supporting action by Palestinian militants, involving the hijacking of the Lufthansa plane Landshut in September-October 1977.[23]

The most damaging 'signifier' however, was the climax of the 'German autumn', namely the collective suicide of imprisoned RAF terrorists of the first generation in October 1977. The nationally and internationally predominant image of stern German governmental actions had already been constructed based on the TV footage of the high-security Stammheim prison, the previous suicide of Ulrike Meinhof and the many hunger strikes that RAF prisoners had carried out. Although the government of Helmut Schmidt had gained broad public support for the liberation of the hostages by the German elite team GSG- 9 in Mogadishu, this did not alter the fact that in the eyes of a sizeable minority, the survival of democracy in the German Federal Republic was considered to be in serious peril.[24]

These doubts gained more substance when four of the remaining first generation RAF leaders were found dead (and in one case wounded) in their cells of the Stammheim prison, the day after the Landshut hostages in the hijacked plane in Mogadishu (Somalia) were liberated. Although Brigitte Mohnhaupt, the new RAF leader, later admitted that she knew from the beginning that Baader and two of his colleagues had taken their own lives, at that time she immediately crafted the 'legend' that they had been murdered by 'the government'. She and others portrayed this as another step in the direction towards a totalitarian police state. This legend managed to trigger a series of new terrorist actions in the years to come – attacks that continued with decreasing frequency and severity until the early 1990s.[25]

Only after the Stammheim drama did the government make serious efforts to try to 'neutralize' the left-wing legends with new counter-narratives of its own. As a consequence, political polarisation and mutual recrimination among the parliamentary parties declined. The accusation of being 'weak' was no longer made, and the government led by Chancellor H. Schmidt could at last relax somewhat. The social-liberal political coalition that had, up until then, acted relatively defensively, gradually came out of its shell. In 1978, President Walter Scheel stated that there was to be an end to polarisation and the widespread tendency to denunciate alleged terrorism sympathisers anonymously to the police. The 'private sphere of fellow citizens' was to be respected once again – by the police forces as well as the citizens themselves. [26]

In addition, in 1978, the new liberal Interior Minister, Gerhard Baum, published a series of TV interviews in book form - interviews he had conducted with Horst Mahler, a lawyer defending the RAF terrorists. In these dialogues he discussed the political aspirations of the left-wing 'revolutionaries' and exposed their failures in an open and honest debate.[27] Through this courageous step, it became clear to almost anybody except the most fanatic 'true believers' that the alleged relapse of West Germany into fascist behaviours had been a huge exaggeration. Freedom of speech prevailed throughout, and there was plenty of opportunity to criticise the new security measures. Furthermore, the government asked Horst Herold to step down as head of the BKA in 1981. Through his name, the BKA and counterterrorism had become tainted with the association of an Orwellian 'surveillance state', partly due to the data-mining programs Herold had introduced.[28]

The federal prosecution subsequently offered collaborating terrorists a crown witness arrangement - but this was kept secret for some time. In 1991 only, Minister Klaus Kinkel formalized this arrangement and - following the Italian experience with the pentiti [those who repented] – also offered lenient treatment to sympathizers and supporters in exchange for a truce (contrary to Italy, the West-German authorities excluded all terrorists from this provision who had been sentenced for major offences, only the ones with lower penalties could profit from this offer).[29] This offer divided the remaining terrorists; some of

them did come forward and provided useful information, thereby allowing the authorities to roll up much of what remained of the RAF. However, the aftermath of German terrorism was protracted and only in 1998 did the RAF officially disband itself. It is worth noting that this closure was not primarily the result of governmental counter-narratives or clemency offers. Neither was it the result of the pressure of prosecution. It was just as much, and perhaps more, the result of the end of Communism in East Germany, Eastern Europe and the Soviet Union. [30] What also mattered was that extremists who in the 1970s had endorsed the revolutionary ideals of the RAF found, since the 1980s, new outlets for their militant energy in non-violent civil society organisations and in the rising political party of the Greens.

#### Conclusion

What lessons can be learned from the German experience with left-wing terrorism between 1968 and 1998? Four German lessons stand out:

- 1- The declaratory policy of official narratives is less persuasive than the actual practical experience of terrorists and their sympathizers in their encounters with state and society experiences gained from security measures, police approaches, and (ab-) uses of the law;
- 2- Democratic governments need to recognize and understand the way terrorists and their sympathizers try to capitalise on the practices and, even more so, malpractices of the organs of the state when trying to maintain law and order;
- 3- Governments need to be cognizant of the fact that not only terrorists try to play politics with the government's sometimes ill-considered counter-measures;
- 4- Opposition parties also try to gain political capital from the confrontation between terrorists and the state and contribute to the polarisation in society while also being engaged in myth-making and the creation of urban legends.

It is only possible to counter such legends, connected to all kinds of possible signifiers, when these signifiers are first clearly identified. An effort of separating fact from fiction probably produces more results than constructing counter- narratives that will have little effect at best or are considered state propaganda at worst - thereby further antagonizing radical elements in society.

Therefore, these 'German lessons' suggest that governments should not embark on inventing new, offensive counter-narratives. It is doubtful that the government is the right party to launch a credible counter-narrative. The message of parliamentary democracy, freedom of speech and association should be enough. However, it makes sense to invest energy and resources in neutralizing existing myths and legends. Those 'neutralizers' are much more important: they can serve to dry up the pool of new terrorist recruits, take away justifications for new attacks and, in doing so, undermine the potential legitimacy of terrorist calls to arms.

Terrorism is theatre, Brian M. Jenkins observed in the 1970s. That is also true for counter-terrorism. The public forum is the stage, and governments, political parties, civil society, media, and citizens are all players, performing one role or another. We would all do well to keep in mind that what matters is not only what we think we do, but how our performance is received and perceived by various audiences. The terrorist is a performer. Yet counter-terrorism too is about performance: it involves not only target hardening, surveillance and prevention and pursuit. It also involves the production of images and stories and the debunking of legends, like the myth that the 'West' is seeking the submission of cultural, religious or ethnic minorities. [31] Before governments state their own counter-narrative against such myths, as is often advocated by counter-terrorist experts,[32] the authorities should become fully aware of the unintentional and unconscious messages they propagate – messages that are often exaggerated by terrorists and their sympathizers. Only when democratic governments succeed in shattering the myths and half-truth propagated by terrorists and their sympathizers, will they manage to take the wind out of the sails that keep

terrorism alive. [33]

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#### **NOTES**:

[1]Based on the forthcoming study: Beatrice de Graaf, *De strijd tegen terrorisme in Nederland, Duitsland, Amerika en Italië* (Amsterdam: Boom, 2009). English translation to be published in 2010 under the title: *Counterterrorism as Performance. The Presentation and Perception of Counterterrorism in the Netherlands, Germany, the United States and Italy.* 

[2]Cf. Butz Peters, *Tödlicher Irrtum. Die Geschichte der RAF*. Berlin 2004; Stefan Aust, *Der Baader-Meinhof-Komplex*. Hamburg 2008.

[3]See Matthias Dahlke, *Der Anschlag auf Olympia '72. Die politischen Reaktionen auf den internationalen Terrorismus in Deutschland.* München, 2006, pp. 25-27; Klaus Weinhauer, 'Terrorismus in der Bundesrepublik der Siebzigerjahre', in: Beatrix Bouvier et al., *Archiv für Sozialgeschichte*, Vol. 44 (Bonn, 2004), p. 225; Cf. Matthias Dahlke, 'Der blinde Fleck. Transnationaler und nationaler Terrorismus auf dem Weg zum "Deutschen Herbst"; in: Jan-Holger Kirsch/Annette Vowinckel (Eds.), *Zeitgeschichte-online*, Thema: Die RAF als Geschichte und Gegenwart, Mai 2007, p. 8. URL: http://www.zeitgeschichteonline.de/zol/portals/\_rainbow/documents/pdf/raf/dahlke\_dbf.pdf (September 2008).

[4] Klaus Weinhauer, 'Zwischen Partisanenkampf und "Kommissar Computer". Polizei und Linksterrorismus in der Bundesrepublik bis Anfang der 1980er Jahre', in: Jörg Weinhauer et al (Eds.), *Der linke Terrorismus in der Bundesrepublik*. Frankfurt am Main, 2006, pp. 244-270.

[5]Cf. Matthias Dahlke, "'Nur eingeschränkte Krisenbereitschaft". Die staatliche Reaktion auf die Entführung des CDU-Politikers Peter Lorenz 1975', in: *Vierteljahresheft für Zeitgeschichte* (2007) No. 4, pp. 641-678; Michael März, *Die Machtprobe* 1975. Wie RAF und Bewegung 2. Juni den Staat erpressten. Leipzig, 2007.

[6] Dahlke, "Nur eingeschränkte Krisenbereitschaft", op. Cit., p. 654.

[7] Georg Bönisch, Klaus Wiegrefe, "Massive Gegendrohung", in: Der Spiegel, No.. 37/2008, pp. 48-53.

[8]Karl Mannheim, *Diagnosis of Our Time. Wartime Essays of a Sociologist.* London, 1943; Karl Loewenstein, 'Militant Democracy and Fundamental Rights'; in: *American Political Science Review* (1937), No.. 31, pp. 417-433 & pp. 638-658. [9]Dahlke, "Nur eingeschränkte Krisenbereitschaft", op. cit., p. 650.

[10] Karl Mannheim, Diagnosis of Our Time, op. cit.; Karl Loewenstein, op. cit., pp. 417-433 and pp. 638-658.

[11]Cit. in Nicolas Büchse, "Von Staatsbürgern und Protestbürgern. Der Deutsche Herbst und die Veränderung der politischen Kultur in der Bundesrepublik", p. 318.

[12]Ibid, p. 319.

[13] See Wilhelm Hennis, Peter Graf Kielmansegg, Ulrich Matz (Eds.), *Regierbarkeit. Studien zu ihrer Problematisierung*. Stuttgart, 1977.

[14] Carstens sieht im Terrorismus eine Hauptgefahr', Weserkurier, 29 September 1977.

[15In social-constructivist discourse analysis, 'signifiers' are empty shells, to which meaning is attached, thus constructing a discourse. L.J. Phillips and M.Jørgensen, *Discourse Analysis as Theory and Method*. London/New Delhi, Sage, 2002, pp. 50-51. Here, the concept of 'signifiers' is being interpreted less in a social-constructivist sense than in an empirical-historical manner. In this context, 'signifiers' are not only terms, but also incidents and occurrences, that subsequently are interpreted and filled with meaning by actors in the public and political discourse.

[16]D. Della Porta. Social *Movements, Political Violence and the State. A Comparative Analysis of Italy and Germany.* Cambridge: University Press, 1995, pp. 60-61, 195.

[17]Cf. Uwe Soukup, Wie starb Benno Ohnesorg? Der 2. Juni 1967. Berlin, Verlag 1900, 2007.

[18]In May 2009, Kurras was exposed as an *Inoffizieller Mitarbeiter* ("informal collaborator", i.e. an informer) of the East German Ministry of State Security, the so-called Stasi. It is not clear whether Kurras also acted as an *agent provocateur*, under orders of the Stasi, to destabilize the German Federal Republic. So far, no evidence to that effect has surfaced from the DDR Stasi files. German experts on the matter, such as Aust, Kraushaar or Timm, leave that possibility open, but are cautious. From known Stasi-files, it appears that the Stasi itself considered Ohnesorg's death as an accident. Kurras was depicted as 'very much in love with guns'. Cf. also 'Vielleicht war es nicht die NS-Vergangenheit', *Frankfurter Rundschau*, 23 May 2009; 'Kurras gesteht IM-Tätigkeit', *Frankfurter Allgemeine Zeitung (FAZ)*, 24 May 2009; ,Der Schuss, der die Republik veränderte', *FAZ*, 24 May 2009; 'Es wäre trotzdem zur Protestbewegung gekommen', *FAZ*, 27 May 2009; ,Spy Fired Shot That Changed West Germany', *New York Times*, 26 May 2009.

[19]Ralf Reinders, Ronald Fritzsch, *Die Bewegung 2. Juni 1967. Gespräche über Haschrebellen, Lorenz-Entführung, Knast.* Berlin/Amsterdam, Edition ID-Archiv,1995, p. 39.

[20] See Eberhard Foth, 'Terrorismus vor Gericht', Deutsche Richterzeitung, September 2001, pp. 389-390.

[21] Der Spiegel, 18 November 1974, No. 47, p. 1; see also the article "Es werden Typen dabei kaputt gehen", in: idem, p. 28. [22] Gisela Diewald Kerkmann, "Im Vordergrund steht immer die Tat….". Gerichtsverfahren gegen Mitglieder der RAF"; in: Rechtsgeschichte (2005), No. 7, pp.139-152; See, for example, the contributions in Wolfgang Dressen (Ed.), Politische Prozesse ohne Verteidigung. Berlin, 1976.

[23]For an overview of developments during the 'Deutscher Herbst'["German Autumn"], see Stefan Aust, *Der Baader-Meinhof-Komplex. München*, Goldmann Verlag, 2008; Peter Butz. *Tödlicher Irrtum. Die Geschichte der RAF.* Berlin, Argon, 2004. [24]See Rudolf Wassermann, 'Sicherung oder Aushöhlung des Rechtsstaates?', in: J. Augstein et al. *Terrorismus contra Rechts-staat* Darmstadt/Neuwied, Hermann Luchterhand Verlag, 1976, pp. 125-162.

[25]See, for example, A. Lehning, H. Wielek and P.H. Bakker Schut, *Duitsland: voorbeeld of waarschuwing? West-Duitsland een politiestaat, of "de geschiedenis herhaalt zich"* [Germany: example or warning? West Germany a police state, or "history repeating itself"]Baarn, Wereldvenster, 1976.

[26]Cit. in: Weinhauer, ,Zwischen "Partisanenkampf" und "Kommissar Computer"', p. 262.

[27] The interview was published in *Der Spiegel* (Hamburg), No. 53/1979. For the extended version, see Axel Jeschke and Wolfgang Malanowski (Eds.), *Der Minister und der Terrorist – Gespräche zwischen Gerhart Baum und Horst Mahler*. Reinbek bei Hamburg, 1980.

[28] The compilation by the Federal Ministry of the Interior [Bundesministerium des Innern] (Ed.), *Hat sich die Republik verändert? Terrorismus im Spiegel der Presse* (Bonn, 1978) includes several newspaper articles, in which a greater level of understanding for the government's attitude is requested. - see Weinhauer, 'Zwischen "Partisanenkampf" und "Kommissar Computer", op. cit., pp. 261-266.

[29] Antje Vollmer, "Die Kinkel-Inititative und das Desaster von Bad Kleinen", in: taz (Berlin), 3 August 1993.

[30]Peters, Tödlicher Irrtum, op. cit., p. 715.

[31] See Walter D. Casebeer and James A. Russell, ,Storytelling and Terrorism: Towards a Comprehensive "Counter-Narrative Strategy", in: *Strategic Insights*, Vol. 4 (2005), No. 3, pp. 1-16.

[32]See suggestion in Anonymus., *Transnational Terrorism, Security & the Rule of Law, 'Theoretical Treatise on Counterter-rorism Approaches'*, 19 October 2007. Deliverable 10, Work package 6. [Executed as project within the European Commission's 'Sixth Framework Programme'.], pp. 18, 24-25.

[33] See also Marc Sageman. *Understanding Terror Networks*. Philadelphia: University of Pennsylvania Press, 2004, p. 176; R. Gunaratna, 'Strategic Counterterrorism: The Way Forward', in: J. Ellis (Ed.), *Terrorism* (Oklahoma, MIPT, 2006), pp. 63-73.